

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

**TO OPERATE AIR EMISSIONS EQUIPMENT**

**THIS CERTIFIES THAT**

Kasai North America Inc, Madison Plant  
435 Church Road  
Madison, MS 39110  
(Madison 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:**      **July 16, 2014**

**Permit Modified:**      **June 29, 2016 (Name change from M Tek Inc, Mississippi Division to Kasai North America Inc, Madison Plant)**

**Effective Date:** As specified herein.

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**



\_\_\_\_\_  
**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Expires:** June 30, 2019

**Permit No.:** 1720-00079

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### **APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT**

## **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 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).)
- 1.5 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 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).)
- 1.7 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.)

1.8 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).)

1.9 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.)

- 1.10 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).)
- 1.11 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).)
- 1.12 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).)
- 1.13 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).)
- 1.14 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).)
- 1.15 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.)
- 1.16 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)., R. 6.4.B., and R. 6.2.A(1)(c).)
- 1.17 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).)
- 1.18 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.)

- 1.19 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."

- 1.20 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).)
- 1.21 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).)
- 1.22 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 ordnance. 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.)
- 1.23 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.)

1.24 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.)

1.25 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         | Facility Wide Interior Door and Deck Panel Manufacturer  |
| AA-100         | Facility Wide Surface Coating Operations   |
| AA-200         | Facility Wide Injection Molding Operations   |
| AA-300         | Facility Wide Natural Gas Fired Fuel Burning Equipment with a total combined capacity of 16.62 MMBTU/Hr which includes (but is not limited to) the use of comfort heating, air conditioning, miscellaneous, roof top units, and miscellaneous heating. |
| AA-400         | One (1) 1,000 Gallon Diesel Dispensing Tank  |
| AA-500         | One (1) 685 HP (1.74 MMBTU/HR) Diesel Fired Emergency Backup Generator   |

### SECTION 3. EMISSION LIMITATIONS & STANDARDS

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

| Emission Point              | Applicable Requirement                      | Condition Number | Pollutant/Parameter | Limit/Standard  |
|-----------------------------|---|------------------|---------------------|---|
| AA-000<br>(Entire Facility) | 11 Miss. Admin. Code Pt. 2, R.2, R.1.3.A    | 3.A.1            | Opacity             | Startup Operations may exceed 40% for 15 minutes for one hour and no more than 3 startups per stack in any 24 hour period   |
|                             |   |                  |                     | Soot blowing operations are permitted such that emissions do not exceed 60% and the aggregate duration during any 24 hour period does not exceed ten (10) minutes per billion BTU in any one hour |
|                             | 11 Miss. Admin. Code Pt. 2, R.1.3.B         | 3.A.2            | Opacity             | No more than 40% at any time except for those situations in 3.A.1   |
|                             | 11 Miss. Admin. Code Pt. 2, R.1.3. F(1)     | 3.A.3            | PM                  | $E = 4.1p^{0.67}$   |
|                             | 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a). | 3.A.4            | PM                  | 0.6 lbs/MMBTU   |
|                             | 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).    | 3.A.5            | SO <sub>2</sub>     | 4.8 lbs/MMBTU   |

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.)

- 3.A.4 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.A.5 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).)

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

| Emission Point               | Applicable Requirement                     | Condition Number | Pollutant/Parameter | Limit/Standard                |
|------------------------------|--|------------------|---------------------|-------------------------------|
| AA-000<br>(Entire Facility)  | 11 Miss. Admin. Code Pt. 2, R.6.3.A.(1)(a) | 3.B.1            | VOCs                | 249.0 tpy                     |
|                              |  | 3.B.2            | HAPs                | 9.9 tpy Individual HAP        |
|                              |  |                  |                     | 24.9 tpy Total HAPs           |
| AA-500 (Emergency Generator) | 40 CFR 63.6585                             | 3.B.3            | Area Source of MACT | Applicability to Subpart ZZZZ |

- 3.B.1 For Emission Point AA-000 (the entire facility), the permittee shall limit emissions of Volatile Organic Compounds (VOCs) to no more than 249.0 tons per year (tpy) as determined for each consecutive twelve month period. (Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.A.(1)(a))
- 3.B.2 For Emission Point AA-000 (the entire facility), the permittee shall limit emissions of Individual Hazardous Air Pollutants (IHAP) to no more than 9.9 tpy and Total HAPs (THAPs) to no more than 24.9 tpy as determined for each consecutive twelve month period. (Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.A.(1)(a))
- 3.B.3 For Emission Point AA-500 (the emergency generator), the permittee is subject to 40 CFR 63, National Emission Standards for Hazardous Air Pollutants, specifically 40 CFR 63.6585 – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines at an area source. (Ref.: 40 CFR 63.6585)

## **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).)

## 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).)
- 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                  | Applicable Requirement                           | Condition Number | Pollutant/Parameter Monitored                 | Monitoring/Recordkeeping Requirement  |
|---------------------------------|--|------------------|---|---|
| AA-000<br>(Facility Wide)       | 11 Miss. Admin. Code Pt. 2, R.6.3.A.(3)(a and b) | 5.B.1            | VOC   | Quantity and Quality of all VOC and HAP containing materials used.  |
|                                 |  |                  | HAP   |   |
| AA-500<br>(Emergency Generator) | 40 CFR 63.6603 (Table 2d)                        | 5.B.2            | Oil and Filter                                | Change every 500 hours or annually, whichever comes first,  |
|                                 |  |                  | Air Cleaner                                   | Inspect every 1,000 hours or annually, whichever comes first, and   |
|                                 |  |                  | Hoses and Belts                               | Inspect every 500 hours or annually, whichever comes first, and replace as necessary.   |
|                                 | 40 CFR 63.6625(e)                                | 5.B.3            | Manufacturer Requirements                     | Operate according to or develop maintenance plan for minimizing emissions.  |
|                                 | 40 CFR 63.6625(f)                                | 5.B.4            | Installation                                  | Non-resettable hour meter.  |
|                                 | 40 CFR 63.6625(h)                                | 5.B.5            | Startup                                       | Minimizing startup idle and time.   |
|                                 | 40 CFR 63.6640(f)                                | 5.B.6            | Operating Requirements                        | No time limit during emergency situations.  |
|                                 |  |                  |   | 100 hour limit annually for maintenance and readiness testing.  |
|                                 |  |                  |   | May be operated for 50 hours per year in non-emergency situations but counts toward the 100 hour maintenance and readiness testing limit.                   |
|                                 |  |                  |   | Any operation other than emergency, maintenance and testing, and operation in non-emergency exceeding 50 hours per year is prohibited.                      |
|                                 | 40 CFR 63.6635                                   | 5.B.7            | Compliance with Emission and Operating Limits | Monitor at all times the unit is in operation.  |
|                                 |  |                  |   | May not use data recorded during malfunctions, repairs, quality assurances or control activities for data averages and calculations. Must use "valid" data. |
|                                 | 40 CFR 63.6655(d)                                | 5.B.8            | Manufacturer Requirements                     | Operate according to Manufacturer's or develop and follow the permittee's maintenance plan for minimizing emissions.  |
|                                 | 40 CFR 63.6655(e)                                | 5.B.9            | Recordkeeping                                 | Maintain for Maintenance to show in compliance with to maintenance plan.  |
|                                 | 40 CFR 63.6655(f)                                | 5.B.10           |   | Hours the engine operated.  |

5.B.1 For Emissions Point AA-000 (the entire facility), the permittee shall determine for each Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) containing material used the following and maintain sufficient monthly records to document:

- (a) Quantity used (gal or lb)
- (b) The percentage of VOC's and HAP's by weight
- (c) The density (lbs/gal), unless material usages are measured in lbs
- (d) The permittee may utilize data supplied by the manufacturer, or analysis of VOC and HAP content by EPA Test Method 24 and/or 311, 40 CFR 60, Appendix A.
- (e) The permittee shall calculate the VOC and HAP emissions from the use of these materials each month and compare the HAP and VOC emissions to those allowed under conditions 3.A.3 and 3.A. 4 respectively of the permit herein.

(Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.A.(3)(a and b))

5.B.2 For Emission Point AA-500 (the emergency generator), the permittee shall comply with the following:

- (a) change oil and filter every 500 hours of operation or annually, whichever comes first,
- (b) inspect air cleaner 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.

(Ref.: 40 CFR 63.6603(Table 2d))

5.B.3 For Emission Point AA-500 (the emergency generator), the permittee shall operate and maintain the emergency stationary RICE 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. (Ref.: 40 CFR 63.6625(e))

5.B.4 For Emission Point AA-500 (the emergency generator), the permittee shall install a non-resettable hour meter if one is not already installed. (Ref.: 40 CFR 63.6625(f))

5.B.5 For Emission Point AA-500 (the emergency generator), 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. (Ref.: 40 CFR 63.6625(h))

5.B.6 For Emission Point AA-500 (the emergency generator), the permittee shall operate according to the following requirements:

- (a) There is no time limit on the use in emergency situations.
- (b) The permittee may operate for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (c) of this section counts as part of the 100 hours per calendar year allowed by this paragraph.
- (c) Emergency stationary RICE located at area sources of HAP 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 provided in paragraph (b) of this section.

(Ref.: 40 CFR 63.6640(f))

5.B.7 For Emission Point AA-500 (the emergency generator), the permittee shall comply with the following requirements by monitoring and collecting data:

- (a) Except for malfunctions, associated repairs, required performance evaluations, and required quality assurance or control activities, the permittee shall monitor continuously at all times the unit is operating. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
- (b) The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels. The permittee shall, however, use all the valid data collected during all other periods.

(Ref.: 40 CFR 63.6635)

- 5.B.8 For Emission Point AA-500 (the emergency generator), the permittee shall keep records to show continuous compliance with the work or management practices (i.e., operating and maintaining the unit according to the manufacturer's emission-related operation and maintenance instructions; or following the permittee's own maintenance plan). (Ref.: 40 CFR 63.6655(d) and Table 6 of Subpart ZZZZ)
- 5.B.9 For Emission Point AA-500 (the emergency generator), the permittee shall keep records of the maintenance conducted on the unit in order to demonstrate that it was operated and maintained according to the maintenance plan requirements as described in Table 2d (Condition 5.B.2). (Ref.: 40 CFR 63.6655(e))
- 5.B.10 For Emission Point AA-500 (the emergency generator), the permittee shall keep records of the hours of operation through the non-resettable hour meter. The permittee shall also document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spend for non-emergency operation. (Ref.: 40 CFR 6655(f))

**C. Specific Reporting Requirements**

| Emission Point            | Applicable Requirement                     | Condition Number | Pollutant/Parameter Monitored | Reporting Requirement   |
|---------------------------|--|------------------|-------------------------------|---|
| AA-000<br>(Facility Wide) | 11 Miss. Admin. Code Pt. 2, R.6.3.A.(3)(c) | 5.C.1            | VOC                           | Submit Semi-annually the Quantity and Quality of all VOC and HAP containing material used |
|                           |  |                  | HAP                           |   |

5.C.1 For Emission Point AA-000 (the entire facility), the permittee shall maintain sufficient records to document and submit semiannually:

- (a) Identification of and the total gallons used of each HAP and VOC containing material used on a monthly basis and in each consecutive 12-month period on a rolling basis.
- (b) The HAP and VOC content(s) of each HAP and VOC containing material used. A description of the method used to determine the HAP and VOC content shall accompany this data.
- (c) The density of each coating, adhesive, solvent or other HAP and VOC containing material used.
- (d) The emission rate of each individual HAP and the total HAP and VOC emission rate in tons/year for each consecutive 12-month period on a rolling monthly basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.A.(3)(c))

## 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           |
| NMVOC                              | Non-Methane Volatile Organic Compounds  |
| NO <sub>x</sub>                    | Nitrogen Oxides   |
| NSPS                               | New Source Performance Standards, 40 CFR 60   |
| O&M                                | Operation and Maintenance   |
| PM                                 | Particulate Matter  |
| PM <sub>10</sub>                   | 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 <sub>2</sub>                    | Sulfur Dioxide  |
| TPY                                | Tons per Year   |
| TRS                                | Total Reduced Sulfur  |
| VEE                                | Visible Emissions Evaluation  |
| VHAP                               | Volatile Hazardous Air Pollutant  |
| VOC                                | Volatile Organic Compound   |