

**STATE OF MISSISSIPPI
AND FEDERALLY ENFORCEABLE
AIR POLLUTION CONTROL
PERMIT**

**TO OPERATE AIR EMISSIONS EQUIPMENT AT A
SYNTHETIC MINOR SOURCE**

THIS CERTIFIES THAT

Mid South Baking Company LLC
4311 Highway 80 West
Pelahatchie, Mississippi
Rankin County

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

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

Krystal Rudolph

AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: February 25, 2021

Permit No.: 2380-00080

Effective Date: As specified herein.

Expires: January 31, 2026

Section 1.

A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
2. This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.4.D.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.4.D.)
3. Any activities not identified in the application are not authorized by this permit.

(Ref.: Miss. Code Ann. 49-17-29 1.b)
4. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)
7. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)
8. The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:

- a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and
- b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission.

(Ref.: Miss. Code Ann. 49-17-21)

9. Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control.

(Ref.: Miss. Code Ann. 49-17-39)

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(7).)

11. This permit does not authorize a modification as defined in Regulation 11 Miss. Admin. Code Pt. 2, Ch.2., "Permit Regulations for the Construction and/or Operation of Air Emission Equipment." A modification may require a Permit to Construct and a modification of this permit. Modification is defined as "Any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

- a. Routine maintenance, repair, and replacement;
- b. Use of an alternative fuel or raw material by reason of an order under Sections 2(a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
- c. Use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
- d. Use of an alternative fuel or raw material by a stationary source which:

- (1) The source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, or 40 CFR 51.166; or
 - (2) The source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, or 40 CFR 51.166;
- e. An increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I or 40 CFR 51.166; or
- f. Any change in ownership of the stationary source.

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

B. GENERAL OPERATIONAL CONDITIONS

1. Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in Regulation, 11 Miss. Admin. Code Pt. 2, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.10.)

2. Any diversion from or bypass of collection and control facilities is prohibited, except as provided for in 11 Miss. Admin. Code Pt. 2, R. 1.10., "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants."

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

3. Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits.

(Ref.: Miss. Code Ann. 49-17-29 1.a(i and ii))

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

- a. Upsets

- (1) For an upset defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:
 - (i) An upset occurred and that the source can identify the cause(s) of the upset;
 - (ii) The source was at the time being properly operated;
 - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
 - (iv) That within 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
 - (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
- (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
- (3) This provision is in addition to any upset provision contained in any applicable requirement.
- (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.

b. Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.)

- (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
- (2) Where the source is unable to comply with existing emission limitations

established under the State Implementation Plan (SIP) and defined in this regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).

- (3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

5. Compliance Testing: Regarding compliance testing:

- a. The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.
- b. Compliance testing will be performed at the expense of the permittee.
- c. Each emission sampling and analysis report shall include but not be limited to the following:
 - (1) Detailed description of testing procedures;
 - (2) Sample calculation(s);
 - (3) Results; and
 - (4) Comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B(3), (4), and (6).)

C. PERMIT RENEWAL / MODIFICATION / TRANSFER / TERMINATION

1. For renewal of this permit, the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board. If the applicant submits a timely and complete application pursuant to this paragraph and the Permit Board, through no fault of the applicant, fails to act on the application on or before the expiration date of the existing permit, the applicant shall continue to operate the stationary source under the terms and conditions of the expired permit, which shall remain in effect until final action on the application is taken by the Permit Board. Permit expiration terminates the

source's ability to operate unless a timely and complete renewal application has been submitted.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.8.)

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).)

3. The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).)

4. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:
 - a. Persistent violation of any terms or conditions of this permit.
 - b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
 - c. A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

5. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B.)

SECTION 2 EMISSION POINT DESCRIPTION

The permittee is authorized to operate air emissions equipment, as described in the following table.

Emission Point	Description
AA-000	Commercial Bun Bakery
AA-001	MS Yeast Baking Line Vents
AA-002	Central Yeast Baking Line Vents
AA-003	MS Baking Line Silo #1 with baghouse
AA-004	MS Baking Line Silo #2 with baghouse
AA-005	MS Baking Line Silo #3 with baghouse
AA-006	Central Baking Line Silo #1 with baghouse
AA-007	Central Baking Line Silo #2 with baghouse
AA-008	Central Baking Line Silo #3 with baghouse
AA-009	MS Baking Line Internal Solids Handling Baghouse
AA-010	Central Baking Line Internal Solids Handling Baghouse
AA-011	Diesel Emergency Generator (2000 kW, 4-Stroke CI, Model: 2000-0DQK-1104)
AA-012	Natural Gas Emergency Generator (125 kW, 4-Stroke SI, Model: 2008-125RZG)
AA-013	1.5 MMBtu/hr Natural Gas Bryan Boiler #1
AA-014	1.5 MMBtu/hr Natural Gas Bryan Boiler #2
AA-015	MS Bake Line Oven (4.82 MMBtu/hr Natural Gas)
AA-016	Central Bake Line Oven (4.86 MMBtu/hr Natural Gas)
AA-017	0.35 MMBtu/hr Natural Gas Water Heating Boiler #1
AA-018	0.35 MMBtu/hr Natural Gas Water Heating Boiler #2
AA-019	0.40 MMBtu/hr Natural Gas Water Heating Boiler #3

SECTION 3 EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
AA-000	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.1	VOC	VOC ≤ 99.0 tons/yr (<i>Title V avoidance</i>)
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.2	PM	E = 4.1 p ^{0.67}
	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.3	Opacity	Opacity ≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.4	Opacity	Opacity ≤ 40%
AA-003 AA-004 AA-005 AA-006 AA-007 AA-008 AA-009 AA-010	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.5	PM ₁₀ /PM _{2.5}	Shall not operate without an operational and properly maintained baghouse
AA-013 AA-014 AA-015 AA-016 AA-017 AA-018 AA-019	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.6	PM	0.6 lb PM/mmBTU
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.7	SO _x	4.8 lbs SO ₂ /mmBTU
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.8		Combust only natural gas
AA-011 AA-012	40 CFR 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants: Reciprocating Internal Combustion Engines (RICE) 40 CFR 63.6585(c), 63.6590(a)(1)(iii), (a)(2)(iii) and (c)(1)	39	HAP	Applicability
AA-011	40 CFR 63.6604(b), Subpart ZZZZ	3.10		Shall use diesel fuel that meets the requirements in 40 CFR 80.150(b) for nonroad diesel.
	40 CFR 63.6605, Subpart ZZZZ	3.11		Compliance at all times
	40 CFR 63.6625(e)(3), Subpart ZZZZ	3.12		Operate and maintain the engines in a manner consistent with safety and good air pollution control practices for minimizing emissions.
AA-011 AA-012	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). and 40 CFR 63.6625(f), Subpart ZZZZ	3.13		Install a non-resettable hour meter

	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). and 40 CFR 63.6640(f)(1), (2), and (4), Subpart ZZZZ	3.14		No limit on use during emergency situations. May operate for 100 hours per year for Maintenance and Readiness Testing
--	--	------	--	---

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

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

3.2 For Emission Point AA-000, except as otherwise specified, no person shall cause, permit, or allow the emission from any manufacturing process, in any one hour from any point source, particulate matter in total quantities in excess of the amount determined by the relationship:

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

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

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

3.3 For Emission Point AA-000, no person shall cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in a. and b. below.

- a. Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.
- b. Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour.

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

3.4 For Emission Point AA-000, no person shall cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Condition 3.4.

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

3.5 For Emission Points AA-003, AA-004, AA-005, AA-006, AA-007, AA-008, AA-009, and AA-010, the permittee shall not operate without an operational and properly maintained baghouse.

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

- 3.6 For Emission Points AA-013, AA-014, AA-015, AA-016, AA-017, AA-018, and AA-019, the maximum permissible emission of ash and/or particulate matter from shall not exceed an emission 0.6 pounds per million BTU per hour heat input.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).)
- 3.7 For Emission Points AA-013, AA-014, AA-015, AA-016, AA-017, AA-018, and AA-019, 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).)
- 3.8 For Emission Points AA-013, AA-014, AA-015, AA-016, AA-017, AA-018, and AA-019, the permittee shall combust only natural gas.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 3.9 For Emission Points AA-011 and AA-012, the permittee is subject to and shall comply with all applicable requirements of National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines and the General Provisions. Emission Point AA-011 is an existing emergency stationary RICE at an area source of HAP.
Emission Point AA-012 is a new emergency stationary RICE at an area source of HAP. Therefore, Emission Point AA-012 shall meet the requirements of 40 CFR 63, Subpart ZZZZ by meeting the requirements of 40 CFR 60, Subpart JJJJ.
(Ref.: 40 CFR 63.6585(c) and 63.6590(a)(1)(iii), (a)(2)(iii) and (c)(1), Subpart ZZZZ)
- 3.10 For Emission Point AA-011, the permittee shall use diesel fuel that meets the requirements in 40 CFR 80.510(b) for non-road diesel fuel.
(Ref.: 40 CFR 6604(b), Subpart ZZZZ)
- 3.11 For Emission Point AA-011, the permittee shall comply with the following:
- a. Be in compliance with the applicable emission limitations, operating limitation, and other requirements in Subpart ZZZZ at all times.
 - b. Operate and maintain the engine 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.
(Ref.: 40 CFR 63.6605, Subpart ZZZZ)
- 3.12 For Emission Point AA-011, 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.

(Ref.: 40 CFR 63.6625(e)(3), Subpart ZZZZ)

- 3.13 For Emission Points AA-011 and AA-012, the permittee shall install a non-resettable hour meter if one is not already installed.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).) and 40 CFR 63.6625(f), Subpart ZZZZ)

- 3.14 For Emission Points AA-011 and AA-012, the permittee shall operate the emergency stationary RICE according to the requirements below. In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in nonemergency situations for 50 hours per year is prohibited.

- a. There is no time limit on the use of emergency stationary RICE in emergency situations.
- b. The permittee shall operate the emergency stationary RICE for any combination of the purposes specified below for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by (c) of this condition counts as part of the 100 hours per calendar year allowed. 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. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.
- c. Emergency stationary RICE located at area sources of HAP 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. 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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). and 40 CFR 63.6640(f)(1), (2), and (4), Subpart ZZZZ)

**SECTION 4
WORK PRACTICES**

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Work Practice
AA-011	40 CFR 63.6603(a), 63.6625(i) and, Table 2d, Subpart ZZZZ	4.1	HAP	Required maintenance and inspection

- 4.1 For Emission Point AA-011, the permittee shall comply with the following requirements:
- a. Change oil and filter every 500 hours of operation or annually, whichever comes first;
 - b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first and replace as necessary;
 - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replaces as necessary.

The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement listed above. The oil analysis must be performed at the same frequency specified above for changing the oil. The analysis program shall contain the information contained in 40 CFR 63.6625(i). The permittee shall keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

If an 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 in this condition, 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.

(Ref.: 40 CFR 63.6603(a), 63.6625(i) and Table 2d, Subpart ZZZZ)

**SECTION 5
MONITORING AND RECORDKEEPING REQUIREMENTS**

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain records for a minimum of 5 years.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2	Recordkeeping	Production data recordkeeping requirement
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.3	Recordkeeping	Calculate the 12-month rolling total VOC emissions
AA-003 AA-004 AA-005 AA-006 AA-007 AA-008 AA-009 AA-010	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.4	Opacity	Weekly visible observations for visible emissions
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.5		Monthly maintenance inspections
AA-011	40 CFR 63.6625(h), Subpart ZZZZ	5.6	HAP	Minimize the engine's time spent at idle
	40 CFR 63.6655(a), Subpart ZZZZ	5.7		Recordkeeping
	40 CFR 63.6655(e), Subpart ZZZZ	5.8		
AA-011 AA-012	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). and 40 CFR 63.6655(f), Subpart ZZZZ	5.9		Recordkeeping

5.1 The permittee shall retain all required records, monitoring data, supporting information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to MDEQ as required by Applicable Rules and Regulations or this permit upon request.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.9.)

5.2 For Emission Point AA-000, the permittee shall keep in log form the following production data on a monthly basis and a 12-month rolling total basis:

- a. Product (bun) type
- b. Initial baker's yeast content for each batch
- c. Yeast action time
- d. Production throughput (lbs/month)

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

5.3 For Emission Point AA-000, the permittee shall calculate and record monthly the 12-month rolling total of VOC emissions.

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

- 5.4 For Emission Points AA-003, AA-004, AA-005, AA-006, AA-007, AA-008, AA-009, and AA-010, the permittee shall perform weekly visual observations of emissions. If any visible emissions are detected, the emission points shall be shut down immediately, and the permittee shall take corrective action as expeditiously as practicable. Further, the permittee shall maintain a record and/or a log documenting all visual observations/tests, the nature and cause of any visible emissions, any corrective action(s) taken to prevent or minimize the emissions, and the date and time when visible emission observations were conducted.

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

- 5.5 For Emission Points AA-003, AA-004, AA-005, AA-006, AA-007, AA-008, AA-009, and AA-010, the permittee shall conduct monthly maintenance inspections. The outcome of the inspections and any maintenance conducted shall be documented. The permittee shall maintain a supply of extra bags for replacement.

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

- 5.6 For Emission Point AA-011, the permittee shall 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.

(Ref.: 40 CFR 63.6625(h), Subpart ZZZZ)

- 5.7 For Emission Point AA-011, the permittee shall keep the following records:
- a. A copy of each notification and report submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in 40 CFR 63.10(b)(2)(xiv).
 - b. Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.
 - c. Records of all required maintenance performed on the air pollution control and monitoring equipment.
 - d. Records of actions taken during periods of malfunction to minimize emissions in accordance with Condition 3.11(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

(Ref.: 40 CFR 63.6655(a), Subpart ZZZZ)

- 5.8 For Emission Point AA-011, the permittee shall 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 your own maintenance plan.

(Ref.: 40 CFR 63.6655(e), Subpart ZZZZ)

- 5.9 For Emission Points AA-011 and AA-012, the permittee shall 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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). and 40 CFR 63.6655(f), Subpart ZZZZ)

SECTION 6 REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	Report permit deviations within five (5) working days.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.2	Submit certified annual monitoring report.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.3	All documents submitted to MDEQ shall be certified by a Responsible Official.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.4	Submit VOC emission data with certified annual monitoring report
AA-011	40 CFR Part 63.6640(b) and 63.6650(a) - (d) and (f), Subpart ZZZZ	6.5	Deviations and malfunction reporting
AA-011 AA-012	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.6	Annual report

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

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

6.2. Except as otherwise specified herein, the permittee shall submit a certified annual synthetic minor monitoring report postmarked no later than 31st of January for the preceding calendar year. This report shall address any required monitoring specified in the permit. All instances of deviations from permit requirements must be clearly identified in the report. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration.

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

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

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

6.4. For Emission Point AA-000, the permittee shall submit the monthly 12 month rolling VOC totals required in Condition 5.3 in accordance with Condition 6.2.

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

- 6.5. For Emission Point AA-011, the permittee shall report each instance in which each applicable operating limitation in Condition 4.1 was not met in accordance with Condition 6.2. These deviations shall be reported according to the following requirements:
- (a) If there were no deviations from any applicable emission limitations or operating limitations, a statement shall be included that there were no deviations from the emission limitations or operating limitations during the reporting period; or
 - (b) If there was a deviation from any emission limitation or operating limitation during the reporting period, then the compliance report shall contain the following information:
 - (1) Company name and address.
 - (2) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.
 - (3) Date of report and beginning and ending dates of the reporting period.
 - (4) The total operating time of the stationary RICE at which the deviation occurred during the reporting period.
 - (5) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
 - (c) If there was a malfunction during the reporting period, the compliance report shall include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report shall also include a description of actions taken by the permittee during a malfunction of an affected source to minimize emissions, including actions taken to correct a malfunction.

(Ref.: 40 CFR Part 63.6640(b) and 63.6650(a) through (d) and (f), Subpart ZZZZ)

- 6.6. For Emission Points AA-011 and AA-012, the permittee shall submit annual reports in accordance with Condition 6.2 summarizing the hours of operation of the engines in the calendar year. This report shall also include what hours were for emergency use and what constituted the emergency and what hours were for non-emergency use.

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