

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

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

**THIS CERTIFIES THAT**

Olin Winchester LLC  
411 County Road 101  
Oxford, Mississippi 38655

(Lafayette 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: December 28, 2016**

**Permit No.: 1420-00029**

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

**Expires: November 30, 2021**

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## SECTION 1. GENERAL CONDITIONS

1. Any activities not identified in the application are not authorized by this permit. (Ref.: Miss. Code Ann. 49-17-29 1.b)
2. The permittee shall at all times maintain in good working order and operate as efficiently as possible all air pollution control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A.)
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 & ii))
4. Any diversion from or bypass of collection and control facilities is prohibited except as provided for in Regulation 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.)
5. Should the Executive Director of the Mississippi Department of Environmental Quality (MDEQ) declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.10.)
6. The permittee shall allow the MDEQ Office of Pollution Control and the MDEQ 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)
7. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:
  - a. Violation of any terms or conditions of this permit;
  - b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
  - c. A change in any condition that required either a temporary or permanent reduction or

elimination of authorized air emissions. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.C.)

8. 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 MDEQ Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.8.)
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 MDEQ Office of Pollution Control. (Ref.: Miss. Code Ann. 49-17-39)
10. 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).)
11. 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).)
12. This permit may only be transferred upon approval of the MDEQ Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B.)
13. This permit is for air pollution control purposes only. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(1).)
14. This permit is a Federally-approved permit to operate a synthetic minor source as described in Regulation 11 Miss. Admin. Code Pt. 2, R. 2.4.D. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.4.D.)
15. This permit and/or any part thereof may be modified, revoked, reopened and reissued, or terminated for cause. Sufficient cause for this permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).)
16. 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).)
17. The permittee shall furnish to MDEQ within a reasonable time any information MDEQ

may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to MDEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to MDEQ along with a claim of confidentiality. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).)

18. 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).)
19. 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.)
20. 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).)
21. 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 Emissions Equipment." Modification is defined as "any physical change in or change in the method of operation of a facility which increases actual emissions or potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:
  - a. Routine maintenance, repair, and replacement;
  - b. Use of any 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:
- 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 Regulation 40 CFR 52.21 or under regulations approved pursuant to Regulation 40 CFR 51.166; or
  - The source is approved to use under any permit issued under Regulation 40 CFR 52.51 or under regulations approved pursuant to Regulation 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 Regulation 40 CFR 52.51, or under regulations approved pursuant to Subpart I or Regulation 40 CFR 51.166; or
- f. Any change in ownership of the stationary source.” (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(2).)

22. Emergencies:

- a. Except as otherwise specified herein, an emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error;
- b. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in paragraph c below are met:
- c. The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence as follows:
- An emergency occurred and that the permittee can identify the cause(s) of the emergency;
  - The permitted facility was at the time being properly operated;
  - During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

- The permittee submitted notice of the emergency to MDEQ within two (2) working days of the time when emission limitations were exceeded due to the emergency which contained a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken;
- d. In any enforcement proceeding, the permittee seeking to establish the occurrence of any emergency has the burden of proof;
- e. This provision is in addition to any emergency or upset provision contained in any application requirement specified elsewhere herein. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

23. Upsets:

- a. The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
  - An upset occurred and that the permittee can identify the cause(s) of the upset;
  - The source was at the time being properly operated;
  - During the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; and
  - The permittee submitted notice of the upset to MDEQ within five (5) working days of the time the upset began which contained a description of the upset, any steps taken to mitigate emissions, and corrective actions taken;
- b. In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof;
- c. This provision is in addition to any upset provision contained in any applicable requirement. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

24. Startups and Shutdowns:

- a. Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows:
  - When sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements in

Condition 23 above;

- When a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or
  - When the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit;
- b. In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof;
- c. In the event this startup or shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply. (Ref.: 11 Miss. Admin. Code Pt. 2, R.1.10.)

25. Maintenance:

- a. Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following:
- The permittee can identify the need for the maintenance;
  - The source was at the time being properly operated;
  - During the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; and
  - The permittee submitted notice of the maintenance to MDEQ within five (5) working days of the time the maintenance began or such other times as allowed by MDEQ, which contained a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken;
- b. In any enforcement proceeding, the permittee seeking to establish the applicability of this Condition has the burden of proof;
- c. In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. (Ref.: 11 Miss. Admin. Code Pt. 2, R.



1.10.)

## SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

### Manufacturing Processes:

Emission Point	Description
AA-001	Billet System (including: 4 sow melt kettles, 4 billet melt kettle furnaces, 3 tundishes, 3 hydron continuous billet casters, baghouses)
AA-002	Bonded Bullet Operations (including: lines BB-1 to BB-4, 1 baghouse)
AA-004	Cobmeal Bullet Tumblers with Solvent (including: 6 tumblers (2 with pollution control devices and 4 without pollution control devices))
AA-005	Cobmeal Bullet Tumblers without Solvent (including: <del>2</del> <u>3</u> tumblers)
AA-008	Ballistic Test Ranges (including: Rimfire ranges (R-1 to R-4), Centerfire ranges (C-1 to C-8))
AA-009	Baird Tubs (including: 66 tubs)
AA-010	Extrusion Presses and Tumblers (including: 5 presses (EP-1 to EP-5), 5 tumblers (EPT-1 to EPT-5))
AA-011	Progressive Die Press (including: 12 presses (PDP-1 to PDP-12))
AA-012	Bulk Sulfuric Acid Storage Tanks (including: 2 tanks (SAT-1 & SAT-2))
AA-013	Lime Storage Silo (including: 1 silo (S-1), 1 fabric filter (FF-1))
AA-014	Metallic Shellcase Polishers (including: 2 polishers)
AA-015	Cooling Towers (including: 3 towers (CT-1 to CT-3))
AA-016	Spin Prime (including: 20 process lines)
AA-017	Carton and Can Printers
AA-018	High Explosives 1

Emission Point	Description
AA-019	High Explosives 2
AA-020	Vibratory Polisher
AA-021	Tumbler 7.62 with Acetone Rags
AA-022	Draw Operation
AA-023	Buckshot Tumbler without Solvent

**Fuel Burning Equipment:**

Emission Point	Description
AB-001	10.2 MMBTU/hr (3,000 kW) Natural Gas-fired (SI) Package Boiler B-1
AB-002	10.2 MMBTU/hr (3,000 kW) Natural Gas-fired (SI) Package Boiler B-2
AB-003	16.3 MMBTU/hr (4,800 kW) Natural Gas-fired (SI) Package Boiler B-3
AB-004	0.512 MMBTU/hr (150 kW) Natural Gas-fired (SI) Emergency Generator
AB-005	0.887 MMBTU/hr (260 kW) Diesel-fired (CI) Emergency Fire Pump
AB-006	Various Natural Gas-fired (SI) Process Heaters, Dryers, Boilers, Ovens, and Furnaces ranging from 0.15 to 2.5 MMBTU/hr
AB-007	Various Natural Gas-fired (SI) Space Heaters used for climate control
AB-008	0.85 MMBTU/hr (250 kW) Diesel-fired (CI) Emergency Wastewater Generator

**Coating, Solvent Usage, and/or Degreasing:**

Emission Point	Description
AC-001	Power Tools (including: 4 loading complexes (LC-1 to LC-4))
AC-002	Gauge and Weigh Lines (including: 25 lines (GW-1 to GW-25))
AC-003	Cappers (CAP-1 to CAP-80)

Emission Point	Description
AC-004	50 Cal Cappers (50CA-1 to 50CA-3)
AC-005	Tip ID (including: 4 lines (TIP-1 to TIP-4))
AC-007	Bullet Swagers (including: 45 swaging units (SW-1 to SW-45))
AC-008	Cleaning Solvents
AC-009	Deprime Operations (including: 1 tank (DP-1))
AC-010	Steel Headers (including: 3 units)

**Groups of Emission Points:**

Group of Emission Points	Group Description	Individual Emission Point	Individual Description
GRPT1	Emergency Equipment	AB-004	0.512 MMBTU/hr (150 kW) Natural Gas-fired (SI) Emergency Generator
		AB-005	0.887 MMBTU/hr (260 kW) Diesel-fired (CI) Emergency Fire Pump
		AB-008	0.85 MMBTU/hr (250 kW) Diesel-fired (CI) Emergency Wastewater Generator
GRPT2	Package Boilers greater than 10 MMBTU/hr	AB-001	10.2 MMBTU/hr (3,000 kW) Natural Gas-fired (SI) Package Boiler B-1
		AB-002	10.2 MMBTU/hr (3,000 kW) Natural Gas-fired (SI) Package Boiler B-2
		AB-003	16.3 MMBTU/hr (4,800 kW) Natural Gas-fired (SI) Package Boiler B-3

## SECTION 3. EMISSION LIMITATIONS & STANDARDS

### A. Facility-Wide Emission Limitations & Standards

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 1.3.A(1,2).)	3.A.1	Opacity	$\leq 40\%$
	11 Miss Admin. Code Pt. 2, R. 1.3.B.	3.A.2		
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.A.3	PM	$E = 4.1 * (p)^{0.67}$
Facility-Wide Fuel Burning Sources	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.A.4	SO <sub>2</sub>	4.8 lbs/MMBTU
	11 Miss Admin. Code Pt. 2, R.1.3.D(1)(a.).	3.A.5	PM	0.6 lbs/MMBtu
Facility-Wide	11 Miss Admin. Code Pt. 2, R. 2.2.B(10).	3.A.6	VOC	99.0 TPY
		3.A.7	HAP	24.90 TPY combined
		3.A.8		9.90 TPY individual

3.A.1. Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial, or waste disposal process which exceeds forty (40) percent opacity. 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(1,2).)

3.A.2. Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Condition 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)

3.A.3. Except as otherwise specified, no person shall cause, permit, or allow the emission of particulate matter (PM) in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to

exceed the amount determined by the relationship  $E = 4.1 * p^{0.67}$ , where E is the emission rate in pounds per hour and p is the process weight input 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.A.4. 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.A.5. The maximum permissible emission of ash and/or PM 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.A.6. The permittee shall limit total volatile organic compound (VOC) emissions to no more than 99.0 tons per year as determined for each consecutive 12-month period. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 3.A.7. The permittee shall limit total (combined) hazardous air pollutant (HAP) emissions to no more than 24.90 tons per year as determined for each consecutive 12-month period. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 3.A.8. The permittee shall limit emissions of any single HAP to no more than 9.90 tons per year as determined for each consecutive 12-month period. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

**B. Emission Point-Specific Emission Limitations & Standards**

Group of Emission Points OR Individual Emission Point	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard
GRPT1	National Emission Standards of Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ.  40 CFR 63.6580, 40 CFR 63.6585(a) & (c), 40 CFR 63.6590(a)(1)(iii) & (2)(iii) & (c)(1)	3.B.1	HAPs	Applicability
	40 CFR 63.6603(a), 40 CFR 63.6625(i), Table 2d and footnotes 1 & 2 of Table 2d of Subpart ZZZZ	3.B.2	HAPs	Work Practices
	40 CFR 63.6640(f)(1) & (2)(i) & (3), 40 CFR 63.6605(a) & (b)	3.B.3	Non-Emergency Use	100 hours per calendar year maximum for maintenance checks and readiness testing 50 hours per calendar year in non-emergency situations, to be counted as part of the total 100 hours per calendar year
	40 CFR 63.6625(e)(3) & (f) & (h), 40 CFR 63.6640(a), Table 2d & Table 6 of Subpart ZZZZ	3.B.4	HAPs	Operations, Install Non-resettable meter
	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart JJJJ  40 CFR 60.4230(a)(4)(iii) & (6)	3.B.5	NOx, CO and VOCs	Applicability
	40 CFR 60.4233(e), 40 CFR 60.4236(a), 40 CFR 60.4234	3.B.6	NOx, CO and VOCs	Operations
	40 CFR 60.4243(d)(1) – (3)	3.B.7	Non-Emergency Use	100 hours per calendar year maximum for maintenance checks and readiness testing 50 hours per calendar year in non-emergency situations, to be counted as part of the total 100 hours per calendar year
	40 CFR 60.4237(c)	3.B.8	NOx, CO and VOCs	Non-resettable meter

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Group of Emission Points OR Individual Emission Point	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard
GRPT1	40 CFR 60.4200(a)(2)(i)	3.B.9	NO <sub>x</sub> , CO and VOCs	Applicability
	40 CFR 60.4205(b), 40 CFR 60.4202(a)(2), 40 CFR 60.4206, 40 CFR 89.112(a), 40 CFR 89.113(a)	3.B.10	Opacity	20 percent during acceleration mode; 15 percent during the lugging mode; and 50 percent during the peaks in either the acceleration or lugging modes.
	40 CFR 60.4207(b), 40 CFR 80.510(b)(1)(i) & (2)	3.B.11	SO <sub>2</sub>	Fuel Restriction
	40 CFR 60.4209(a)	3.B.12	NO <sub>x</sub> , CO and VOCs	Non-resettable meter
	40 CFR 60.4211(a)(1) – (3)	3.B.13	NO <sub>x</sub> , CO and VOCs	Operations
	40 CFR 60.4211(f)(1) – (3)	3.B.14	Non-Emergency Use	100 hours per calendar year maximum for maintenance checks and readiness testing 50 hours per calendar year in non-emergency situations, to be counted as part of the total 100 hours per calendar year
GRPT2	40 CFR 60 Subpart Dc, National Standards of Performance for Small Industrial, Commercial, Institutional Steam Generating Units 40 CFR 60.40c(a)	3.B.15	SO <sub>2</sub>	Applicability
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.B.16	PM	State Air Emissions Regulations
AA-013	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.B.17	PM	Operating Limit

3.B.1. GRPT1 is subject to and shall comply with all applicable requirements of the National Emission Standards of Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ.

For purposes of this subpart, Emission Point AB-004 is a new, spark ignition (SI), emergency, stationary RICE with a site rating of less than 500 HP located at an area source of HAP emissions; Emission Point AB-005 is an existing, compression ignition (CI), emergency, stationary RICE with a site rating of less than 500 HP located at an area

source of HAP emissions; and Emission Point AB-008 is a new, CI, emergency, stationary RICE with a site rating of less than 500 HP located at an area source of HAP emissions.

As such, Emission Point AB-004 shall meet the requirements of Subpart ZZZZ by complying with the applicable requirements of the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart JJJJ. Emission Point AB-008 shall meet the requirements of Subpart ZZZZ by complying with the applicable requirements of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart IIII. There are no other applicable provisions from Subpart ZZZZ for these two Emission Points. (Ref.: 40 CFR 63.6580, 63.6585(a) & (c), 63.6590(a)(1)(iii) & (2)(iii) & (c)(1))

3.B.2. For Emission Point AB-005, the permittee shall comply with the following requirements:

- a. Change oil and filter every 500 hours of operation or annually, whichever comes first or perform an oil analysis at the same frequency in order to extend the oil change requirement. If the permittee chooses to use the oil analysis in an effort to extend the oil/filter change requirement, the results of the analysis must verify the oil still meets the limits contained in (1) through (3) below. If any of these limits are exceeded, the oil must be changed within two business days of receiving the results of the analysis. If the engine is not in operation when the results are received, the oil must be changed within two business days or before commencing operation, whichever is later. The oil analysis program must be included in the engine's maintenance plan required in Condition 5.B.1;
  - (1) Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from the Total Acid Number when new;
  - (2) Viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new;
  - (3) Percent water content (by volume) is greater than 0.5.
- 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.

If an engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practices according to the schedule in paragraphs a through c above, 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 has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk has abated. (Ref.: 40 CFR 63.6603(a), 63.6625(i), Table 2d and footnotes 1 & 2 of Table 2d of Subpart ZZZZ)

- 3.B.3. For Emission Point AB-005, 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, and operation in non-emergency situations for 50 hours per year, as described below, is prohibited. If the permittee does not operate the engine according to these requirements, the engine will not be considered an emergency engine under Subpart ZZZZ and must meet all requirements for non-emergency engines:
- a. There is no time limit on the use of emergency stationary RICE in emergency situations;
  - b. The permittee may operate the emergency stationary RICE for maintenance checks and readiness testing for a maximum of 100 hours per calendar year 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 MDEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records that demonstrate there is a particular requirement under a previously listed authority that requires the engine to operate for more than 100 hours per calendar year;
  - c. The emergency engine may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph b above. 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 supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

The permittee shall, at all times, be in compliance with the applicable requirements of Subpart ZZZZ and shall 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 the permittee to make any further efforts to reduce emissions if levels required by Subpart ZZZZ have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to 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 63.6640(f)(1) & (2)(i))

& (3), 63.6605(a) & (b))

3.B.4. For Emission Point AB-005, the permittee shall comply with the following requirements:

- a. Operate and maintain the engine according to the manufacturer's emission-related operation and maintenance instructions, or the permittee shall develop and follow a maintenance plan which is consistent with good air pollution control practices for minimizing emissions;
- b. The permittee shall install and maintain a non-resettable hour meter on the engine;
- c. The permittee shall also 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(e)(3) & (f) & (h), 63.6640(a), Table 2d & Table 6 of Subpart ZZZZ)

3.B.5. Emission Point AB-004 is subject to and shall comply with all applicable requirements of the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart JJJJ. (Ref.: 40 CFR 60.4230(a)(4)(iii) & (6))

3.B.6. For Emission Point AB-004, the permittee shall certify that the engine meets the emission standards and other applicable requirements for new non-road SI engines given in Table 1 of Subpart JJJJ. The permittee shall operate and maintain the engine such that it achieves the emission standards from Table 1 of Subpart JJJJ over the entire life of the engine. (Ref.: 40 CFR 60.4233(e), 60.4236(a), 60.4234)

3.B.7. For Emission Point AB-004, the permittee shall operate the emergency engine in accordance with the requirements below. In order to be considered an emergency engine under Subpart JJJJ, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations in excess of 50 hours per year, as described below, is prohibited. If the permittee does not operate the engine according to these requirements, the engine will not be considered an emergency engine under Subpart JJJJ and must meet all applicable requirements for non-emergency engines:

- a. There is no time limit on the use of an emergency engine in emergency situations;
- b. The permittee may operate the emergency engine for a maximum of 100 hours per calendar year for maintenance checks and readiness testing, provided the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. The permittee may petition MDEQ for additional hours for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records that demonstrate there is a particular requirement under a previously listed authority that requires the engine to operate for more than 100 hours per calendar year;

- c. The permittee may operate the engine for up to 50 hours per calendar year in non-emergency situations. The 50 hours per year of operation in non-emergency situations are counted as part of the 100 hours per calendar year allowed in paragraph b above. 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 supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity unless all conditions of 40 CFR 60.4243(d)(3)(i)(A) through (E) are met. (Ref.: 40 CFR 60.4243(d)(1) – (3))
- 3.B.8. For Emission Point AB-004, the permittee shall install a non-resettable hour meter. (Ref.: 40 CFR 60.4237(c))
- 3.B.9. Emission Point AB-008 is subject to and shall comply with all applicable requirements of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart IIII. (Ref.: 40 CFR 60.4200(a)(2)(i))
- 3.B.10. For Emission Point AB-008, the permittee shall comply with the emission standards for new non-road compression ignition (CI) engines by certifying the engine meets the Tier 3 standards for 225 – 450 kW engines from Table 1 of 40 CFR 89.112.
- The engine must also meet the following exhaust opacity limits:
- a. 20 percent during acceleration mode;
  - b. 15 percent during the lugging mode; and
  - c. 50 percent during the peaks in either the acceleration or lugging modes.
- The permittee shall operate and maintain the engine such that it achieves the emission standards over the entire life of the engine. (Ref.: 40 CFR 60.4205(b), 60.4202(a)(2), 60.4206, 40 CFR 89.112(a), 89.113(a))
- 3.B.11. For Emission Point AB-008, the permittee shall use diesel fuel that meets the following requirements:
- a. Sulfur content of 15 ppm maximum; and
  - b. Minimum cetane index of 40 **OR** Maximum aromatic content of 35 volume percent. (Ref.: 40 CFR 60.4207(b), 40 CFR 80.510(b)(1)(i) & (2))
- 3.B.12. For Emission Point AB-008, the permittee shall install a non-resettable hour meter prior to startup of the engine. (Ref.: 40 CFR 60.4209(a))
- 3.B.13. For Emission Point AB-008, the permittee shall operate and maintain the engine according to the manufacturer's emission-related written instructions, change only those

emission-related settings that are permitted by the manufacturer, and meet the requirements of Condition 3.B.10. (Ref.: 40 CFR 60.4211(a)(1) – (3))

3.B.14. For Emission Point AB-008, the permittee shall operate the emergency engine according to paragraphs a through c below. In order for the engine to be considered an emergency stationary engine under Subpart IIII, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year as described below is prohibited. If the permittee does not comply with these requirements, the engine will not be considered an emergency engine under Subpart IIII and must meet all requirements for a non-emergency engine.

- a. There is no time limit on the use of the emergency stationary engine in emergency situations;
- b. The permittee may operate the emergency engine for maintenance checks and readiness testing for a maximum of 100 hours per calendar year 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 MDEQ for additional hours for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records that demonstrate there is a particular requirement under a previously listed authority that requires the engine to operate for more than 100 hours per calendar year;
- c. The emergency engine may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and readiness testing provided in paragraph b above. The 50 hours per calendar 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 unless all the conditions in 40 CFR 60.4211(f)(3)(i)(A) through (E) are met. (Ref.: 40 CFR 60.4211(f)(1) – (3))

3.B.15. For GRPT2, the permittee is subject to and shall comply with all applicable requirements of Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR Part 60, Subpart Dc. (Ref.: 40 CFR 60.40c(a))

3.B.16. For GRPT2, the maximum permissible emission of ash and/or PM from fossil fuel burning installations equal to or greater than 10 million BTU per hour heat input shall not exceed an emission rate as determined by the relationship  $E = 0.8808 \cdot I^{-0.1667}$ , where E is the emission rate in pounds per million BTU per hour heat input and I is the heat input in millions of BTU per hour. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).)

3.B.17. For Emission Point AA-013, Lime Storage Silo, the permittee shall not fill more often than four (4) hours per week. Furthermore, Emission Point AA-013 shall only be filled when fabric filter FF-1 is attached and operating efficiently. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

## **SECTION 4. COMPLIANCE SCHEDULE**

- 4.1. Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.

## SECTION 5. MONITORING, RECORDKEEPING, & REPORTING REQUIREMENTS

### A. Facility-Wide Monitoring, Recordkeeping, and Reporting Requirements

5.A.1. For the entire facility, the permittee shall determine the following for each VOC or HAP containing coating, adhesive, solvent, or other VOC or HAP containing material used:

- a. Quantity used (gallons);
- b. The percentage of VOC by weight;
- c. The percentage of HAP by weight; and
- d. The density (lb/gallon).

The permittee may utilize data supplied by the manufacturer, analysis of VOC and/or HAP content by an approved US EPA or State method, or, in lieu of using testing or manufacturer's data to assign a VOC and/or HAP percentage to a material (covered by this Condition), assign a 100% VOC and/or HAP content by weight to the material. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.A.2. The permittee shall monitor the pressure drop across the baghouses associated with Emission Points AA-001 and AA-002 monthly to enable optimum pollutant emission control. Additionally, the High Efficiency Particulate Filter System associated with the two Cobmeal Bullet Tumblers at Centerfire Lead Works (part of Emission Point AA-004) shall be operated and maintained properly according to the manufacturer's instructions. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.A.3. For the entire facility, the permittee shall maintain sufficient records to document:

- a. Identification of each VOC and/or HAP containing coating, adhesive, solvent, or other VOC and/or HAP containing material used, and the total quantity in gallons of each coating, adhesive, solvent, or other VOC and/or HAP containing material used on a monthly basis and in any consecutive 12-month period;
- b. The VOC and/or HAP content(s) of each VOC and/or HAP containing coating, adhesive, solvent, or other VOC and/or HAP containing material used. A description of the method used to determine the VOC and/or HAP content shall accompany this data; and
- c. The density of each VOC and/or HAP containing coating, adhesive, solvent, or other VOC and/or HAP containing material used. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

- 5.A.4. For the entire facility, the permittee shall maintain copies of all records and reports on-site for at least five (5) years and shall make them available upon request by MDEQ personnel and/or their authorized representatives, upon the presentation of credentials. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 5.A.5. For the entire facility, the permittee shall submit a monitoring report due annually by the 31<sup>st</sup> of January for the preceding calendar year. This report shall provide the following:
- a. Identification of each VOC and/or HAP containing coating, adhesive, solvent, or other VOC and/or HAP containing material used;
  - b. The VOC and/or HAP content(s) of each VOC and/or HAP containing coating, adhesive, solvent, or other VOC and/or HAP containing material used;
  - c. The total quantity in gallons of each VOC and/or HAP containing coating, adhesive, solvent, or other VOC and/or HAP containing material used in any consecutive 12-month period; and
  - d. The total VOC emission rate, the emission rate of each individual HAP, and the total (combined) HAP emission rate in tons per year based on any consecutive 12-month period. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 5.A.6. 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. This report shall be made and submitted within five (5) working days of the time the deviation began. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 5.A.7. Except as otherwise specified herein, the permittee shall submit a certified annual synthetic minor monitoring report. This report is due annually by the 31<sup>st</sup> of January for the preceding calendar year. This report shall address any required monitoring specified in this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)



**B. Emission Point-Specific Monitoring, Recordkeeping, and Reporting Requirements**

Group of Emission Points	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping/Reporting Requirement
GRPT1	40 CFR 63.6655(a) & (e)(2)	5.B.1	HAPs	Recordkeeping to demonstrate compliance with 3.B.2 and 3.B.4
	40 CFR 63.6655(f)	5.B.2	HAPs	Record hours of operation and reason for operation
	40 CFR 63.6640(b), footnote 2 of Table 2d of Subpart ZZZZ	5.B.3	HAPs	Work Practice Standards
	40 CFR 60.4243(a) & (f)	5.B.4	NO <sub>x</sub> , CO and VOCs	Operations
	40 CFR 60.4245(a)(1) – (3)	5.B.5	NO <sub>x</sub> , CO and VOCs	Recordkeeping
	40 CFR 60.4211(c)	5.B.6	NO <sub>x</sub> , CO and VOCs	Install certified engine
	40 CFR 60.4214(b)	5.B.7	NO <sub>x</sub> , CO and VOCs	Record hours of operation and reason for operation
GRPT2	40 CFR 60.48c(g)(1) – (3)	5.B.8	SO <sub>2</sub>	Recordkeeping
	40 CFR 60.7(a)(4)	5.B.9	SO <sub>2</sub>	Deviations

5.B.1. For Emission Point AB-005, the permittee shall keep the following records:

- a. A copy of each record submitted to comply with Subpart ZZZZ;
  - b. Records of the occurrence and duration of each malfunction of operation (i.e., process equipment);
  - c. Records of maintenance conducted on the engine in order to demonstrate that the engine is being operated and maintained according to the manufacturer's emission-related operation and maintenance instructions or the permittee's own maintenance plan as required in Condition 3.B.4;
  - d. Records of all required maintenance performed. If using an oil analysis program as defined in Condition 3.B.2, records of the results for each required parameter of the oil analysis. (Ref.: 40 CFR 63.6655(a) & (e)(2))
- 5.B.2. For Emission Point AB-005, the permittee shall keep the records of the hours of operation for each engine that is recorded through the non-resettable hour meter required in Condition 3.B.4. These records must indicate how many hours are spent for emergency operation and how many hours are spent for non-emergency operation. For each instance of emergency operation, the records should include the date, start time, end time, and an explanation as to what classified the engine's operation as emergency operation. The records should also identify the time spent operating for the specific purposes identified in paragraphs b and c of Condition 3.B.3. (Ref.: 40 CFR 63.6655(f))
- 5.B.3. For Emission Point AB-005, the permittee shall report each instance in which the work practices listed in Condition 3.B.2 were not met. Such instances are deviations and should be reported within five (5) working days in accordance with Condition 5.A.6. If the management practices were not performed on the required schedule because it posed an unacceptable risk under Federal, State, or local law at the time of the required scheduled maintenance, the report must include the Federal, State, or local law under which the risk was deemed unacceptable. (Ref.: 40 CFR 63.6640(b), footnote 2 of Table 2d of Subpart ZZZZ)
- 5.B.4. For Emission Point AB-004, the permittee shall operate and maintain the engine according to the manufacturer's emission-related written instructions and keep records of any maintenance to demonstrate compliance. If the permittee does not operate and maintain the certified engine according to the manufacturer's written emission-related instructions, the engine will be considered a non-certified engine and the permittee must demonstrate compliance in accordance with 40 CFR 60.4243(a)(2)(ii). (Ref.: 40 CFR 60.4243(a) & (f))
- 5.B.5. For Emission Point AB-004, the permittee shall keep the following records:

- a. All notifications submitted to comply with Subpart JJJJ and all documentation that supports the notification;
  - b. Maintenance records for the engine;
  - c. Documentation from the manufacturer that the engine is certified to meet the emission standards as required in 40 CFR Parts 90, 1048, 1054, and 1060, as applicable. (Ref.: 40 CFR 60.4245(a)(1) – (3), 40 CFR Part 1054)
- 5.B.6. For Emission Point AB-008, the permittee shall demonstrate compliance by using engines certified to meet the emission standards in Condition 3.B.10. The engine must be installed and configured according to the manufacturer's emission-related specifications. (Ref.: 40 CFR 60.4211(c))
- 5.B.7. For Emission Point AB-008, the permittee shall keep records of the operation of the engine in emergency and non-emergency service that is recorded through the non-resettable hour meter required in Condition 3.B.12. The permittee shall record the time and reason when the engine is operated. (Ref.: 40 CFR 60.4214(b))
- 5.B.8. For GRPT2, the permittee shall comply with the following recordkeeping requirements:
- a. Record and maintain the amount of each fuel combusted during each operating day; or
  - b. Record and maintain the amount of each fuel combusted during each calendar month; or
  - c. Record and maintain the amount of each steam generating unit fuel delivered to the permittee during each calendar month. (Ref.: 40 CFR 60.48c(g)(1) – (3))
- 5.B.9. For GRPT2, the permittee shall submit written notification of any physical or operational change to an existing Emission Point which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the Emission Point before and after the change, and the expected completion date of the change. The MDEQ may request additional relevant information subsequent to this notice. (Ref.: 40 CFR 60.7(a)(4))

## **SECTION 6. ALTERNATIVE OPERATING SCENARIOS**

6.1. None permitted.