



State of Mississippi



FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL PERMIT

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

THIS CERTIFIES

AC Polymers Inc

103 Lowry Drive

Byhalia, MS

Marshall County

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

Mississippi Environmental Quality Permit Board

A handwritten signature in blue ink, reading "Kristel Rudolph", written over a horizontal line.

Mississippi Department of Environmental Quality

Issued/Modified: FEB 01 2019

Expires: NOV 30 2020

Permit No. 1780-00054

Agency Interest # 10494

Table of Contents

Subject Item Inventory.....i

Facility Requirements.....1

General Information.....A-1

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Subject Item Inventory

Permit Number: 1780-00054

Activity ID No.: PER20190001

Subject Item Inventory:

ID	Designation	Description
AREA2	AA-000	Facility-Wide Requirements
EQPT1	AA-001	2,000-gallon Reactor #1 sharing common vent with Reactor #2, AA-002
EQPT2	AA-002	2,000-gallon Reactor #2 sharing common vent with Reactor #1, AA-001
EQPT3	AA-003	2,000-gallon Reactor #3 sharing common vent with Reactor #4, AA-004
EQPT4	AA-004	2,000-gallon Reactor #4 sharing common vent with Reactor #3, AA-003
EQPT5	AA-005	1,000-gallon Reactor #5
EQPT16	AA-006	Product Dryer equipped with a cyclone and baghouse for recovering product, venting inside the building
EQPT6	AB-001	15,000-gallon horizontal Styrene Storage Tank
EQPT7	AB-002	15,000-gallon horizontal Styrene Storage Tank
EQPT8	AB-003	8,500-gallon horizontal Styrene Storage Tank
EQPT9	AB-004	5,000-gallon fixed roof Divinylbenzene Storage Tank sharing common vent and flame arrestor with AB-005
EQPT10	AB-005	5,000-gallon fixed roof Divinylbenzene Storage Tank sharing common vent and flame arrestor with AB-004
EQPT11	AB-006	4,500-gallon fixed roof Divinylbenzene Storage Tank sharing common vent and flame arrestor with AB-007
EQPT12	AB-007	4,500-gallon fixed roof Divinylbenzene Storage Tank sharing common vent and flame arrestor with AB-006
EQPT13	AB-008	Fixed roof lost batch dump tank (located on exterior of building)
AREA1	AC-001	Fugitive emissions of VOC from equipment leaks
EQPT14	AD-001	4.185 MMBtu/hr Natural Gas-Fired Boiler
EQPT15	AD-002	180 kW (241 hp) Natural Gas-Fired Emergency Generator (Spark Ignition Internal Combustion Engine (SI ICE), 4-stroke, rich burn, pre-2006 model)
EQPT17	AD-003	5.25 MMBTU/hr Natural Gas-Fired Boiler
AI10494	10494	Styrene-divinylbenzene copolymer production

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Subject Item Inventory

Permit Number: 1780-00054

Activity ID No.: PER20190001

KEY

ACT = Activity

AREA = Area

CAFO = Concentrated Animal Feeding Operation

EQPT = Equipment

IMPD = Impoundment

RPNT = Release Point

WDPT = Withdrawal Point

AI = Agency Interest

CONT = Control Device

IA = Insignificant Activity

MAFO = Animal Feeding Operation

PCS = PCS

TRMT = Treatment

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 1 of 33

AREA0000000002 (AA-000) Facility-Wide Requirements:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Opacity	Opacity: The permittee shall not cause, allow, or permit the discharge into the ambient air from any point source of emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity. This shall not apply to vision obscuration caused by uncombined water droplets. [11 Miss. Admin. Code Pt. 2, R. 1.3.B.]
L-2	Styrene	Styrene: The permittee shall limit the facility-wide emissions of styrene to no more than 9.9 tons per year, as determined for each consecutive 12-month period. [11 Miss. Admin. Code Pt. 2, Ch. 2. 2.2.B(10).]
L-3		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 relationship: $E = 4.1 * p^{0.67}$, where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour. [11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).]

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		Within 180 days of permit issuance, the permittee shall conduct a performance test to determine the emissions of styrene from reactor venting. The permittee may only test one of the 2,000-gallon reactors (Reactors No. 1-4) and assume emissions are consistent for all reactors at the facility. The performance test shall be conducted in accordance with 40 CFR 63.1325(c), as applicable, and shall measure the VOC concentration (as styrene) venting from the reactor for the entire duration of the batch emissions episode. The styrene emissions in lb/episode shall be determined. The amount of styrene-divinylbenzene copolymer produced during the episode shall be recorded to determine an emission factor in lb of styrene/lb of product. The permittee shall conduct subsequent performance tests on at least one reactor within 24 months of the previous test and shall update the emission factor to reflect the results of the most current test. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 2 of 33

AREA0000000002 (AA-000) Facility-Wide Requirements:

Record-Keeping Requirements:

Condition No.	Condition
R-1	To demonstrate compliance with the facility-wide styrene emission limit, the permittee shall calculate and record the emissions of styrene for each calendar month and the total emissions for each consecutive 12-month period (in tons per year). All emissions sources of styrene shall be accounted for and calculated as follows: (A) Styrene Storage Tanks: The permittee shall use the actual monthly throughput of styrene to determine the emissions from each tank. (B) Fugitive Emissions from Equipment Leaks: The permittee may use one or more of the following three methods for calculating fugitive emissions associated with equipment leaks from EPA's Protocol for Equipment Leak Emission Estimates (EPA-453/R-95-017). The method(s) used must be documented and all calculations maintained on file at the facility. (1) For monitored equipment, use the Screening Value Correlations available in Section 2.3.3 and Table 2-9 of EPA's Protocol for Equipment Leak Emission Estimates and results from the most recent monitoring event. (2) For monitored equipment, use the Screening Range Emission Factors available in Section 2.3.2 and Table 2-5 of EPA's Protocol for Equipment Leak Emission Estimates and results from the most recent monitoring event. (3) For both monitored and unmonitored equipment, use the SOCMI Average Emission Factors available in Table 2-1 of EPA's Protocol for Equipment Leak Emission Estimates. The control efficiencies in Table 5-1 may be applied based on equipment design. The control efficiencies for "quarterly monitoring, 10,000 ppmv leak definition" in Table 5-2 may be applied to the monitored equipment components. If connectors are monitored in a manner equivalent to valves in light liquid service, the corresponding control efficiency may be used. (C) Reactor Venting: The permittee shall use the most recent reactor test for styrene to develop an emission factor in units of lb of styrene/lb of product. The amount of styrene-divinylbenzene copolymer produced each calendar month shall be used to determine the styrene emissions for each month. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 3 of 33

AREA0000000002 (AA-000) Facility-Wide Requirements:

Submittal/Action Requirements:

Condition No.	Condition
S-1	Performance Test Reporting Requirements: A written test protocol must be submitted at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the MDEQ. If the permittee is proposing an alternative test method not previously approved by EPA, a cover letter indicating such must be attached and submitted with the test protocol. The DEQ shall be notified ten (10) days prior to the scheduled date(s) so that an observer may be afforded the opportunity to witness the test(s). The performance test results shall be submitted to MDEQ within forty-five (45) days following the completion of the test. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 4 of 33

AREA0000000001 (AC-001) Fugitive emissions of VOC from equipment leaks:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		For Emission Point AC-001, the permittee shall comply with the requirements specified in 40 CFR 60.482-1 through 60.482-10 no later than 180 days after initial startup. The permittee may elect to comply with the requirements specified in 40 CFR 60.483-1 and 60.483-2. [40 CFR 60.562-2(a) and (b)]

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		The permittee shall comply with the provisions specified in 40 CFR 60.485 for test methods and procedures. [40 CFR 60.562-2(d)]
M-2		The permittee may monitor to detect leaks from pumps and valves at the frequency specified in §60.482-1(f)(1) instead of monitoring as specified in §§60.482-2, 60.482-7, and 60.483-2. [40 CFR 60.482-1(f)(1)]
M-3		Standards: Pumps in Light Liquid Service (a)(1) Each pump in light liquid service shall be monitored monthly to detect leaks by the methods specified in §60.485(b), except as provided in §60.482-1(c) and (f) and §60.482-2(d), (e), and (f). A pump that begins operation in light liquid service after the initial startup date for the process unit must be monitored for the first time within 30 days after the end of its startup period, except for a pump that replaces a leaking pump and except as provided in §60.482-1(c) and (f) and §60.482-2(d), (e), and (f). (2) Each pump in light liquid service shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal, except as provided in §60.482-1(f). (b)(1) If an instrument reading of 10,000 ppm or greater is measured, a leak is detected. (2) If there are indications of liquids dripping from the pump seal, the owner or operator shall follow the procedure specified

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 5 of 33

AREA0000000001 (AC-001) Fugitive emissions of VOC from equipment leaks:

Monitoring Requirements:

Condition No.	Parameter	Condition
		in either paragraph (b)(2)(i) or (ii) of this section. This requirement does not apply to a pump that was monitored after a previous weekly inspection if the instrument reading for that monitoring event was less than 10,000 ppm and the pump was not repaired since that monitoring event.
		(i) Monitor the pump within 5 days as specified in §60.485(b). If an instrument reading of 10,000 ppm or greater is measured, a leak is detected. The leak shall be repaired using the procedures in paragraph (c) of this section.
		(ii) Designate the visual indications of liquids dripping as a leak, and repair the leak within 15 days of detection by eliminating the visual indications of liquids dripping.
		(c)(1) When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in §60.482-9.
		(2) A first attempt at repair shall be made no later than 5 calendar days after each leak is detected. First attempts at repair include, but are not limited to, the practices described in paragraphs (c)(2)(i) and (ii) of this section, where practicable.
		(i) Tightening the packing gland nuts;
		(ii) Ensuring that the seal flush is operating at design pressure and temperature. [40 CFR 60.482-2(a)-(c)]
M-4		Standards: Compressors
		(a) Each compressor shall be equipped with a seal system that includes a barrier fluid system and that prevents leakage of VOC to the atmosphere, except as provided in §60.482-1(c) and §60.482-3(h), (i), and (j).
		(b) Each compressor seal system as required in paragraph (a) shall be:
		(1) Operated with the barrier fluid at a pressure that is greater than the compressor stuffing box pressure; or

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 6 of 33

AREA0000000001 (AC-001) Fugitive emissions of VOC from equipment leaks:

Monitoring Requirements:

Condition No.	Parameter	Condition
		(2) Equipped with a barrier fluid system degassing reservoir that is routed to a process or fuel gas system or connected by a closed vent system to a control device that complies with the requirements of §60.482-10; or
		(3) Equipped with a system that purges the barrier fluid into a process stream with zero VOC emissions to the atmosphere.
		(c) The barrier fluid system shall be in heavy liquid service or shall not be in VOC service.
		(d) Each barrier fluid system as described in paragraph (a) shall be equipped with a sensor that will detect failure of the seal system, barrier fluid system, or both.
		(e)(1) Each sensor as required in paragraph (d) shall be checked daily or shall be equipped with an audible alarm.
		(2) The owner or operator shall determine, based on design considerations and operating experience, a criterion that indicates failure of the seal system, the barrier fluid system, or both.
		(f) If the sensor indicates failure of the seal system, the barrier system, or both based on the criterion determined under paragraph (e)(2), a leak is detected.
		(g)(1) When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in §60.482-9.
		(2) A first attempt at repair shall be made no later than 5 calendar days after each leak is detected. [40 CFR 60.482-3(a)-(g)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 7 of 33

AREA0000000001 (AC-001) Fugitive emissions of VOC from equipment leaks:

Monitoring Requirements:

Condition No.	Parameter	Condition
M-5		Standards: Pressure Relief Devices in Gas/Vapor Service (a) Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as determined by the methods specified in §60.485(c). (b)(1) After each pressure release, the pressure relief device shall be returned to a condition of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as soon as practicable, but no later than 5 calendar days after the pressure release, except as provided in §60.482-9. (2) No later than 5 calendar days after the pressure release, the pressure relief device shall be monitored to confirm the conditions of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, by the methods specified in §60.485(c). (c)(1) Any pressure relief device that is equipped with a rupture disk upstream of the pressure relief device is exempt from the requirements of paragraphs (a) and (b) of this section, provided the owner or operator complies with the requirements in paragraph (c)(2) of this section. (2) After each pressure release, a new rupture disk shall be installed upstream of the pressure relief device as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in §60.482-9. [40 CFR 60.482-4 (a), (b), (d)]

M-6

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 8 of 33

AREA0000000001 (AC-001) Fugitive emissions of VOC from equipment leaks:

Monitoring Requirements:

Condition No.	Parameter	Condition
		Standards: Sampling Connection Systems
		(a) Each sampling connection system shall be equipped with a closed-purge, closed-loop, or closed-vent system, except as provided in §60.482-1(c) and paragraph (c) of this section.
		(b) Each closed-purge, closed-loop, or closed-vent system as required in paragraph (a) of this section shall comply with the requirements specified in paragraphs (b)(1) through (4) of this section.
		(1) Gases displaced during filling of the sample container are not required to be collected or captured.
		(2) Containers that are part of a closed-purge system must be covered or closed when not being filled or emptied.
		(3) Gases remaining in the tubing or piping between the closed-purge system valve(s) and sample container valve(s) after the valves are closed and the sample container is disconnected are not required to be collected or captured.
		(4) Each closed-purge, closed-loop, or closed-vent system shall be designed and operated to meet requirements in either paragraph (b)(4)(i), (ii), (iii), or (iv) of this section.
		(i) Return the purged process fluid directly to the process line.
		(ii) Collect and recycle the purged process fluid to a process.
		(iii) Capture and transport all the purged process fluid to a control device that complies with the requirements of §60.482-10.
		(iv) Collect, store, and transport the purged process fluid to any of the systems or facilities identified in §60.482-5(b)(4)(iv) (A)-(E).
		(c) In situ sampling systems and sampling systems without purges are exempt from the requirements of paragraphs (a) and (b) of this section. [40 CFR 60.482-5]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 9 of 33

AREA0000000001 (AC-001) Fugitive emissions of VOC from equipment leaks:

Monitoring Requirements:

Condition No.	Parameter	Condition
M-7		Standards: Open-ended Valves or Lines (a)(1) Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in §60.482-1(c) and paragraphs (d) and (e) of this section. (2) The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line. (b) Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed. (c) When a double block-and-bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall comply with paragraph (a) at all other times. (d) Open-ended valves or lines in an emergency shutdown system which are designed to open automatically in the event of a process upset are exempt from the requirements of paragraphs (a), (b) and (c) of this section. (e) Open-ended valves or lines containing materials which would autocatalytically polymerize or would present an explosion, serious overpressure, or other safety hazard if capped or equipped with a double block and bleed system as specified in paragraphs (a) through (c) of this section are exempt from the requirements of paragraphs (a) through (c) of this section. [40 CFR 60.482-6]
M-8		Standards: Valves in Gas/Vapor Service and in Light Liquid Service (a)(1) Each valve shall be monitored monthly to detect leaks by the methods specified in §60.485(b) and shall comply with paragraphs (b) through (e) of this section, except as provided in §60.482-7(f), (g), and (h), §60.482-1(c) and (f), and §§60.483-1 and 60.483-2. (2) A valve that begins operation in gas/vapor service or light liquid service after the initial startup date for the process unit

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 10 of 33

AREA0000000001 (AC-001) Fugitive emissions of VOC from equipment leaks:

Monitoring Requirements:

Condition No.	Parameter	Condition
		must be monitored according to paragraphs (a)(2)(i) or (ii), except for a valve that replaces a leaking valve and except as provided in §60.482-7(f), (g), and (h), §60.482-1(c), and §§60.483-1 and 60.483-2.
		(i) Monitor the valve as in paragraph (a)(1) of this section. The valve must be monitored for the first time within 30 days after the end of its startup period to ensure proper installation.
		(ii) If the valves on the process unit are monitored in accordance with §60.483-1 or §60.483-2, count the new valve as leaking when calculating the percentage of valves leaking as described in §60.483-2(b)(5). If less than 2.0 percent of the valves are leaking for that process unit, the valve must be monitored for the first time during the next scheduled monitoring event for existing valves in the process unit or within 90 days, whichever comes first.
		(b) If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.
		(c)(1)(i) Any valve for which a leak is not detected for 2 successive months may be monitored the first month of every quarter, beginning with the next quarter, until a leak is detected.
		(ii) As an alternative to monitoring all of the valves in the first month of a quarter, an owner or operator may elect to subdivide the process unit into 2 or 3 subgroups of valves and monitor each subgroup in a different month during the quarter, provided each subgroup is monitored every 3 months. The owner or operator must keep records of the valves assigned to each subgroup.
		(2) If a leak is detected, the valve shall be monitored monthly until a leak is not detected for 2 successive months.
		(d)(1) When a leak is detected, it shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in §60.482-9.
		(2) A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.
		(e) First attempts at repair include, but are not limited to, the following best practices where practicable:

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 11 of 33

AREA0000000001 (AC-001) Fugitive emissions of VOC from equipment leaks:

Monitoring Requirements:

Condition No.	Parameter	Condition
M-9		(1) Tightening of bonnet bolts;
		(2) Replacement of bonnet bolts;
		(3) Tightening of packing gland nuts;
		(4) Injection of lubricant into lubricated packing. [40 CFR 60.482-7(a)-(e)]
		Standards: Delay of repair.
		(a) Delay of repair of equipment for which leaks have been detected will be allowed if repair within 15 days is technically infeasible without a process unit shutdown. Repair of this equipment shall occur before the end of the next process unit shutdown. Monitoring to verify repair must occur within 15 days after startup of the process unit.
		(b) Delay of repair of equipment will be allowed for equipment which is isolated from the process and which does not remain in VOC service.
		(c) Delay of repair for valves will be allowed if:
		(1) The owner or operator demonstrates that emissions of purged material resulting from immediate repair are greater than the fugitive emissions likely to result from delay of repair, and
		(2) When repair procedures are effected, the purged material is collected and destroyed or recovered in a control device complying with §60.482-10.
		(d) Delay of repair for pumps will be allowed if:
		(1) Repair requires the use of a dual mechanical seal system that includes a barrier fluid system, and

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 12 of 33

AREA0000000001 (AC-001) Fugitive emissions of VOC from equipment leaks:

Monitoring Requirements:

Condition No.	Parameter	Condition
		(2) Repair is completed as soon as practicable, but not later than 6 months after the leak was detected.
		(e) Delay of repair beyond a process unit shutdown will be allowed for a valve, if valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the next process unit shutdown will not be allowed unless the next process unit shutdown occurs sooner than 6 months after the first process unit shutdown.
		(f) When delay of repair is allowed for a leaking pump or valve that remains in service, the pump or valve may be considered to be repaired and no longer subject to delay of repair requirements if two consecutive monthly monitoring instrument readings are below the leak definition. [40 CFR 60.482-9]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 13 of 33

AREA0000000001 (AC-001) Fugitive emissions of VOC from equipment leaks:

Monitoring Requirements:

Condition No.	Parameter	Condition
M-10		Alternative Standards for Valves—Allowable Percentage of Valves Leaking (a) An owner or operator may elect to comply with an allowable percentage of valves leaking of equal to or less than 2.0 percent. (b) The following requirements shall be met if an owner or operator wishes to comply with an allowable percentage of valves leaking: (1) An owner or operator must notify the MDEQ that the owner or operator has elected to comply with the allowable percentage of valves leaking before implementing this alternative standard, as specified in §60.487(d). (2) A performance test as specified in paragraph (c) of this section shall be conducted initially upon designation, annually, and at other times requested by the MDEQ. (3) If a valve leak is detected, it shall be repaired in accordance with §60.482-7(d) and (e). (c) Performance tests shall be conducted in the following manner: (1) All valves in gas/vapor and light liquid service within the affected facility shall be monitored within 1 week by the methods specified in §60.485(b). (2) If an instrument reading of 10,000 ppm or greater is measured, a leak is detected. (3) The leak percentage shall be determined by dividing the number of valves for which leaks are detected by the number of valves in gas/vapor and light liquid service within the affected facility. (d) Owners and operators who elect to comply with this alternative standard shall not have an affected facility with a leak percentage greater than 2.0 percent, determined as described in §60.485(h). [40 CFR 60.483-1]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 14 of 33

AREA0000000001 (AC-001) Fugitive emissions of VOC from equipment leaks:

Monitoring Requirements:

Condition No.	Parameter	Condition
M-11		Alternative Standards for Valves—Skip Period Leak Detection and Repair (a)(1) An owner or operator may elect to comply with one of the alternative work practices specified in paragraphs (b)(2) and (3) of this section. (2) An owner or operator must notify the MDEQ before implementing one of the alternative work practices, as specified in §60.487(d). (b)(1) An owner or operator shall comply initially with the requirements for valves in gas/vapor service and valves in light liquid service, as described in §60.482-7. (2) After 2 consecutive quarterly leak detection periods with the percent of valves leaking equal to or less than 2.0, an owner or operator may begin to skip 1 of the quarterly leak detection periods for the valves in gas/vapor and light liquid service. (3) After 5 consecutive quarterly leak detection periods with the percent of valves leaking equal to or less than 2.0, an owner or operator may begin to skip 3 of the quarterly leak detection periods for the valves in gas/vapor and light liquid service. (4) If the percent of valves leaking is greater than 2.0, the owner or operator shall comply with the requirements as described in §60.482-7 but can again elect to use this section. (5) The percent of valves leaking shall be determined as described in §60.485(h). (6) An owner or operator must keep a record of the percent of valves found leaking during each leak detection period. (7) A valve that begins operation in gas/vapor service or light liquid service after the initial startup date for a process unit following one of the alternative standards in this section must be monitored in accordance with §60.482-7(a)(2)(i) or (ii) before the provisions of this section can be applied to that valve. [40 CFR 60.483-2]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 15 of 33

AREA0000000001 (AC-001) Fugitive emissions of VOC from equipment leaks:

Record-Keeping Requirements:

Condition No.	Condition
R-1	The permittee shall comply with the recordkeeping requirements of 40 CFR 60.486. [40 CFR 60.562-2(e)]
R-2	When each leak is detected, the following requirements apply: (1) A weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment. (2) The identification on a valve may be removed after it has been monitored for 2 successive months as specified in §60.482-7(c) and no leak has been detected during those 2 months. (3) The identification on equipment except on a valve, may be removed after it has been repaired. [40 CFR 60.486(b)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 16 of 33

AREA0000000001 (AC-001) Fugitive emissions of VOC from equipment leaks:

Record-Keeping Requirements:

Condition No.	Condition
R-3	When each leak is detected, the following information shall be recorded in a log and shall be kept for 5 years in a readily accessible location: (1) The instrument and operator identification numbers and the equipment identification number. (2) The date the leak was detected and the dates of each attempt to repair the leak. (3) Repair methods applied in each attempt to repair the leak. (4) "Above 10,000" if the maximum instrument reading measured by the methods specified in §60.485(a) after each repair attempt is equal to or greater than 10,000 ppm. (5) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak. (6) The signature of the owner or operator (or designate) whose decision it was that repair could not be effected without a process shutdown. (7) The expected date of successful repair of the leak if a leak is not repaired within 15 days. (8) Dates of process unit shutdowns that occur while the equipment is unrepaired. (9) The date of successful repair of the leak. [40 CFR 60.486(c)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 17 of 33

AREA0000000001 (AC-001) Fugitive emissions of VOC from equipment leaks:

Record-Keeping Requirements:

Condition No.	Condition
R-4	The following information pertaining to all equipment subject to the requirements in §§60.482-1 to 60.482-10 shall be recorded in a log that is kept in a readily accessible location: (1) A list of identification numbers for equipment subject to the requirements of this subpart. (2)(i) A list of identification numbers for equipment that are designated for no detectable emissions under the provisions of §§60.482-2(e), 60.482-3(i) and 60.482-7(f). (ii) The designation of equipment as subject to the requirements of §60.482-2(e), §60.482-3(i), or §60.482-7(f) shall be signed by the owner or operator. (3) A list of equipment identification numbers for pressure relief devices required to comply with §60.482-4. (4)(i) The dates of each compliance test as required in §§60.482-2(e), 60.482-3(i), 60.482-4, and 60.482-7(f). (ii) The background level measured during each compliance test. (iii) The maximum instrument reading measured at the equipment during each compliance test. (5) A list of identification numbers for equipment in vacuum service. [40 CFR 60.486(e)(1)-(5)]
R-5	The following information shall be recorded for valves complying with §60.483-2: (1) A schedule of monitoring. (2) The percent of valves found leaking during each monitoring period. [40 CFR 60.486(g)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 18 of 33

AREA0000000001 (AC-001) Fugitive emissions of VOC from equipment leaks:

Record-Keeping Requirements:

Condition No.	Condition
R-6	The following information, regarding sensor alarm criterion, shall be recorded in a log that is kept in a readily accessible location: (1) Design criterion required in §§60.482-2(d)(5) and 60.482-3(e)(2) and explanation of the design criterion; and (2) Any changes to this criterion and the reasons for the changes. [40 CFR 60.486(h)]
R-7	Information and data used to demonstrate that a piece of equipment is not in VOC service shall be recorded in a log that is kept in a readily accessible location. [40 CFR 60.486(j)]

Submittal/Action Requirements:

Condition No.	Condition
S-1	The permittee shall comply with the reporting requirements of 40 CFR 60.487. [40 CFR 60.562-2(e)]
S-2	The permittee shall submit semiannual reports to the MDEQ beginning six months after the initial startup date. [40 CFR 60.487(a)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 19 of 33

AREA0000000001 (AC-001) Fugitive emissions of VOC from equipment leaks:

Submittal/Action Requirements:

Condition No.	Condition
S-3	All semiannual reports to the MDEQ shall include the following information, summarized from the information in §60.486: (1) Process unit identification. (2) For each month during the semiannual reporting period, (i) Number of valves for which leaks were detected as described in §60.482-7(b) or §60.483-2, (ii) Number of valves for which leaks were not repaired as required in §60.482-7(d)(1), (iii) Number of pumps for which leaks were detected as described in §60.482-2(b), (d)(4)(ii)(A) or (B), or (d)(5)(iii), (iv) Number of pumps for which leaks were not repaired as required in §60.482-2(c)(1) and (d)(6), (v) Number of compressors for which leaks were detected as described in §60.482-3(f), (vi) Number of compressors for which leaks were not repaired as required in §60.482-3(g)(1), and (vii) The facts that explain each delay of repair and, where appropriate, why a process unit shutdown was technically infeasible. (3) Dates of process unit shutdowns which occurred within the semiannual reporting period. (4) Revisions to items reported according to paragraph (b) if changes have occurred since the initial report or subsequent revisions to the initial report. [40 CFR 60.487(c)]
S-4	If electing to comply with the provisions of §§60.483-1 or 60.483-2, the permittee shall notify the MDEQ of the alternative standard selected 90 days before implementing either of the provisions. [40 CFR 60.487(d)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 20 of 33

AREA0000000001 (AC-001) Fugitive emissions of VOC from equipment leaks:

Submittal/Action Requirements:

Condition No.	Condition
S-5	The permittee shall report the results of all performance tests in accordance with §60.8 of the General Provisions. The provisions of §60.8(d) do not apply to affected facilities subject to the provisions of this subpart except that an owner or operator must notify the MDEQ of the schedule for the initial performance tests at least 30 days before the initial performance tests. [40 CFR 60.487(e)]

Narrative Requirements:

Condition No.	Condition
T-1	The permittee is subject to the applicable requirements of the New Source Performance Standards for VOC Emissions from the Polymer Manufacturing Industry (40 CFR Part 60, Subpart DDD) and the applicable General Provisions (40 CFR Part 60, Subpart A). Specifically, the permittee is subject to the requirements for VOC emissions from equipment leaks from the polystyrene manufacturing process. [40 CFR 60.560(a)(4)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 21 of 33

EQPT0000000014 (AD-001) 4.185 MMBtu/hr Natural Gas-Fired Boiler:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Particulate Matter	Particulate Matter: For Emission Point AD-001, the particulate matter emissions shall not exceed 0.6 pounds per million BTU per hour heat input. [11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).]
L-2	Opacity	Opacity: For Emission Point AD-001, the permittee shall not cause, allow, or permit the discharge into the ambient air, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity. This shall not apply to vision obscuration caused by uncombined water droplets. [11 Miss. Admin. Code Pt. 2, R. 1.3.B.]
L-3	Sulfur Dioxide	Sulfur Dioxide: For Emission Point AD-001, the maximum discharge of sulfur oxides shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. [11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 22 of 33

EQPT0000000015 (AD-002) 180 kW (241 hp) Natural Gas-Fired Emergency Generator (Spark Ignition Internal Combustion Engine (SI ICE), 4-stroke, rich burn, pre-2006 model):

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Particulate Matter	Particulate Matter: For Emission Point AD-002, the emissions of particulate matter shall not exceed 0.6 pounds per million BTU per hour heat input. [11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).]
L-2	Opacity	Opacity: For Emission Point AD-002, the permittee shall not cause, allow, or permit the discharge into the ambient air of any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity. This shall not apply to vision obscuration caused by uncombined water droplets. [11 Miss. Admin. Code Pt. 2, R. 1.3.B.]
L-3		For Emission Point AD-002, the permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR 63.6625(e)(3), 40 CFR 63.6640(a) and Table 6]
L-4		For Emission Point AD-002, the permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Table 2d apply. [40 CFR 63.6625(h)]
L-5		The permittee must be in compliance with the emission limitations, operating limitations, and other requirements in subpart ZZZZ at all times. At all times, the permittee must operate and maintain the engine, 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 which 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. [40 CFR 63.6605]
L-6		For Emission Point AD-002, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (1) through (3) below, is prohibited. If you do not operate the engine according to the requirements in paragraphs (1) through (3) below, the engine will not be considered an emergency engine under subpart ZZZZ and must meet all requirements for non-emergency engines.

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 23 of 33

EQPT0000000015 (AD-002) 180 kW (241 hp) Natural Gas-Fired Emergency Generator (Spark Ignition Internal Combustion Engine (SI ICE), 4-stroke, rich burn, pre-2006 model):

Limitation Requirements:

Condition No.	Parameter	Condition
		(1) There is no time limit on the use of emergency stationary RICE in emergency situations.
		(2) You may operate your emergency stationary RICE for any combination of the purposes specified in paragraphs (2)(i) through (iii) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (3) counts as part of the 100 hours per calendar year allowed by this paragraph.
		(i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that 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 the insurance company associated with the engine.
		(ii) Emergency stationary RICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.
		(iii) Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.
		(3) Emergency stationary RICE 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 and emergency demand response provided in paragraph (2). Except as provided in 63.6640(f)(4)(i) and (ii), 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 as part of a financial arrangement with another entity. [40 CFR 63.6640(f)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 24 of 33

EQPT0000000015 (AD-002) 180 kW (241 hp) Natural Gas-Fired Emergency Generator (Spark Ignition Internal Combustion Engine (SI ICE), 4-stroke, rich burn, pre-2006 model):

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		For Emission Point AD-002, the permittee shall comply with the following work practice standards: (a) Change oil and filter every 500 hours of operation or annually, whichever comes first; (b) Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and (c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. The permittee may utilize an oil analysis program as described in §63.6625(j) in order to extend the specified oil change requirement above. If the emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required above, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable. [40 CFR 63.6603(a) and Table 2d]
M-2		For Emission Point AD-002, the permittee shall install a non-resettable hour meter, if one is not already installed. [40 CFR 63.6625(f)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 25 of 33

EQPT0000000015 (AD-002) 180 kW (241 hp) Natural Gas-Fired Emergency Generator (Spark Ignition Internal Combustion Engine (SI ICE), 4-stroke, rich burn, pre-2006 model):

Record-Keeping Requirements:

Condition No.	Condition
R-1	For Emission Point AD-002, the permittee shall keep the following records: (1) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. (2) Records of all required maintenance performed on the air pollution control and monitoring equipment. (3) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [40 CFR 63.6655(a)]
R-2	For Emission Point AD-002, the permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to the manufacturer's operation and maintenance instructions or your own maintenance plan. [40 CFR 63.6655(d) and (e)]
R-3	For Emission Point AD-002, the permittee must keep records of 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. If the engine is used for the purposes specified in §63.6640(f)(2)(ii) or (iii) or §63.6640(f)(4)(ii), the owner or operator must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes. [40 CFR 63.6655(f)]
R-4	For Emission Point AD-002, the permittee shall maintain records according to the following: (a) Records must be in a form suitable and readily available for expeditious review according to §63.10(b)(1). (b) As specified in §63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. (c) The permittee must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). [40 CFR 63.6660]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 26 of 33

EQPT0000000015 (AD-002) 180 kW (241 hp) Natural Gas-Fired Emergency Generator (Spark Ignition Internal Combustion Engine (SI ICE), 4-stroke, rich burn, pre-2006 model):

Submittal/Action Requirements:

Condition No.	Condition
S-1	For Emission Point AD-002, the permittee must report each instance in which you did not meet each operating limitation (work practice standard) in Table 2d that applies to you. These instances are deviations from the operating limitations and must be reported according to the requirements of this permit. [40 CFR 63.6640(b)]

Narrative Requirements:

Condition No.	Condition
T-1	For Emission Point AD-002, the permittee is subject to and shall comply with the applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ, "RICE MACT") and the applicable requirements of the General Provisions (40 CFR Part 63, Subpart A). Emission Point AD-002 is an existing emergency RICE for purposes of this Subpart. [40 CFR 63.6585]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 27 of 33

EQPT0000000017 (AD-003) 5.25 MMBTU/hr Natural Gas-Fired Boiler:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Particulate Matter	Particulate Matter: For Emission Point AD-003 the particulate matter emissions shall not exceed 0.6 pounds per million BTU per hour heat input. [11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).]
L-2	Opacity	Opacity: For Emission Point AD-003, the permittee shall not cause, allow, or permit the discharge into the ambient air, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity. This shall not apply to vision obscuration caused by uncombined water droplets. [11 Miss. Admin. Code Pt. 2, R. 1.3.B.]
L-3	Sulfur Dioxide	Sulfur Dioxide: For Emission Point AD-003, the maximum discharge of sulfur oxides shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. [11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 28 of 33

AI0000010494 (10494) Styrene-divinylbenzene copolymer production:

Submittal/Action Requirements:

Condition No.	Condition
S-1	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.2.B(10).]
S-2	Except as otherwise specified herein, the permittee shall Submit a certified annual synthetic minor monitoring report: Due annually, by the 31st of January for preceding calendar year. This report shall address any required monitoring specified in the permit. [11 Miss. Admin.Code Pt. 2, R.2.2.B(11).]

Narrative Requirements:

Condition No.	Condition
T-1	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49-17-29 1.b]
T-2	General Condition: The permittee shall at all times maintain in good working order and operate as efficiently as possible all air pollution control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit. [11 Miss. Admin. Code Pt. 2, R. 2.5.A.]
T-3	General Condition: Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering state waters without the proper environmental permits. [Miss. Code Ann. 49-17-29 1.a(i and ii)]
T-4	General Condition: Any diversion from or bypass of collection and control facilities is prohibited except as provided for in 11 Miss. Admin. Code Pt.2, R. 1.10, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", [11 Miss. Admin.Code Pt. 2, R.1.10.]
T-5	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.10.]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 29 of 33

AI0000010494 (10494) Styrene-divinylbenzene copolymer production:

Narrative Requirements:

Condition No.	Condition
T-6	General Condition: The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials: (a) To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and (b) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission. [Miss. Code Ann. 49-17-21]
T-7	General Condition: After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to: (a) Violation of any terms or conditions of this permit (b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or (c) A change in any condition that required either a temporary or permanent reduction or elimination of authorized air emissions. [11 Miss. Admin.Code Pt. 2, R. 2.2.C.]
T-8	General Condition: This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for this permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of the permit. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(b).]
T-9	General Condition: Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control. [Miss. Code Ann. 49-17-39]
T-10	General Condition: The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(15)(c).]
T-11	General Condition: Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(7).]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 30 of 33

AI0000010494 (10494) Styrene-divinylbenzene copolymer production:

Narrative Requirements:

Condition No.	Condition
T-12	General Condition: This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board. [11 Miss. Admin. Code Pt. 2, R. 2.16.B.]
T-13	General Condition: This permit is for air pollution control purposes only. [11 Miss. Admin.Code Pt. 2, R. 2.1.D(1).]
T-14	General Condition: This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.4.D [11 Miss. Admin.Code Pt. 2, R. 2.4.D.]
T-15	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R. 2.1.D(7).]
T-16	General Condition: The permittee shall furnish to MDEQ within a reasonable time any information 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 MDEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to MDEQ along with a claim of confidentiality. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(15)(d).]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 31 of 33

AI0000010494 (10494) Styrene-divinylbenzene copolymer production:

Narrative Requirements:

Condition No.	Condition
T-17	General Condition: This permit does not authorize a modification as defined in 11 Miss. Admin. Code Pt. 2, Ch. 2 "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment". Modification is defined as "Any physical change in or change in the method of operation of a facility which increases actual emissions or 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: (i) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or (ii) the source is approved to use under any permit issued under 40 CFR 52.51 or under regulations approved pursuant to 40 CFR 51.166; (e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.51, or under regulations approved pursuant to Subpart I or 40 CFR 51.166; or (f) any change in ownership of the stationary source" [11 Miss. Admin.Code Pt. 2, R. 2.1.D(2).]
T-18	General Condition: It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(a).]
T-19	General Condition: The permittee shall retain all required records, monitoring data, supported information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to MDEQ as required by Applicable Rules and Regulations or this permit upon request. [11 Miss. Admin.Code Pt. 2, R.2.9.]
T-20	General Condition: The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit. [11 Miss. Admin.Code Pt. 2, R.2.2.B(5).]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 32 of 33

AI0000010494 (10494) Styrene-divinylbenzene copolymer production:

Narrative Requirements:

Condition No.	Condition
T-21	General Condition: Emergencies (a) Except as otherwise specified herein, an emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error. (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met. (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence as follows: (i) an emergency occurred and that the permittee can identify the cause(s) of the emergency; (ii) the permitted facility was at the time being properly operated; (iii) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and (iv) the permittee submitted notice of the emergency to MDEQ within two (2) working days of the time when emission limitations were exceeded due to the emergency which contained a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of any emergency has the burden of proof. (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein [11 Miss. Admin.Code Pt. 2, R.2.2.B(10).]
T-22	General Condition: Upsets (a) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows: (i) an upset occurred and that the permittee can identify the cause(s) of the upset; (ii) the source was at the time being properly operated; (iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (iv) the permittee submitted notice of the upset to the DEQ within five (5) working days of the time the upset began which contained a description of the upset, any steps taken to mitigate emissions, and corrective actions taken. (b) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof. (c) This provision is in addition to any upset provision contained in any applicable requirement. [11 Miss. Admin.Code Pt. 2, R.1.10.]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

AC Polymers Inc

Facility Requirements

Permit Number: 1780-00054

Activity ID No.:PER20190001

Page 33 of 33

AI0000010494 (10494) Styrene-divinylbenzene copolymer production:

Narrative Requirements:

Condition No.	Condition
T-23	General Condition: Startups and Shutdowns (a) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows: (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above; (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit. (b) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof. (c) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply. [11 Miss. Admin.Code Pt. 2, R.1.10.]
T-24	General Condition: Maintenance (a) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following: (i) the permittee can identify the need for the maintenance; (ii) the source was at the time being properly operated; (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (iv) the permittee submitted notice of the maintenance to MDEQ within five (5) working days of the time the maintenance began or such other times as allowed by MDEQ, which contained a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken. (b) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof. (c) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. [11 Miss. Admin.Code Pt. 2, R.1.10.]
T-25	General Condition: For renewal of this permit the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board. [11 Miss. Admin.Code Pt. 2, R.2.8.]

GENERAL INFORMATION

AC Polymers Inc
103 Lowry Drive
Byhalia, MS
Marshall County

Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
10494	AC Polymers, Inc.	Official Site Name	06/20/2014	
10494	Fleer Corporation	Historic Site Name	09/09/1992	05/18/2001
MSP092360	AC Polymers Inc	Water - Pretreatment	03/16/2015	02/28/2020
178000054	AC Polymers Inc	Air-Synthetic Minor Operating	12/22/2015	11/30/2020
178000054	AC Polymers Inc	Air-Construction	12/22/2015	
2809300054	AC Polymers Inc	Air-AIRS AFS	12/28/2015	
10494	AC Polymers, Inc.	No Exposure Certification	02/22/2016	02/21/2021
	Branch	Branches Group - Air	07/18/2017	
	Branch	Branches Group - Water	07/18/2017	
	Branch	Branches Group - Stormwater-401	07/18/2017	

Basin: Yazoo River Basin

Location Description: Imported from I-sys