

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

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

**THIS CERTIFIES THAT**

Southwire Company LLC  
103 Airport Road  
Starkville, Mississippi  
Okibbeha 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**

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**AUTHORIZED SIGNATURE**  
**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Issued:** September 16, 2015

**Permit No.:** 2060-00002

**Modified:** \_\_\_\_\_

**Effective Date:** As specified herein.

**Expires:** August 31, 2020

Draft/Proposed

**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. Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)

11. 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).)

12. 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	Manufacturer of Insulated, Bare and Armored Copper and Aluminum Building Wire (Entire Facility)
AA-001	One (1) 10.461 MMBtu/hr Natural Gas-Fired Boiler
AA-002	One (1) 10.461 MMBtu/hr Natural Gas-Fired Boiler
AA-003	One (1) 4.55 MMBtu/hr Natural Gas-Fired Boiler
AA-007	Extrusion Operations
AA-008	One (1) 0.002 MMBtu/hr Natural Gas Fired Bake-off Oven
AA-012	Drawing Machines/Operations with Annealers
AA-013	Four (4) CV Lines/Operations (Lines C-1, C-2, C-3 and C-4)
AA-015	Armoring Lines/Operations
AA-016	Maintenance Welding Operations
AA-017	Blasting Operations
AA-018	Cooling Towers
AA-019	Curing Operations
AA-020	Tooling Cleaning Operations
AA-021	One (1) 5.6 MMBtu/hr Natural Gas Fired Annealing Oven
AA-022	Air Plasma Surface Treatment Operations
AB-007	One (1) 25,000 Gallon Diesel Fuel Tank
AB-008	One (1) 5,500 Gallon Polypropylene Tank
AD-001	One (1) 5.46 MMBtu/hr Diesel Fired Engine and Generator Set (ICE)
AD-002	One (1) 0.40 MMBtu/hr Diesel Fired Emergency Pump (ICE)



### SECTION 3 EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
AA-000 (Entire Facility)	11 Miss Admin. Code Pt. 2, R. 2.2.B(10).	3.1	NO <sub>x</sub>	99.0 TPY
		3.2	HAP	24.90 TPY combined
				9.90 TPY individual
AA-000 (Entire Facility)	11 Miss Admin. Code Pt. 2, R. 1.3.B.	3.3	Opacity	≤40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.4	PM	$E = 0.8808 * (I)^{-0.1667}$
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.5	PM	$E = 4.1 * (p)^{0.67}$
AA-000 (Facility-Wide Fuel Burning Sources)	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.6	SO <sub>2</sub>	4.8 lbs/MMBTU
	11 Miss Admin. Code Pt. 2, R.1.3.D(1)(a.).	3.7	PM	0.6 lbs/MMBtu
AA-001	40 CFR 60, Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units  40 CFR 60.40c(a)	3.8	SO <sub>2</sub>	Applicability
AD-001 and AD-002	40 CFR 63, Subpart ZZZZ: National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines  40 CFR 63.6585(b), 40 CFR 63.6590(a)(1)i, 40 CFR 63.6595(a)	3.9	HAPs	Applicability
	40 CFR 63.6625(h)	3.13		Operational Requirement
AD-001	40 CFR 63.6603(a)	3.10, 3.11	CO	23 ppmvd at 15 percent O <sub>2</sub> or reduce CO emissions by 70 percent
AD-002	40 CFR 63.6640	3.12		Emergency Operation Restriction

3.1 For Emission Point AA-000 (Entire Facility), the permittee shall limit emissions of total Nitrogen Oxides (NO<sub>x</sub>) to no more than 99.0 tons per year as determined for each rolling consecutive twelve-month period.

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

- 3.2 For Emission Point AA-000 (Entire Facility), the permittee shall limit emissions of Hazardous Air Pollutants (HAPs) to no more than 9.90 tons per year for each individual HAP and 24.9 tons per year for combined HAPs, as determined for each rolling consecutive twelve-month period.

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

- 3.3 For Emission Point AA-000 (Entire Facility), 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 Rule 1.3.A.(1).

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

- 3.4 For Emission Point AA-000 (Entire Facility), emissions from installations equal to or greater than 10 million BTU per hour heat input but less than 10,000 million BTU per hour heat input shall not exceed an emission rate as determined by the relationship

$$= 0.8808 * (I)^{-0.1667}$$

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. 1.3D(1)(b).)

- 3.5 For Emission Point AA-000 (Entire Facility), 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.

Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs.

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

- 3.6 For Emission Point AA-000 (Facility-Wide Fuel Burning Equipment), 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).)

- 3.7 For Emission Point AA-000 (Facility-Wide Fuel Burning Equipment), 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).)

- 3.8 For Emission Point AA-001, the permittee is subject to and shall comply with all applicable standards and provisions of 40 CFR 60, Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

(Ref.: 40 CFR 60.40c(a))

- 3.9 For Emission Points AD-001 and AD-002, the permittee is subject to and shall comply with all applicable standards and provisions of 40 CFR 63, Subpart ZZZZ: National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, as an existing source located at a major source of HAP emissions.

(Ref.: 40 CFR 63.6585(b), 40 CFR 63.6590(a)(1)i, 40 CFR 63.6595(a))

- 3.10 For Emission Point AD-001, as the operator of a non-emergency, non-black start compression ignition (CI) engine >500 HP, the permittee shall limit the concentration of CO in the stationary RICE exhaust to 23 ppmvd at 15 percent O<sub>2</sub> or reduce CO emissions by 70 percent or more for demonstrating compliance with 40 CFR 63, Subpart ZZZZ, specifically Table 2d.

(Ref.: 40 CFR 63.6603(a))

- 3.11 For Emission Point AD-001, If the permittee opts to comply with the requirement to reduce CO emissions using an oxidation catalyst, the permittee shall maintain the catalyst such that the pressure drop across the catalyst does not change by more than 2 inches of water at 100 percent load plus or minus 10 percent from the pressure drop across the catalyst that was measured during the prior compliance performance test; and maintain the temperature of the stationary RICE exhaust so that the catalyst inlet temperature is greater than or equal to 450 °F and less than or equal to 1350 °F, for demonstrating compliance with 40 CFR 63, Subpart ZZZZ, specifically Table 2b.

(Ref.: 40 CFR 63.6603(a))

- 3.12 For Emission Point AD-002, the permittee may operate as much as required during emergency situations. However, the permittee's use of Emission Point AD-002 is limited to 100 hours per year for any combination of maintenance checks, readiness testing, and other non-emergency use. Additionally, non-emergency use (excluding maintenance

checks and readiness testing) is limited to 50 hours per year. The use of Emission Point AD-002 for peak shaving, non-emergency demand response, and operating to generate income by supplying power to another facility is prohibited.

(Ref.: 40 CFR 63.6640)

- 3.13 For Emission Points AD-001 and AD-002, the permittee must minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

(Ref.: 40 CFR 63.6625(h))

**SECTION 4**  
**WORK PRACTICES**

<b>Emission Point</b>	<b>Applicable Requirement</b>	<b>Condition Number(s)</b>	<b>Pollutant/Parameter</b>	<b>Work Practice</b>
AD-002	40 CFR 63.6640	4.1		Required Maintenance and Inspections

4.1 For Emission Point AD-002, the permittee shall:

- (a) Change oil and filter every 500 hours of operation or annually, whichever comes first; and
- (b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
- (c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

However, if Emission Point AD-002 is operating during an emergency and it is not possible to shut down the engine in order to perform these work practice requirements, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the work practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.

(Ref.: 40 CFR 63.6640)

## SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
AA-000 (Entire Facility)	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, 5.3	VOC	Monthly Records of quantity of VOC- and HAP-containing material used, VOC and HAP content, and material density and calculation of monthly VOC and HAP emission rates
			HAPs	
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	5.4	NO <sub>x</sub>	Record monthly
AA-001	40 CFR 60.40c(g)(1)-(3), i	5.5	SO <sub>2</sub>	Record Fuel Usage
AA-007 and AA-019	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.6	VOC  Methanol	Use of 0.067 lb/hr for Emission Factor based on Stack Test Data
AD-001 and AD-002	40 CFR 63.6655(a), 40 CFR 63.6655(b), 40 CFR 63.6655(c), 40 CFR 63.6655(d), 40 CFR 63.6655(e), 40 CFR 63.6655(f), 40 CFR 63.6660(a), 40 CFR 63.6660(b), 40 CFR 63.6660(c)	5.12		Demonstrate Compliance and Recordkeeping
AD-001	40 CFR 63.6615, 40 CFR 63.6620	5.7		Performance Test
	40 CFR 63.6635(a), 40 CFR 63.6635(b), 40 CFR 63.6635(c), 40 CFR 63.6640(a), 40 CFR 63.6640(b), 40 CFR 63.6640(c)	5.8	CO	Reduce Carbon Monoxide emissions
AD-002	40 CFR 63.6640	5.9		Operational Maintenance
	40 CFR 63.6625(f)	5.10		Install a non-resettable hour meter
	11 Miss. Admin. Code Pt. 2, R. 6625(e)(2)	5.11		Operation Requirement
	40 CFR 63.6655(f)	5.13		Record hours of operation of the engine that is recorded through the non-resettable hour meter

5.1 For Emission Point AA-000 (Entire Facility), 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 (Entire Facility), the permittee shall determine for each coating, adhesive, solvent or other VOC or HAP containing material used, including VOC or HAPs that are generated as reaction by-products:

- (a) The quantity used (gallons);
- (b) The percentage of VOCs by weight;
- (c) The percentage of each individual HAP and total HAP by weight;
- (d) The density (lbs/gal);
- (e) The permittee shall calculate the VOC and HAP emissions from the use of these materials on a monthly basis and keep the 12-month rolling total in tons per year and compare the VOC and HAP emissions to those allowed under Conditions 3.1 and 3.2.

The permittee may utilize data supplied by the manufacturer, or analysis of VOC and HAP content by EPA Test Method 24, 40 CFR 60, Appendix A and/or EPA Test Method 311, 40 CFR 63, Appendix A, and/or an alternate EPA approved test method.

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

- 5.3 For Emission Point AA-000 (Entire Facility), the permittee shall maintain sufficient records to document:

- (a) The identification of each coating, adhesive, solvent or other VOC or HAP containing material and the total gallons of each coating, adhesive, solvent or other VOC or HAP containing material used, including VOC or HAPs that are generated as reaction by-products, on a monthly basis and in each consecutive 12-month period;
- (b) The VOC and HAP content(s) of each coating, adhesive, solvent or other VOC or HAP containing material used, including VOC or HAPs that are generated as reaction by-products. A description of the method used to determine the VOC and HAP content shall accompany this data;
- (c) The density of each coating, adhesive, solvent or other VOC or HAP containing material used, including VOC or HAPs that are generated as reaction by-products;
- (d) The total VOC emission rate, the emission rate of each individual HAP and the total HAP emission rate in tons per year (tpy) for each consecutive 12-month period.

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

- 5.4 For Emission Point AA-000 (Entire Facility), the permittee shall record on a monthly basis the NO<sub>x</sub> emissions as determined by a 12-month consecutive basis. The permittee shall calculate the NO<sub>x</sub> emissions from the use of fuel on a monthly basis and keep the 12-month rolling total in tons per year.

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

- 5.5 For Emission Point AA-001, the permittee shall record and maintain records of the amount of each fuel combusted according to the requirements of 40 CFR 60.48c(g)(1)-(3).

(Ref.: 40 CFR 60.40c(g)(1)-(3))

- 5.6 For Emission Points AA-007 and AA-019, the permittee shall utilize the 1994 Stack Test performed on a Moisture Cure Cross-Linked Polyethylene (MC XLPE) Extrusion Line at its facility in Carrollton, Georgia, for determining the Volatile Organic Compound (VOC) and Methanol Emission Rates. The Stack Test data for VOCs and Methanol will serve as a VOC and Methanol Emission Factor of 0.067 lb/hr for these emission points only and for determining these particular VOC and Hazardous Air Pollutant (HAP) emissions. The emissions will also be determined accordingly utilizing production data.

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

- 5.7 For Emission Point AD-001, the permittee shall conduct subsequent performance tests every 8,760 hours of operation or 3 years, whichever comes first, as specified in Table 3 of 40 CFR 63, Subpart ZZZZ and shall also utilize the procedures specified in 40 CFR 63.6620 during the performance test.

(Ref.: 40 CFR 63.6615, 40 CFR 63.6620)

- 5.8 For Emission Point AD-001, the permittee shall monitor, collect data, and keep the following records for demonstrating continuous compliance with the emission limitations and operating limitations according to the requirements of 40 CFR 63.6635 and 63.6640, specifically Table 6, Sections 9(a) and 10(a). For Emission Point AD-001, Section 10(a) states that the permittee shall perform the following for reducing Carbon Monoxide Emission:

- (1) Conduct performance tests every 8,760 hours or 3 years, whichever comes first, for CO to demonstrate that the required CO percent reduction is achieved; and
- (2) Collect the catalyst inlet temperature data according to 40 CFR 63.6625(b); and
- (3) Reduce this data to 4-hour rolling averages; and
- (4) Maintain the 4-hour rolling averages within the operating limitations for the catalyst inlet temperature; and



- (5) Measure the drop across the catalyst once per month and demonstrating that the pressure drop across the catalyst is within the operating limitation established during the performance test.

The permittee shall maintain all records on site for a period of five (5) years and shall make these records available upon request by MDEQ personnel.

(Ref.: 40 CFR 63.6635(a), 40 CFR 63.6635(b), 40 CFR 63.6635(c), 40 CFR 63.6640(a), 40 CFR 63.6640(b), 40 CFR 63.6640(c), 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(2))

- 5.9 For Emission Point AD-002, the permittee shall install a non-resettable hour meter if one is not already installed.

(Ref.: 40 CFR 63.6625(f))

- 5.10 For Emission Point AD-002, the permittee must operate and maintain the engine according to the manufacturer's emission-related written instructions or develop its 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.: 11 Miss. Admin. Code Pt. 2, R. 6625(e)(2))

- 5.11 For Emission Point AD-002, the permittee shall keep the following records for demonstrating compliance with 40 CFR 63, Subpart ZZZZ:

- (a) The permittee shall keep the records described in paragraphs (a)(1) through (a)(5), (b)(1) through (b)(3) and (c) of this section.
- (1) A copy of each notification and report that the permittee submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted, according to the requirement in 40 CFR 63.10(b)(2)(xiv).
  - (2) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.
  - (3) Records of performance tests and performance evaluations as required in 40 CFR 63.10(b)(2)(viii).
  - (4) Records of all required maintenance performed on the air pollution control and monitoring equipment.
  - (5) Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

- (b) For each CPMS, the permittee shall keep the records listed in paragraphs (b)(1) through (3) of this section.
  - (1) Records described in 40 CFR 63.10(b)(2)(vi) through (xi).
  - (2) Previous (i.e., superseded) versions of the performance evaluation plan as required in 40 CFR 63.8(d)(3).
  - (3) Requests for alternatives to the relative accuracy test for CPMS as required in 40 CFR 63.8(f)(6)(i), if applicable.
- (c) The permittee shall keep the records required in Table 6 of this subpart to show continuous compliance with each emission or operating limitation that applies to the permittee.

(Ref.: 40 CFR 63.6655(a), 40 CFR 63.6655(b), 40 CFR 63.6655(c), 40 CFR 63.6655(d), 40 CFR 63.6655(e), 40 CFR 63.6655(f))

- 5.12 For Emission Point AA-001, the permittee shall keep records in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1), and for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee shall also keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1).

(Ref.: 40 CFR 63.6660(a), 40 CFR 63.6660(b), 40 CFR 63.6660(c))

- 5.13 For Emission Point AD-002, the permittee must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency, and how many hours are spent for non-emergency operation. Additionally, the permittee must keep records of the notification of the emergency situation(s), and the date(s), start time(s), and end time(s) of engine operation for these purposes.

(Ref.: 40 CFR 63.6655(f))

## 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(10).	6.4	Annual report of NOx emission rate
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.5	Annual report of quantity of VOC- and HAP-containing material used, VOC and HAP content, and material density and calculation of monthly VOC and HAP emission rates
AA-001	40 CFR 60.48c(a)	6.6	Semi-annual Report of Fuel Usage
AD-001 and AD-002	40 CFR 63.6645(a)	6.7	Reporting Requirements
	40 CFR 63.6645(g)	6.8	Notify and Conduct Performance Testing
	40 CFR 63.6645(h)(2)	6.9	Submit Compliance Status Notification
	40 CFR 63.6650(a), 40 CFR 63.6650(b))	6.10	Semi-annual reporting
	40 CFR 63.6650(d)	6.11	Report deviations for the RICE
AD-002	40 CFR 63.6650	6.12	Submit annual report

6.1 For Emission Point AA-000 (Entire Facility), 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 For Emission Point AA-000 (Entire Facility), 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 For Emission Point AA-000 (Entire Facility), 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 (Entire Facility), the permittee shall submit an annual monitoring report providing the NO<sub>x</sub> emission rate as determined by a 12-month consecutive basis. The report is due annually by the 31st of January for the preceding calendar year.

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

- 6.5 For Emission Point AA-000 (Entire Facility), the permittee shall submit a monitoring report due annually by the 31st of January for the preceding calendar year. This report shall provide the following:

- (a) The identification of each coating, adhesive, solvent or other VOC or HAP containing material used, including VOC or HAPs that are generated as reaction by-products;
- (b) The VOC and HAP content(s) of each coating, adhesive, solvent, or other VOC or HAP containing material used, including VOC or HAPs that are generated as reaction by-products;
- (c) The total gallons of each coating, adhesive, solvent or other VOC or HAP containing material used, including VOC or HAPs that are generated as reaction by-products in each consecutive 12-month period;
- (d) The total VOC emission rate, the emission rate of each individual HAP and the total HAP emission rate in tons per month and tons per year (tpy) for each consecutive 12-month period.

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

- 6.6 For Emission Point AA-001, the permittee shall submit a semi-annual report according to the requirements listed in 40 CFR 60.48c(j). These reports report must be postmarked or delivered no later than July 31 or January 31.

(Ref.: 40 CFR 60.48(c))

- 6.7 For Emission Points AD-001 and AD-002, the permittee shall submit all of the notifications in 40 CFR 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9(b) through (e), and (g) and (h) that apply to the permittee.

(Ref.: 40 CFR 63.6645(a))

- 6.8 For Emission Points AD-001 and AD-002, if the permittee is required to conduct a performance test, the permittee shall submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin as required in 40 CFR 63.7(b)(1).

(Ref.: 40 CFR 63.6645(g))

- 6.9 For Emission Points AD-001 and AD-002, the permittee shall submit a Notification of Compliance Status according to 40 CFR 63.9(h)(2)(ii). For each subsequent compliance demonstration required in Table 5 to this subpart that includes a performance test conducted according to the requirements in Table 3 to this subpart, the permittee shall submit the Notification of Compliance Status, including the performance test results, before the close of business on the 60th day following the completion of the performance test according to 40 CFR 63.10(d)(2).

(Ref.: 40 CFR 63.6645(h)(2))

- 6.10 For Emission Points AD-001 and AD-002, the permittee shall submit each report according to the requirements of Table 7 of 40 CFR 63, Subpart ZZZZ, and according to the following requirements:

- (1) For semiannual Compliance reports, the first Compliance report must cover the period beginning on the compliance date that is specified for your affected source in 40 CFR 63.6595 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for your source in 40 CFR 63.6595.
- (2) For semiannual Compliance reports, the first Compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for your affected source in 40 CFR 63.6595.
- (3) For semiannual Compliance reports, each subsequent Compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
- (4) For semiannual Compliance reports, each subsequent Compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

(Ref.: 40 CFR 63.6650(a), 40 CFR 63.6650(b))

6.11 For Emission Points AD-001 and AD-002, for each deviation from an emission or operating limitation that occurs for a stationary RICE where you are not using a CMS to comply with the emission or operating limitations in this subpart, the Compliance report shall contain the following:

- (1) The total operating time of the stationary RICE at which the deviation occurred during the reporting period; and
- (2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

(Ref.: 40 CFR 63.6650(d))

6.12 For Emission Point AD-002, the permittee shall submit an annual report according to the requirements listed in 40 CFR 63.6650(h).

(Ref.: 40 CFR 63.6650)