## 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) 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: AUG 1 5 2019

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: JUL 3 1 2024 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 noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(a).)
- 1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(b).)
- 1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(c).)
- 1.4 (a) This permit shall be reopened and revised under any of the following circumstances:
  - (1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of 3 or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.
  - (2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
  - (3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.
  - (4) The Administrator or the Permit Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
  - (b) Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such 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 DEQ at least 30 days in advance of the date that the permit is to

be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

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

- 1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(e).)
- 1.6 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(d).)
- 1.7 The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(5).)
- 1.8 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.)
  - (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).)
  - (b) If the Commission determines that there is not sufficient information available on a

facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D(2).)

- (c) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.)
- (d) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.C.)
- 1.9 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 emissionsrelated activity is conducted, or where records must be kept under the conditions of this permit;
  - (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- (c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(2).)
- 1.12 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(1).)
- 1.13 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(2).)
- 1.14 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(1).)
- 1.15 Nothing in this permit shall alter or affect the following:
  - (a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
  - (b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - (c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
  - (d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(2).)
- 1.16 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.H.)
- 1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is

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

- 1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:
  - (a) the changes are not modifications under any provision of Title I of the Act;
  - (b) the changes do not exceed the emissions allowable under this permit;
  - (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:
    - (1) a brief description of the change(s),
    - (2) the date on which the change will occur,
    - (3) any change in emissions, and
    - (4) any permit term or condition that is no longer applicable as a result of the change;
  - (d) the permit shield shall not apply to any Section 502(b)(10) change. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F(1).)
- 1.19 Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in 11 Miss. Admin. Code Pt. 2, Ch. 3., "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)
- 1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 11 Miss. Admin. Code Pt. 2, Ch. 2., "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations 11 Miss. Admin. Code Pt. 2, Ch. 6., "Air Emissions Operating Permit Regulations for the

Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

- (a) routine maintenance, repair, and replacement;
- (b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
- (c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
- (d) use of an alternative fuel or raw material by a stationary source which:
  - (1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or
  - (2) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166;
- (e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or
- (f) any change in ownership of the stationary source."
- 1.21 Any change in ownership or operational control must be approved by the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.D(4).)
- 1.22 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.B(1).)
- 1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not

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

- (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.
- (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.
- (c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.G.)
- 1.24 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies.
  - (a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
  - (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.
  - (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
    - (1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
    - (2) the permitted facility was at the time being properly operated;

- (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.G.)
- 1.25 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.
  - (a) Upsets
    - (1) For an upset defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:
      - (i) An upset occurred and that the source can identify the cause(s) of the upset;
      - (ii) The source was at the time being properly operated;
      - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
      - (iv) That within 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
      - (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to

human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.

- (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
- (3) This provision is in addition to any upset provision contained in any applicable requirement.
- (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- (b) Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.)
  - (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
  - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).
  - (3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.
- 1.26 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation 11 Miss Admin. Code Pt. 2, R. 1.8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

## SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AB-003	21.1 MMBTUH natural gas-fired paint dryer #1, Line 2 (Facility Ref. No. PD-1-2)
AC-001	Paint spray booth #1, Offline tile finishing (Facility Ref. No. PS-1)
AC-002	Paint spray booth #2, Offline tile finishing (Facility Ref. No. PS-2)
AD-001	Board sawing finishing operation with baghouse (Facility Ref. No. FG-2-2A)
AD-002	Offline Plank Saw with baghouse
AD-003	Offline Plank Edge Coating (Facility Ref. No. EO-1, EO-2)
AD-007	Central baghouse No. 1 (Facility Ref. No. FB-1-C) controlling emissions from Line No. 3 Finishing
AD-008	Central baghouse No. 2 (Facility Ref. No. FB-2-C) controlling emissions from Tile Lines
AD-009	Central baghouse No. 3 (Facility Ref. No. FB-3-C) controlling emissions from Line No. 3 Trimmer Saw Finishing
AE-001	Starch Storage Silo with baghouse
AE-002	Clay Storage Silo with baghouse
AE-003	800 CFM bin vent filter for high fill material transfer
AE-007	12 MMBTUH natural gas-fired perlite expander #4 with baghouse for material recovery (Facility Ref. No. PE-4)
AE-008	12 MMBTUH natural gas-fired perlite expander #5 with baghouse for material recovery (Facility Ref. No. PE-5)
AE-009	12 MMBTUH natural gas-fired perlite expander #6 with baghouse for material recovery (Facility Ref. No. PE-6)
AE-010	12 MMBTUH natural gas-fired perlite expander #7 with baghouse for material recovery (Facility Ref. No. PE-7)
AE-011	12 MMBTUH natural gas-fired perlite expander #8 with baghouse for material recovery (Facility Ref. No. PE-8)
AE-018	Mix tank dust collector with baghouse (Facility Ref. Nos. M2, M3)
AE-019	Five (5) Perlite ore storage bins, each with a baghouse (Facility Ref. Nos. PO-04 – PO-08)
AE-020	Two (2) Perlite ore surge bin, each with a baghouse (Facility Ref. Nos. PO-9, PO-10)
AE-021	Storage silo bin vent filter
AE-022	Scale hopper filter receiver tank
AF-001	180 MMBTUH natural gas-fired drying kiln, Line 3 (Facility Ref. No. K-3)
AF-002	21.1 MMBTUH natural gas-fired paint dryer #1, Line 3 (Facility Ref. No. PD-1-3)
AF-008	Paint spray booth, Line 3 (Facility Ref. No. PS-1-3)
AG-003	Paint spray booth #1, Tile Line (Facility Ref. No. PS-1-T3)
AH-002	Paint spray booth #1, Fiberglass Line (Facility Ref. No. PS-1-FG)
AH-003	Paint spray booth #2, Fiberglass Line (Facility Ref. No. PS-2-FG)
AI-001	54.9 Horsepower (HP) Deutz Model D914L3 diesel-fired compression ignition (CI) emergency backup power generating engine
AI-002	8.2 MMBTUH natural gas-fired boiler

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Emission Point	Description
AI-003	6,000 Gallon gasoline storage tank

#### SECTION 3. EMISSION LIMITATIONS & STANDARDS

- A. <u>Facility-Wide Emission Limitations & Standards</u>
- 3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).
  - (a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.
  - (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour.

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

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

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

## B. <u>Emission Point Specific Emission Limitations & Standards</u>

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant / Parameter	Limit/Standard
Facility-	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)	3.B.1	VOC	240 tpy
Wide	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)	3.B.2	HAPs	Total combined HAPs 24.0 tpy and each individual HAP 9.0 tpy
AB-003, AE-007 through AE-011,	Air Title V Permit issued August 23, 2007 and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)	3.B.3	Fuel	Combust pipeline quality natural gas only
AF-001, AF-002, and AI-002	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1)	3.B.4	$\mathrm{SO}_2$	4.8 lbs/MMBTU
AB-003, AE-007 through AE-011, AF-001, and AF-002	11 Miss. Admin. Code Pt. 2, R. 1.3. D(1)(b)	3.B.5	PM	E=0.8808*I -0.1667
AI-001 and AI-002	11 Miss. Admin. Code Pt. 2, R. 1.3. D(1)(a)	3.B.6	PM	0.6 lbs/MMBTU
AD-001, AD-002, AD-007 through AD-009, AE-001 through AE-003, AE-007 through AE-011, and AE-018 through AE-018	11 Miss. Admin. Code Pt. 2, R. 1.3. F(1)	3.B.7	PM	$E = 4.1*(p)^{0.67}$
AE 001	Air Title V Permit issued August 23, 2007	3.B.8	NO <sub>x</sub>	17.64 lbs/hr and 77.26 tpy
AF-001	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)	3.B.9	СО	21.60 lbs/hr and 94.61 tpy
AE-007 through AE-011	NSPS for Calciners and Dryers in Mineral Industries, 40 CFR Part 60, Subpart UUU 40 CFR 60.730, Subpart UUU and 40 CFR 60.731, Subpart UUU	3.B.10	PM	Applicability

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Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant / Parameter	Limit/Standard
	40 CFR 60.732(a), Subpart UU	3.B.11	PM	0.040 gr/dscf
	40 CFR 60.732(b), Subpart UU	3.B.12	Opacity	< 10%
	NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR 63, Subpart ZZZZ  40 CFR 63.6580, Subpart ZZZZ; 40 CFR.6585(a) and (c), Subpart ZZZZ; and 40 CFR 63.6590(c)(1), Subpart ZZZZ	3.B.13	НАР	Applicability
AI-001	NSPS for Stationary Compression Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart IIII  40 CFR Part 60.4200(a)(2)(i), Subpart IIII	3.B.14	NMHC + NOx, CO, and PM	Applicability
	40 CFR 60.4202(a)(2), Subpart IIII; 40 CFR 60.4205(b), Subpart IIII; 40 CFR 60.4206, Subpart IIII; and Tier 3 of Table 1 of 40 CFR 89.112(a)	3.B.15	CO, and I W	4.7 g/kw-hr NMHC + NOx 5.0 g/kw-hr CO 0.4 g/kw-hr PM
	40 CFR 60.4207(b), Subpart IIII and 40 CFR 80.510(b)	3.B.16	Fuel Content	Max. sulfur content of 15 ppm; and a min. cetane index of 40 or a max. aromatic content of 35% volume.
	40 CFR 60.4211(a), Subpart IIII	3.B.17	NMHC + NOx, CO, and PM	Operational Requirement
	40 CFR 60.4211(f), Subpart IIII	3.B.18	Hours	Emergency Operational Requirements

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

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

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

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

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

(Ref.: Air Title V Permit issued August 23, 2007 and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2))

3.B.4 For Emission Points AB-003, AE-007 through AE-011, AF-001, AF-002, and AI-002, the permittee shall not exceed a maximum discharge of sulfur oxides 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.5 For Emission Points AB-003, AE-007 through AE-011, AF-001, and AF-002, the permittee shall not have particulate emissions from fossil fuel burning installations of greater than 10 MMBTU/hr heat input that exceeds the 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.6 For Emission Points AI-001 and AI-002, the maximum permissible emission of ash and/or particulate matter shall not exceed 0.6 pounds per million BTU per hour heat input.

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

3.B.7 For Emission Points AD-001, AD-002, AD-007 through AD-009, AE-001 through AE-003, AE-007 through AE-011, and AE-018 through AE-022, the permittee shall limit particulate matter (PM) emissions, determined by the relationship

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

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

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

3.B.8 For Emission Point AF-001, Nitrogen Oxides (NOx) emissions shall be limited to 17.64 pounds per hour (lbs/hr) and 77.26 tons per year (tpy).

(Ref: Air Title V Permit issued August 23, 2007)

3.B.9 For Emission Point AF-001, Carbon Monoxide (CO) emissions shall be limited to 21.60 pounds per hour (lbs/hr) and 94.61 tons per year (tpy).

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

3.B.10 For Emission Points AE-007 through AE-011, the permittee is subject to the Standards of Performance for Calciners and Dryers in Mineral Industries, 40 CFR Part 60, Subpart UUU.

(Ref. 40 CFR Part 60.730 and 40 CFR Part 60.731, Subpart UUU)

3.B.11 For Emission Points AE-007 through AE-011, Particulate Matter (PM) emissions shall be limited to 0.092 gram per dry standard cubic meter (g/dscm) [0.040 grain per dry standard cubic foot (gr/dscf)].

(Ref. 40 CFR Part 60.732(a), Subpart UUU)

3.B.12 For Emission Points AE-007 through AE-011, the permittee shall not cause to be discharged into the atmosphere emissions which exhibit greater than 10 percent opacity.

(Ref. 40 CFR Part 60.732(b), Subpart UUU)

3.B.13 For Emission Point AI-001, the permittee is subject to the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR 63, Subpart ZZZZ.

Emission Point AI-001 is considered a new compression ignition (CI) emergency engine with a site rating less than 500 HP that is located at an Area Source of HAP emissions and, as such, meets the requirements of 40 CFR Part 63, Subpart ZZZZ by meeting the

requirements of 40 CFR Part 60, Subpart IIII. No other requirements of 40 CFR Part 63, Subpart ZZZZ or the General Provisions in Subpart A apply to the emergency engine.

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

3.B.14 For Emission Point AI-001, the permittee is subject to the New Source Performance Standard for Stationary Compressor Ignition Internal Combustion Engines in 40 CFR 60, Subpart IIII and the General Provisions in Subpart A.

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

3.B.15 For Emission Point AI-001, Nitrogen Oxides plus Total Non-Methane Hydrocarbons (NMHC + NOx) emissions are limited to 4.7 grams per kilowatt-hour (g/kw-hr); Carbon Monoxide (CO) emissions are limited to 5.0 g/kw-hr; and Particulate Matter (PM) emissions are limited to 0.40 g/kw-hr. The permittee must operate and maintain the engine to achieve these emission standards over the entire life of the engine.

(Ref.: 40 CFR 60.4202(a)(2), 40 CFR 60.4205(b), 40 CFR 60.4206, Subpart IIII and Tier 3 of Table 1 of 40 CFR 89.112(a))

3.B.16 For Emission Point AI-001, the permittee shall use diesel fuel that has a maximum sulfur content of 15 ppm and a minimum cetane index of 40 or a maximum aromatic content of 35 percent volume.

(Ref.: 40 CFR 60.4207(b), Subpart IIII and 40 CFR 80.510(b))

3.B.17 For Emission Point AI-001, the permittee shall operate and maintain the engine according to the manufacturer's written instructions and procedures. In addition, the only settings that will be changed are those permitted by the manufacturer. The permittee shall comply with the emission standards by purchasing an engine certified to the emission standards for the same model year and maximum engine power. The engine shall be installed and configured according to the manufacturer's specifications. Any operation of the engine other than emergency operation, maintenance, and testing is prohibited.

(Ref.: 40 CFR 60.4211(a), Subpart IIII)

3.B.18 For Emission Point AI-001, the permittee must operate the emergency stationary engine according to the requirements cited below. In order for the engine to be considered an emergency stationary engine, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described below, is prohibited. If the engine is not operated according to these requirements, the engine will not be considered an emergency engine under 40 CFR Part 60, Subpart IIII and must meet all requirements for non-emergency engines.

- (a) There is no time limit on the use of the emergency engine in emergency situations.
- (b) The engine 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. 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 permittee maintains records indicating that federal, state, or local standards require maintenance and testing of engine beyond 100 hours per calendar year.
- (c) The 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.

(Ref.: 40 CFR Part 60.4211(f), Subpart IIII)

#### C. <u>Insignificant and Trivial Activity Emission Limitations & Standards</u>

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

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

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

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

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

3.C.3 Except as otherwise specified, no person shall 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.

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

D.	Work	<b>Practice</b>	Standard

None.

#### SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:
  - (a) the identification of each term or condition of the permit that is the basis of the certification;
  - (b) the compliance status;
  - (c) whether compliance was continuous or intermittent;
  - (d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
  - (e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit.

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

# SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

- A. General Monitoring, Recordkeeping and Reporting Requirements
- 5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)
- 5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:
  - (a) the date, place as defined in the permit, and time of sampling or measurements;
  - (b) the date(s) analyses were performed;
  - (c) the company or entity that performed the analyses;
  - (d) the analytical techniques or methods used;
  - (e) the results of such analyses; and
  - (f) the operating conditions existing at the time of sampling or measurement.

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

- 5.A.3 Except as otherwise specified herein, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(2).)
- 5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 6.2.E. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)
- 5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within

- five (5) days of the time the deviation began. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(2).)
- 5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the DEQ and the EPA. (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).)

## B. <u>Specific Monitoring and Recordkeeping Requirements</u>

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)(2)	5.B.1	Fuel	Monitor and maintain records of the type and quantity of fuel used
AF-001	Air Construction Permit issued April 22, 1999 and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)	5.B.2	NOx, PM, and CO	Biennial Performance Stack Tests
AD-007, AG-003, and AH-002	Air Construction Permit issued April 22, 1999 and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)	5.B.3	PM	Biennial Performance Stack Tests
AE-007	Air Construction Permit issued April 22, 1999 and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)	5.B.4	PM	Biennial Performance Stack Tests
though AE-011	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)	5.B.5	Pressure Drop	Daily Monitoring and Recordkeeping
	40 CFR 736(b)(2), Subpart UUU and 40 CFR 60.11, Subpart A	5.B.6	Opacity	VEE Observations
AD-001, AD-002, AD-007 through AD-009, AE-001 through	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)	5.B.7	Operating Requirement	Operating Requirement
AE-003, AE-007 through AE-011, and AE-018 through AE-022	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)	5.B.8	Inspections	Weekly Monitoring and Recordkeeping
AD-001, AD-002, AD-007 through AD-009, AE-003, and AE-018 through AE-022	40 CFR Part 64, CAM Requirements	5.B.9	PM	Baghouse Monitoring; See CAM Plan in Appendix C
AE-001 and AE-002	40 CFR Part 64, CAM Requirements	5.B.10	PM	Baghouse Monitoring; See CAM Plan in Appendix C

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Monitoring/Recordkeeping Requirement
AC-001, AF-008, and AG-003	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)	5.B.11	Hours	Monitoring and Recordkeeping
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)	5.B.12	Coatings	Monitor and maintain records of the type and quantity of coatings used
	40 CFR 60.4211(a), Subpart IIII	5.B.13	NMHC + NOx, CO, and PM	Operational Requirements
	40 CFR 60.4211(c), Subpart IIII	5.B.14		Compliance Demonstration via installation of NSPS-Certified Engine(s)
AI-001	40 CFR 60.4211(g)(1), Subpart IIII	5.B.15		Operational Requirements
	40 CFR 60.4214(b), Subpart IIII	5.B.16		Operational Requirements
	40 CFR 60.4211(f), Subpart IIII	5.B.17	Hours	Emergency Operational Requirements

5.B.1 For facility-wide stationary combustion sources, the permittee shall monitor the type and quantity of fuel used. These records shall be maintained in accordance with paragraph 5.A.3.

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

5.B.2 For Emission Point AF-001, the permittee shall conduct biennial performance stack tests by December 31, 2019, and by December 31<sup>st</sup> every odd number year thereafter, for Nitrogen Oxides (NOx) in accordance with EPA Test Method 7E or an approved equivalent and for Particulate Matter (PM) in accordance with EPA Test Methods 1-5 or an approved equivalent.

The permittee shall also conduct performance stack tests for Carbon Monoxide (CO) in accordance with EPA Test Method 10 or an approved equivalent by December 31, 2019, and by December 31<sup>st</sup> every odd number year thereafter,. The initial performance stack test shall be conducted on the same calendar schedule as the NOx and PM10 performance stack tests.

Performance testing shall be conducted while the respective processes are operating within 80% of maximum operational capacity.

The permittee shall submit a written test protocol at least thirty (30) days prior to the

intended test date(s) to ensure that all test methods and procedures are acceptable to DEQ. Also, the permittee shall notify the DEQ in writing at least ten (10) days prior to the intended test date(s) so that an observer may be afforded the opportunity to witness the test.

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

5.B.3 For Emission Points AD-007, AG-003, and AH-002, the permittee shall conduct biennial performance stack tests for Particulate Matter (PM) in accordance with EPA Test Methods 1-5, or an approved equivalent, by December 31, 2019, and by December 31<sup>st</sup> every odd number year thereafter.

Performance testing shall be conducted while the respective processes are operating within 80% of maximum operational capacity.

For Emission Point AD-007, the permittee shall measure, monitor, and record pressure drop every fifteen (15) minutes across the baghouse during the stack test. This information shall be submitted as part of each stack test report.

The permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to DEQ. Also, the permittee shall notify the DEQ in writing at least ten (10) days prior to the intended test date(s) so that an observer may be afforded the opportunity to witness the test.

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

5.B.4 For Emission Points AE-007 through AE-011, the permittee shall conduct biennial performance stack tests for Particulate Matter (PM) in accordance with EPA Test Methods 1-5 or an approved equivalent to demonstrate compliance with emission limitations referenced in Condition 3.B.11. Performance stack testing shall be conducted on one source on a rotating basis by December 31, 2019, and by December 31<sup>st</sup> every odd number year thereafter. Performance stack testing shall be conducted on one source on a rotating basis by December 31, 2019, and by December 31<sup>st</sup> every odd number year thereafter.

Performance testing shall be conducted while the respective processes are operating within 80% of maximum operational capacity.

The permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to DEQ. Also, the permittee shall notify the DEQ in writing at least ten (10) days prior to the intended test date(s) so that an observer may be afforded the opportunity to witness the test.

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

5.B.5 For Emission Points AE-007 through AE-011, the permittee shall monitor pressure drop

devices on the baghouses. A log shall be kept of the pressure drop readings performed once daily on the device. These records shall be kept at the facility for a period of five years and made available for review by Office of Pollution Control personnel upon request.

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

5.B.6 For Emission Points AE-007 through AE-011, the permittee shall conduct opacity observations in accordance with Method 9 in Appendix A of 40 CFR Part 60, concurrently during performance stack testing. For purposes of determining compliance, the minimum total time of observations shall be 3 hours (30 6-minute averages) for the performance test or other set of observations (meaning those fugitive-type emission sources subject only to an opacity standard).

The permittee shall record the opacity of emissions, and shall report to the DEQ the opacity results along with the results of the performance test required under Condition 5.B.4. The inability of the permittee to secure a visible emissions observer shall not be considered a reason for not conducting the opacity observations concurrent with the initial performance test.

#### (Ref.: 40 CFR 736(b)(2), Subpart UUU and 40 CFR 60.11, Subpart A)

5.B.7 For Emission Points AD-001, AD-002, AD-007 through AD-009, AE-001 through AE-003, and AE-018 through AE-022, the permittee shall operate the pollution control equipment at all times each respective process is in operation. For Emission Points AE-007 through AE-011, the permittee shall operate the process control equipment at all times each respective process is in operation.

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

5.B.8 For Emission Points AD-001, AD-002, AD-007 through AD-009, AE-001 through AE-003, AE-007 through AE-011, and AE-018 through AE-022, the permittee shall perform weekly inspections and any required maintenance on the pollution control equipment. The permittee shall maintain on hand at all times sufficient equipment as is necessary to repair and/or overhaul the pollution control equipment. In the event of a failure of the pollution control equipment, the permittee shall cease operation 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. 6.3.A(3)(a)(2))

5.B.9 For Emission Points AD-001, AD-002, AD-007 through AD-009, AE-003 and AE-018 through AE-022, the permittee shall comply with the Compliance Assurance Monitoring (CAM) requirements as specified in 40 CFR Part 64. A CAM Plan has been prepared to ensure proper operation of the dust collector on each source to ensure compliance with Particulate Matter (PM) emissions limitations. The CAM Plan is provided below and in Appendix C.

Emission Points: AD-001, AD-002, AD-007, AD-008, AD-009, AE- 003, AE-018, AE-019, AE-020, AE-021, and AE-022	INDICATOR NO. 1	INDICATOR NO. 2
Indicator	Differential Pressure	Visible Emissions
Measurement Approach	Record pressure differential in inches of water.	Visible emissions from dust collectors' exhaust will be monitored as needed using EPA Method 22.
Indicator Range	An excursion is defined as 8 inches or higher. At 8 inches, USG will cease throughput and place the unit in cleaning cycle and/or shut down the unit for inspection and maintenance.	An excursion is defined as the presence of visible emissions.
Performance Criteria		
A. Data Representativeness	A. Measurements made across baghouse	A. Measurements are being made at the emission point
B. Verification of Operational Status	B. Calibrate pressure gauge annually	B. VE observer will be an EPA Method 9 trained observer
C. QA/QC Practice and Criteria	C. Pressure differential monitored continuously	C. As necessary
D. Monitoring Frequency and Data Collection Procedures	D. Pressure differential manually recorded once daily.	D. A 6-minute EPA Method 9 observation
E. Averaging Period	E. None.	E. None.
Air Pollution Control Device Bypass Monitoring	N/A	Checked if visible emissions present

(Ref.: 40 CFR 64, 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2))

5.B.10 For Emission Points AE-001 and AE-002, the permittee shall comply with the Compliance Assurance Monitoring (CAM) requirements as specified in 40 CFR Part 64. A CAM Plan has been prepared to ensure proper operation of the dust collector on each source to ensure compliance with Particulate Matter (PM) emissions limitations. The CAM Plan is provided below and in Appendix C.

Emission Points: AE-001 and AE-002	INDICATOR NO. 1	INDICATOR NO. 2
Indicator	Silo Level	Visible Emissions
Measurement Approach	Record silo level in feet	Visible emissions from dust collectors' exhaust will be monitored as needed using EPA Method 22.
Indicator Range	An excursion is defined as <3 feet of clearance from topside.  Discontinue loading until material level drops.	An excursion is defined as the presence of visible emissions.
Performance Criteria		
A. Data Representativeness	A. Measurements made	A. Measurements are being made at the emission point
B. Verification of Operational Status	B. N/A	B. VE observer will be an EPA Method 9 trained observer
C. QA/QC Practice and Criteria	C. N/A	C. As necessary
D. Monitoring Frequency and Data Collection Procedures	D. Level manually recorded once daily.	D. A 6-minute EPA Method 22 observation
E. Averaging Period	E. None.	E. None.
Air Pollution Control Device Bypass Monitoring	N/A	Checked if visible emissions present

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

5.B.11 For Emission Points AC-001, AF-008, and AG-003, the permittee shall monitor the hours of operation of each source. A rolling, consecutive 12-month log shall be kept of the hours of operation of each source on a monthly basis. These records shall be kept at the facility for a period of five years and made available for review by Office of Pollution Control personnel upon request.

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

- 5.B.12 For Emission Points AC-001, AF-008, and AG-003, the permittee shall monitor and maintain records of the following for each coating, adhesive, solvent or any other Volatile Organic Compounds (VOC) or Hazardous Air Pollutant (HAP)-containing material:
  - (a) The total quantity (gallons or pounds) of each VOC or HAP-containing material used on a monthly and consecutive, rolling 12-month basis;

- (b) The density in pounds per gallon (lbs/gallon) for each VOC or HAP-containing material used on a monthly and consecutive, rolling 12-month basis;
- (c) The percentage of VOCs and HAPs by weight for each VOC or HAP-containing material used on a monthly and consecutive, rolling 12-month basis;
- (d) The permittee may utilize data supplied by the manufacturer, or analysis of VOC or HAP by EPA Test Method 24, 40 CFR 60, Appendix A; and
- (e) The VOC and HAP emissions calculated in tons per year (tpy) on a monthly and consecutive, rolling 12-month basis.

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

5.B.13 For Emission Point AI-001, the permittee must operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions. The permittee may change only those emission-related settings that are permitted by the manufacturer. The permittee must also meet the requirements of 40 CFR Part 89.

(Ref.: 40 CFR 60.4211(a), Subpart IIII)

5.B.14 For Emission Point AI-001, the permittee must demonstrate compliance with emission standards specified in Condition 3.B.15 by purchasing an engine certified to the emission standards specified in Condition 3.B.15. The engine must be installed and configured according to the manufacturer's specification.

(Ref.: 40 CFR 60.4211(c), Subpart IIII)

5.B.15 For Emission Point AI-001, if the engine and control device are not installed, configured, operated, and maintained and control device according to the manufacturer's emission-related written instructions, or if emission-related settings are changed in a way that is not permitted by the manufacturer, then a maintenance plan and records of conducted maintenance must be kept, and must, to the extent practicable, maintain and operate each engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, an initial performance test must be conducted to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after the emission-related settings are changed in a way that is not permitted by the manufacturer.

(Ref.: 40 CFR 60.4211(g)(1), Subpart IIII)

5.B.16 For Emission Point AI-001, if the emergency engine does not meet the standards applicable to non-emergency engines in the applicable model year of Table 5 to 40 CFR 60 Subpart IIII, the permittee must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The permittee must record the time of operation of the engine and the reason the engine was in operation during that time.

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

#### C. Specific Reporting Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Reporting Requirement
Facility-	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)	5.C.1	Fuel	Submit semiannual reports of fuel monitoring
Wide	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)	5.C.2	Coatings	Submit semiannual reports of coatings monitoring
AD-007, AG-003, AH-002, AE-007 though AE-011, and AF-001	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)	5.C.3	PM	Submit reports of stack test results
AD-001, AD-002, AD-007 through AD-009, AE-001 through AE-003, and AE-018 through AE-022	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)	5.C.4	PM	Submit semiannual reports of CAM Plan deviations

5.C.1 For facility-wide stationary combustion sources, the permittee shall submit fuel usage reports summarizing the type and quantity of fuel used for each fuel-burning source in accordance with Condition 5.A.4.

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

- 5.C.2 For the entire facility, the permittee shall submit reports summarizing the information below in accordance with Condition 5.A.4.
  - (a) The product name of each VOC or HAP-containing material (coatings, solvents, adhesives, etc.) used on a monthly and consecutive, rolling twelve month basis;
  - (b) The total quantity (gallons or pounds) used of each VOC or HAP-containing material used on a monthly and consecutive, rolling twelve month basis;

- (c) The density in pounds per gallon (lbs/gallon) for each VOC or HAP-containing material used on a monthly and consecutive, rolling twelve month basis;
- (d) The percentage of VOCs and HAPs by weight for each VOC or HAP-containing material used on a monthly and consecutive, rolling twelve month basis;
- (e) A description of the method used to determine the VOC and HAP content of each VOC or HAP-containing material used; and
- (f) The total VOC and HAP emissions calculated in tons per year (tpy) on a monthly and consecutive, rolling twelve month basis.

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

5.C.3 For Emission Points AD-007, AG-003, AH-002, AE-007 though AE-011, and AF-001, the permittee shall submit the performance test results within 60 days of conducting the performance of the tests.

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

5.C.4 For Emission Points AD-001, AD-002, AD-007 through AD-009, AE-001 through AE-003, and AE-018 through AE-022, the permittee shall submit semi-annual reports summarizing each excursion from the CAM Plan and the associated corrective actions. If there were no excursions, a negative declaration should be reported. This data will be reported in accordance with Condition 5.A.4.

(Ref: 40 CFR 64.9(a) and (b) and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c))

## SECTION 6. ALTERNATIVE OPERATING SCENARIOS

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 <a href="http://ecfr.gpoaccess.gov">http://ecfr.gpoaccess.gov</a> under Title 40, or DEQ shall provide a copy upon request from the permittee.

- 7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A Production and Consumption Controls.
- 7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B Servicing of Motor Vehicle Air Conditioners.
- 7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E

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

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

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

### **APPENDIX A**

#### List of Abbreviations Used In this Permit

11 Miss. Admin. Code Pt. 2, Ch. 1. Air Emission Regulations for the Prevention, Abatement, and

Control of Air Contaminants

Permit Regulations for the Construction and/or Operation of Air 11 Miss. Admin. Code Pt. 2, Ch. 2.

**Emissions Equipment** 

11 Miss. Admin. Code Pt. 2, Ch. 3. Regulations for the Prevention of Air Pollution Emergency Episodes

Ambient Air Quality Standards 11 Miss. Admin. Code Pt. 2, Ch. 4.

Regulations for the Prevention of Significant Deterioration of Air 11 Miss. Admin. Code Pt. 2, Ch. 5.

**Ouality** 

Air Emissions Operating Permit Regulations for the Purposes of 11 Miss. Admin. Code Pt. 2, Ch. 6.

Title V of the Federal Clean Air Act

Acid Rain Program Permit Regulations for Purposes of Title IV of 11 Miss. Admin. Code Pt. 2, Ch. 7.

the Federal Clean Air Act

Best Available Control Technology **BACT Continuous Emission Monitor** CEM

Continuous Emission Monitoring System **CEMS** 

Code of Federal Regulations **CFR** 

Carbon Monoxide CO

COM Continuous Opacity Monitor

Continuous Opacity Monitoring System **COMS** 

DEO Mississippi Department of Environmental Quality **EPA** United States Environmental Protection Agency

gr/dscf Grains Per Dry Standard Cubic Foot

HP Horsepower

**HAP** Hazardous Air Pollutant Pounds per Hour lbs/hr

M or K Thousand

**MACT** Maximum Achievable Control Technology

MM

Million British Thermal Units per Hour MMBTUH

Not Applicable NA

National Ambient Air Quality Standards **NAAOS** 

National Emissions Standards For Hazardous Air Pollutants, 40 CFR 61 or National Emission **NESHAP** 

Standards For Hazardous Air Pollutants for Source Categories, 40 CFR Part 63

**NMVOC** Non-Methane Volatile Organic Compounds

 $NO_{x}$ Nitrogen Oxides

New Source Performance Standards, 40 CFR Part 60 **NSPS** 

Operation and Maintenance O&M

Particulate Matter PM

Particulate Matter less than 10 µm in diameter  $PM_{10}$ 

Parts per Million ppm

PSD Prevention of Significant Deterioration, 40 CFR 52

State Implementation Plan SIP

Sulfur Dioxide  $SO_2$ Tons per Year **TPY** Total Reduced Sulfur **TRS** 

VEE Visible Emissions Evaluation Volatile Hazardous Air Pollutant VHAP Volatile Organic Compound VOC

#### APPENDIX B

#### LIST OF REGULATIONS REFERENCED IN PERMIT

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

- 11 Miss. Admin. Code Pt. 2, Ch. 1, Mississippi Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants (Amended December 14, 2011)
- 11 Miss. Admin. Code Pt. 2, Ch. 6, Mississippi Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Air Emissions Operating Permit Regulations for the Purpose of Title V of the Federal Clean Air Act (Amended December 14, 2011)
- 40 CFR Part 82 Title VI of the Clean Air Act (Stratospheric Ozone Protection)
- 40 CFR Part 63, Subpart ZZZZ National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
- 40 CFR 60, Subpart A General Provisions
- 40 CFR 60, Subpart UUU New Source Performance Standards for Calciners and Dryers in Mineral Industries
- 40 CFR 60, Subpart IIII New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines

## **APPENDIX C**

COMPLIANCE ASSURANCE MONITORING (CAM) PLAN EMISSION POINTS AD-001, AD-002, AD-007, AD-008, AD-009, AE-001, AE-002, AE-003, and AE-018 through AE-022