

**STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
TITLE V PERMIT**

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Ergon Biofuels, LLC
1833 Haining Road
Vicksburg, Mississippi
(Warren 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 Title V of the Federal Clean Air Act (42 U.S.C.A. § 7401 - 7671) and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

Permit Issued: December 4, 2013

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: November 30, 2018

Permit No.: 2780-00107

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APPENDIX A: LIST OF ABBREVIATIONS

APPENDIX B: SITE SPECIFIC COMPLIANCE ASSURANCE MONITORING (CAM)
PLAN

OTHER RELATED DOCUMENTS:

NSPS Subpart Dc for Industrial-Commercial-Institutional Steam Generating Units

NSPS Subpart DD - Standards of Performance for Grain Elevators

NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels
(Including Petroleum Liquid Storage Vessels)

NSPS Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal
Combustion Engines

NSPS Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion
Engines

NSPS Subpart VVa – Standards of Performance for Equipment Leaks of VOC in the Synthetic
Organic Chemicals Manufacturing Industry

NESHAP Subpart ZZZZ for Stationary Reciprocating Internal Combustion Engines (RICE)

SECTION 1. GENERAL CONDITIONS

- 1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(a).)
- 1.2 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(b).)
- 1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. 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. 6.3.A(6)(c).)
- 1.4 (a) This permit shall be reopened and revised under any of the following circumstances:
 - (1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of 3 or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.
 - (2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
 - (3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.
 - (4) The Administrator or the Permit Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
 - (b) Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.
 - (c) Reopenings shall not be initiated before a notice of such intent is provided to the Title

V source by the DEQ at least 30 days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.G)

- 1.5 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 permittee or, for information to be confidential, the permittee shall furnish such records to 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. 6.3.A(6)(e).)
- 1.6 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(d).)
- 1.7 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. 6.3.A(5).)
- 1.8 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.
 - (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).)

- (b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D(2).)
 - (c) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.)
 - (d) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.C.)
- 1.9 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(8).)
- 1.10 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states 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. 6.2.E.)
- 1.11 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:
- (a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) inspect at reasonable times any facilities, equipment (including monitoring and air

pollution control equipment), practices, or operations regulated or required under the permit; and

- (d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(2).)
- 1.12 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(1).)
- 1.13 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(2).)
- 1.14 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(1).)
- 1.15 Nothing in this permit shall alter or affect the following:
 - (a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
 - (b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - (c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
 - (d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(2).)
- 1.16 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.H.)
- 1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee

submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C(2). and 11 Miss. Admin. Code Pt. 2, R. 6.2.A(1)(c).)

- 1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:
- (a) the changes are not modifications under any provision of Title I of the Act;
 - (b) the changes do not exceed the emissions allowable under this permit;
 - (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:
 - (1) a brief description of the change(s),
 - (2) the date on which the change will occur,
 - (3) any change in emissions, and
 - (4) any permit term or condition that is no longer applicable as a result of the change;
 - (d) the permit shield shall not apply to any Section 502(b)(10) change. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F.)
- 1.19 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 11 Miss. Admin. Code Pt. 2, Ch. 3, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3)
- 1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 11 Miss. Admin. Code Pt. 2, Ch. 2, "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations 11 Miss. Admin. Code Pt. 2, Ch. 6, "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny 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 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 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 Subpart I or 40 CFR 51.166; or
- (f) any change in ownership of the stationary source."

1.21 Any change in ownership or operational control must be approved by the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.D(4).)

1.22 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.B(1).)

1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordinance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by

local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.

- (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.
- (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.
- (c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.G.)

1.24 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies.

- (a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
- (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.
- (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
 - (1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - (2) the permitted facility was at the time being properly operated;
 - (3) 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

- (4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain 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 an 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.G.)
- 1.25 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, shutdowns and maintenance.
- (a) Upsets (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.KK.)
 - (1) 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 5 working days of the time the upset began; and
 - (v) the notice of the upset shall contain a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.
 - (2) In any enforcement proceeding, the permittee 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.

- (b) Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.HH. & R. 1.2.CC.)
 - (1) 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.
 - (2) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.
 - (3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply.
- (c) Maintenance.
 - (1) 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 the DEQ within 5 working days of the time the maintenance began or such other times as allowed by DEQ; and

(v) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.

(2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.

(3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

1.26 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation 11 Miss Admin. Code Pt. 2, R. 1.8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-000	Receiving
AA-001	Truck and Rail Receiving with air emissions controlled by a common baghouse
AA-002	Barge Receiving with air emissions controlled by a baghouse
AB-000	Handling
AB-001	Headhouse conveying with air emissions controlled by a baghouse
AB-002	Barge Receiving Scale with air emissions controlled by a baghouse
AB-003	Grain Scale with air emissions controlled by a baghouse
AB-004	Barge Unloading Conveyor with air emissions controlled by a baghouse
AB-005	Grain-to-Ethanol Covered Conveyor
AC-000	Hammermills
AC-001	No. 1 Hammermill with air emissions controlled by a baghouse
AC-002	No. 2 Hammermill with air emissions controlled by a baghouse
AD-000	Fermenting & Distillation
AD-001	Yeast System, Slurry Mix Tank, Liquefaction Tank, Thin Stillage Collection Tank, Thin Stillage Tank, Whole Stillage Tank, Process condensate Tank, Syrup Tank, Evaporator Vacuum Receiver, Beer Column vent Condenser, Reflux Vent Condenser, and Regen receiver with air emissions being controlled by a vent gas scrubber
AD-002	4 fermenters, 1 beer column, 1 rectifier column, 1 stripper column, centrifuges, and evaporators with air emissions being controlled by a carbon dioxide scrubber
AD-003	The Methanator with air emission controlled by a flare with natural gas pilot (5MMBTU/hr)
AE-000	Ethanol Loadout
AE-001	Ethanol Truck Loadout
AE-002	Ethanol Rail Loadout
AE-003	Ethanol Barge Loadout
AG-000	Storage
AG-001	Day Storage Bin No. 1 with bin vent filter

Emission Point	Description
AG-002	Day Storage Bin No. 2 with bin vent filter (Formerly AG-001)
AG-003	Day Storage Bin No. 3 with bin vent filter (Formerly AG-001)
AG-004	Day Storage Bin No. 4 with bin vent filter (Formerly AG-001)
AG-005	Day Storage Bin No. 5 with bin vent filter (Formerly AG-001)
AG-006	Grain Storage Bin No. 6 with bin vent filter (Formerly AG-001)
AG-007	Grain Storage Bin No. 7 with bin vent filter (Formerly AG-001)
AG-008	Grain Storage Bin No. 8 with bin vent filter (Formerly AG-001)
AG-009	Grain Storage Bin No. 9 with bin vent filter (Formerly AG-001)
AG-010	Ground Pile (Formerly AG-001)
AG-014	B-House (Distiller Dried Grain with Solubles (DDGS) storage) (Formerly AG-002)
AG-015	C-House (Corn Storage) (Formerly AG-001)
AG-016	D-House (Corn Storage) (Formerly AG-001)
AH-000	Distiller Dried Grain with Solubles (DDGS) Processing and Loadout
AH-001	DDGS Truck Loadout and DDGS rail Loadout with air emissions controlled by a common baghouse
AH-002	DDGS Barge Loadout
AH-003	Thermal Oxidizer (Heat Capacity 18 MMBTU/hr) controlling emissions from the natural gas fired DDGS dryer (96.4 MMBTU/hr; Ref. SV-007) and from the baghouse for the DDGS fluidized bed cooler
AI-000	Miscellaneous Fuel Burning Sources
AI-001	No. 1 Natural Gas Fired Boiler (Heat Capacity 92.4 MMBTU/hr; Ref. SV-011A)
AI-002	No. 2 Natural Gas Fired Boiler (Heat Capacity 92.4 MMBTU/hr; Ref. SV-011B)
AI-004	Guard Shack and Main Gate 18 HP Emergency Generator (0.22 MMBTU/hr) fueled by LPG
AI-005	Control Room Building 36 HP Emergency Generator (0.30 MMBTU/hr) fueled by LPG
AI-006	742 HP Fire Pump Engine (2011 Model; Heat Input Capacity 4.8 MMBTU/hr) fueled by diesel
AJ-000	Fugitive/Other Sources
AJ-001	Equipment Leaks of VOC subject to NSPS Subpart VVa
AJ-002	On Site Plant Roads

Emission Point	Description
AK-000	Storage Tanks
AK-001	Ethanol Storage Tank (420,000 gallon capacity; Ref. T-6101)
AK-002	Ethanol Storage Tank (420,000 gallon capacity; Ref. T-6102)
AK-003	Denaturant Storage Tank (420,000 gallon capacity; Ref. T-6103)
AK-004	Denatured Ethanol Storage Tank (2,520,000 gallon capacity; Ref. T-6105)
AK-005	Denatured Ethanol Storage Tank (2,520,000 gallon capacity; Ref. T-6106)
AK-008	Corn Oil Storage Tank (26,852 gallon capacity; Ref. T-6109)
AK-009	Corn Oil Storage Tank (26,852 gallon capacity; Ref. T-6110)
AL-001	Corn Oil Loadout

SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. Facility-Wide Emission Limitations & Standards

- 3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).
- (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.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Paragraph 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)

B. Emission Point Specific Emission Limitations & Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.B.1	PM (filterable only)	$E=4.1p^{0.67}$
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.B.2	Ethanol Production	715,000 tons per year (12-month rolling total)
				69,300,000 gallons per year (12-month rolling total)
			DDGS Production	225,000 tons per year (12-month rolling total)
			Grain Throughput	1,100,000 tons per year (12-month rolling total)
AD-001	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.B.3	Acetaldehyde	0.1 lb/hr
			VOC	1.0 lb/hr
AD-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.B.4	Acetaldehyde	1.0 lb/hr
			VOC	11.0 lb/hr
AH-003 (Thermal Oxidizer)	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.B.5	VOC	4.7 lb/hr
			PM/ PM ₁₀ (filterable + condensable)	4.1 lb/hr
			CO	7.2 lb/hr
			NO _x	5.9 lb/hr
AA-001, AA-002, AB-001, AB-002, AB-003, AB-004	NSPS Subpart DD, 40 CFR 60.300	3.B.6	Applicability	Applicability to NSPS for grain elevators
	NSPS Subpart DD, 40 CFR 60.302(b)	3.B.7	PM (filterable only)	0.01gr/dscf
			Opacity	0%
AA-002	NSPS Subpart DD, 40 CFR 60.302(d)	3.B.8	PM (filterable only)	Operation must be enclosed and vented to a control device. Total rate of air ventilated shall be at least 32.1 m ³ /m ³ of grain handling capacity.
AI-001, AI-002	NSPS Subpart Dc, 40 CFR 60.40c(a)	3.B.9	Applicability	Applicability to NSPS for boilers

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.B.10	Operating Restriction	Only two units may be fired at one time
	Permit to Construct issued May 30, 2008	3.B.11	Fuel Restriction	Fuel restricted to natural gas
AI-004, AI-005	NSPS Subpart JJJJ 40 CFR 60.4230	3.B.12	Applicability	Applicability to NSPS for stationary spark ignition internal combustion engines
AI-004	40 CFR 60.4233(a)	3.B.13	Combustion Emissions	Comply with emission standards of 40 CFR 60.4231(a)
AI-005	40 CFR 60.4233(c)	3.B.14	Combustion Emissions	Comply with emission standards of 40 CFR 60.4231(c)
AI-004, AI-005	40 CFR 60.4234	3.B.15	O&M	Operate and maintain engine to meet emission standards over life of engine
AI-004, AI-005, AI-006	40 CFR 60.4211(f) and 60.4243(d)	3.B.16	Emergency Operations	May operate up to 100 hr/yr for maintenance and readiness testing, including 50 hr/yr for non-emergency use
AI-004, AI-005, AI-006	NESHAP Subpart ZZZZ, 40 CFR 63.6585 and 63.6590(c)(1)	3.B.17	Applicability	Applicability to NESHAP for stationary reciprocating internal combustion engines
AI-006	NSPS Subpart IIII, 40 CFR 60.4200	3.B.18	Applicability	Applicability to NSPS for stationary compression ignition internal combustion engines
	40 CFR 60.4205(c), and Table 4	3.B.19	NMHC + NOx	3.0 grams/HP-hr
			PM	0.15 grams/HP-hr
	40 CFR 60.4206	3.B.20	O&M	Operate and maintain engine to meet emission standards over life of engine
	40 CFR 60.4207(b)	3.B.21	Fuel Specifications	Use diesel meeting requirements of 40 CFR 80.510(b) for nonroad diesel fuel
AJ-001	NSPS Subpart VVa, 40 CFR 60.480a	3.B.22	Applicability	Applicability to NSPS for equipment leaks of VOC
	40 CFR 60.482-1a	3.B.23	VOC	Comply with applicable emission standards of 40 CFR 60.482-1a to 60.482-11a
AK-001 through AK-005	NSPS Subpart Kb, 40 CFR 60.110b(a)	3.B.24	Applicability	Applicability to NSPS for Storage Tanks
	NSPS Subpart Kb, 40	3.B.25	VOC	Tank design specifications

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
	CFR 60.112b(a)(1)			
AA-001, AA-002, AB-001, AB-002, AB-003, AB-004, AC-001, AC-002, AD-001, AD-002, AD-003, AG-001, AG-002, AG-003, AG-004, AG-005, AG-006, AG-007, AG-008, AG-009, AH-001, AH-003	Permit to Construct issued on May 30, 2008	3.B.26	Equipment Operation	Emissions must be vented to a control device when emission units are operating
AH-003 (Thermal Oxidizer)	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.B.27	Downtime	Annual downtime allowance of 150 hours/year
AC-001, AC-002, AD-002 (four fermenters), AH-003 (DDGS dryer and DDGS fluidized bed cooler)	40 CFR 64.2	3. B.28	Applicability	Applicability to Compliance Assurance Monitoring (CAM)

3.B.1 Except as otherwise specified, no person shall 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

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

where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour.

Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).)

3.B.2 For the entire facility, the permittee shall limit throughput and production as follows:

- (a) Ethanol Production – 715,000 tons per year (12-month rolling total); 69,300,000 gallons per year (12-month rolling total)
- (b) DDGS Production – 225,000 tons per year (12-month rolling total)
- (c) Total Grain Throughput – 1,100,000 tons per year (12-month rolling total)

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

- 3.B.3 For Emission Point AD-001, the permittee shall limit Acetaldehyde emissions to 0.10 lb/hr (3-hr average) and VOC emissions to 1.0 lb/hr (3-hr average). (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 3.B.4 For Emission Point AD-002, the permittee shall limit Acetaldehyde emissions to 1.0 lb/hr (3-hr average) and VOC emissions to 11.0 lb/hr (3-hr average). (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 3.B.5 For Emission Point AH-003, the permittee shall limit emissions of the following pollutants, based on a 3-hr average emission rate: VOC at 4.7 lb/hr, PM/PM₁₀ at 4.1 lb/hr (filterable + condensable), CO at 7.2 lb/hr, and NO_x at 5.9 lb/hr. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 3.B.6 Grain Receiving and Handling (Emission Points AA-001, AA-002, AB-001, AB-002, AB-003, and AB-004) are subject to and shall comply with all applicable standards of 40 CFR Part 60, Subpart DD (NSPS for Grain Elevators) and Subpart A (General Provisions). (Ref.: 40 CFR 60.300)
- 3.B.7 For Emission Points AA-001, AA-002, AB-001, AB-002, AB-003, and AB-004, the permittee shall not discharge into the atmosphere from any affected facility except a grain dryer any process emission which contains particulate matter in excess of 0.023 g/dscm (ca. 0.01 gr/dscf) and exhibits greater than 0 percent opacity. (Ref.: 40 CFR 60.302(b))
- 3.B.8 For Emission Point AA-002, the permittee shall operate the barge unloading station as follows:
1. The unloading leg shall be enclosed from the top (including the receiving hopper) to the center line of the bottom pulley and ventilation to a control device shall be maintained on both sides of the leg and the grain receiving hopper.
 2. The total rate of air ventilated shall be at least 32.1 actual cubic meters per cubic meter of grain handling capacity (ca. 40 ft³/bu).
 3. Rather than meet the requirements of 1. or 2., the permittee may use other methods of emission control if it is demonstrated to the MDEQ's satisfaction that they would reduce emissions of particulate matter to the same level or less.

(Ref.: 40 CFR 60.302(d))

- 3.B.9 The natural gas fired boilers (Emission Points AI-001 and AI-002) are subject to and shall comply with all applicable standards of 40 CFR Part 60, Subpart Dc (NSPS for Small Industrial-Commercial-Institutional Steam Generating Units) and Subpart A (General Provisions). (Ref.: 40 CFR 60.40c(a))
- 3.B.10 Only two boilers shall be fired simultaneously. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 3.B.11 For Emission Points AI-001 and AI-002, the permittee shall only combust natural gas. (Ref.: Permit to Construct issued May 30, 2008))
- 3.B.12 Emergency Generators (Emission Points AI-004 and AI-005) are subject to and shall comply with all applicable standards of 40 CFR Part 60, Subpart JJJJ (NSPS for Stationary Spark Ignition (SI) Internal Combustion Engines (ICE)) and Subpart A (General Provisions). (Ref.: 40 CFR 60.4230)
- 3.B.13 For Emission Point AI-004, the permittee shall comply with the emission standards of 40 CFR 60.4231(a). (Ref.: 40 CFR 60.4233(a))
- 3.B.14 For Emission Point AI-005, the permittee shall comply with the emission standards of 40 CFR 60.4231(c). (Ref.: 40 CFR 60.4233(c))
- 3.B.15 For Emission Points AI-004 and AI-005, the permittee shall achieve the emission standards as required by 40 CFR 60.4233 over the entire life of the engine. (Ref.: 40 CFR 60.4234)
- 3.B.16 For Emission Points AI-004, AI-005, and AI-006, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year is prohibited. There is no time limit on the use of emergency stationary ICE in emergency situations. The permittee may operate the emergency stationary ICE for a maximum of 100 hours per calendar year for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing. (Ref.: 40 CFR 60.4211(f) and 60.4243(d))
- 3.B.17 The emergency generators (AI-004 and AI-005) and fire pump engine (AI-006) are subject to and shall comply with all applicable standards of 40 CFR Part 63, Subpart ZZZZ (NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE)) and Subpart A (General Provisions). AI-004, AI-005, and AI-006 are new stationary RICE at an area source subject to regulations under 40 CFR Part 60; therefore, no further requirements of Subpart ZZZZ apply. (Ref.: 40 CFR 63.6585 and 63.6590(c)(1))

- 3.B.18 The fire pump engine (AI-006) is subject to and shall comply with all applicable standards of 40 CFR Part 60, Subpart IIII (NSPS for Stationary Compression Ignition Internal Combustion Engines) and Subpart A (General Provisions). (Ref.: 40 CFR 60.4200)
- 3.B.19 For Emission Point AI-006, the permittee shall comply with an emission limitation of 3.0 grams/hp-hr for NMHC + NO_x and 0.15 grams/hp-hr for PM. (Ref.: 40 CFR 60.4205(c), and Table 4)
- 3.B.20 For Emission Point AI-006, the permittee shall operate and maintain the engine to achieve the emission standards in 40 CFR 60.4205 over the entire life of the engine. (Ref.: 40 CFR 60.4206)
- 3.B.21 For Emission Point AI-006, the permittee shall use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted. (Ref.: 40 CFR 60.4207(b))
- 3.B.22 The facility is subject to and shall comply with all applicable standards of 40 CFR Part 60, Subpart VVa (NSPS for equipment leaks of VOC) and Subpart A (General Provisions). (Ref.: 40 CFR 60.480a)
- 3.B.23 For equipment subject to NSPS Subpart VVa, the permittee is subject to the applicable requirements of 40 CFR 60.482-1a through 60.482-11a. Compliance with 40 CFR 60.482-1a to 60.482-11a will be determined by review of records and reports, review of performance test results, and inspection using the methods and procedures specified in 40 CFR 60.485a. Equipment that is in vacuum service is excluded from the requirements of 40 CFR 60.482-2a through 60.482-11a if it is identified as required in 40 CFR 60.486a(e)(5). Equipment that the permittee designates as being in VOC service less than 300 hr/yr is excluded from the requirements of 40 CFR 60.482-2a through 60.482-11a if it is identified as required in 40 CFR 60.486a(e)(6) and it meets any of the conditions specified in paragraphs 40 CFR 60.482-1a (e)(1) through (3). (Ref.: 40 CFR 60.482-1a)
- 3.B.24 Storage Tanks (Emission Points AK-001 through AK-005) are subject to and shall comply with all applicable standards of 40 CFR Part 60, Subpart Kb (NSPS for Standards of Performance for Volatile Organic Liquid Storage Vessels) and Subpart A (General Provisions). (Ref.: 40 CFR 60.110b(a))
- 3.B.25 For Emission Points AK-001 through AK-005, the permittee shall equip the storage vessels with a fixed roof in combination with an internal floating roof meeting the design specifications of 40 CFR 60.112b(a)(1)(i)-(ix). (Ref.: 40 CFR 60.112b(a)(1))

- 3.B.26 For the entire facility, each control device shall be in operation and functioning efficiently when operating any emissions equipment that vents to a control device. Should any control device become inoperable the respective emissions equipment shall be shut down until the proper repairs can be completed. Operation of equipment, as listed in Table 3, without controls is prohibited. (Ref.: Permit to Construct issued May 30, 2008)
- 3.B.27 As an exception to condition 3.B.26, the permittee may elect to operate the emission sources from emission point AH-003, (the natural gas fired DDGS dryer and the DDGS fluidized bed cooler) for 150 hours/year with uncontrolled emissions. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 3.B.28 For emission points AC-001, AC-002, AD-002 (four fermenters), and AH-003 (DDGS dryer and DDGS fluidized bed cooler), the permittee is subject to and shall comply with all applicable standards of 40 CFR 64 – Compliance Assurance Monitoring. (Ref.: 40 CFR 64.2)

C. Insignificant and Trivial Activity Emission Limitations & Standards

Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.C.1	PM	0.6 lbs/MMBTU
11 Miss. Admin. Code Pt. 2, R. 1.4.A(1)	3.C.2	SO ₂	4.8 lbs/MMBTU

- 3.C.1 The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).)
- 3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)

SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:
- (a) the identification of each term or condition of the permit that is the basis of the certification;
 - (b) the compliance status;
 - (c) whether compliance was continuous or intermittent;
 - (d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
 - (e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(5)(a), (c), & (d).)
- 4.3 The permittee shall submit progress reports consistent with an applicable schedule of compliance and 11 Miss. Admin. Code Pt. 2, R. 6.2.C(8) semiannually, or at such other frequency as is specified in an applicable requirement or by the Permit Board. Such progress reports shall contain the following:
- (a) dates for achieving the activities, milestone(s), or compliance required in the schedule of compliance, and dates when such activities, milestone(s) or compliance were achieved; and
 - (b) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. General Monitoring, Recordkeeping and Reporting Requirements

- 5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.
- 5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:
- (a) the date, place as defined in the permit, and time of sampling or measurements;
 - (b) the date(s) analyses were performed;
 - (c) the company or entity that performed the analyses;
 - (d) the analytical techniques or methods used;
 - (e) the results of such analyses; and
 - (f) the operating conditions existing at the time of sampling or measurement. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(1)(i)-(vi).)
- 5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information 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 for continuous monitoring instrumentation, and copies of all reports required by the permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(2).)
- 5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 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 consistent with 11 Miss. Admin. Code Pt. 2, R. 6.2.E. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)
- 5.A.5 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) days of the time the deviation began. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(2).)

- 5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the DEQ and the EPA.
- 5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

B. Specific Monitoring and Recordkeeping Requirements

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AI-001, AI-002	Fuel Burning	Monthly recordkeeping of amount of each fuel combusted	5.B.1	40 CFR 60.48c(g)(2)
	Operating hours	Log of dates and times each boiler is operated	5.B.2	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(3).
AA-000, AB-000, AH-000	Opacity	Monitoring and recordkeeping of weekly visible emission observations, via method 22	5.B.3	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(3).
AA-001, AA-002, AB-001, AB-002, AB-003, AB-004, AC-001, AC-002	PM	Stack testing via Method 5 or 17 once during life of permit	5.B.4	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(3).
	Pressure Drop	Monitor and record pressure drop daily	5.B.5	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(3).
AK-001 through AK-005	VOC	Visual inspections	5.B.6	40 CFR 60.113b(a)(2)-(4) and 60.115b(a)(2)
		Records of storage vessel dimensions and capacity	5.B.7	40 CFR 60.116b(b)
		Records of VOL stored, period of storage, and maximum true vapor pressure	5.B.8	40 CFR 60.116b(c)
AI-004, AI-005	Install non-resettable hour meter	Records of operation recorded using a non-resettable hour meter. Record time of operation and reason engine was in operation at that time	5.B.9	40 CFR 60.4237(c) and 60.4245(b)
	Engine certification	Purchase engine certified to meet emission standards	5.B.10	40 CFR 60.4243(a)(1)
	Recordkeeping Requirements	Records of notifications, maintenance, and engine certification	5.B.11	40 CFR 4245(a)
AI-006	Hours of operation	Records of operation of engine in emergency and non-emergency service that are recorded through a non-resettable hour meter	5.B.12	40 CFR 60.4209(a) and 60.4214(b)
	O&M	Operating and maintenance requirements	5.B.13	40 CFR 60.4211(a)

	Engine certification	Purchase engine certified to meet emission standards	5.B.14	40 CFR 60.4211(c)
AJ-001	VOC	Keep log of all equipment components subject to NSPS Subpart VVa	5.B.15	40 CFR 60.486a(e)
		Records of each monitoring event	5.B.16	40 CFR 60.486a(a)(3)
		Additional monitoring requirements for leaking equipment	5.B.17	40 CFR 60.486a(b)
		Records for detected leaks	5.B.18	40 CFR 60.486a(c)
		Records of equipment not in VOC service	5.B.19	40 CFR 60.486a(j)
AD-001, AD-002	VOC Acetaldehyde	Biennial stack testing	5.B.20	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(3).
	Pressure Drop	Monitor pressure drop across scrubbers daily	5.B.21	
AH-003 (Thermal Oxidizer)	VOC PM/PM ₁₀	Biennial stack testing of thermal oxidizer	5.B.22	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(3).
	CO NOx	Continuously monitor temperature and maintain a minimum combustion temperature of 1400°F	5.B.23	
Facility-Wide	Ethanol Production	Monitoring and monthly recordkeeping of ethanol production	5.B.24	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(3).
	DDGS production	Monitoring and monthly recordkeeping of DDGS production		
	Grain Throughput	Monitoring and monthly recordkeeping of grain throughput		
	Preventative Maintenance	Monitoring and weekly recordkeeping of regular maintenance	5.B.25	
AH-003 (Thermal Oxidizer)	Operating hours	Recordkeeping of hours of downtime	5.B.26	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).

5.B.1 For Emission Points AI-001 and AI-002, the permittee shall record and maintain records of the amount of each fuel combusted during each calendar month. (Ref.: 40 CFR 60.48c(g)(2))

5.B.2 For Emission Points AI-001 and AI-002, the permittee shall maintain a written or electronic log of the dates and times each boiler is operated such that the permittee can demonstrate that only two boilers are operating simultaneously. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(3).)

- 5.B.3 For Emission Groups AA-000, AB-000, and AH-000, the permittee shall perform visible emission observations (Method 22) for six minutes on a weekly basis for each emission point. If during the visible emission observation any visible emissions are observed, the permittee shall perform an EPA Reference Method 9 Visible Emission Evaluation (VEE). The permittee shall record and maintain a log of the results of these observations/evaluations. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(3).)
- 5.B.4 For Emission Points AA-001, AA-002, AB-001, AB-002, AB-003, AB-004, AC-001, and AC-002, the permittee shall demonstrate compliance with the PM (filterable) standards by performing a stack test of each emission point once during the life of the permit. The permittee shall use EPA Method 5 or 17 to determine the PM concentration and the volumetric flow rate of the effluent gas. The sampling time and sample volume for each run shall be at least 60 minutes and 1.70 dscm (60 dscf). The probe and filter holder shall be operated without heaters. Method 2 shall be used to determine the ventilation volumetric flow rate. Method 9 and the procedures in 40 CFR 60.11 shall be used to determine opacity. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(3).)
- 5.B.5 For Emission Points AA-001, AA-002, AB-001, AB-002, AB-003, AB-004, AC-001, and AC-002 the permittee shall install, operate, and maintain devices for monitoring the pressure drop across each baghouse. The permittee shall comply with the following requirements for each baghouse: (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(3).)
- (a) Establish a pressure drop range indicative of efficient PM control based upon the baghouse manufacturer's recommendation and/or the performance testing.
 - (b) Record the pressure drop across each baghouse on a daily basis, when the related process equipment is operating.
 - (c) Keep a log of the daily pressure drop readings, as well as records of the pressure drop range for each baghouse indicative of efficient operation and the basis for such range.
 - (d) Should a pressure drop reading outside the established range, immediately take corrective measures to restore the baghouse operating efficiency.
 - (e) Note any corrective measures taken in the facility records.
- 5.B.6 For Emission Points AK-001 through AK-005, the permittee shall conduct the inspections required by 40 CFR 60.113b(a)(2) through (a)(4).

The permittee shall keep a record of each inspection performed as required by 40 CFR 60.113b(a)(1), (a)(2), (a)(3), and (a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings). (Ref.: 40 CFR 60.113b(a)(2)-(4), 60.115b(a)(2))

- 5.B.7 For Emission Points AK-001 through AK-005, the permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. (Ref.: 40 CFR 60.116b(b))
- 5.B.8 For Emission Points AK-001 through AK-005, the permittee shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. (Ref.: 40 CFR 60.116b(c))
- 5.B.9 For Emission Points AI-004 and AI-005, the permittee shall install a non-resettable hour meter upon startup of the emergency engine. The permittee must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.. (Ref.: 40 CFR 60.4237(c) and 60.4245(b))
- 5.B.10 For Emission Point AI-004 and AI-005, the permittee must comply by purchasing an engine certified to the emission standards in § 60.4231(a) through (c), as applicable, for the same engine class and maximum engine power. The permittee shall operate and maintain the certified stationary SI internal combustion engine and control device (if applicable) according to the manufacturer's emission-related written instructions. The permittee must keep records of conducted maintenance to demonstrate compliance, but no performance testing is required. The permittee must also meet the requirements as specified in 40 CFR part 1068, subparts A through D, as they apply. If the permittee adjusts engine settings according to and consistent with the manufacturer's instructions, the stationary SI internal combustion engine will not be considered out of compliance. (Ref.: 40 CFR 4243(a)(1))
- 5.B.11 For Emission Points AI-004 and AI-005, the permittee must keep records of the following information:
- (a) All notifications submitted to comply with Subpart JJJJ and all documentation supporting any notification.
 - (b) Maintenance conducted on the engine.
 - (c) Documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR parts 90, 1048, 1054, and 1060, as applicable.
- (Ref.: 40 CFR 60.4245(a))
- 5.B.12 For Emission Point AI-006, the permittee shall install a non-resettable hour meter prior to startup of the engine. The permittee shall keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable

hour meter. The owner must record the time of operation of the engine and the reason the engine was in operation during that time. (Ref.: 40 CFR 60.4209(a) and 60.4214(b))

5.B.13 For Emission Point AI-006, the permittee shall do the following:

- (a) Operate and maintain the stationary CI internal combustion engine and control device (if applicable) according to the manufacturer's emission-related written instructions;
- (b) Change only those emission-related settings that are permitted by the manufacturer; and
- (c) Meet the requirements of 40 CFR parts 89, 94 and/or 1068, as they apply.

(Ref.: 40 CFR 60.4211(a))

5.B.14 For Emission Point AI-006, the permittee must comply by purchasing an engine certified to the emission standards in 40 CFR 60.4205(c) for the same model year and maximum (or in the case of fire pumps, NFPA nameplate) engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications. (Ref.: 40 CFR 60.4211(c))

5.B.15 For Emission Point AJ-001, for all equipment subject to the requirements in 40 CFR 60.482-1a to 60.482-11a, the permittee shall record in a log that is kept in a readily accessible location the information in 40 CFR 60.486a(e)(1) through (e)(10).: (Ref.: 40 CFR 60.486a(e))

5.B.16 For Emission Point AJ-001, the permittee shall record the information specified below for each monitoring event required by 40 CFR 60.482-2a, 60.482-3a, 60.482-7a, 60.482-8a, 60.482-11a, and 60.483-2a. (Ref.: 40 CFR 60.486a(a)(3))

- (a) Monitoring instrument identification.
- (b) Operator identification.
- (c) Equipment identification.
- (d) Date of monitoring.
- (e) Instrument reading.

5.B.17 For Emission Point AJ-001, when each leak is detected as specified in 40 CFR 60.482-2a, 60.482-3a, 60.482-7a, 60.482-8a, 60.482-11a, and 60.483-2a, the following requirements apply: (Ref.: 40 CFR 60.486a(b))

- (a) A weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment.
- (b) The identification on a valve may be removed after it has been monitored for 2 successive months as specified in § 60.482-7a(c) and no leak has been detected during those 2 months.
- (c) The identification on a connector may be removed after it has been monitored as specified in 40 CFR 60.482-11a(b)(3)(iv) and no leak has been detected during that monitoring.
- (d) The identification on equipment, except on a valve or connector, may be removed after it has been repaired.

5.B.18 For Emission Point AJ-001, when each leak is detected as specified in 40 CFR 60.482-2a, 60.482-3a, 60.482-7a, 60.482-8a, 60.482-11a, and 60.483-2a, the following information shall be recorded in a log and shall be kept in a readily accessible location: (Ref.: 40 CFR 60.486a(c))

- (a) The instrument and operator identification numbers and the equipment identification number, except when indications of liquids dripping from a pump are designated as a leak.
- (b) The date the leak was detected and the dates of each attempt to repair the leak.
- (c) Repair methods applied in each attempt to repair the leak.
- (d) Maximum instrument reading measured by Method 21 of appendix A-7 of this part at the time the leak is successfully repaired or determined to be non-repairable, except when a pump is repaired by eliminating indications of liquids dripping.
- (e) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak.
- (f) The signature of the owner or operator (or designate) whose decision it was that repair could not be effected without a process shutdown.
- (g) The expected date of successful repair of the leak if a leak is not repaired within 15 days.
- (h) Dates of process unit shutdowns that occur while the equipment is unrepaired.
- (i) The date of successful repair of the leak.

- 5.B.19 For Emission Point AJ-001, the information and data used to demonstrate that a piece of equipment is not in VOC service shall be recorded in a log that is kept in a readily accessible location. (Ref.: 40 CFR 60.486a(j))
- 5.B.20 The permittee shall stack test Emission Points AD-001 and AD-002 for VOC and acetaldehyde. Stack testing shall be performed during periods when the relevant process area is being operated at or near the capacity provided in the permit application. Stack testing shall be performed within 24 months of permit issuance and within 24 months of the previous stack test thereafter. Stack testing shall be performed using EPA method 18, 25, 25A, and/or other EPA approved equivalent method. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(3).)
- 5.B.21 For Emission Points AD-001 and AD-002, the permittee shall install, operate, and maintain devices for monitoring the pressure drop across each scrubber. The permittee shall comply with the following requirements for each scrubber: (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(3).)
- (a) Establish a pressure drop range indicative of efficient VOC control based upon the scrubber manufacturer's recommendation and/or the performance testing.
 - (b) Record the pressure drop across each scrubber on a daily basis, when the related process equipment is operating.
 - (c) Keep a log of the daily pressure drop readings, as well as records of the pressure drop range for each scrubber indicative of efficient operation and the basis for such range.
 - (d) Should a pressure drop reading outside the established range, immediately take corrective measures to restore the scrubber operating efficiency.
 - (e) Note any corrective measures taken in the facility records.
- 5.B.22 For Emission Point AH-003, the permittee shall conduct stack testing on the thermal oxidizer for VOC, PM and PM₁₀, carbon monoxide, and nitrogen oxides. Stack testing shall be performed during periods when the relevant process area is being operated at or near the capacity provided in the permit application. Stack testing shall be performed within 24 months of permit issuance and within 24 months of the previous stack test thereafter. Stack testing shall be performed using EPA Methods 25, 5, 201A, 10, and 7, or other EPA-approved equivalent, respectively. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(3).)
- 5.B.23 For Emission Point AH-003, the permittee shall install, operate, and maintain a device for continuously monitoring the temperature in the thermal oxidizer combustion chamber and shall comply with the following requirements: (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(3).)

- (a) Maintain a minimum temperature in the combustion chamber of 1400°F.
 - (b) Continuously record the temperature at 15-minute intervals, at a minimum.
 - (c) Should a temperature reading fall below 1400°F, immediately take corrective measures to restore the temperature to at least 1400°F.
 - (d) Note any corrective measures taken in the facility records.
- 5.B.24 The permittee shall monitor and record the monthly and 12-month rolling total of the following: (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(3).)
- (a) Ethanol production in tons and gallons;
 - (b) DDGS production in tons; and
 - (c) Total grain throughput in tons.
- 5.B.25 For all control devices and air emission equipment, the permittee shall perform weekly maintenance inspections and record all maintenance activities performed. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(3).)
- 5.B.26 For emission point AH-003, the permittee must record on a 12-month rolling total, the hours of downtime of the thermal oxidizer while the DDGS grain dryer and DDGS fluidized bed cooler were in operation. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

C. Specific Reporting Requirements

Emission Point(s)	Pollutant/Parameter Monitored	Reporting Requirement	Condition Number	Applicable Requirement
Facility Wide	Stack Test	Pretest protocols submitted within 30 days of stack tests and notification within 10 days prior to stack test	5.C.1	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c).
AI-001, AI-002	Fuel Burning	Submit semi-annual reports of each fuel combusted during each calendar month	5.C.2	40 CFR 60.48c(j)
AK-001 through AK-005	Internal Floating Roof Notifications	Notification of filling or refilling of vessel within 30 days prior to fill date	5.C.3	40 CFR 60.113b(a)(5)
		Notification of defects found during annual inspection (liquid-mounted)	5.C.4	40 CFR 60.115b(a)(3)
		Notification of any defects in vessels (double seal)	5.C.5	40 CFR 60.115b(a)(4)
Facility Wide	Ethanol Production	Notification of start-up of ethanol production	5.C.6	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).

- 5.C.1 For any stack testing required herein, the permittee shall submit a written test protocol at least thirty (30) days prior to the intended stack test date(s) to ensure that all test methods and procedures are acceptable to the DEQ. Also, the permittee shall notify the DEQ in writing at least ten (10) days prior to the intended test date(s) so that an observer may be afforded the opportunity to witness the test. The performance test results shall be submitted to DEQ within forty-five (45) days following the completion of the test. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c).)
- 5.C.2 For Emission Points AI-001 and AI-002, the permittee shall submit semi-annual reports in accordance with Condition 5.B.1 indicating the amount of each fuel combusted during each calendar month. All reports shall be submitted to the MDEQ and shall be postmarked by the 30th day following the end of the reporting period. (Ref.: 40 CFR 60.48c(j))
- 5.C.3 For Emission Points AK-001 through AK-005, the permittee shall notify the MDEQ in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by Condition 5.B.4 to afford the MDEQ the opportunity to have an observer present. If the inspection required by Condition 5.B.4 of this section is not planned and the permittee could not have known about the inspection 30 days in advance of refilling the tank, the permittee shall notify the MDEQ at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the MDEQ at least 7 days prior to the refilling. (Ref.: 40 CFR 60.113b(a)(5))

- 5.C.4 For Emission Points AK-001 through AK-005, if any of the conditions described in 40 CFR 60.113b(a)(2) are detected during the annual visual inspection required by 40 CFR 60.113b(a)(2), a report shall be furnished to the DEQ within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made. (Ref.: 40 CFR 60.115b(a)(3))
- 5.C.5 For Emission Points AK-001 through AK-005, the permittee shall report to the DEQ within 30 days of the inspection required by Condition 5.B.4 of any holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects. The report shall identify the storage vessel and the reason it did not meet the specifications of Condition 5.B.4 and list each repair made. (Ref.: 40 CFR 60.115b(a)(4))
- 5.C.6 While the facility's ethanol production is not operating, the permittee is not required to comply with any applicable conditions pertaining to ethanol production. The permittee shall notify the DEQ in writing no later than ten (10) days after the start-up of ethanol production, after which any required conditions issued herein shall become effective. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act – Stratospheric Ozone Protection. The full text of the referenced regulations may be found on-line at <http://ecfr.gpoaccess.gov> under Title 40, or DEQ shall provide a copy upon request from the permittee.

- 7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A – Production and Consumption Controls.
- 7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.
- 7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E – The Labeling of Products Using Ozone-Depleting Substances, for the following containers and products:
 - (a) All containers in which a class I or class II substance is stored or transported;
 - (b) All products containing a class I substance; and
 - (c) All products directly manufactured with a process that uses a class I substance, unless otherwise exempted by this subpart or, unless EPA determines for a particular product that there are no substitute products or manufacturing processes for such product that do not rely on the use of a class I substance, that reduce overall risk to human health and the environment, and that are currently or potentially available. If the EPA makes such a determination for a particular product, then the requirements of this subpart are effective for such product no later than January 1, 2015.
- 7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F – Recycling and Emissions Reduction:
 - (a) Servicing, maintaining, or repairing appliances;
 - (b) Disposing of appliances, including small appliances and motor vehicle air conditioners;
or
 - (c) Refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, persons

selling class I or class II refrigerants or offering class I or class II refrigerants for sale,
and persons purchasing class I or class II refrigerants.

- 7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any acceptable alternative that is listed in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR Part 82, Subpart G – Significant New Alternatives Policy Program. The permittee shall also comply with any use conditions for the acceptable alternative substance.
- 7.6 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart H – Halon Emissions Reduction:
- (a) Any person testing, servicing, maintaining, repairing, or disposing of equipment that contains halons or using such equipment during technician training;
 - (b) Any person disposing of halons;
 - (c) Manufacturers of halon blends; or
 - (d) Organizations that employ technicians who service halon-containing equipment.

APPENDIX A

List of Abbreviations Used In this Permit

11 Miss. Admin. Code Pt. 2, Ch. 1	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
11 Miss. Admin. Code Pt. 2, Ch. 2	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
11 Miss. Admin. Code Pt. 2, Ch. 3	Regulations for the Prevention of Air Pollution Emergency Episodes
11 Miss. Admin. Code Pt. 2, Ch. 4	Ambient Air Quality Standards
11 Miss. Admin. Code Pt. 2, Ch. 5	Regulations for the Prevention of Significant Deterioration of Air Quality
11 Miss. Admin. Code Pt. 2, Ch. 6	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
11 Miss. Admin. Code Pt. 2, Ch. 7	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lbs/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards For Hazardous Air Pollutants, 40 CFR 61
	or
	National Emission Standards For Hazardous Air Pollutants for Source Categories, 40 CFR 63
NM VOC	Non-Methane Volatile Organic Compounds
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM ₁₀	Particulate Matter less than 10 µm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound

APPENDIX B

SITE SPECIFIC COMPLIANCE ASSURANCE MONITORING (CAM) PLAN