STATE OF MISSISSIPPI
AND FEDERALLY ENFORCEABLE
AIR POLLUTION CONTROL
PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT AT A SYNTHETIC MINOR SOURCE

THIS CERTIFIES THAT

Platte Chemical Co dba Loveland Products
917 Platte Road
Greenville, Mississippi
Washington County

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with 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

_____

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: _____ **Permit No.: 2800-00008**

Effective Date: As specified herein.

Expires:

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

6. 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.)

7. 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).)

8. 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).)

9. 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.)

10. 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-004	8.5 MMBtu/hr Natural Gas-Fired Boiler for the Liquid Herbicide Units
AA-008	Liquid Herbicide Unit No. 1
AA-009	Glyphosate Formulation Unit with VOC's and PM from the mixing
AA-013	Liquid Herbicide Unit No. 2
AA-014	Liquid Herbicide Unit No. 3
AA-015	Liquid Herbicide Unit No. 4
AA-017	Liquid Insecticide/Fungicide Unit No. 1
AA-018	Liquid Insecticide/Fungicide Unit No. 2
AA-019	Liquid Insecticide/Fungicide Unit No. 3
AA-020	6 MMBtu/hr Natural Gas-Fired Boiler for the Liquid Insecticide/Fungicide Units
AA-022	Liquid Insecticide/Fungicide Unit No. 5 (including Tank Truck Loading Rack)
AT-101	Vertical, Fixed Roof Tank, 24,500 gallon, Glyphosate Unit (ID No. Gly T-1)
AT-102	Vertical, Fixed Roof Tank, 24,500 gallon, Glyphosate Unit (ID No. Gly T-2)
AT-103	Vertical, Fixed Roof Tank, 24,500 gallon, Glyphosate Unit (ID No. Gly T-3)
AT-104	Vertical, Fixed Roof Tank, 24,500 gallon, Glyphosate Unit (ID No. Gly T-4)
AT-105	Vertical, Fixed Roof Tank, 29,500 gallon, Gyphosate Unit (ID No. Gly T-5)
AT-106	Vertical, Fixed Roof Tank, 29,500 gallon, Glyphosate Unit (ID No. Gly T-6)
AT-107	Vertical, Fixed Roof Tank, 24,500 gallon, Glyphosate Unit (ID No. Gly T-7)
AT-108	Vertical, Fixed Roof Tank, 24,500 gallon, Glyphosate Unit (ID No. Gly T-8)
AT-109	Vertical, Fixed Roof Tank, 10,000 gallon, Glyphosate Unit (ID No. TK-1B)
AT-110	Vertical, Fixed Roof Tank, 10,000 gallon, Glyphosate Unit (ID No. TK-2B)

AT-201	Vertical, Fixed Roof, 6,000 gallon, Surfactant Storage (ID No. C-1)
AT-203	Horizontal, Fixed Roof, Pressurized, 30,000 gallon, Isoproplyamine Storage Tank (ID No. T-9B)
AT-301	Vertical, Fixed Roof Tank, 18,000 gallon, Liquid Herbicide Unit (ID No. LH T-1)
AT-302	Vertical, Fixed Roof Tank, 18,000 gallon, Liquid Herbicide Unit (ID No. LH T-2)
AT-303	Vertical, Fixed Roof Tank, 18,000 gallon, Liquid Herbicide Unit (ID No. LH T-3)
AT-304	Vertical, Fixed Roof Tank, 18,000 gallon, Liquid Herbicide Unit (ID No. LH T-4)
AT-305	Horizontal, Fixed Roof Tank, 22,000 gallon, Liquid Herbicide Unit (ID No. LH T-5)
AT-306	Vertical, Fixed Roof Tank, 6,663 gallon, Liquid Herbicide Unit (ID No. LH T-6)
AT-307	Vertical, Fixed Roof Tank, 9,306 gallon, Liquid Herbicide Unit (ID No. LH T-8)
AT-308	Vertical, Fixed Roof Tank, 9,306 gallon, Liquid Herbicide Unit (ID No. LH T-9)
AT-309	Vertical, Fixed Roof Tank, 5,500 gallon, Liquid Herbicide Unit (ID No. LH T-10)
AT-310	Vertical, Fixed Roof Tank, 10,000 gallon, Liquid Herbicide Unit (ID No. LH T-11)
AT-311	Vertical, Heated Fixed Roof Tank, 6,000 gallon, Liquid Herbicide Unit (ID No. LH T-12)
AT-312	Vertical, Fixed Roof Tank, 6,000 gallon, Liquid Herbicide Unit (ID No. LH T-13A)
AT-313	Vertical, Fixed Roof Tank, 6,000 gallon, Liquid Herbicide Unit (ID No. LH T-13B)
AT-314	Vertical, Fixed Roof Tank, 6,000 gallon, Liquid Herbicide Unit (ID No. LH T-13C)
AT-315	Vertical, Fixed Roof Tank, 6,000 gallon, Liquid Herbicide Unit (ID No. LH T-13D)
AT-316	Vertical, Fixed Roof Tank, 6,000 gallon, Liquid Herbicide Unit (ID No. LH T-14)
AT-317	Vertical, Fixed Roof Tank, 9,500 gallon, Liquid Herbicide Unit (ID No. LH T-15)
AT-318	Vertical, Fixed Roof Tank, 7,144 gallon, Liquid Herbicide Unit (ID No. LH T-24)
AT-319	Vertical, Fixed Roof Tank, 9,988 gallon, Liquid Herbicide Unit (ID No. LH T-25)
AT-320	Vertical, Fixed Roof Tank, 30,000 gallon, Liquid Herbicide Unit (ID No. LH T-M1)
AT-321	Vertical, Fixed Roof Tank, 30,000 gallon, Liquid Herbicide Unit (ID No. LH T-M2)
AT-322	Vertical, Fixed Roof Tank, 30,000 gallon, Liquid Herbicide Unit (ID No. LH T-M3)
AT-323	Vertical, Fixed Roof Tank, 18,000 gallon, Liquid Herbicide Unit (ID No. LH T-M4)
AT-324	Vertical, Fixed Roof Tank, 27,000 gallon, Liquid Herbicide Unit (ID No. LH T-G)

AT-325	Vertical, Fixed Roof Tank, 22,500 gallon, Liquid Herbicide Unit (ID No. LH T-M5)
AT-326	Vertical, Fixed Roof Tank, 106,000 gallon, Liquid Herbicide Unit (ID No.LH T-M6)
AT-327	Vertical, Fixed Roof Tank, 106,000 gallon, Liquid Herbicide Unit (ID No. LH T-M7)
AT-328	Vertical, Fixed Roof Tank, 25,000 gallon, Liquid Herbicide Unit (ID No. LH T-7)
AT-401	Vertical, Fixed Roof Tank, 9,300 gallon, Liquid Insecticide/Fungicide Unit (ID No. LIF T-1)
AT-402	Vertical, Fixed Roof Tank, 9,300 gallon, Liquid Insecticide/Fungicide Unit (ID No. LIF T-2)
AT-403	Vertical, Fixed Roof Tank, 9,300 gallon, Liquid Insecticide/Fungicide Unit (ID No. LIF T-3)
AT-404	Vertical, Fixed Roof Tank, 9,300 gallon, Liquid Insecticide/Fungicide Unit (ID No. LIF T-4)
AT-405	Vertical, Fixed Roof Tank, 8,800 gallon, Liquid Insecticide/Fungicide Unit (ID No. LIF T-5)
AT-406	Vertical, Fixed Roof Tank, 9,000 gallon, Liquid Insecticide/Fungicide Unit (ID No. LIF T-6)
AT-407	Vertical, Fixed Roof Tank, 9,300 gallon, Liquid Insecticide/Fungicide Unit (ID No. LIF T-7)
AT-408	Vertical, Fixed Roof Tank, 9,300 gallon, Liquid Insecticide/Fungicide Unit (ID No. LIF T-8)
AT-409	Vertical, Fixed Roof Tank, 9,300 gallon, Liquid Insecticide/Fungicide Unit (ID No. LIF T-9)
AT-410	Vertical, Fixed Roof Tank, 9,500 gallon, Liquid Insecticide/Fungicide Unit (ID No. LIF T-10)
AT-411	Vertical, Fixed Roof Tank, 4,500 gallon, Liquid Insecticide/Fungicide Unit (ID No. LIF TS-210)

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SECTION 3
EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limitation/Standard
Facility-wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.1	VOC	≤ 99.0 tons per year VOC (12-month rolling) – *Title V avoidance*
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.2	VOC/HAP	Emissions requirement
	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.3	Opacity	≤ 40 % opacity
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.4	Opacity	≤ 40% opacity (fuel burning)

3.1 The permittee shall not emit more than 99.0 tons per year of volatile organic compounds (VOC) during a rolling 12-month period

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

3.2 The permittee shall not formulate any product which may cause an increase in emissions of total VOCs and/or HAPs in excess of those calculated in the application without first obtaining written approval from MDEQ.

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

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

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

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

3.4 No person shall cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Condition 3.3. This shall not apply to vision obscuration caused by uncombined water droplets.

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

SECTION 4
WORK PRACTICES

THIS SECTION WAS INTENTIONALLY LEFT BLANK SINCE NO WORK PRACTICE STANDARDS APPLY TO THIS PERMIT ACTION.

SECTION 5
MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Monitoring/Recordkeeping Requirement
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain records for a minimum of 5 years.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	5.2	Recordkeeping	Calculate and record monthly and annual VOC emissions
AA-009	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	5.3		Implement a Glyphosate Process IPA Emissions Minimization Plan
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	5.4		Review Plan requirement
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	5.5	Recordkeeping	Recordkeeping requirement

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

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

5.2 The permittee shall calculate and record the VOC emission rates in tons/month and tons/year on a rolling 12-month basis.

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

5.3 For Emission Point AA-009, the permittee shall continue to implement a Glyphosate Process Isopropylamine Emissions Minimization Plan to minimize emissions of isopropylamine from fugitive sources including equipment leaks, transfer operations, and pressure relief valves. At a minimum, the plan shall include:

a. A schedule for preventative maintenance, which shall include checking valves, seals, connections, etc. on a regular basis;
b. Routine monitoring of IPA storage and transfer areas for odor causing leaks;
c. An action plan for responding to any leaks or spills, including a timeline for repairing leaks; and
d. Procedures for minimizing emissions and spills during unloading operation.

The permittee may submit a statement certifying the facility is complying with the above requirements through compliance with 40 CFR Part 68, Chemical Accident Prevention Provisions in their Risk Management Program (RMP). The statement shall state which

parts of RMP satisfy the above requirements and be submitted annually in accordance with Condition 6.2.

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

5.4 For Emission Point AA-009, the permittee shall review the minimization plan at minimum every five years and shall update the plan within 30 days if changes are made to the process. The permittee shall document when each review is completed and any necessary revisions. If revisions are made to the plan, the changes shall be submitted to MDEQ in accordance with Condition 6.4.

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

5.5 For Emission Point AA-009, the permittee shall maintain sufficient records to demonstrate the full implementation of the Glyphosate Process Isopropylamine Emissions Minimization Plan.

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

SECTION 6
REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	Report permit deviations within five (5) working days.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.2	Submit certified annual monitoring report.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.3	All documents submitted to MDEQ shall be certified by a Responsible Official.
AA-009	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.4	Submit any changes to Glyphosate Process Isopropylamine Emissions Minimization Plan within 30 days

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

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

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

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

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

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

6.4 For Emission Point AA-009, the permittee shall submit to MDEQ any revisions to the Glyphosate Process Isopropylamine Emissions Minimization Plan within 30 days of the update.

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