

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

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

**THIS CERTIFIES THAT**

Sunshine Mills Inc  
2103 South Gloster Street  
Tupelo, Mississippi  
Lee 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**

*Becky Simonson*

**AUTHORIZED SIGNATURE  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Issued: February 3, 2025**

**Permit No.: 1540-00027**

**Effective Date: As specified herein.**

**Expires: January 31, 2030**

**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-001	10.045 MMBtu/hr Cleaver Brooks Natural Gas Fired Boiler
AA-002	8.625 MMBtu/hr Superior Natural Gas Fired Boiler
AA-003	8.5 MMBtu/hr Aeroglide Dryer with Cyclone
AA-004	8.5 MMBtu/hr Aeroglide Dryer with Cyclone
AA-005	8.5 MMBtu/hr Aeroglide Dryer with Cyclone
AA-006	7.4 MMBtu/hr Grain Dryer with Cyclone
AA-007	Grinding Operations (Corn Air Lift Filter with Baghouse)
AA-008	Grinding Operations (Wheat Air Lift Filter with Baghouse)
AA-009	Regrinder #1 with Baghouse (Shares back-up Cyclone with AA-010)
AA-010	Regrinder #2 with Baghouse (Shares back-up Cyclone with AA-009)
AA-011	Regrinder #3 with Baghouse
AA-014	Sprout Take Away Fan #1 with Cyclone
AA-015	Regrinder #4 with Baghouse
AA-016	Dust Collection from Head Sections with Baghouse
AA-017	Pneumatic Conveying System (Equipped with two Cyclones)
AA-018	Vac System Grain Elevator with Baghouse
AA-019	Bin Vents off Regrinder #4 with Baghouse
AA-020	Sprout Take Away Fan #2 with Cyclone
AA-021	Sprout Take Away Fan #3 with Cyclone
AA-022	Regrinder # 5 with Baghouse
AA-023	Seasonal Bin Vents
AA-024	1,000 Gallon Diesel Storage Tank
AA-025	500 Gallon Gasoline Storage Tank



**SECTION 3  
EMISSION LIMITATIONS AND STANDARDS**

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity	Opacity shall not exceed 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2		Equivalent Opacity
	11 Miss. Admin. Code Pt. 2, R. 1.3.C	3.3	Nuisances	Minimize off-site impacts
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.4	Throughput	182,500 tons per year of dog food produced (Title V and PSD Avoidance)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.5	Particulate Matter (Filterable Only)	Total PM/PM10/PM2.5 emissions shall be limited to 99.0 tons per year (Title V and PSD Avoidance)
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.6		$E = 4.1p^{0.67}$
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.7		Control devices must be always operational when processing
11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.8	$E = 0.8808 * I^{-0.1667}$		
AA-001	40 CFR 60 Subpart Dc Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units 40 CFR 60.40c(a)	3.9	SO <sub>2</sub> & Particulate Matter	Applicability
AA-001 AA-002 AA-003	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.10	SO <sub>2</sub>	4.8 lbs/MMBtu
AA-004 AA-005 AA-006	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.11	Fuel Requirement	Shall combust only natural gas
AA-002 AA-003 AA-004 AA-005 AA-006	11 Miss. Admin Code Pt. 2, R. 1.3.D(1)(a).	3.12	Particulate Matter (Filterable Only)	0.6 lbs/MMBtu
AA-025	40 CFR 63, Subpart CCCCCC	3.13	HAP	Applicability

	National Emissions Standards for Source Category: Gasoline Dispensing Facilities			
	40 CFR 63.11111(a), Subpart CCCCCC			

3.1. For the entire facility, 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. 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.

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

3.2. For the entire facility, except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Condition 3.1. This shall not apply to vision obscuration caused by uncombined water droplets.

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

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

The permittee shall not cause or permit the handling, transporting, or storage of any material in a manner which allows or may allow unnecessary amounts of particulate matter to become airborne.

When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than that from which it originated or to violate any other provision of 11 Miss. Admin. Code Pt. 2, Ch. 1, the Commission may order such corrected in a way that all air and gases or air and gas borne material leaving the building or equipment are controlled or removed prior to discharge to the open air.

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

3.4. For the entire facility, the permittee shall limit the annual throughput of dog food products to 182,500 tons per year (tpy), as determined for each 12-month rolling period.

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

- 3.5. For the entire facility, the permittee shall limit the facility's Particulate Matter (PM/PM10/PM2.5) 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). PSD and Title V Avoidance)

- 3.6. For the entire facility, the permittee shall not cause, permit, or allow the emission of particulate matter in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship:

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

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

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

- 3.7. For the entire facility, the permittee shall route all emissions to the respective control device. The permittee shall operate all control devices at all times when operating. Should the control device(s) become non-operational then the respective process shall be shut down immediately, but not as to cause damage to equipment or property or cause further environmental problems. The process shall not startup until such time that the control device(s) becomes operational.

The permittee shall maintain on hand at all times sufficient equipment as 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 operations until such time as repairs are made and the proper efficiency of the pollution control equipment is restored.

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

- 3.8. For Emission Point AA-001, the maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of equal to or greater than 10 million BTU per hour per heat input shall not exceed an emission rate as determined by the relationship:

$$E = 0.8808 * I^{-0.1667}$$

where "E" is the emission rate in pounds per million BTU per hour heat input and "I" is the heat input in millions of BTU per hour.

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

- 3.9. For Emission Point AA-001, the facility is subject to and shall comply with all applicable conditions of Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60 Subpart Dc. Emission Point AA-001 is natural gas fired boiler with a rated capacity of 10.045 MMBtu/hr.

(Ref.: 40 CFR 60.40c(a), Subpart Dc)

- 3.10. For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, and AA-006, the maximum discharge of sulfur from any fuel burning installation in which 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. 2.2.B(10).)

- 3.11. For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, and AA-006, the permittee shall only combust natural gas.

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

- 3.12. For Emission Points AA-002, AA-003, AA-004, AA-005, and AA-006, the maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour per 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).)

- 3.13. For Emission Point AA-025, the permittee is subject to and shall comply with all applicable requirements of the NESHAP for Gasoline Dispensing Facilities, 40 CFR 63, Subpart CCCCCC, and the applicable requirements of the General Provisions, 40 CFR 63, Subpart A, as noted in Table 3 to Subpart CCCCCC. The gasoline dispensing facility has a monthly throughput of less than 10,000 gallons; therefore, the permittee is only required to comply with the work practice standards in Conditions 4.1 and 4.2 and the recordkeeping requirement in Condition 5.9.

(Ref.: 40 CFR 63.11110, 63.11111(a) and (b), and Table 3, Subpart CCCCCC)

**SECTION 4  
WORK PRACTICES**

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Work Practice
AA-025	40 CFR 63.11115(a), Subpart CCCCCC	4.1	HAP	Good air pollution control practices
	40 CFR 63.11116(a) and (d), Subpart CCCCCC	4.2		

4.1. For Emission Point AA-025, the permittee must, at all times, operate and maintain the affected source in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the DEQ 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 63.11115(a), Subpart CCCCCC)

4.2. For Emission Point AA-025, the permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken shall include, but are not limited to, the following:

- (a) Minimize gasoline spills;
- (b) Clean up spills as expeditiously as practicable;
- (c) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; and
- (d) Minimize gasoline sent to an open waste collection system that collects and transports gasoline to reclamation and recycling devices, such as oil/water separators, if applicable.
- (e) Portable gasoline containers that meet the requirements of 40 CFR part 59, subpart F, are considered acceptable for compliance with paragraph (c) of this condition.

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

## SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
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(10).	5.2	Operation and Maintenance	Perform weekly routine maintenance inspections on all control devices and air emission equipment
		5.3	Recordkeeping	Maintain records of particulate matter emissions
		5.4		Maintain records of feed production
AA-001	40 CFR 60.48c(g)(2), Subpart Dc	5.5	Fuel Usage	Maintain records of natural gas combusted
AA-003 through AA-006	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.6	Stack Testing	Stack tests shall be performed once every three years
AA-007 through AA-022		5.7		Perform a one-time stack test upon permit issuance
AA-003 through AA-022	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.8	PM	Perform weekly visible emissions evaluation
AA-025	40 CFR 63.11111(e) and 63.11116(b), Subpart CCCCC	5.9	HAP	Records of monthly gasoline throughput

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 the DEQ 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 the entire facility, the permittee shall perform routine maintenance inspections on all control devices and air emission equipment on a weekly basis to ensure it is operating as designed. A record documenting the date of the inspections, the name of the person who performs the inspections, and results of the inspection, including the date, time, and duration of the corrective action period from the time the inspection indicated a problem

to the time of the indication that the device was replaced or restored to operation. These records shall be kept at the facility and made available to the DEQ upon request.

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

- 5.3. The permittee shall monitor and record PM, PM<sub>10</sub> and PM<sub>2.5</sub> emissions in tpy, as determined on a monthly basis and for each consecutive 12-month period on a rolling basis. Emissions shall be calculated using, but not limited to, control device data, feed throughput, hours of operation, manufacturer's specifications, and stack testing data.

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

- 5.4. The permittee shall maintain sufficient records to document the total feed production in tons per year on a monthly and for each consecutive 12-month period on a rolling basis.

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

- 5.5. For Emission Point AA-001 through AA-006, the permittee shall maintain records of the amount of natural gas combusted during each calendar month.

(Ref.: 40 CFR 60.48c(g)(2), Subpart Dc and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 5.6. For Emission Points AA-003, AA-004, AA-005, and AA-006, the permittee shall perform a triennial (not to exceed 37 months from the previous stack test) stack test of the vent stream past the control device(s) for the purpose of determining the emission rate of particulate matter (PM/PM<sub>10</sub>/PM<sub>2.5</sub>) when the facility is operating at, or near, full production rate. The next stack test shall be completed within 12 months of permit issuance with subsequent test being completed on a triennial basis (not to exceed 37 months from the previous test). Facility particulate matter emissions shall be determined by EPA Test Methods 5 and 201 or an EPA approved equivalent, 40 CFR 51, Appendix M.

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

- 5.7. For Emission Points AA-007 through AA-022, the permittee shall perform a one-time stack test of the vent stream past the control device(s) for determining the emission rate of particulate matter (PM/PM<sub>10</sub>/PM<sub>2.5</sub>) when the facility is operating at, or near, full production rate. This stack test shall be performed within 180 days of issuance of this permit. Facility particulate matter emissions shall be determined by EPA Test Methods 5 and 201 or an EPA approved equivalent, 40 CFR 51, Appendix M.

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

- 5.8. For Emission Points AA-003 through AA-022, the permittee shall perform EPA Test Method 22 visual observation on a weekly basis. Results shall be recorded in log form. If

visible emissions are observed, the permittee shall immediately conduct EPA Test Method 9 visual observation according to the procedures in 40 CFR 60.11. The source producing visual emissions shall be shut down in accordance with the manufacturer's protocols and corrective actions shall be taken. The emission source shall begin operations once corrective actions have been taken. Records of observations, any maintenance work conducted, and any corrective actions shall be kept in log form and made available for review upon request.

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

- 5.9. For Emission Point AA-025, the permittee shall keep records to demonstrate that the monthly throughput of gasoline is less than the 10,000-gallon threshold level. The permittee is not required to submit any notifications or reports, as specified in 40 CFR 63.11125, 63.11126, or Subpart A, but must have records available within 24 hours of a request by the DEQ to document the gasoline throughput.

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



## SECTION 6 REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
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 the DEQ shall be certified by a Responsible Official.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.4	Submit stack test reports
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.5	Submit annual reports

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 DEQ 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 the entire facility, the permittee shall submit stack test reports required by Conditions 5.6 and 5.7 for PM, PM<sub>10</sub> and PM<sub>2.5</sub> emissions within 60 days of completing the test.

As part of the test report, the permittee shall provide the average operating rate during testing of the process associated with the units being tested.

For all required testing, the permittee shall submit a written test protocol at least 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 DEQ in writing at least 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. 2.2.B(10).)

6.5. The permittee shall submit in accordance with the annual report required in Condition 6.2, the following information:

- (1) The total facility PM<sub>10</sub> emission rate in tons per year during each month and the rolling 12-month total along with a description of the method(s) used to determine the total facility PM<sub>10</sub> emission rate. The permittee shall use actual stack test data, if available, and actual production and/or actual operating hours to demonstrate compliance. If stack test data is not available, EPA or industry-approved emission factors may be used.
- (2) The amount of dog food produced monthly per Condition 5.2
- (3) The type and amount of fuel combusted in each combustion source and emissions in tons per year from each combustion source.

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