



## State of Mississippi



### FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL PERMIT

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

#### **THIS CERTIFIES**

JNS Biofuel LLC

823 Highway 15 North

New Albany, MS

Union County

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with the Federal Clean Air Act and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. set., Mississippi Code of 1972), the regulations and standards adopted and promulgated thereunder, and the State Implementation Plan for operating permits for synthetic minor sources.

**Mississippi Environmental Quality Permit Board**

**Mississippi Department of Environmental Quality**

**Issued/Modified: MAR 06 2017**

**Expires: FEB 28 2022**

**Permit No. 2700-00043**

**Agency Interest # 23187**

Table of Contents

Subject Item Inventory.....i

Facility Requirements.....1

General Information.....A-1

Other Relevant Documents:

**Permit to Operate Air Emissions Equipment at a Synthetic Minor Source**

JNS Biofuel LLC

Subject Item Inventory

Permit Number: 2700-00043

Activity ID No.: PER20150001

**Subject Item Inventory:**

<b>ID</b>	<b>Designation</b>	<b>Description</b>
EQPT22	AA-101	Biodiesel Fuel (B100) Loading Operations
EQPT23	AA-102	Glycerine Loading Operations
AREA2	AA-103	Biodiesel Production Process Equipment Leaks
CONT1	AA-104	Two (2) Condensers in series to recover Methanol in the Biodiesel Production Process
EQPT24	AA-105	157,000 Gallon Fixed Roof Crude Organic Oil Storage Tank
EQPT25	AA-106	157,000 Gallon Fixed Roof Biodiesel Fuel Storage Tank (B100)
EQPT26	AA-107	20,000 Gallon Fixed Roof Glycerine Storage Tank
EQPT27	AA-108	20,000 Gallon Fixed Roof Glycerine Storage Tank
EQPT28	AA-109	20,000 Gallon Fixed Roof Glycerine Storage Tank
EQPT29	AA-110	9,000 Gallon Fixed Roof Methanol Storage Tank
EQPT30	AA-111	9,000 Gallon Fixed Roof Sodium Methylate Storage Tank (70% Methanol)
EQPT31	AA-112	20,000 Gallon Fixed Roof Glycerine Receiving Storage Tank
EQPT32	AA-113	20,000 Gallon Fixed Roof Glycerine Receiving Storage Tank
EQPT33	AA-114	14,000 Gallon Fixed Roof Finished Biodiesel Spec Fuel Storage Tank (B100)
EQPT34	AA-115	1,000 Gallon Fixed Roof Dirty Methanol Storage Tank
EQPT35	AA-116	1,000 Gallon Fixed Roof Dirty Methanol Storage Tank
EQPT36	AA-117	1,000 Gallon Fixed Roof Dirty Methanol Storage Tank
EQPT37	AA-118	8,500 Gallon Fixed Roof Biodiesel Process Storage Tank (B100)
EQPT38	AA-119	525 Gallon Fixed Roof Methanol Recovery Storage Tank
EQPT41	AA-122	6,000 Gallon Fixed Roof Methanol Storage Tank

**Permit to Operate Air Emissions Equipment at a Synthetic Minor Source**

JNS Biofuel LLC

Subject Item Inventory

Permit Number: 2700-00043

Activity ID No.: PER20150001

**Subject Item Inventory:**

<b>ID</b>	<b>Designation</b>	<b>Description</b>
AI23187	23187	Biodiesel Production
EQPT42	AA-123	30,000 Gallon Fixed Roof Crude Organic Oil Storage Tank
EQPT43	AA-124	30,000 Gallon Fixed Roof Crude Organic Oil Storage Tank
EQPT44	AA-125	30,000 Gallon Fixed Roof Biodiesel Fuel Storage Tank (B100)
EQPT45	AA-126	30,000 Gallon Fixed Roof Biodiesel Fuel Storage Tank (B100)

**Subject Item  
Groups:**

<b>ID</b>	<b>Description</b>	<b>Components</b>
GRPT4	NSPS NNN and NSPS RRR	AREA2 Biodiesel Production Process Equipment Leaks
		CONT1 Two (2) Condensers in series to recover Methanol in the Biodiesel Production Process
GRPT5	NSPS VVa Requirements	AREA2 Biodiesel Production Process Equipment Leaks

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

JNS Biofuel LLC

Subject Item Inventory

Permit Number: 2700-00043

Activity ID No.: PER20150001

### **KEY**

ACT = Activity

AREA = Area

CONT = Control Device

IA = Insignificant Activity

MAFO = Animal Feeding Operation

RPNT = Release Point

WDPT = Withdrawal Point

AI = Agency Interest

CAFO = Concentrated Animal Feeding Operation

EQPT = Equipment

IMPD = Impoundment

PCS = PCS

TRMT = Treatment

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

JNS Biofuel LLC

Facility Requirements

Permit Number: 2700-00043

Activity ID No.:PER20150001

Page 1 of 28

### CONT0000000001 (AA-104) Two (2) Condensers in series to recover Methanol in the Biodiesel Production Process:

#### Limitation Requirements:

Condition No.	Parameter	Condition
L-1		The permittee shall operate the condensers at all times when the Biodiesel Production Process (AA-103) is operating. Should the condensers become non-operational then the process shall be shutdown immediately, but not as to cause damage to equipment or property, or cause further environmental problems. The process shall not startup until such time that the condensers become operational. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).]

#### Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		<p>The permittee shall perform a stack test within 60 days after permit issuance or upon startup of the production facility. The permittee shall demonstrate compliance with the emission limitation for methanol by stack testing in accordance with EPA Test Method 308 (40 CFR Part 63, Appendix A) unless an alternative is approved by MDEQ.</p> <p>The permittee shall monitor the temperatures to the inlet and outlet of the condensers and the vapor pressure at the inlet and outlet of the condensers during the performance test.</p> <p>The permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to MDEQ. Also, the MDEQ shall be notified in writing at least ten (10) days prior to the scheduled test date(s) so that an observer may be afforded the opportunity to witness the test(s).</p> <p>After the first successful submittal of an initial written test protocol in conjunction with the initial compliance test(s), the permittee may request that the resubmittal of the testing protocol be waived for subsequent testing by certifying in writing at least thirty (30) days prior to subsequent testing that all conditions for testing remain unchanged such that the original protocol can and will be followed. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).]</p>

**Permit to Operate Air Emissions Equipment at a Synthetic Minor Source**

JNS Biofuel LLC

Facility Requirements

Permit Number: 2700-00043

Activity ID No.:PER20150001

Page 2 of 28

**CONT0000000001 (AA-104) Two (2) Condensers in series to recover Methanol in the Biodiesel Production Process:**

**Submittal/Action Requirements:**

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Condition No.	Condition
S-1	<p>Within 180 days of completion of the stack test for methanol, the permittee shall submit a plan outlining the operational ranges necessary to achieve 95% or greater control efficiency.</p> <p>The plan shall also address the parameters to be monitored, the monitoring system(s) used and their location, QA/QC for all monitoring systems, the frequency the parameters will be monitored and the minimum, maximum or range that the condensers will be operated at. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).]</p>

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

JNS Biofuel LLC

Facility Requirements

Permit Number: 2700-00043

Activity ID No.:PER20150001

Page 3 of 28

### AI0000023187 (23187) Biodiesel Production:

#### Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Methanol	Methanol: The permittee shall limit the methanol emissions to no more than 9.9 tons per year as determined for each consecutive 12-month period. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]
L-2	Opacity	Opacity: 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. This shall not apply to vision obscuration caused by uncombined water droplets. [11 Miss. Admin. Code Pt. 2, R. 1.3.B.]
L-3		The permittee's annual biodiesel production shall not exceed 13,000,000 gallons per year as determined for each consecutive 12-month period. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).]

#### Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		<p>The permittee shall monitor and record the monthly methanol emissions and each consecutive 12-month total of methanol (a HAP) emissions for each methanol emission source, including, but not limited to: Condensers, Tanks, Equipment Leaks, etc.</p> <p>The actual production data, throughput, etc. and all calculations shall be provided. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).]</p>
M-2		The permittee shall monitor and record a rolling consecutive 12-month total volume of materials produced, including Biodiesel and Glycerin. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).]
M-3		The permittee shall perform routine maintenance inspections on all control devices and air emission equipment on a weekly basis and document the date of the inspections, the name of the person who performs the inspections, and any maintenance conducted. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).]



## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

JNS Biofuel LLC

Facility Requirements

Permit Number: 2700-00043

Activity ID No.:PER20150001

Page 4 of 28

### AI0000023187 (23187) Biodiesel Production:

#### Record-Keeping Requirements:

Condition No.	Condition
R-1	The permittee shall retain all required records, monitoring data, supported information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to MDEQ as required by Applicable Rules and Regulations or this permit upon request. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10.), 11 Miss. Admin. Code Pt. 2, R. 2.9.]

#### Submittal/Action Requirements:

Condition No.	Condition
S-1	General Condition: Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began. [11 Miss. Admin.Code Pt. 2, R.2.2.B(10).]
S-2	Except as otherwise specified herein, the permittee shall Submit a certified annual synthetic minor monitoring report: Due annually, by the 31st of January for preceding calendar year. This report shall address any required monitoring specified in the permit. [11 Miss. Admin.Code Pt. 2, R.2.2.B(11).]

#### Narrative Requirements:

Condition No.	Condition
T-1	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49-17-29 1.b]
T-2	General Condition: The permittee shall at all times maintain in good working order and operate as efficiently as possible all air pollution control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit. [11 Miss. Admin. Code Pt. 2, R. 2.5.A.]

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

JNS Biofuel LLC

Facility Requirements

Permit Number: 2700-00043

Activity ID No.:PER20150001

Page 5 of 28

### AI0000023187 (23187) Biodiesel Production:

#### Narrative Requirements:

Condition No.	Condition
T-3	General Condition: Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering state waters without the proper environmental permits. [Miss. Code Ann. 49-17-29 1.a(i and ii)]
T-4	General Condition: Any diversion from or bypass of collection and control facilities is prohibited except as provided for in 11 Miss. Admin. Code Pt.2, R. 1.10, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", [11 Miss. Admin.Code Pt. 2, R.1.10.]
T-5	General Condition: Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule. [11 Miss. Admin.Code Pt. 2, R.2.10.]
T-6	General Condition: The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials: (a) To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and (b) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission. [Miss. Code Ann. 49-17-21]
T-7	General Condition: After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to: (a) Violation of any terms or conditions of this permit (b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or (c) A change in any condition that required either a temporary or permanent reduction or elimination of authorized air emissions. [11 Miss. Admin.Code Pt. 2, R. 2.2.C.]
T-8	General Condition: This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for this permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of the permit. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(b).]
T-9	General Condition: Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control. [Miss. Code Ann. 49-17-39]

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

JNS Biofuel LLC

Facility Requirements

Permit Number: 2700-00043

Activity ID No.:PER20150001

Page 6 of 28

### AI0000023187 (23187) Biodiesel Production:

#### Narrative Requirements:

Condition No.	Condition
T-10	General Condition: The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(15)(c).]
T-11	General Condition: Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(7).]
T-12	General Condition: This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board. [11 Miss. Admin. Code Pt. 2, R. 2.16.B.]
T-13	General Condition: This permit is for air pollution control purposes only. [11 Miss. Admin.Code Pt. 2, R. 2.1.D(1).]
T-14	General Condition: This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.4.D [11 Miss. Admin.Code Pt. 2, R. 2.4.D.]
T-15	General Condition: The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. [11 Miss. Admin.Code Pt. 2, R. 2.1.D(7).]
T-16	General Condition: The permittee shall furnish to MDEQ within a reasonable time any information MDEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to MDEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to MDEQ along with a claim of confidentiality. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(15)(d).]

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

JNS Biofuel LLC

Facility Requirements

Permit Number: 2700-00043

Activity ID No.:PER20150001

Page 7 of 28

### AI0000023187 (23187) Biodiesel Production:

#### Narrative Requirements:

Condition No.	Condition
T-17	<p>General Condition: This permit does not authorize a modification as defined in 11 Miss. Admin. Code Pt. 2, Ch. 2 "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment". Modification is defined as "Any physical change in or change in the method of operation of a facility which increases actual emissions or potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:</p> <ul style="list-style-type: none"><li>(a) routine maintenance, repair, and replacement;</li><li>(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;</li><li>(c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;</li><li>(d) use of an alternative fuel or raw material by a stationary source which: (i) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or (ii) the source is approved to use under any permit issued under 40 CFR 52.51 or under regulations approved pursuant to 40 CFR 51.166;</li><li>(e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.51, or under regulations approved pursuant to Subpart I or 40 CFR 51.166; or</li><li>(f) any change in ownership of the stationary source" [11 Miss. Admin.Code Pt. 2, R. 2.1.D(2).]</li></ul>
T-18	<p>General Condition: It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(a).]</p>
T-19	<p>General Condition: The permittee shall retain all required records, monitoring data, supported information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to MDEQ as required by Applicable Rules and Regulations or this permit upon request. [11 Miss. Admin.Code Pt. 2, R.2.9.]</p>
T-20	<p>General Condition: The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit. [11 Miss. Admin.Code Pt. 2, R.2.2.B(5).]</p>

# Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

JNS Biofuel LLC

Facility Requirements

Permit Number: 2700-00043

Activity ID No.:PER20150001

Page 8 of 28

## AI0000023187 (23187) Biodiesel Production:

### Narrative Requirements:

Condition No.	Condition
T-21	<p>General Condition: Emergencies</p> <p>(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.</p> <p>(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.</p> <p>(c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence as follows: (i) an emergency occurred and that the permittee can identify the cause(s) of the emergency; (ii) the permitted facility was at the time being properly operated; (iii) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and (iv) the permittee submitted notice of the emergency to MDEQ within two (2) working days of the time when emission limitations were exceeded due to the emergency which contained a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(d) In any enforcement proceeding, the permittee seeking to establish the occurrence of any emergency has the burden of proof.</p> <p>(e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein [11 Miss. Admin.Code Pt. 2, R.2.2.B(10).]</p>
T-22	<p>General Condition: Upsets</p> <p>(a) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows: (i) an upset occurred and that the permittee can identify the cause(s) of the upset; (ii) the source was at the time being properly operated; (iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (iv) the permittee submitted notice of the upset to the DEQ within five (5) working days of the time the upset began which contained a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.</p> <p>(c) This provision is in addition to any upset provision contained in any applicable requirement. [11 Miss. Admin.Code Pt. 2, R.1.10.]</p>

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

JNS Biofuel LLC

Facility Requirements

Permit Number: 2700-00043

Activity ID No.:PER20150001

Page 9 of 28

### AI0000023187 (23187) Biodiesel Production:

#### Narrative Requirements:

Condition No.	Condition
T-23	<p>General Condition: Startups and Shutdowns</p> <p>(a) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows: (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above; (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.</p> <p>(c) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply. [11 Miss. Admin.Code Pt. 2, R.1.10.]</p>
T-24	<p>General Condition: Maintenance</p> <p>(a) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following: (i) the permittee can identify the need for the maintenance; (ii) the source was at the time being properly operated; (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (iv) the permittee submitted notice of the maintenance to MDEQ within five (5) working days of the time the maintenance began or such other times as allowed by MDEQ, which contained a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.</p> <p>(c) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. [11 Miss. Admin.Code Pt. 2, R.1.10.]</p>
T-25	<p>General Condition: For renewal of this permit the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board. [11 Miss. Admin.Code Pt. 2, R.2.8.]</p>

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

JNS Biofuel LLC

Facility Requirements

Permit Number: 2700-00043

Activity ID No.:PER20150001

Page 10 of 28

**GRPT0000000004 NSPS NNN and NSPS RRR:**

### Limitation Requirements:

Condition No.	Parameter	Condition
L-1		If the fractionation column is operated with a vent stream flow rate less than 0.008 scm/min, the permittee is exempt from all provisions of Subpart NNN except for the requirements in 40 CFR 60.664(g) and 40 CFR 60.665(i), (l)(5), and (o). [40 CFR 60.660(a)(6)]
L-2		If the fractionation column has a total resource effectiveness (TRE) index value greater than 8.0, the permittee is exempt from all provisions of Subpart NNN except for 40 CFR 60.662; 40 CFR 60.664 (d), (e), and (f); and 40 CFR 60.665 (h) and (l). [40 CFR 60.660(c)(4)]
L-3		<p>IF the fractionation column does not meet L-1 or L-2, the permittee shall comply 40 CFR 60.662(a), (b), or (c) for each vent stream on and after the date on which the initial performance test required by 40 CFR 60.8 and 40 CFR 60.664 is completed, but not later than 60 days after achieving the maximum production rate at which the affected facility will be operated, or 180 days after the initial start-up, whichever date comes first. The permittee shall either:</p> <p>(i) Reduce emissions of TOC (less methane and ethane) by 98 weight-percent, or to a TOC (less methane and ethane) concentration of 20 ppmv, on a dry basis corrected to 3 percent oxygen, whichever is less stringent. If a boiler or process heater is used to comply with this paragraph, then the vent stream shall be introduced into the flame zone of the boiler or process heater; or</p> <p>(ii) Combust the emissions in a flare that meets the requirements of 40 CFR 60.18; or</p> <p>(iii) Maintain a TRE index value greater than 1.0 without use of VOC emission control devices. [40 CFR 60.662]</p>

### Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		The permittee shall provide information describing the operation of the control device or recovery device and the process parameter(s) which would indicate proper operation and maintenance of the device. The MDEQ may request further information and will specify appropriate monitoring procedures or requirements. [40 CFR 60.663(f)]

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

JNS Biofuel LLC

Facility Requirements

Permit Number: 2700-00043

Activity ID No.:PER20150001

Page 11 of 28

**GRPT0000000004 NSPS NNN and NSPS RRR:**

### Monitoring Requirements:

Condition No.	Parameter	Condition
M-2		The test methods in 40 CFR 60, Appendix A, except as provided under 40 CFR 60.8(b), shall be used for determining the net heating value of the gas combusted to determine compliance under 40 CFR 60.662(b) and for determining the process vent stream TRE index value to determine compliance under 40 CFR 60.662(c). [40 CFR 60.664(e)]
M-3		The permittee shall calculate the TRE index value of the vent stream using the equation for incineration in 40 CFR 60.664(e) (1) for halogenated vent streams. For a nonhalogenated vent stream, the permittee shall determine the TRE index value by calculating values using both the incinerator equation in 40 CFR 60.664(e)(1) and the flare equation in 40 CFR 60.664(e)(2) and selecting the lower of the two values. [40 CFR 60.664(f)]
M-4		<p>The permittee shall recalculate the TRE index value whenever process changes are made. Examples of process changes include changes in production capacity, feedstock type, or catalyst type, or whenever there is replacement, removal, or addition of recovery equipment. The TRE index value shall be recalculated based on test data, or on best engineering estimates of the effects of the change to the recovery system.</p> <p>(i) Where the recalculated TRE index value is less than or equal to 1.0, the permittee shall notify the MDEQ within 1 week of the recalculation and shall conduct a performance test according to the methods and procedures required by 40 CFR 60.664 in order to determine compliance with 40 CFR 60.662(a). Performance tests must be conducted as soon as possible after the process change but no later than 180 days from the time of the process change.</p> <p>(ii) Where the initial TRE index value is greater than 8.0 and the recalculated TRE index value is less than or equal to 8.0 but greater than 1.0, the permittee shall conduct a performance test in accordance with 40 CFR 60.8 and 40 CFR 60.664 and shall comply with 40 CFR 60.663, 40 CFR 60.664 and 40 CFR 60.665. Performance tests must be conducted as soon as possible after the process change but no later than 180 days from the time of the process change. [40 CFR 60.664(g)]</p>



## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

JNS Biofuel LLC

Facility Requirements

Permit Number: 2700-00043

Activity ID No.:PER20150001

Page 12 of 28

### GRPT0000000004 NSPS NNN and NSPS RRR:

#### Record-Keeping Requirements:

Condition No.	Condition
R-1	The permittee shall keep up-to-date, readily accessible records of:  (i) Any changes in production capacity, feedstock type, or catalyst type, or of any replacement, removal or addition of recovery equipment or a distillation unit; (ii) Any recalculation of the TRE index value performed pursuant to 40 CFR 60.664(f); and (iii) The results of any performance test performed pursuant to the methods and procedures required by 40 CFR 60.664(d). [40 CFR 60.665(h)]
R-2	The permittee shall keep up-to-date, readily accessible records to indicate that the vent stream flow rate is less than 0.008 scm/min (0.3 scf/min) and of any change in equipment or process operation that increases the operating vent stream flow rate, including a measurement of the new vent stream flow rate. [40 CFR 60.665(i)]

#### Submittal/Action Requirements:

Condition No.	Condition
S-1	The permittee shall submit semiannual reports of the following recorded information. The initial report shall be submitted within 6 months after the initial start-up date.  (i) All periods recorded under 40 CFR 60.665(d) when the vent stream is diverted from the control device or has no flow rate. (ii) Any change in equipment or process operation that increases the operating vent stream flow rate above the low flow exemption level in 40 CFR 60.660(c)(6), including a measurement of the new vent stream flow rate, as recorded under 40 CFR 60.665(i). These must be reported as soon as possible after the change and no later than 180 days after the change. These reports may be submitted either in conjunction with semiannual reports or as a single separate report. A performance test must be completed with the same time period to verify the recalculated flow value and to obtain the vent stream characteristics of heating value and ETOC. The performance test is subject to the requirements of 40 CFR 60.8 of the General Provisions. Unless the facility qualifies for an exemption under the low capacity exemption status in 40 CFR 60.660(c)(5), the permittee must begin compliance with the requirements set forth in 40 CFR 60.662. [40 CFR 60.665(l)(5)]
S-2	The permittee shall submit an initial report including a flow rate measurement using the test methods specified in 40 CFR 60.664. [40 CFR 60.665(o)]
S-3	Exemption: If the vent stream from an affected reactor under Subpart RRR is routed to a distillation unit subject to NSPS Subpart NNN and has no other releases to the air except for a pressure release valve, the permittee is except from all provisions of NSPS Subpart RRR except the permittee shall submit to MDEQ a process design description as part of the initial report. [40 CFR 60.700(c)(5)]

**Permit to Operate Air Emissions Equipment at a Synthetic Minor Source**

JNS Biofuel LLC

Facility Requirements

Permit Number: 2700-00043

Activity ID No.:PER20150001

Page 13 of 28

**GRPT0000000004 NSPS NNN and NSPS RRR:**

**Narrative Requirements:**

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Condition No.	Condition
T-1	The permittee is subject to and shall comply with all applicable provisions in the Standards of Performance for Volatile Organic Compound (VOC) Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations and General Provisions (40 CFR 60, Subparts NNN and A). [40 CFR 60.660]

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

JNS Biofuel LLC

Facility Requirements

Permit Number: 2700-00043

Activity ID No.:PER20150001

Page 14 of 28

### GRPT0000000005 NSPS VVa Requirements:

#### Limitation Requirements:

Condition No.	Parameter	Condition
L-1		<p>Closed vent systems and control devices used to comply with the following:</p> <p>(i) Vapor recovery systems (for example, condensers and absorbers) shall be designed and operated to recover the VOC emissions vented to them with an efficiency of 95 percent or greater, or to an exit concentration of 20 parts per million by volume (ppmv), whichever is less stringent.</p> <p>(ii) Enclosed combustion devices shall be designed and operated to reduce the VOC emissions vented to them with an efficiency of 95 percent or greater, or to an exit concentration of 20 ppmv, on a dry basis, corrected to 3 percent oxygen, whichever is less stringent or to provide a minimum residence time of 0.75 seconds at a minimum temperature of 816 °C.</p> <p>(iii) The permittee shall monitor these control devices to ensure that they are operated and maintained in conformance with their designs.</p> <p>(iv) Closed vent systems and control devices used to comply with provisions of this subpart shall be operated at all times when emissions may be vented to them. [40 CFR 60.482-10a]</p>

#### Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		<p>Each pump in light liquid service shall be monitored monthly to detect leaks by the methods specified in 40 CFR 60.485a(b). A pump that begins operation in light liquid service after the initial startup date for the process unit must be monitored for the first time within 30 days after the end of its startup period, except for a pump that replaces a leaking pump. Each pump shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal. [40 CFR 60.482-2a(a)]</p>

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

JNS Biofuel LLC

Facility Requirements

Permit Number: 2700-00043

Activity ID No.:PER20150001

Page 15 of 28

### GRPT0000000005 NSPS VVa Requirements:

#### Monitoring Requirements:

Condition No.	Parameter	Condition
M-2		<p>The instrument reading that defines a leak is 2,000 parts per million (ppm). If there are indications of liquids dripping from the pump seal, the permittee shall follow the procedures outlined below. This requirement does not apply to a pump that was monitored after a previous weekly inspection and the instrument reading was less than 2,000 ppm.</p> <p>(i) Monitor the pump within 5 days. A leak is detected if the instrument reading measured during monitoring indicates a leak. The leak shall be repaired using the procedures in 40 CFR 60.482-2a(c).</p> <p>(ii) Designate the visual indications of liquids dropping as a leak, and repair the leak using either the procedures in 40 CFR 60.482-2a(c) by eliminating the visual indications of liquids dripping. [40 CFR 60.482-2a(b)]</p>
M-3		<p>When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 days after it is detected, except as provided in 40 CFR 60.482-9a. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected. First attempts at repair include, but are not limited to , the practices described below:</p> <p>(i) Tightening the packing gland nuts;</p> <p>(ii) Ensuring that the seal flush is operating at design pressure and temperature. [40 CFR 60.482-2a(c)]</p>
M-4		<p>Each compressor shall be equipped with a seal system that includes a barrier fluid system and that prevents leakage of VOC to the atmosphere. Each compressor seal system shall be:</p> <p>(i) Operated with the barrier fluid at a pressure that is greater than the compressor stuffing box pressure; or</p> <p>(ii) Equipped with a barrier fluid system degassing reservoir that is routed to a process or fuel gas system or connected by a closed vent system to a control device that complies with the requirements of 40 CFR 60.482-10a; or</p> <p>(iii) Equipped with a system that purges the barrier fluid into a process stream with zero VOC emissions to the atmosphere</p> <p>A compressor is exempt from the above requirements if it is equipped with a closed vent system to capture and transport leakage from the compressor drive shaft back to a process or fuel gas system or to a control device that complies with the requirements of 40 CFR 60.482-10a. [40 CFR 60.482-3a(a), 40 CFR 60.482-3a(b), 40 CFR 60.482-3a(h)]</p>
M-5		<p>The barrier fluid system shall be in heavy liquid service or shall not be in VOC service. [40 CFR 60.482-3a(c)]</p>

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

JNS Biofuel LLC

Facility Requirements

Permit Number: 2700-00043

Activity ID No.:PER20150001

Page 16 of 28

### GRPT0000000005 NSPS VVa Requirements:

#### Monitoring Requirements:

Condition No.	Parameter	Condition
M-6		Each barrier fluid system shall be equipped with a sensor that will detect failure of the seal system, barrier fluid system, or both. Each sensor shall be checked daily or shall be equipped with an audible alarm. The permittee shall determine, based on design considerations and operating experience, a criterion that indicates failure of the seal system, the barrier fluid system, or both. [40 CFR 60.482-3a(d), 40 CFR 60.482-3a(e)]
M-7		If the sensor indicates failure of the seal system, the barrier system, or both, a leak is detected. When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 CFR 60.482-9a. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected. [40 CFR 60.482-3a(f), 40 CFR 60.482-3a(g)]
M-8		<p>Any compressor that is designated, as described in 40 CFR 60.486a(e)(1) and (2), for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the requirements of 40 CFR 60.482-3a(a) through (h), if the compressor:</p> <p>(i) Is demonstrated to be operating with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as measured by the methods specified in 40 CFR 60.485a(c); and</p> <p>(ii) Is tested for compliance with paragraph (a) above initially upon designation, annually, and at other times requested by the Administrator. [40 CFR 60.482-3a(i)]</p>
M-9		Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as determined by the methods specified in 40 CFR 60.485a(c). [40 CFR 60.482-4a(a)]
M-10		After each pressure release, the pressure relief device shall be returned to a condition of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as soon as practicable, but no later than 5 calendar days after the pressure release, except as provided in 40 CFR 60.482-9a. No later than 5 calendar days after the pressure release, the pressure relief device shall be monitored to confirm the conditions of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, by the methods specified in 40 CFR 60.485a(c). [40 CFR 60.482-4a(b)]

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

JNS Biofuel LLC

Facility Requirements

Permit Number: 2700-00043

Activity ID No.:PER20150001

Page 17 of 28

### GRPT0000000005 NSPS VVa Requirements:

#### Monitoring Requirements:

Condition No.	Parameter	Condition
M-11		Any pressure relief device that is routed to a process or fuel gas system or equipped with a closed vent system capable of capturing and transporting leakage through the pressure relief device to a control device as described in 40 CFR 60.482-10a is exempted from the requirements of 40 CFR 60.482-4a(a) and (b). [40 CFR 60.482-4a(c)]
M-12		<p>Each sampling connection system shall be equipped with a closed-purge, closed-loop, or closed-vent system. Each closed-purge, closed-loop, or closed-vent system shall comply with the following requirements:</p> <ul style="list-style-type: none"><li>(i) Gases displaced during filling of the sample container are not required to be collected or captured;</li><li>(ii) Containers that are part of a closed-purge system must be covered or closed when not being filled or emptied;</li><li>(iii) Gases remaining in the tubing or piping between the closed-purge system valve(s) and sample container valve(s) after the valves are closed and the sample container is disconnected are not required to be collected or captured.</li><li>(iv) Each closed-purge, closed-loop, or closed-vent system shall be designed and operated to meet the following requirements:<ul style="list-style-type: none"><li>(a) Return the purged process fluid directly to the process line.</li><li>(b) Collect and recycle the purged process fluid to a process.</li><li>(c) Capture and transport all the purged process fluid to a control device. [40 CFR 60.482-5a]</li></ul></li></ul>
M-13		Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve. The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line. [40 CFR 60.482-6a(a)]
M-14		Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed. [40 CFR 60.482-6a(b)]
M-15		When a double block-and-bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall comply with 40 CFR 60.482-6a(a) at all other times. [40 CFR 60.482-6a(c)]

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

JNS Biofuel LLC

Facility Requirements

Permit Number: 2700-00043

Activity ID No.:PER20150001

Page 18 of 28

### GRPT0000000005 NSPS VVa Requirements:

#### Monitoring Requirements:

Condition No.	Parameter	Condition
M-16		Open-ended valves or lines in an emergency shutdown system which are designed to open automatically in the event of a process upset are exempt from the requirements of 40 CFR 60.482-6a(a)(a), (b), and (c). [40 CFR 60.482-6a(d)]
M-17		<p>Each valve shall be monitored monthly to detect leaks by the requirements in 40 CFR 60.485a(b) and shall comply with the following:</p> <ul style="list-style-type: none"><li>(i) If an instrument reading of 500 ppm or greater is measured, a leak is detected.</li><li>(ii) Any valve for which a leak is not detected for 2 successive months may be monitored the first month of every quarter, beginning with the next quarter, until a leak is detected. As an alternative to monitoring all the valves in the first month of a quarter, the permittee may elect to subdivide the process unit into two or three subgroups of valves and monitor each subgroup in a different month during the quarter, provided each subgroup is monitored every 3 months. The permittee must keep records of the valves assigned to each subgroup. If a leak is detected, the valve shall be monitored monthly until a leak is not detected for 2 successive months.</li><li>(iii) When a leak is detected, the valve shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 60.482-9a. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.</li><li>(iv) First attempts at repair include, but are not limited to, the following best practices were practicable:<ul style="list-style-type: none"><li>(a) Tightening of bonnet bolts,</li><li>(b) Replacement of bonnet bolts,</li><li>(c) Tightening of packing gland nuts;</li><li>(d) Injection of lubricant into lubricated packing. [40 CFR 60.482-7a]</li></ul></li></ul>

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

JNS Biofuel LLC

Facility Requirements

Permit Number: 2700-00043

Activity ID No.:PER20150001

Page 19 of 28

### GRPT0000000005 NSPS VVa Requirements:

#### Monitoring Requirements:

Condition No.	Parameter	Condition
M-18		<p>If evidence of a potential leak is found by visual, audible, olfactory, or any other detection method at pumps, valves, and connectors in heavy liquid service and pressure relief devices in light liquid or heavy liquid service, the permitting shall monitor the equipment within 5 days or the permittee shall eliminate the visual, audible, olfactory, or other indicatoin of a potential leak within 5 calendar days of detection.</p> <p>If the permittee monitors the equipment and an instrument reading of 10,000 ppm or greater is measured then a leak is detected. When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 CFR 482-9a. The first attempt at repair shall be made no later than 5 calendar days after each leak is detected. First attempts at repair include, but are not limited to the best practices described in 40 CFR 60.482-2a (c)(2) and 60.482-7a(e). [40 CFR 60.482-8a]</p>



## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

JNS Biofuel LLC

Facility Requirements

Permit Number: 2700-00043

Activity ID No.:PER20150001

Page 20 of 28

### GRPT0000000005 NSPS VVa Requirements:

#### Monitoring Requirements:

Condition No.	Parameter	Condition
M-19		<p>Delay of repair of equipment for which leaks have been detected will be allowed if repair within 15 days is technically infeasible without a process unit shutdown.</p> <p>Repair of this equipment shall occur before the end of the next process unit shutdown. Monitoring to verify repair must occur within 15 days after startup of the process unit.</p> <p>Delay of repair of equipment will be allowed for equipment which is isolated from the process and which does not remain in VOC service.</p> <p>Delay of repair for valves and connectors will be allowed if:</p> <ul style="list-style-type: none"><li>(i) The permittee demonstrates that emissions of purged material resulting from immediate repair are greater than the fugitive emissions likely to result from delay of repair, and</li><li>(ii) When repair procedures are effected, the purged material is collected and destroyed or recovered in a control device.</li></ul> <p>Delay of repair for pumps will be allowed if:</p> <ul style="list-style-type: none"><li>(i) Repair requires the use of a dual mechanical seal system that includes a barrier fluid system, and</li><li>(ii) Repair is completed as soon as practicable, but not later than 6 months after the leak was detected.</li></ul> <p>Delay of repair beyond a process unit shutdown will be allowed for a valve, if valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the next process unit shutdown will not be allowed unless the next process unit shutdown occurs sooner than 6 months after the first process unit shutdown. When delay of repair is allowed for a leaking pump, valve, or connector that remains in service, the pump, valve, or connector may be considered to be repaired and no longer subject to delay of repair requirements if two consecutive monthly monitoring instrument readings are below the leak definition. [40 CFR 60.482-9a]</p>

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

JNS Biofuel LLC

Facility Requirements

Permit Number: 2700-00043

Activity ID No.:PER20150001

Page 21 of 28

### GRPT0000000005 NSPS VVa Requirements:

#### Monitoring Requirements:

Condition No.	Parameter	Condition
M-20		<p>The permittee may elect to comply with an allowable percentage of valves leaking of equal to or less than 2.0 percent. The following requirements shall be met if the permittee wishes to comply with an allowable percentage of valves leaking:</p> <ul style="list-style-type: none"><li>(i) The permittee must notify MDEQ if the permittee has elected to comply with the allowable percentage of valves leaking before implementing this alternative standard.</li><li>(ii) A performance test shall be conducted initially upon designation, annually, and at other times requested by the Administrator.</li><li>(iii) If a valve leak is detected, it shall be repaired in accordance with 40 CFR 60.482-7a(d) and 60.482-7a(e).</li></ul> <p>Performance tests shall be conducted in the following manner:</p> <ul style="list-style-type: none"><li>(i) All valves in gas/vapor and light liquid service within the affected facility shall be monitored within 1 week by the methods specified in 40 CFR 60.485a(b).</li><li>(ii) If an instrument reading of 500 ppm or greater is measured, a leak is detected.</li><li>(iii) The leak percentage shall be determined by dividing the number of valves for which leaks are detected by the number of valves in gas/vapor and light liquid service within the affected facility.</li></ul> <p>Permittees who elect to comply with this alternative standard shall not have an affected facility with a leak percentage greater than 2.0 percent, determined as specified in 40 CFR 60.485a(h). [40 CFR 60.483-1a]</p>

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

JNS Biofuel LLC

Facility Requirements

Permit Number: 2700-00043

Activity ID No.:PER20150001

Page 22 of 28

### GRPT0000000005 NSPS VVa Requirements:

#### Monitoring Requirements:

Condition No.	Parameter	Condition
M-21		<p>The permittee may elect to comply with one of the alternative work practices specified below. The permittee must notify MDEQ before implementing one of the alternative work practices.</p> <p>(i) The permittee shall comply initially with the requirements for valves in gas/vapor service and valves in light liquid service, as described in 40 CFR 60.482-7a.</p> <p>(ii) After 2 consecutive quarterly leak detection periods with the percent of valves leaking equal to or less than 2.0, the permittee may begin to skip 1 of the quarterly leak detection periods for the valves in gas/vapor and light liquid service.</p> <p>(iii) After 5 consecutive quarterly leak detection periods with the percent of valves leaking equal to or less than 2.0, the permittee may begin to skip 3 of the quarterly leak detection periods for the valves in gas/vapor and light liquid service.</p> <p>(iv) If the percent of valves leaking is greater than 2.0, the permittee shall comply with the requirements as described in 40 CFR 60.482-7a but can again elect to use this section.</p> <p>(v) The percent of valves leaking shall be determined as specified in 40 CFR 60.485a(h).</p> <p>(vi) The permittee must keep a record of the percent of valves found leaking during each leak detection period. [40 CFR 60.483-2a]</p>
M-22		<p>In conducting the performance tests required in §60.8, the permittee shall use as reference methods and procedures the test methods in appendix A of this part or other methods and procedures as specified in this section. The permittee shall determine compliance with the standards in 40 CFR 60.482-1a through 60.482-11a, 60.483a, and 60.484a, as specified in 40 CFR 60.485a. [40 CFR 60.485a]</p>

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

JNS Biofuel LLC

Facility Requirements

Permit Number: 2700-00043

Activity ID No.:PER20150001

Page 23 of 28

### GRPT0000000005 NSPS VVa Requirements:

#### Monitoring Requirements:

Condition No.	Parameter	Condition
M-23		<p>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:</p> <ul style="list-style-type: none"><li>(i) A weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment.</li><li>(ii) The identification on a valve may be removed after it has been monitored for 2 successive months as specified in 40 CFR 60.482-7a(c) and no leak has been detected during those 2 months.</li><li>(iii) The identification on a connector may be removed after it has been monitored as specified in 40 CFR 60.482-11a(b)(3) and no leak has been detected during that monitoring.</li><li>(iv) The identification on equipment, except on a valve or connector, may be removed after it has been repaired. [40 CFR 60.486a(b)]</li></ul>

#### Record-Keeping Requirements:

Condition No.	Condition
R-1	<p>The permittee shall record the information following information 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:</p> <ul style="list-style-type: none"><li>(i) Monitoring instrument identification.</li><li>(ii) Operator identification.</li><li>(iii) Equipment identification.</li><li>(iv) Date of monitoring.</li><li>(v) Instrument reading. [40 CFR 60.486a(a)(3)]</li></ul>

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

JNS Biofuel LLC

Facility Requirements

Permit Number: 2700-00043

Activity ID No.:PER20150001

Page 24 of 28

### GRPT0000000005 NSPS VVa Requirements:

#### Record-Keeping Requirements:

Condition No.	Condition
R-2	<p>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 for 2 years in a readily accessible location:</p> <ul style="list-style-type: none"><li>(i) 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.</li><li>(ii) The date the leak was detected and the dates of each attempt to repair the leak.</li><li>(iii) Repair methods applied in each attempt to repair the leak.</li><li>(iv) Maximum instrument reading measured by Method 21 of appendix A-7 of 40 CFR Part 60 Subpart VVa, 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.</li><li>(v) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak.</li><li>(vi) The signature of the owner or operator (or designate) whose decision it was that repair could not be effected without a process shutdown.</li><li>(vii) The expected date of successful repair of the leak if a leak is not repaired within 15 days.</li><li>(viii) Dates of process unit shutdowns that occur while the equipment is unrepaired.</li><li>(ix) The date of successful repair of the leak. [40 CFR 60.486a(c)]</li></ul>
R-3	<p>The following information pertaining to the design requirements for closed vent systems and control devices described in 40 CFR 60.482-10a shall be recorded and kept in a readily accessible location:</p> <ul style="list-style-type: none"><li>(i) Detailed schematics, design specifications, and piping and instrumentation diagrams.</li><li>(ii) The dates and descriptions of any changes in the design specifications.</li><li>(iii) A description of the parameter or parameters monitored, as required in 40 CFR 60.482-10a(e), to ensure that control devices are operated and maintained in conformance with their design and an explanation of why that parameter (or parameters) was selected for the monitoring.</li><li>(iv) Periods when the closed vent systems and control devices required in 40 CFR 60.482-2a, 60.482-3a, 60.482-4a, and 60.482-5a are not operated as designed, including periods when a flare pilot light does not have a flame.</li><li>(v) Dates of startups and shutdowns of the closed vent systems and control devices required in 40 CFR 60.482-2a, 60.482-3a, 60.482-4a, and 60.482-5a. [40 CFR 60.486a(d)]</li></ul>
R-4	<p>The following information pertaining to all equipment subject to the requirements in 40 CFR 60.482-1a to 60.482-11a shall be recorded in a log that is kept in a readily accessible location:</p>

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

JNS Biofuel LLC

Facility Requirements

Permit Number: 2700-00043

Activity ID No.:PER20150001

Page 25 of 28

### GRPT0000000005 NSPS VVa Requirements:

#### Record-Keeping Requirements:

Condition No.	Condition
	(i) A list of identification numbers for equipment subject to the requirements of this subpart.
	(ii)(a) A list of identification numbers for equipment that are designated for no detectable emissions under the provisions of 40 CFR60.482-2a(e), 60.482-3a(i), and 60.482-7a(f).
	(b) The designation of equipment as subject to the requirements of 40 CFR60.482-2a(e), 40 CFR60.482-3a(i), or 40 CFR60.482-7a(f) shall be signed by the owner or operator.
	(iii) A list of equipment identification numbers for pressure relief devices required to comply with 40 CFR60.482-4a.
	(iv) (a) The dates of each compliance test as required in 40 CFR60.482-2a(e), 60.482-3a(i), 60.482-4a, and 60.482-7a(f).
	(b) The background level measured during each compliance test.
	(c) The maximum instrument reading measured at the equipment during each compliance test.
	(v) A list of identification numbers for equipment in vacuum service.
	(vi) A list of identification numbers for equipment that the owner or operator designates as operating in VOC service less than 300 hr/yr in accordance with 40 CFR60.482-1a(e), a description of the conditions under which the equipment is in VOC service, and rationale supporting the designation that it is in VOC service less than 300 hr/yr.
	(vii) The date and results of the weekly visual inspection for indications of liquids dripping from pumps in light liquid service.
	(viii) Records of the information specified in paragraphs (a) through (f) below, for monitoring instrument calibrations conducted according to sections 8.1.2 and 10 of Method 21 of appendix A-7 40 CFR Part 60 Subpart VVa and 40 CFR60.485a(b).
	(a) Date of calibration and initials of operator performing the calibration.
	(b) Calibration gas cylinder identification, certification date, and certified concentration
	(c) Instrument scale(s) used.
	(d) A description of any corrective action taken if the meter readout could not be adjusted to correspond to the calibration gas value in accordance with section 10.1 of Method 21 of appendix A-7 of 40 CFR Part 60 Subpart VVa.
	(e) Results of each calibration drift assessment required by 40 CFR60.485a(b)(2) (i.e., instrument reading for calibration at end of monitoring day and the calculated percent difference from the initial calibration value).
	(f) If an owner or operator makes their own calibration gas, a description of the procedure used.
	(ix) The connector monitoring schedule for each process unit as specified in 40 CFR60.482-11a(b)(3)(v).

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

JNS Biofuel LLC

Facility Requirements

Permit Number: 2700-00043

Activity ID No.:PER20150001

Page 26 of 28

### GRPT0000000005 NSPS VVa Requirements:

#### Record-Keeping Requirements:

Condition No.	Condition
	(x) Records of each release from a pressure relief device subject to 40 CFR60.482-4a. [40 CFR 60.486a(e)]
R-5	<p>The following information pertaining to all valves subject to the requirements of 40 CFR60.482-7a(g) and (h), all pumps subject to the requirements of 40 CFR60.482-2a(g), and all connectors subject to the requirements of 40 CFR60.482-11a(e) shall be recorded in a log that is kept in a readily accessible location:</p> <p>(i) A list of identification numbers for valves, pumps, and connectors that are designated as unsafe-to-monitor, an explanation for each valve, pump, or connector stating why the valve, pump, or connector is unsafe-to-monitor, and the plan for monitoring each valve, pump, or connector.</p> <p>(ii) A list of identification numbers for valves that are designated as difficult-to-monitor, an explanation for each valve stating why the valve is difficult-to-monitor, and the schedule for monitoring each valve. [40 CFR 60.486a(f)]</p>
R-6	<p>The following information shall be recorded for valves complying with 40 CFR60.483-2a:</p> <p>(i) A schedule of monitoring.</p> <p>(ii) The percent of valves found leaking during each monitoring period. [40 CFR 60.486a(g)]</p>
R-7	<p>The following information shall be recorded in a log that is kept in a readily accessible location:</p> <p>(i) Design criterion required in 40 CFR60.482-2a(d)(5) and 60.482-3a(e)(2) and explanation of the design criterion; and</p> <p>(ii) Any changes to this criterion and the reasons for the changes. [40 CFR 60.486a(h)]</p>
R-8	<p>The following information shall be recorded in a log that is kept in a readily accessible location for use in determining exemptions as provided in 40 CFR60.480a(d):</p> <p>(i) An analysis demonstrating the design capacity of the affected facility,</p> <p>(ii) A statement listing the feed or raw materials and products from the affected facilities and an analysis demonstrating whether these chemicals are heavy liquids or beverage alcohol, and</p> <p>(iii) An analysis demonstrating that equipment is not in VOC service. [40 CFR 60.486a(i)]</p>
R-9	<p>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. [40 CFR 60.486a(j)]</p>

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

JNS Biofuel LLC

Facility Requirements

Permit Number: 2700-00043

Activity ID No.:PER20150001

Page 27 of 28

### GRPT0000000005 NSPS VVa Requirements:

#### Submittal/Action Requirements:

Condition No.	Condition
S-1	Each owner or operator subject to the provisions of this subpart shall submit semiannual reports to the Administrator beginning 6 months after the initial startup date. [40 CFR 60.487a(a)]
S-2	<p>All semiannual reports to the Administrator shall include the following information, summarized from the information in 40 CFR 60.486a:</p> <ul style="list-style-type: none"><li>(i) Process unit identification.</li><li>(ii) For each month during the semiannual reporting period,<ul style="list-style-type: none"><li>(a) Number of valves for which leaks were detected as described in 40 CFR60.482-7a(b) or 40 CFR 60.483-2a,</li><li>(b) Number of valves for which leaks were not repaired as required in 40 CFR60.482-7a(d)(1),</li><li>(c) Number of pumps for which leaks were detected as described in 40 CFR60.482-2a(b), (d)(4)(ii)(A) or (B), or (d)(5)(iii),</li><li>(d) Number of pumps for which leaks were not repaired as required in 40 CFR60.482-2a(c)(1) and (d)(6),</li><li>(e) Number of compressors for which leaks were detected as described in 40 CFR60.482-3a(f),</li><li>(f) Number of compressors for which leaks were not repaired as required in 40 CFR60.482-3a(g)(1),</li><li>(g) Number of connectors for which leaks were detected as described in 40 CFR60.482-11a(b)</li><li>(h) Number of connectors for which leaks were not repaired as required in 40 CFR60.482-11a(d), and</li><li>(i) The facts that explain each delay of repair and, where appropriate, why a process unit shutdown was technically infeasible.</li></ul></li><li>(iii) Dates of process unit shutdowns which occurred within the semiannual reporting period.</li><li>(iv) Revisions to items reported according to 40 CFR Part 60.487a(b) if changes have occurred since the initial report or subsequent revisions to the initial report. [40 CFR 60.487a(c)]</li></ul>



## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

JNS Biofuel LLC

Facility Requirements

Permit Number: 2700-00043

Activity ID No.:PER20150001

Page 28 of 28

### GRPT0000000005 NSPS VVa Requirements:

#### Narrative Requirements:

Condition No.	Condition
T-1	The permittee is subject and shall comply with Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construcion, Reconstruction, or Modification Commenced after November 7, 2006 and General Provisions (40 CFR 60, Subparts VVa and A). The permittee shall demonstrate compliance with the requirements of 40 CFR 60.482-1a through 482-10a, for all equipment within 180 days of initial startup. Compliance will be determined by review of records and reports, review of performance test results, and inspection using the methods and procedures identified in 40 CFR 60.485a. [40 CFR 60.480a]
T-2	The provisions of 40 CFR 60.7(b) and (d) do not apply to affected facilities subject to 40 CFR Part 60 Subpart VVa. [40 CFR 60.486a(k)]

## GENERAL INFORMATION

JNS Biofuel LLC  
823 Highway 15 North  
New Albany, MS  
Union County

### Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
23187	JNS Biofuel, LLC	Official Site Name	04/09/2014	
2814500043	JNS Biofuel, LLC	Air-AIRS AFS	10/13/2005	
MSR001733	North Mississippi Biodiesel, Inc.	GP-Baseline	03/28/2006	01/09/2012
270000043	North Mississippi Biodiesel, Inc.	Air-Synthetic Minor Operating	03/29/2006	02/28/2011
270000043	North Mississippi Biodiesel, Inc.	Air-Construction	03/29/2006	
MSU060006	North Mississippi Biodiesel, Inc.	Water - SOP	03/29/2006	02/28/2011
MSR001733	North Mississippi Biodiesel, Inc.	GP-Baseline	01/09/2012	09/28/2015
270000043	North Mississippi Biodiesel Inc	Air-Synthetic Minor Operating	01/09/2012	10/10/2014
23187	North Mississippi Biodiesel, Inc.	Historic Site Name	10/13/2005	04/09/2014
MSR001733	JNS Biofuel, LLC	GP-Baseline	06/23/2014	09/28/2015
270000043	JNS Biofuel LLC	Air-Synthetic Minor Operating	10/10/2014	12/31/2016
MSR001733	North Mississippi Biodiesel, Inc.	GP-Baseline	01/28/2016	10/31/2020
270000043	JNS Biofuel LLC	Air-Synthetic Minor Operating	03/06/2017	02/28/2022

**Basin:** Yazoo River Basin

**Location Description:** PG- Plant Entrance (General). Data collected by J. Dewayne Headrick on 5/8/2006.

## **GENERAL INFORMATION**