

# STATE OF MISSISSIPPI AND FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL

## PERMIT

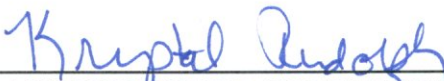
TO OPERATE AIR EMISSIONS EQUIPMENT AT A  
SYNTHETIC MINOR SOURCE

### THIS CERTIFIES THAT

M J Feed Mill MS LLC  
261 Marshall Durbin Drive  
Waynesboro, Mississippi  
Wayne 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. seq., 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



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: AUG 03 2017

Permit No.: 2840-00020

**Effective Date: As specified herein.**

Expires: JUL 31 2022

**Section 1.**

**A. GENERAL CONDITIONS**

1. This permit is for air pollution control purposes only. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
2. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.4.D.)
3. Any activities not identified in the application are not authorized by this permit. (Ref.: Miss. Code Ann. 49-17-29 1.b)
4. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
5. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
6. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)
7. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)
8. 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.

(Ref.: Miss. Code Ann. 49-17-21)

9. 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. (Ref.: Miss. Code Ann. 49-17-39)
10. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
11. 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. 2.1.D(7).)
12. This permit does not authorize a modification as defined in Regulation 11 Miss. Admin. Code Pt. 2, Ch.2., "Permit Regulations for the Construction and/or Operation of Air Emission Equipment." A modification may require a Permit to Construct and a modification of this permit. Modification is defined as "Any 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 40CFR 51.66;
- 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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.C(15).)

**B. GENERAL OPERATIONAL CONDITIONS**

- 1. 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 Regulation, 11 Miss. Admin. Code Pt. 2, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.10.)
- 2. 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." (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)
- 3. 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. (Ref.: Miss. Code Ann. 49-17-29 1.a(i and ii))
- 4. Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.
  - a. Upsets
    - (1) For an upset defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:

- (i) An upset occurred and that the source can identify the cause(s) of the upset;
  - (ii) The source was at the time being properly operated;
  - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
  - (iv) That within 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
  - (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
- (2) In any enforcement proceeding by the Commission, the source 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.
  - (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.

**b. Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.)**

- (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
- (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).

- (3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

5. Compliance Testing: 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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B(3), (4), and (6).)

**C. PERMIT RENEWAL / MODIFICATION / TRANSFER / TERMINATION**

1. 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. If the applicant submits a timely and complete application pursuant to this paragraph and the Permit Board, through no fault of the applicant, fails to act on the application on or before the expiration date of the existing permit, the applicant shall continue to operate the stationary source under the terms and conditions of the expired permit, which shall remain in effect until final action on the application is taken by the Permit Board. Permit expiration terminates the source's ability to operate unless a timely and complete renewal application has been submitted. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.8.)
2. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).)

3. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).)
4. 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. 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 federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

5. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B.)

**SECTION 2**  
**EMISSION POINT DESCRIPTION**

The permittee is authorized to operate air emissions equipment, as described in the following table.

Emission Point	Description
AA-001	25 TPH Grain Dryer with 5.81MMBtu/hr gas-fired burner
AA-002	75 TPH Pellet Cooling System with 3 cyclones
AA-003	250 TPH Grain Elevator Dust System with baghouse
AA-004	60 TPH Hammermills with cyclone
AA-005	100 TPH Feedmill Ingredient Receiving Operations
AA-006	20.5 MMBtu/hr gas-fired Boiler
AA-007	8000 gallon Fuel Storage Tank
AA-008	20 THP Salt Storage Bin



### SECTION 3 EMISSION LIMITATIONS AND STANDARDS

Emission Point(s)	Applicable Requirement	Pollutant/Parameter	Condition Number(s)	Limit/Standard
Facility Wide	11 Miss. Admin. Code Pt. 2, R.1.3.A.	Opacity	3.1	Opacity from any point source shall not exceed 40 % unless otherwise specified
	11 Miss. Admin. Code Pt. 2, R.2.2.B(10).	Particulate Matter (Filterable Only)	3.2	Total PM / PM10 / PM2.5 emissions shall be limited to 99.0 tons / year
	11 Miss. Admin. Code Pt. 2, R.1.3.F(1).		3.3	$E = 4.1 p^{0.67}$
	11 Miss. Admin. Code Pt. 2, R.2.2.B(10).	Operation	3.4	Control devices must operate at all times when processing
	NESHAP Subpart DDDDDDD, 40 CFR 63.11619(a); 40 CFR 63.11619 (b)(1); 40 CFR 63.11625	Applicability	3.5	Comply with 40 CFR 63, Subpart DDDDDDD and 40 CFR 63 Subpart A
AA-001	11 Miss. Admin. Code Pt. 2, R.2.2.B(10).	Fuel Usage	3.6	Natural gas only
	11 Miss. Admin. Code Pt. 2, R.1.3.D(1)(a).	Particulate Matter (Filterable Only)	3.7	0.6 pounds per million BTU per hour heat input
AA-001 AA-006	11 Miss. Admin. Code Pt. 2, R.1.4.A(1).	Sulfur Oxides	3.8	4.8 pounds per million BTU heat input
AA-002	NESHAP Subpart DDDDDDD, 40 CFR 63.11621(f)	HAPs	3.9	Must capture and route emissions to a cyclone. Cyclone must be maintained in accordance with good air pollution control practices.
AA-006	NSPS Subpart Dc, 40 CFR 60.40(c)(a); 40 CFR 60.48(c)(g); 40 CFR 60 Subpart A	Applicability	3.10	Comply with 40 CFR 60, Subpart Dc and 40 CFR 60, Subpart A
	11 Miss. Admin. Code Pt. 2, R.2.2.B(10).	Fuel Usage	3.11	Natural gas and/or distillate fuel oil
	NSPS Subpart Dc, 40 CFR 60.42(c)(d and i)		3.12	0.5 percent sulfur by weight
	NSPS Subpart Dc, 40 CFR 60.42(c)(h); 40 CFR 60.44(c)(h)		3.13	Fuel supplier certification
	11 Miss. Admin. Code Pt. 2, R.1.3.D(1)(b).	Particulate Matter (Filterable Only)	3.14	$E = 0.8808 * I^{-0.1667}$

- 3.1 For the entire facility, 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) and (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% 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(1), (2).)
- 3.2 For the entire facility, the permittee shall limit the facility's Particulate Matter (PM / PM10 / PM2.5) emissions to no more than 99.0 tons/year (TPY) as determined for each consecutive 12-month period. (Ref.: 11 Miss. Admin. Code Pt. 2, R.2.2.B(10).)
- 3.3 For the entire facility, the permittee shall not cause, permit, or allow the emission of particulate matter in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship
- $$E = 4.1 p^{0.67}$$
- where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).)
- 3.4 For the entire facility, the permittee must operate control device(s) at all times when processing. Should the control device(s) become non-operational then the respective process shall be shutdown immediately, but not as to cause damage to the equipment, property, or further environmental problems. The process shall not startup until such time that the control device(s) becomes operational. The permittee shall maintain on hand at all times sufficient equipment as is necessary to repair and/or overhaul the pollutions control equipment. (Ref. 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 3.5 The permittee is subject to and shall comply with 40 CFR 63 National Emission Standards for Hazardous Air Pollutants for Area Sources Subpart DDDDDDD - Prepared Feeds Manufacturing for which Construction or Reconstruction commenced after July 27, 2009 and applicable provisions of Subpart A – General Provisions. The subpart applies to each new or existing prepared feed manufacturing facility that uses a material containing chromium or a material containing manganese and is an area source of emissions of hazardous air pollutants.

A prepared feeds manufacturing affected source is the collection of all equipment and activities necessary to produce animal feed from the point in the process where a material containing chromium or a material containing manganese is added, to the point where the finished animal feed product leaves the facility. (Ref.: 40 CFR 63.11619(a), (b)(1); 40 CFR 63.11625)

- 3.6 For Emission Point AA-001, the permittee shall only burn natural gas. (Ref.: 11 Miss. Admin. Code Pt. 2, R.2.2.B(10).)
- 3.7 For Emission Point AA-001, the maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour per 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).)
- 3.8 For Emission Points AA-001 and AA-006, the maximum discharge of sulfur 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).)
- 3.9 For Emission Point AA-002, the permittee must capture emissions and route them to a cyclone. The cyclone must be maintained in accordance with good air pollution control practices and manufacturer's specifications and operating instructions, if available. If manufacturer's specifications and operating instructions are not available, you must develop and follow standard operating procedures that ensure proper operation and maintenance of the cyclone. (Ref.: 40 CFR 63.11621(f))
- 3.10 For Emission Point AA-006, the permittee is subject to and shall comply with 40 CFR 60.40c, the National Standards of Performance for New Stationary Sources Subpart Dc – Standards of Performance for Small Industrial-Commercial-Industrial Steam Generating Units for which Construction, Reconstruction, or Modification is commenced after June 9, 1989 and has a maximum design heat capacity of 29 megawatts (MW) (100 million BTU per hour (BTU/hr)) or less, but greater than or equal to 2.9 MW (10 million BTU) and Subpart A – General Provisions. Steam Generating Units that utilize only natural gas as fuel are exempt from the other provisions of Subpart Dc, except the recordkeeping specified in 40 CFR 60.48c(g). (Ref.: 40 CFR 60.40(c)(a); 40 CFR 60.48(c)(g); 40 CFR 60 Subpart A)
- 3.11 For Emission Point AA-006, the permittee shall only combust natural gas and/or distillate fuel oil. (Ref.: 11 Miss. Admin. Code Pt. 2, R.2.2.B(10).)
- 3.12 For Emission Point AA-006, the permittee shall not combust fuel oil containing greater than 0.5% sulfur by weight. The fuel oil sulfur limits apply at all times, including periods of startup, shutdown, and malfunction. (Ref.: 40 CFR 60.42(c)(d and i))

- 3.13 For Emission Point AA-006, compliance with fuel oil sulfur limits shall be determined based on a certification from the fuel supplier. (Ref.: 40 CFR 60.42(c)(h); 40 CFR 60.44(c)(h))
- 3.14 For Emission Point AA-006, the maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of equal to or greater than 10 million BTU per hour per heat input shall not exceed an emission rate as determined by the relationship

$$E = 0.8808 * I^{-0.1667}$$

where E is the emission rate in pounds per million BTU per hour heat input and I is the heat input in millions of BTU per hour. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).)

## SECTION 4 WORK PRACTICES

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limitation/Standard
Facility Wide	NESHAP Subpart DDDDDDD, 40 CFR 63.11621(a)	4.1	HAPs	Management practices and standards for feeds manufacturing facilities.
	NESHAP Subpart DDDDDDD, 40 CFR 63.11621(b)	4.2		Store any raw materials containing chromium or manganese in closed containers.
	NESHAP Subpart DDDDDDD, 40 CFR 63.11621(c)	4.3		Operational Practices
	NESHAP Subpart DDDDDDD, 40 CFR 63.11621(d)	4.4		Fugitive emissions management during loading.

4.1 In all areas of the affected source where materials contain chromium or manganese are stored, used, or handled, the permittee must at all times operate all process equipment in accordance with manufacturer's specifications and in a manner to minimize dust creation and perform housekeeping measures to minimize excess dust. These measures must include, but are not limited to:

- (1) use either an industrial vacuum system or manual sweeping to reduce the amount of dust;
- (2) at least once per month, remove dust from walls, ledges, and equipment using low pressure air or by other means, and then sweep or vacuum the area;
- (3) keep exterior doors in the immediate affected areas shut except during normal ingress and egress, as practicable. This paragraph (a)(1)(iii) does not apply to areas where finished product is stored in closed containers, and no other containing chromium or manganese are present. (Ref.: 40 CFR 63.11621(a))

- 4.2 The permittee must at all times store any raw materials containing chromium or manganese in closed containers. (Ref.: 40 CFR 63.11621(b))
- 4.3 The mixer where materials containing chromium and manganese are added must be covered at all times when mixing is occurring, except when the materials are being added to the mixer. Materials containing chromium or manganese must be added to the mixer in a manner that minimizes emissions. (Ref.: 40 CFR 63.11621(c))
- 4.4 For the bulk loading process where materials containing chromium or manganese are loaded into trucks or railcars, the permittee must lessen fugitive emissions by reducing the distance between the loadout spout and the vehicle being loaded by either paragraph (1) or (2) below:
  - (1) Use a device of any kind at the bulk loadout spout that minimizes the distance to the vehicle being loaded.
  - (2) Use any other means to minimize the distance between the loadout spout and the vehicle being loaded. (Ref.: 40 CFR 63.11621(d))

## SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain records for a minimum of 5 years.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	5.2	Operations and Maintenance	Routine maintenance inspections on control devices.
	NESHAP Subpart DDDDDDD, 40 CFR 63.11624(c)(1)	5.3	HAPs	Keep documentation of Initial Notification or Notification of Compliance Status.
	NESHAP Subpart DDDDDDD, 40 CFR 63.11624(b)(1); 40CFR 63.11624(c)(2)	5.4		Annual compliance certification report
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	5.5		Records of particulate emissions
AA-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	5.6	Particulate Matter	Stack testing.
	NESHAP Subpart DDDDDDD, 40 CFR 63.11622(b)(1); 40 CFR 63.11622(b)(3)	5.7	HAPs	Weekly visual inspections of cyclones.
	NESHAP Subpart DDDDDDD, 40 CFR 63.11624(c)(5)	5.8		Record weekly visual inspections of cyclones.
AA-003 AA-004 AA-005	NESHAP Subpart DDDDDDD, 40 CFR 63.11622(a)	5.9	HAPs	Monthly inspections of loadout devices.
	NESHAP Subpart DDDDDDD, 40 CFR 63.11624(c)(3))	5.10		Records of all inspections.
AA-006	NSPS Subpart Dc, 40 CFR 60.48c(g)(2)	5.11	Fuel Usage and Records	Maintain daily records of fuel used.

AA-006	NSPS Subpart Dc, 40 CFR 60.48c(d, e, f, and j)	5.12	Fuel Usage and Records	Maintain monthly fuel supplier certification records.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	5.13		Maintain a log of the amount of fuel oil combusted.

- 5.1 The permittee shall retain all required records, monitoring data, supporting 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.9.)
- 5.2 For the entire facility, the permittee shall perform routine maintenance inspections on all control devices and air emissions equipment on a weekly basis to make sure it is operating as designed. A record documenting the date of the inspections, the name of the person who performs the inspections, and any maintenance conducted shall be kept at the facility and be made available to MDEQ upon request. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 5.3 The permittee must keep a copy of all documentation supporting any Initial Notification or Notification of Compliance Status as required by 40 CFR 63.11624(a) and in accordance with 40 CFR 63.10(b)(2)(xiv). (Ref.: 40 CFR 63.11624(c)(1))
- 5.4 The permittee must by January 31 of each year, prepare an annual compliance certification report for the previous calendar year containing the information specified in 40 CFR 63.11624(b)(1), (b)(2), (b)(3), and (b)(5). The permittee must keep a copy of each annual compliance certification report. (Ref.: 40 CFR 63.11624(b); 40 CFR 63.11622(c)(2))
- 5.5 The permittee shall maintain records of the calculated particulate matter emissions for each month and each consecutive (or rolling) 12-month period. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 5.6 For Emission Point AA-002, once every five years the permittee shall perform a stack test of the vent stream past the control device(s) for the purpose of determining the emission rate of particulate matter (PM / PM10 / PM2.5) when the facility is operating at, or near, full production rate. The stack test shall be performed no later than 9 months prior to the permit expiration date so that the results of the stack test can be considered during the reissuance of the permit. Facility PM, PM10, and PM2.5 emissions shall be determined by EPA Test Methods 201 or 201A in conjunction with Method 202, 40 CFR 51, Appendix M. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)



- 5.7 For Emission Point AA-002, the permittee must perform a weekly visual inspection of each operating cyclone to ensure it is operating consistent with good air pollution control practices. The permittee must also perform quarterly inspections of each cyclone for corrosion, erosion, or any other damage that could result in air in-leakage, and record the results of these inspections. (Ref.: 40 CFR 63.11622(b)(1); 40 CFR 63.11622(b)(3))
- 5.8 For Emission Point AA-002, the permittee must keep records of weekly visual inspections of the operating cyclone, required by Condition 5.7, including a record of any corrective action taken as a result of the inspection. The permittee must also keep records of all quarterly inspections required by Condition 5.7 including the information identified in 40 CFR 63.11624(c)(5)(i)(A) through (C). (Ref.: 40 CFR 63.11624(c)(5))
- 5.9 For Emission Points AA-003, AA-004, and AA-005, the permittee must perform monthly inspections of each control device to ensure it is in proper working condition and record the results of these inspections. (Ref.: 40 CFR 63.11622(a))
- 5.10 For Emission Points AA-003, AA-004, and AA-005, the permittee must keep records of all inspections including but not limited to the following:
- (1) The date, place, and time of each inspection;
  - (2) Person performing the inspection;
  - (3) Results of the inspection, including the date, time, and duration of the corrective action period from the time the inspection indicated a problem to the time of the indication that the device was replaced or restored to operation. (Ref.: 40 CFR 63.11624(c)(3))
- 5.11 For Emission Point AA-006, the permittee shall record and maintain records of the amount of each fuel (including natural gas) combusted during each calendar month. (Ref.: 40 CFR 60.48c(g)(2))
- 5.12 For Emission Point AA-006, the permittee shall record and maintain monthly fuel supplier certification records for the distillate fuel oil that is combusted. The records shall include the following:
- (1) The name of the oil supplier;
  - (2) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in Part 60.41c; and

- (3) The sulfur content of the oil fuel supplier certification records are required to be submitted only if the distillate fuel oil is combusted during a reporting period. The reporting period for the fuel supplier certification records is each six-month period. These records shall be submitted to MDEQ and shall be postmarked by the 30<sup>th</sup> day of January and July for the preceding six-month period.

In addition to the fuel supplier certification records, the permittee shall also include a certified statement signed by the owner or operator of the facility that the records of fuel supplier certifications submitted represent all of the distillate fuel oil combusted during the reporting period. (Ref.: 40 CFR 60.48c(d, e, f, and j))

- 5.13 For Emission Point AA-006, the permittee shall maintain a log of the date, duration (in hours), and amount of fuel oil combusted for each occurrence during the calendar year and shall note the reason that fuel oil was combusted (e.g., maintenance test, natural gas curtailment, etc.). (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

## SECTION 6 REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	Report permit deviations within five (5) working days.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.2	Submit certified annual monitoring report.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.3	All documents submitted to MDEQ shall be certified by a Responsible Official.
	NESHAP Subpart DDDDDDD, 40 CFR 63.11624(b)	6.4	Submit the annual compliance certification report.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	6.5	Submit stack test reports.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	6.6	Submit particulate matter emissions report.

- 6.1 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 6.2 Except as otherwise specified herein, the permittee shall submit a certified annual synthetic minor monitoring report postmarked no later than 31st of January for the preceding calendar year. This report shall address any required monitoring specified in the permit. All instances of deviations from permit requirements must be clearly identified in the report. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration. Also, for Emission Point AA-006, the report shall indicate that either fuel oil was not combusted during the reporting period or if fuel oil was combusted then the log required by Condition 5.12 and the report required by Condition 5.11 shall be included in the report. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 6.3 Any document required by this permit to be submitted to the MDEQ shall contain a certification signed by a responsible official stating 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. 2.2.B(11).)

- 6.4 The permittee must submit the annual compliance certification report by March 1 of each year. (Ref.: 40 CFR 63.11624(b))
- 6.5 For PM, PM10, and PM2.5 emissions, the permittee shall submit the stack test report required by Condition 5.6 not less than one-hundred eighty (180) days prior to the expiration date of the permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 6.6 The permittee shall submit a report of the particulate matter emissions for each month and each consecutive (or rolling) 12-month period, due annually by the 31<sup>st</sup> of January. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)