State of Mississippi

FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL PERMIT

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

THIS CERTIFIES

Kemira Chemicals Inc 10930 Darracott Road Aberdeen, MS 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. set., 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

Mississippi Department of Environmental Quality

Issued/Modified: SEP 2 3 2014

Expires: AUG 3 1 2019

Permit No. 1840-00013

Agency Interest # 1937

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Kemira Chemicals Inc Subject Item Inventory Permit Number:1840-00013 Activity ID No.: PER20130002

Subject Item Inventory:

ID	Designation	Description
AREA13	AD-101	Acrylamide (AMD) Reactor Process vents to scrubber H-380
EQPT37	AT-1001	25,000 Gallon Glacial Acrylic Acid Storage Tank (TS-1001)
CONT3	AD-102	Packed Bed Scubber (H-380) controlling emissions from AMD reactor process, TIP reactor process, Mix tanks, Euroquat tank, Acrylic Acid tank, Acrylonitrile storage tank, AMD storage tank
EQPT14	AD-500	14.87 MMBTU/hr Natural Gas Fired Band Dryer associated with Cationic/Anionic Manufacturing
EQPT15	AD-501	40 MMBTU/hr Steam Fluidized Bed Dryer associated with TIP Process (E-410)
EQPT50	AD-502	800 hP (29.8 MMBTU/he) Natural Gas fired boiler to generate steam for the fluidized bed.
EQPT19	AD-504	235 hp Diesel Emergency Fire Pump Engine (Plant 4)
EQPT20	AD-505	415 hp Diesel Emergency Generator (AMD-old Plant 2)
EQPT21	AD-506	250 hp Diesel Emergency Generator (Plant 4 power and lighting)
EQPT22	AD-507	32 hp Natural Gas Emergency Generator (Plant 4 Data Center)
EQPT49	AD-510	Belt Reactor (B-51)
AREA15	AP-101	Cationic/Anionic Emulsion Process
AREA14	AP-102	Cationic/Anionic Powder Process
AREA16	AP-103	TIP Reactor Process vents to scrubber H-380
EQPT36	AT-1000	50,000 Gallon AMD Storage Tank (TS-1000)
EQPT38	AT-1002	11,300 Gallon Euroquat Storage Tank (TS-1002)
EQPT39	AT-1003	5,707 Gallon Water Phase Storage Tank (TM-1001)
EQPT40	AT-1004	5,707 Gallon Oil Phase Storage Tank (TM-1002)
EQPT41	AT-1005	5,707 Gallon Emulsion Reactor #1 (TR-1001)
EQPT42	AT-1006	5,707 Gallon Emulsion Reactor #2 (TR-1002)
EQPT43	AT-1007	7,000 Gallon Post Polymerization Reactor (TH-1001)
EQPT44	AT-1008	7,000 Gallon Post Polymerization Reactor (TH-1002)

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ID	Designation	Description
EQPT45	AT-1009	12,683 Gallon Essol Storage Tank (TS-1003)
EQPT46	AT-1010	12,683 Gallon Span 80 Storage Tank (TS-1007)
EQPT47	AT-1011	12,683 Gallon Emulsion Storage Tank (TS-1011)
EQPT48	AT-1012	12,683 Gallon Emulsion Storage Tank (TS-1012)
EQPT23	AT-301	47,000 Gallon AMD Storage Tank (T-301) vents to scrubber H-380
EQPT27	AT-302	8,240 Gallon AMD Reactor #1 (AMDR1) (TR-111) vents to scrubber H-380
EQPT28	AT-303	8,240 Gallon AMD Reactor #2 (AMDR2) (TR-112) vents to scrubber H-380
EQPT29	AT-304	8,554 Gallon AMD Settling Tank (TS-113) vents to scrubber H-380
EQPT51	AT-305	47,000 Gallon AMD Storage Tank vents to scrubber H-380
EQPT25	AT-321	50,000 Gallon Acrylonitrile Storage Tank (T-321) vents to scrubber H-380
EQPT26	AT-332	20,000 Gallon Euroquat Storage Tank (T-332) vents to scrubber H-380
EQPT24	AT-335	32,000 Gallon Acrylic Acid Storage Tank (T-335) vents to scrubber H-380
EQPT30	AT-351	2,500 Gallon Anionic and Cationic Monomer Mix Tank (T-351) vents to scrubber H-380
EQPT32	AT-352	2,500 Gallon Anionic and Cationic Monomer Mix Tank (T-352) vents to scrubber H-380
EQPT33	AT-353	2,500 Gallon Anionic and Cationic Monomer Mix Tank (T-353) vents to scrubber H-380
EQPT34	AT-354	6,000 Gallon Anionic and Cationic Monomer Mix Tank (T-354) vents to scrubber H-380
EQPT35	AT-355	3,700 Gallon Anionic or Cationic Monomers Hold Tank (T-355) vents to scrubber H-380
AI1937	1937	Production of water treatment polymers
EQPT52	AT-356	7,925 Gallon Water Phase Storage Tank (R-401)
EQPT53	AT-357	7,925 Gallon Water Phase Storage Tank (D-401)
EQPT54	AT-306	8,240 Gallon AMD Reactor #3 (AMDR3) (TR-113) vents to scrubber H-380
EQPT55	AT-307	8,240 Gallon AMD Reactor #4 (AMDR4) (TR-114) vents to scrubber H-380
EQPT56	AT-358	AMD 40% Weigh Tank (T-310)

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ID	Designation	Description
EQPT57	AT-359	GAA Weigh Tank (T-311)
EQPT58	AT-360	Monomer View Tank 50 Gallons (T-963)
EQPT59	AT-361	Gel Reciever
EQPT60	AT-362	Water Buffer Tank (AMD) (TD-112)
EQPT61	AT-363	AMD Hold Tank (TD-115)

Subject Item Groups:

ID	Description	Components
GRPT1	Fuel Burning Requirements	EQPT14 14.87 MMBTU/hr Natural Gas Fired Band Dryer associated with Cationic/Anionic Manufacturing
		EQPT50 800 hP (29.8 MMBTU/he) Natural Gas fired boiler to generate steam for the fluidized bed.
GRPT2	RICE Requirements	EQPT19 235 hp Diesel Emergency Fire Pump Engine (Plant 4)
		EQPT20 415 hp Diesel Emergency Generator (AMD-old Plant 2)
		EQPT21 250 hp Diesel Emergency Generator (Plant 4 power and lighting)
		EQPT22 32 hp Natural Gas Emergency Generator (Plant 4 Data Center)

KEY	
ACT = Activity	AI = Agency Interest
AREA = Area	CAFO = Concentrated Animal Feeding Operation
CONT = Control Device	EQPT = Equipment
IA = Insignificant Activity	IMPD = Impoundment
MAFO = Animal Feeding Operation	PCS = PCS
RPNT = Release Point	TRMT = Treatment

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KEY

WDPT = Withdrawal Point

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GRPT0000000001 Fuel Burning Requirements:

Limitation Requirements:

Condition		
No.	Parameter	Condition
L-1		The permittee shall only use natural gas as fuel. [11 Miss. Admin. Code Pt. 2, R.2.2.B(10).]
L-2		The maximum opacity from any point source or emissions at any time shall not exceed 40% as determined by EPA Test Method 9, 40 CFR 60, Appendix A. [11 Miss. Admin. Code Pt. 2, R. 1.3.8.B.]
L-3		The maximum discharge of sulfur oxides from each 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. [11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).]
L-4		The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations greater than 10 million BTU per hour heat input shall not exceed an emission rate as determined by the relationship E=0.8808*I^-0.1667 Where E is the emission rate in pounds per million BTU per hour heat input and I is the heat input in millions of BTU per hour. [11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b)]
	Keeping Requirements: Combusted:	

Condition	
No.	Condition
R-1	Fuel Combusted: The permittee shall maintain records of the amount of natural gas combusted during each calendar month. [40 CFR 60.48c(g)(2)]

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GRPT0000000001 (continued):

Condition No.	Condition
T-1	The permittee is subject to and shall comply with the applicable requirements of the New Source Performance Standards specified in 40 CFR Part 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) and in 40 CFR Part 60, Subpart A (General Provisions). [40 CFR 60.40c(a)]

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GRPT0000000002 RICE Requirements:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		For Emission Points AD-504, AD-505, AD-506, and AD-507, the permittee is subject to and shall comply with National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines and General Provisions (40 CFR 63, Subparts ZZZZ and A). [40 CFR 63.6585]
L-2		For an emergency stationary RICE the permittee shall:
		(a) change oil and filter every 500 hours of operation or annually, whichever comes first,
		(b) inspect air cleaner or spark plugs every 1,000 hours of operation or annually, whichever comes first, and
		(c) inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. [40 CFR 63.6603(Table 2d)]
L-3		The permittee shall operate and maintain the emergency stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR 63.6625(e)]
L-4		The permittee shall install a non-resettable hour meter if one is not already installed. [40 CFR 63.6625(f)]
L-5		The permittee shall 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, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to the subpart apply. [40 CFR 63.6625(h)]

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GRPT0000000002 (continued):

Limitation Requirements:

Condition No.	on Parameter	Condition
L-6		The permittee shall operate the emergency stationary RICE in accordance with the following requirements:
2.0		(a) There is no time limit on the use of the emergency stationary RICE in emergency situations
		(b) The emergency stationary RICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year.
		Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50

Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in the conditions of this requirement, is prohibited. If the engine is not operated according to conditions (a)-(c) in this requirement, the engine will not be considered an emergency engine under the subpart and will need to meet all requirements for non-emergency engines. [40 CFR 63.6640(f)]

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GRPT0000000002 (continued):

Record-Keeping Requirements:

Condition No.	Condition
R-1	The permittee shall keep the following records:
	(a) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in §63.10(b)(2)(xiv)
	(b) Records of all required maintenance performed on the air pollution control and monitoring equipment. [40 CFR 63.6655(a)]
R-2	The permittee shall operate and maintain the emergency stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or develop and follow their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in manner consistent with good air pollution control practice for minimizing emissions. [40 CFR 63.6655(d)]
R-3	The permittee shall keep records of the maintenance conducted on the emergency stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to your the permittee's maintenance plan. [40 CFR 63.6655(e)]
R-4	The permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, the permittee shall keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response. [40 CFR 63.6655(f)]

Submittal/Action Requirements:

Condition No.	Condition
S-1	The permittee shall report each instance in which the operating limit in Table 2d of the subpart was not met. These instances are deviations from the emission and operating limitations of the subpart. These deviations must be reported according to the requirements in 40 CFR 63.6550. [40 CFR 63.6640(b)]

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GRPT0000000002 (continued):

Submittal/Action Requirements:

Condition No.	Condition
S-2	The permittee shall submit an annual compliance report covering the annual reporting period from January 1 through December 31. The first compliance report shall be postmarked or delivered no later than January 31 following the end of the first calendar year after the compliance date, and each subsequent report shall be postmarked or delivered no later than January 31. [40 CFR 63.6650(a)]
S-3	The Compliance report shall contain the following information:
	(a) Company name and address.
	(b) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.
	(c) Date of report and beginning and ending dates of the reporting period.
	(d) If you had a malfunction during the reporting period, the compliance report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by the permittee during a malfunction of an affected source to minimize emissions in accordance with §63.6605(b), including actions taken to correct a malfunction.
	(e) The total operating time of the stationary RICE at which the deviation occurred during the reporting period.
	(f) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. [40 CFR 63.6650(c)]

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${\bf AI0000001937~(1937)~Production~of~water~treatment~polymers:}$

Limitation Requirements:

Condition No.	Parameter	Condition	
<u></u>	r ar arrieter	Condition	
L-1		Except as otherwise specified, the permittee shall not cause, permit, or allow the emission of particulate matter in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship $E = 4.1 \text{p}^{\circ}0.67$	
		where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour.	
		Conveyor discharge of course solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs. [11 Miss. Admin. Code Pt. 2, R. 1.3.F(1)]	
L-2		Facility-Wide Emission Limitations The permittee shall limit hazardous air pollutant (HAP) emissions to no more than 9.9 tons/year (TPY) of any single HAP and no more than 24.9 TPY of total combined HAPs as determined for each consecutive 12-month period. [11 Miss. Admin. Code Pt. 2, R.2.2.B(10).]	
Monito	ring Requirements:		

Monitoring Requirements:

Condition No.	Parameter	Condition
<u> </u>	r ai ailletei	Condition
M-1		Monitoring Requirements For the entire facility, the permittee shall determine individual and total HAP emissions monthly and for each 12-month rolling total using mass balance, available emission factors, or other documented emission calculation methods. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).]
M-2		The permittee shall install, maintain, and operate pressure transducers to measure the pressure drop across the scrubber (H-380). The pressure transducers shall be maintained and calibrated in accordance to the manufacturer's specification. The pressure drop shall be maintained within the range recommended by the manufacturer, or as otherwise determined through testing to provide effective control of VOCs. The pressure drop range and basis for the range shall be recorded, and the actual pressure drop across the scrubber will be recorded at least daily. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]

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AI000001937 (continued):

Record-Keeping Requirements:

Condition No.	Condition
R-1	Recordkeeping Requirements For the entire facility, the permittee shall maintain sufficient records to document the monthly and 12-month rolling total HAP emissions. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).]
R-2	Recordkeeping Requirements 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 Mississippi Department of Environmental Quality (MDEQ) personnel. [11 Miss. Admin. Code Pt. 2, R.2.2.B(10).]

Submittal/Action Requirements:

Condition No.	Condition
S-1	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.2.B(10).]
S-2	Except as otherwise specified herein, the permittee shall Submit a certified annual synthetic minor monitoring report: Due annually, by the 31st of January for preceding calendar year. This report shall address any required monitoring specified in the permit. [11 Miss. Admin.Code Pt. 2, R.2.2.B(11).]
S-3	For the entire facility, the permittee shall submit a monitoring report due annually by the 31st of January for the preceding calendar year. This report shall provide the following: (a) The HAP content(s) of each material used; (b) The total of HAP containing material used in each consecutive 12-month period; (c) The emission rate of each individual HAP and the total HAP emission rate in tons per month and TPY for each consecutive 12-month period. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).]

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AI000001937 (continued):

Condition No.	Condition
T-1	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49-17-29 1.b]
T-2	General Condition: 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. [11 Miss. Admin. Code Pt. 2, R. 2.5.A.]
T-3	General Condition: 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. [Miss. Code Ann. 49-17-29 1.a(i and ii)]
T-4	General Condition: 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", [11 Miss. Admin.Code Pt. 2, R.1.10.]
T-5	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.10.]
T-6	General Condition: 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. [Miss. Code Ann. 49-17-21]
T-7	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R. 2.2.C.]

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AI000001937 (continued):

Condition	
Condition No.	Condition
T-8	General Condition: 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, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of the permit. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(b).]
T-9	General Condition: 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. [Miss. Code Ann. 49-17-39]
T-10	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(15)(c).]
T-11	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(7).]
T-12	General Condition: This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board. [11 Miss. Admin. Code Pt. 2, R. 2.16.B.]
T-13	General Condition: This permit is for air pollution control purposes only. [11 Miss. Admin.Code Pt. 2, R. 2.1.D(1).]
T-14	General Condition: 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 [11 Miss. Admin.Code Pt. 2, R. 2.4.D.]
T-15	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R. 2.1.D(7).]

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AI000001937 (continued):

Condition No.	Condition
T-16	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(15)(d).]
T-17	General Condition: This permit does not authorize a modification as defined in 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 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: (i) 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 51.166; or (ii) the source is approved to use under any permit issued under 40 CFR 52.51 or under regulations approved pursuant to 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 52.51, or under regulations approved pursuant to Subpart I or 40 CFR 51.166; or (f) any change in ownership of the stationary source" [11 Miss. Admin.Code Pt. 2, R. 2.1.D(2).]
T-18	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(a).]
T-19	General Condition: The permittee shall retain all required records, monitoring data, supported 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. [11 Miss. Admin.Code Pt. 2, R.2.9.]

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AI000001937 (continued):

Narrative Requirements:

Condition No.	Condition
T-20	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.2.B(5).]
T-21	General Condition: Emergencies (a) Except as otherwise specified herein, an emergency means any situation arising from sudden and reasonably unforseeable 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 (c) following are met. (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence as follows: (i) an emergency occurred and that the permittee can identify the cause(s) of the emergency; (ii) the permitted facility was at the time being properly operated; (iii) 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 (iv) 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 applicable requirement specified elsewhere herein [11 Miss. Admin.Code Pt. 2, R.2.2.B(10).]
T-22	General Condition: Upsets (a) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other

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- (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: (i) an upset occurred and that the permittee can identify the cause(s) of the upset; (ii) the source was at the time being properly operated; (iii) 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; (iv) the permittee submitted notice of the upset to the DEQ 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. [11 Miss. Admin.Code Pt. 2, R.1.10.]

Kemira Chemicals Inc Facility Requirements Permit Number:1840-00013 Activity ID No.: PER20130002

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AI000001937 (continued):

Narrative Requirements:

[11 Miss. Admin.Code Pt. 2, R.2.8.]

Condition	
No.	Condition
T-23	General Condition: 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: (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above; (ii) 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 (iii) 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 and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply. [11 Miss. Admin.Code Pt. 2, R.1.10.]
T-24	General Condition: 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: (i) the permittee can identify the need for the maintenance; (ii) the source was at the time being properly operated; (iii) 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; (iv) 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 section has the burden of proof. (c) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. [11 Miss. Admin.Code Pt. 2, R.1.10.]
T-25	General Condition: 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.

GENERAL INFORMATION

Kemira Chemicals Inc 10930 Darracott Road Aberdeen, MS Monroe County

Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
1937	Kemira Chemicals, Inc.	Official Site Name	11/1/2013	
2809500013	Kemira Chemicals, Inc.	Air-AIRS AFS	10/12/2000	
MSR000005140	BASF Corporation	Hazardous Waste-EPA ID	10/12/2000	11/16/2012
184000013	Chemdal Corporation, The	Air-Title V Operating	3/10/1999	6/1/2000
184000013	Chemdal Corporation, The	Air-Construction	8/14/1998	
184000013	Chemdal Corporation, The	Air-Construction	9/11/1996	
184000013	Chemdal Corporation, The	Air-Synthetic Minor Operating	9/11/1996	3/1/1998
184000013	Chemdal Corporation, The	Air-Construction	1/28/1997	
184000013	Chemdal Corporation, The	Air-Synthetic Minor Operating	1/28/1997	3/1/1998
184000013	Chemdal Corporation, The	Air-Construction	3/12/1999	
184000013	Chemdal Corporation, The	Air-Construction	9/27/1999	9/27/1999
184000013	Chemdal Corporation, The	Air-Construction	6/7/1999	6/7/1999
MSR110071	BASF Corporation	GP-Sara Title III	11/10/1992	11/10/1992
MSR000896	BASF Corporation	GP-Baseline	9/29/1993	6/1/2000
MSR100348	BASF Corporation	GP-Construction	8/3/1994	10/2/1996
MSR000896	BASF Corporation	GP-Baseline	6/1/2000	1/30/2001
MSP090826	Chemdal Corporation, The	Water - Pretreatment	7/25/1997	6/1/2000
MSP090826	Chemdal Corporation, The	Water - Pretreatment	11/10/1992	11/9/1997
MS0043664	Chemdal Corporation, The	Water - NPDES	6/14/1988	6/13/1992
MSR000896	BASF Corporation	GP-Baseline	1/30/2001	9/11/2005
MSP090826	BASF Corporation	Water - Pretreatment	3/17/2003	2/28/2008
1937	Chemdal Corporation, The	Historic Site Name	3/9/1987	5/31/2000
184000013	BASF Corporation	Air-Title V Operating	6/1/2000	3/1/2004

GENERAL INFORMATION

ID	Alternate/Historic Name	User Group	Start Date	End Date
MSP090826	BASF Corporation	Water - Pretreatment	6/1/2000	7/22/2002
184000013	BASF Corporation	Air-Title V Operating	4/22/2005	1/28/2008
MSR000896	BASF Corporation	GP-Baseline	12/16/2005	1/24/2008
184000013	US Polymers, Inc.	Air-Title V Fee Customer	6/1/2000	8/28/2008
1937	BASF Corporation	Historic Site Name	5/31/2000	1/15/2008
184000013	US Polymers Inc	Air-Title V Operating	1/28/2008	8/28/2008
MSR000896	US Polymers Inc	GP-Baseline	1/24/2008	12/16/2010
MSP090826	US Polymers Inc	Water - Pretreatment	11/13/2008	11/28/2012
MSR000896	US Polymers, Inc.	GP-Baseline	12/16/2010	11/9/2012
1937	US Polymers, Inc.	Historic Site Name	1/15/2008	11/15/2012
MSR000005140	3F Chimica Americas Inc	Hazardous Waste-EPA ID	11/16/2012	
MSP090826	3F Chimica Americas Inc	Water - Pretreatment	11/28/2012	10/31/2013
MSR000896	3F Chimica Americas Inc	GP-Baseline	11/9/2012	11/15/2013
1937	3F Chimica Americas, Inc.	Historic Site Name	11/15/2012	11/1/2013
MSR000896	Kemira Chemicals, Inc.	GP-Baseline	11/15/2013	9/28/2015
MSP090826	Kemira Chemicals Inc	Water - Pretreatment	11/20/2013	10/31/2018
184000013	Kemira Chemicals Inc	Air-Synthetic Minor Operating	9/23/2014	8/31/2019

Basin: Tombigbee River Basin

Location Description: PG- Plant Entrance (General). Data collected by Brad Overley on 11/15/2005. Elevation 250 feet.