

STATE OF MISSISSIPPI AND FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL

PERMIT

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

THIS CERTIFIES THAT

Watco Transloading LLC, WTPS Amory Bulk Terminal
101 Waterway Drive North
Amory, Mississippi
Monroe 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.: 1840-00080

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-001	9.54 MMBtu/hr Natural Gas-fired Thermal Dryer Controlled by two baghouses.
AA-002	Bucket Elevator #2 and Conveyor Coal processing and conveying equipment. Controlled by a baghouse.
AA-003	Conveyor, Crusher, and Screens Coal processing and conveying equipment. Controlled by central baghouse.
AA-004	Three Coal Storage Silos Controlled by central baghouse.
AA-005	Carbon Transfer and Loading System (Truck Loadout) Controlled by central baghouse.
AA-006	Bucket Elevator #1, Conveyor, Crusher, Screens Transfers materials from barge to storage domes. Controlled by three baghouses
AA-007	Rail Coke/Ore Loadout Controlled by central baghouse.
AA-008	2,000 gallon Fixed Roof Diesel Storage Tank
AA-009	2,000 gallon Fixed Roof Diesel Storage Tank

SECTION 3 EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Smoke	Opacity shall not exceed 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2		
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.3	PM (Filterable Only)	Emissions shall not exceed $E = 4.1 p^{0.67}$
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.4	Throughput	Operational Limitation
AA-001 AA-002 AA-003 AA-004 AA-005	40 CFR 60, Subpart Y (Standards of Performance for Coal Preparation and Processing Plants) 40 CFR 60.250(a), (c), (d), Subpart Y	3.5	PM SO ₂ NO _x CO	General Applicability
AA-001	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). 40 CFR 60.252(b)(1)(ii)(A), (b)(1)(ii)(B), (b)(2)(i), (b)(3)(i), Subpart Y	3.6	PM	Pressure Drop Requirement
			PM	Shall not exceed 0.031 gr/dscf
			Smoke	Opacity shall not exceed 20%
			SO ₂	Shall not exceed 0.20 lbs/MMBtu
			NO _x CO	Shall not exceed 1.0 lb/MMBtu
AA-002 AA-003 AA-004 AA-005	40 CFR 60.254(b)(1), (b)(2), Subpart Y	3.8	Smoke	Opacity shall not exceed 10%
			PM	Shall not exceed 0.010 gr/dscf

- 3.1. For the entire facility, except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds 40 percent opacity subject to the exceptions provided in (a) and (b).
- a) Startup operations may produce emissions which exceed 40 percent opacity for up to 15 minutes per startup in any one hour and not to exceed three startups per stack in any 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-hour period does not exceed ten minutes per billion BTU gross heating value of fuel in any one hour.

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

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

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

- 3.3. For the entire facility, except as otherwise specified or limited herein, the permittee shall not allow the emission of particulate matter in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets or combination thereof, to exceed the amount determined by the relationship

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

where E is the emission rate in pounds per hour (lb/hr) and p is the process weight input rate in tons per year (tpy).

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).)

- 3.4. For the entire facility, the permittee shall limit the throughput of all materials, determined on a 12-month rolling basis. The limitations are displayed in the following table:

Material	Limitation
Ore	300,000 tpy
Coke	200,000 tpy
Sand	100,000 tpy
Wood Pellets	150,000 tpy
Coal	70,000 tpy
Bulk Transfers: Aggregates, Stones, Minerals, Ores, Grains, Seeds, Fly Ash, Scrap Steel, Fertilizers, Slag, Alloys, Salt	150,000 tpy
Liquid (Vapor Pressure less than 0.5 psi at 100°F)	10,000,000 gallons per year

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

- 3.5. For Emission Points AA-001, AA-002, AA-003, AA-004, and AA-005, the permittee is subject to and shall comply with all applicable requirements of the Performance for Coal Preparation and Processing Plants (40 CFR 60, Subpart Y) and General Provisions (40 CFR 60, Subpart A).

The facility is a coal preparation and processing plant with a coal throughput greater than 200 tons per day. The facility was constructed after April 28, 2008 and before May 27, 2009; however, Emission Point AA-001 was modified in October 2013. Emission Points AA-001, AA-002, AA-003, AA-004, and AA-005 are affected sources under Subpart Y.

(Ref.: 40 CFR 60.250(a), (c), (d), Subpart Y)

- 3.6. For Emission Point AA-001, the permittee shall ensure that the pressure drop of both baghouses remain in the +/- 20 inches H₂O range, based on the differential pressure gauge.

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

3.7. For Emission Point AA-001, the permittee shall not allow any gas to discharge into the atmosphere from the emission point which contains:

- a) Particulate matter in excess of 0.031 gr/dscf.
- b) Any gas that exceeds 20 percent opacity.
- c) SO₂ in excess of 0.20 lb/MMBtu heat input.
- d) Combined concentration of NO_x and CO in excess of 1.0 lb/MMBtu heat input.

(Ref.: 40 CFR 60.252(b)(1)(ii)(A), (b)(1)(ii)(B), (b)(2)(i), (b)(3)(i), Subpart Y)

3.8. For Emission Points AA-002, AA-003, AA-004, and AA-005, the permittee shall not allow any gases to discharge into the atmosphere from the emission points that exceeds 10 percent opacity. The permittee shall not allow any gases to discharge into the atmosphere from any mechanical vent which contains particulate matter in excess of 0.010 gr/dscf.

(Ref.: 40 CFR 60.254(b)(1), (b)(2), Subpart Y)

SECTION 4
WORK PRACTICES

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Work Practice
AA-001 AA-002 AA-003 AA-004 AA-006 AA-007	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	4.1	PM	Operational Requirement
		4.2		Maintenance Requirement

- 4.1. For Emission Points AA-001, AA-002, AA-003, AA-004, AA-006, and AA-007, the permittee shall operate the control device at all times when processing. Should the control device become nonoperational then the respective process shall be shutdown immediately, but not as to cause damage to equipment or property, or cause further environmental problems. The process shall not startup until such time that the control device become operational. The permittee shall maintain on hand at all times sufficient equipment as is necessary to repair and/or overhaul the pollution control equipment.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 4.2. For Emission Points AA-001, AA-002, AA-003, AA-004, AA-006, and AA-007, the permittee shall maintain an inventory of all spare parts and equipment as is necessary to repair and/or replace the filter bags in 1.86, 2.1667, 3.25, and 12-foot length. The permittee shall maintain a minimum acceptable inventory of one set for each aforementioned bag length at all times.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

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(11).	5.2	Throughput	Recordkeeping Requirement
AA-001 AA-002 AA-003 AA-004 AA-005	40 CFR 60.255(b)(1), Subpart Y	5.3	PM SO ₂ NO _x CO	Conduct Performance Tests
	40 CFR 60.255(b)(2)(i), (ii), Subpart Y	5.4	Smoke	Conduct Performance Tests
	40 CFR 60.255(f)(1), Subpart Y	5.5		Alternative Compliance Demonstration
	40 CFR 60.258(a)(1), (2), (3), (5), Subpart Y	5.6	Recordkeeping	Develop and maintain a logbook.
AA-001 AA-002 AA-003 AA-004 AA-005 AA-006 AA-007	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.7	Recordkeeping	Daily Baghouse Differential Pressure

- 5.1. For the 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 the entire facility, the permittee shall demonstrate compliance with Condition 3.4 by monitoring and keeping records of the throughput for each material listed in Condition 3.4. The records shall be kept in tpy or gallons per year, as determined for each consecutive 12-month period on a rolling basis.

The permittee shall keep all supporting documentation and/or calculations used to generate the records required by this condition including but not limited to purchase orders, logbooks, etc.

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

- 5.3. For Emission Points AA-001, AA-002, AA-003, AA-004, and AA-005, the permittee shall demonstrate compliance with Conditions 3.7 and 3.8 by conducting performance tests according to the requirements of 40 CFR 60.8 and the methods identified in 40 CFR 60.257 to demonstrate compliance with the applicable emissions standards of Subpart Y.

An initial performance test shall be performed no later than 180 days after the facility reaches the maximum production rate. Subsequent performance tests shall be conducted if the results of the most recent performance test demonstrate that emissions from Emission Points AA-001, AA-002, AA-003, AA-004, and/or AA-005 are greater than 50 percent of the applicable emissions standard, a new performance test must be conducted within 12 calendar months of the date that the previous performance test was required to be completed. However, if the results of the most recent performance test(s) demonstrate that emissions from Emission Points AA-001, AA-002, AA-003, AA-004, and/or AA-005 are 50 percent or less of the applicable emissions standard, a new performance test must be conducted within 24 calendar months of the date that the previous performance test was required to be completed.

If the permittee has not operated Emission Point AA-001, AA-002, AA-003, AA-004, and/or AA-005 for the 60 calendar days prior to the due date of a performance test, the permittee is not required to perform the subsequent performance test until 30 calendar days after the next operating day.

(Ref.: 40 CFR 60.255(b)(1), Subpart Y)

- 5.4. For Emission Points AA-001, AA-002, AA-003, AA-004, and AA-005, the permittee shall demonstrate compliance with Conditions 3.7 and 3.8 by conducting performance tests according to the requirements of 40 CFR 60.8 and the methods identified in 40 CFR 60.257(a). An initial performance shall be conducted no later than 180 after the facility reaches the maximum production rate. Subsequent performance tests shall be conducted according to the following:

- a) If any 6-minute average opacity reading in the most recent performance test exceeds half the applicable opacity limit, a new performance test must be conducted within 90 operating days of the date that the previous performance test was required to be completed.
- b) If all 6-minute average opacity readings in the most recent performance test are equal to or less than half the applicable opacity limit, a new performance test must be conducted within 12 calendar months of the date that the previous performance test was required to be completed.

(Ref.: 40 CFR 60.255(b)(2)(i), (ii), Subpart Y)

- 5.5. Emission Points AA-001, AA-002, AA-003, AA-004, and AA-005, as an alternative to meeting the requirements of Condition 5.4, the permittee may comply with the opacity standards by monitoring visible emissions according to the following:
- a) Conduct one daily 15-second observation each operating day for Emission Points AA-001, AA-002, AA-003, AA-004, and AA-005 (during normal operation) when the coal preparation and processing plant is in operation. Each observation must be recorded as either visible emissions observed or no visible emissions observed. Each observer determining the presence of visible emissions must meet the training requirements specified in 2.3 of Method 22 of appendix A-7 of Part 60. If visible emissions are observed during any 15-second observation, the permittee shall adjust the operation of the emission point and demonstrate within 24 hours that no visible emissions are observed from the emission point. If visible emissions are observed, a Method 9, of appendix A-4 of Part 60, performance test must be conducted within 45 operating days.
 - b) Conduct monthly visual observations of all process and control equipment. If any deficiencies are observed, the necessary maintenance must be performed as expeditiously as possible.
 - c) Conduct a performance test using Method 9 of appendix A-4 of Part 60 at least once every 5 calendar years for Emission Points AA-001, AA-002, AA-003, AA-004, and AA-005.

(Ref.: 40 CFR 60.255(f)(1), Subpart Y)

5.6. For Emission Point AA-001, AA-002, AA-003, AA-004, and AA-005, the permittee shall maintain in a logbook (written or electronic) on-site and make it available upon request.

The logbook shall record the following:

- a) The manufacturer's recommended maintenance procedures and the date and time of any maintenance and inspection activities and the results of those activities. Any variance from manufacturer recommendation, if any, shall be noted.
- b) The date and time of periodic coal preparation and processing plant visual observations, noting those sources with visible emissions along with corrective actions taken to reduce visible emissions. Results from the actions shall be noted.
- c) The amount and type of coal processed each calendar month.
- d) Monthly certification that the dust suppressant systems were operational when any coal was processed and that manufacturer's recommendations were followed for all control systems. Any variance from the manufacturer's recommendations, if any, shall be noted.

(Ref.: 40 CFR 60.258(a)(1), (2), (3), (5), Subpart Y)

5.7. For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, and AA-007, the permittee shall monitor and record each daily baghouse differential pressure.

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

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-001	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.4	Report Daily Pressure Drop Differential
AA-001 AA-002 AA-003 AA-004 AA-005	40 CFR 60.258(b)(3), Subpart Y	6.5	Report semiannual excess emissions
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).		
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.6	Report performance tests
	40 CFR 60.258(d), Subpart Y		

- 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 Conditions 5.1. 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-001, in accordance with Condition 6.2, the permittee shall submit an annual report containing the daily pressure drop differential records of Condition 5.7.

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

- 6.5. For Emission Points AA-001, AA-002, AA-003, AA-004, and AA-005, the permittee shall submit semiannual reports for periods of excess emissions for all 6-minute average opacities that exceed the standards in Conditions 3.7 and 3.8.

The permittee shall submit semiannual excess emissions reports by July 31st and January 31st for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official.

(Ref.: 40 CFR 60.258(b)(3), Subpart Y; 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 6.6. For Emission Points AA-001, AA-002, AA-003, AA-004, and AA-005, the permittee shall submit a stack test reports for PM, SO₂, NO_x, and CO emissions within 30 days of completing the test.

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

For all required testing, the permittee shall submit a written test protocol at least 30 days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the Office of Pollution Control. Also, the permittee shall notify the Office of Pollution Control in writing at least 10 days prior to the intended test date(s) so that an observer may be afforded the opportunity to witness the test.

After the first successful submittal of an initial written test protocol, the permittee may request that the submittal of a testing protocol be waived for subsequent testing by certifying in writing at least 30 days prior to subsequent testing that all conditions for testing remain unchanged such that the original protocol can and will be followed.

The permittee shall submit the test report to EPA by successfully entering the data electronically into EPA's WebFIRE data base available at <http://cfpub.epa.gov/oarweb/index.cfm?action=fire.main>. For performance tests that cannot be entered into WebFIRE (*i.e.*, Method 9 of appendix A-4 of Part 60 opacity performance tests) the permittee shall mail a summary copy to United States Environmental Protection Agency; Energy Strategies Group; 109 TW Alexander DR; mail code: D243-01; RTP, NC 27711.

(Ref.: 11 Miss. Admin. Code Pt. 2, R.2.2.B(11).; 40 CFR 60.258(c), (d), Subpart Y)