



State of Mississippi

AIR POLLUTION CONTROL PERMIT

To Construct Air Emissions Equipment



THIS CERTIFIES

Delta Energy Natchez LLC

61A Carthage Point Road

Natchez, MS

Adams County

has been granted permission to construct air emissions equipment to comply with the emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with 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.

Mississippi Environmental Quality Permit Board

Mississippi Department of Environmental Quality

Issued/Modified: MAY 10 2017

Expires:

Permit No. 0040-00059

Agency Interest # 68507

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Subject Item Inventory

Permit Number: 0040-00059

Activity ID No.: PER20170001

Subject Item Inventory:

ID	Designation	Description
AREA1	AA-000	Facility-wide Requirements
CONT1	AA-001	Pulse Jet Baghouses - one controlling PM emissions from each jet mill and carbon solids handling areas and one controlling PM emissions from each pellet dryer
CONT2	AA-002	Non-assisted Flare controlling VOC emissions from the liquids condensing system and truck loading
EQPT1	AA-003	16,800-gallon Fixed-Roof Hydrocarbon Liquids Storage Tanks, each equipped with a vapor recovery system
EQPT2	AA-004	Carbon Solids Pellet Dryers, with emissions from each routed to a dedicated baghouse (AA-001)
EQPT3	AA-005	Truck and rail car loading of hydrocarbon liquids
AREA2	AA-006	Fugitive PM from road traffic and fugitive VOCs from equipment leaks
AI68507	68507	Waste tire chip processing plant

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

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AREA0000000001 (AA-000) Facility-wide Requirements:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		The permittee shall limit the throughput of waste tire chips processed at the facility to 192 tons per day. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).]
L-2		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 Rule 1.3.A.(1). This shall not apply to vision obscuration caused by uncombined water droplets. [11 Miss. Admin. Code Pt. 2, R. 1.3.B.]

Record-Keeping Requirements:

Condition No.	Condition
R-1	The permittee shall monitor and record the amount of waste tire chips processed each day. This amount shall be recorded in tons for each calendar day. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).]

Submittal/Action Requirements:

Condition No.	Condition
S-1	In accordance with Condition S-1 for AI 68507, the permittee shall submit a certification of construction upon completion of each process line. [11 Miss. Admin. Code Pt. 2, R. 2.5.D.]

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CONT0000000001 (AA-001) Pulse Jet Baghouses - one controlling PM emissions from each jet mill and carbon solids handling areas and one controlling PM emissions from each pellet dryer:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		The permittee shall route emissions from each pellet dryer, each jet mill, and each carbon solids handling area to one or more baghouses for control of particulate emissions. Each baghouse shall be operated at all times when the carbon solids processing equipment is being operated. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).]

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		For Emission Point AA-001, the permittee shall install, operate, and maintain a system for continuously monitoring the pressure drop across each baghouse. The monitoring system shall be operated and maintained in accordance to the manufacturer's specifications. Each baghouse shall also be equipped with an alarm system such that facility personnel are notified if the pressure drop falls out of the range recommended by the baghouse manufacturer. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).]

Record-Keeping Requirements:

Condition No.	Condition
R-1	For Emission Point AA-001, the permittee shall record the date, time, and duration that (1) any baghouse operates outside the manufacturer's recommended pressure drop range and (2) carbon solids processing occurs while the associated baghouse is inoperable. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).]
R-2	For Emission Point AA-001, the permittee shall maintain the manufacturer's recommended operating procedures on site and make such available to DEQ personnel upon request. The permittee shall also record the date and extent of all maintenance activities on each baghouse (including bag replacement, monitoring system calibration, etc.). [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).]

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CONT0000000002 (AA-002) Non-assisted Flare controlling VOC emissions from the liquids condensing system and truck loading:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		For Emission Point AA-002, the permittee shall operate the flare at all times when emissions may be vented to it. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).]
L-2		The permittee shall either route all non-condensed gases from the liquid hydrocarbon condensers to the flare or shall recover these gases for sale. The permittee may also route emissions from the liquid hydrocarbon tank and truck loading to the flare for control. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).]

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		For Emission Point AA-002, the permittee shall install, operate, and maintain a device for monitoring the gas flow to the flare and for monitoring the presence of a flame in the pilot. The monitoring devices shall be maintained in accordance to the manufacturer's recommendations. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).]

Record-Keeping Requirements:

Condition No.	Condition
R-1	For Emission Point AA-002, the permittee shall record the time, date, and duration during which emissions are vented to the flare while the flare is inoperable. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).]
R-2	For Emission Point AA-002, the permittee shall maintain records of any maintenance performed on the flare and shall maintain a copy of the manufacturer's recommended operating procedures on site and make such available for review by DEQ personnel. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).]

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EQPT0000000001 (AA-003) 16,800-gallon Fixed-Roof Hydrocarbon Liquids Storage Tanks, each equipped with a vapor recovery system:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		For Emission Point AA-003, the permittee shall equip each tank with a carbon canister for VOC control. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).]

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		For Emission Point AA-003, the permittee shall monitor each carbon canister for breakthrough in accordance with the manufacturer's recommendations and shall replace the carbon upon breakthrough. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).]

Record-Keeping Requirements:

Condition No.	Condition
R-1	For Emission Point AA-003, the permittee shall record the date that carbon is replaced for each tank. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).]

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EQPT0000000002 (AA-004) Carbon Solids Pellet Dryers, with emissions from each routed to a dedicated baghouse (AA-001):

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		For Emission Point AA-004, the permittee shall burn either natural gas or non-condensable gas produced on site in the pellet dryers. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).]

Record-Keeping Requirements:

Condition No.	Condition
R-1	For Emission Point AA-004, the permittee shall record the amount of non-condensable gas combusted for each calendar month. A material balance may be used to determine the monthly gas usage. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).]

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AI0000068507 (68507) Waste tire chip processing plant:

Submittal/Action Requirements:

Condition No.	Condition
S-1	General Condition: The permittee shall submit certification of construction: Due within thirty (30) days of completion of construction or installation of an approved stationary source or prior to startup, whichever is earlier. The notification shall certify that construction or installation was performed in accordance with the approved plans and specifications. In the event there is any change in construction from the previously approved plans and specifications or permit, the permittee shall promptly notify MDEQ in writing. If MDEQ determines the changes are substantial, MDEQ may require the submission of a new application to construct with "as built" plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an "as built" application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law. [11 Miss. Admin. Code Pt. 2, R. 2.5.D.]
S-2	Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun. [11 Miss. Admin.Code Pt. 2, R.2.5.C (2).]
S-3	The permittee must notify DEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more. [11 Miss. Admin.Code Pt. 2, R.2.5.C(4).]

Narrative Requirements:

General Condition:

Condition No.	Condition
T-1	General Condition: The stationary source shall be designed and constructed so as to operate without causing a violation of any Applicable Rules and Regulations or this permit, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards, and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries. [11 Miss. Admin.Code Pt. 2, R.2.5.A.]
T-2	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49_17_29 1.b]
T-3	General Condition: The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may 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]

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AI0000068507 (68507) Waste tire chip processing plant:

Narrative Requirements:

Condition No.	Condition
T-4	General Condition: The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed except as provided for in Regulation 11 Miss. Admin. Code Pt.2, R. 1.10 "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. [11 Miss. Admin. Code Pt. 2, R. 1.10]
T-5	General Condition: The permittee shall allow the Mississippi Environmental Quality Commission, the Mississippi Environmental Quality Permit Board, MDEQ staff 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-6	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 good cause shown including, but not limited to, the following: a. Persistent violation of any terms or conditions of this permit; b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or c. A change in any condition that requires either a temporary or permanent reduction or elimination of previously authorized air emissions. [11 Miss. Admin.Code Pt. 2, R.2.2.C.]
T-7	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]
Condition No.	Condition
T-8	General Condition:This permit is for air pollution control purposes only. [11 Miss. Admin.Code Pt. 2, R.2.1.D.]
T-9	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 operating without a valid permit pursuant to State Law. [11 Miss. Admin.Code Pt. 2, R.2.2.B(5).]
T-10	General Condition: It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits. [11 Miss. Admin.Code Pt. 2, R.2.1.D(6).]

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AI0000068507 (68507) Waste tire chip processing plant:

Narrative Requirements:

Condition No.	Condition
T-11	General Condition: The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities. [11 Miss. Admin.Code Pt. 2, R.2.1.D(7).]
T-12	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 the permit, unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(a).]
T-13	General Condition: The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(b).]
T-14	General Condition: The permit does not convey any property rights of any sort, or any exclusive privilege. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(c).]
T-15	General Condition: The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(d).]
T-16	General Condition: This permit shall not be transferred except upon approval of the Permit Board. [11 Miss. Admin.Code Pt. 2, R.2.16.B.]
T-17	General Condition: The provisions of this permit are severable. If any provision of the permit, or the application of any provision of the 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.1.1.D(7).]
T-18	General Condition: The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance or if construction is suspended for eighteen (18) months or more. [11 Miss. Admin.Code Pt. 2, R.2.5.C(1).]
T-19	General Condition: A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee. [11 Miss. Admin.Code Pt. 2, R.2.5.D(3).]

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Narrative Requirements:

Condition No.	Condition
T-20	General Condition: Except as prohibited in 11 Miss. Admin. Code Pt. 2,R. 2.5.D(7) after certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by 11 Miss. Admin. Code Pt. 2, R. 2.13.G. [11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).]
T-21	General Condition: Except as otherwise specified in 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7), the application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing. [11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).]
T-22	General Condition: Except as otherwise specified in 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7), upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate. [11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).]
T-23	General Condition: For moderate modifications that require contemporaneous enforceable emissions reductions from more than one emission point in order to net out of PSD/NSR, the applicable Title V Permit to Operate or State Permit to Operate must be modified prior to beginning operation of the modified facilities. [11 Miss. Admin.Code Pt. 2, R.2.5.D(7).]
T-24	General Condition: Regarding compliance testing: (a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time. (b) Compliance testing will be performed at the expense of the permittee. (c) Each emission sampling and analysis report shall include but not be limited to the following: 1. detailed description of testing procedures; 2. sample calculation(s); 3. results; and 4. comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit. [11 Miss. Admin.Code Pt. 2, R.2.6.B(3),(4)&(6).]

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AI0000068507 (68507) Waste tire chip processing plant:

Narrative Requirements:

Condition No.	Condition
T-25	General Condition: The construction of the stationary source shall be performed in such a manner so as to reduce fugitive dust emissions from construction activities to a minimum. [11 Miss. Admin.Code Pt. 2, R.2.5.A(4).]

GENERAL INFORMATION

Delta Energy Natchez LLC
61A Carthage Point Road
Natchez, MS
Adams County

Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
68507	Delta-Energy Natchez, LLC	Official Site Name	08/31/2015	
2800100059	Delta-Energy Natchez LLC	Air-AIRS AFS (MDEQ USE ONLY)	10/01/2015	
004000059	Delta-Energy Natchez LLC	Air-Construction	11/12/2015	
004000059	Delta-Energy Natchez LLC	Air-Synthetic Minor Operating	11/12/2015	10/31/2020