

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

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Griffin Industries, Inc.
1299 Prisock Road
Jackson
Hinds County

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with Title V of the Federal Clean Air Act (42 U.S.C.A. § 7401 - 7671) and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

Permit Issued: *January 29, 2009*

Permit Modified: JUN 26 2009

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: December 31, 2013

Permit No.: 1080-00040

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APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT

SECTION 1. GENERAL CONDITIONS

- 1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (Ref.: APC-S-6, Section III.A.6.a.)
- 1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (Ref.: APC-S-6, Section III.A.6.b.)
- 1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (Ref.: APC-S-6, Section III.A.6.c.)
- 1.4 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: APC-S-6, Section III.A.6.d.)
- 1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: APC-S-6, Section III.A.6.e.)
- 1.6 The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref.: APC-S-6, Section III.A.5.)
- 1.7 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation APC-S-6.
 - (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters,

such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgements where such judgements are derived from process and/or emission data which supports the estimates of maximum actual emission. (Ref.: APC-S-6, Section VI.A.2.)

- (b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee. (Ref.: APC-S-6, Section VI.A.2.) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time. (Ref.: APC-S-6, Section VI.D.2.)
- (c) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due. (Ref.: APC-S-6, Section VI.D.)
- (d) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition. (Ref.: APC-S-6, Section VI.C.)

- 1.8 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (Ref.: APC-S-6, Section III.A.8.)
- 1.9 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (Ref.: APC-S-6, Section II.E.)
- 1.10 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:
 - (a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
 - (d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. (Ref.: APC-S-6, Section III.C.2.)
- 1.11 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere. (Ref.: APC-S-1, Section 3.9(a))
- 1.12 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970. (Ref.: APC-S-1, Section 3.9(b))
- 1.13 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source. (Ref.: APC-S-6, Section III.F.1.)
- 1.14 Nothing in this permit shall alter or affect the following:
 - (a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;

- (b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - (c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
 - (d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act. (Ref.: APC-S-6, Section III.F.2.)
- 1.15 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan. (Ref.: APC-S-6, Section III.H.)
- 1.16 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application. (Ref.: APC-S-6, Section IV.C.2., Section IV.B., and Section II.A.1.c.)
- 1.17 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:
- (a) the changes are not modifications under any provision of Title I of the Act;
 - (b) the changes do not exceed the emissions allowable under this permit;
 - (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:
 - (1) a brief description of the change(s),
 - (2) the date on which the change will occur,
 - (3) any change in emissions, and
 - (4) any permit term or condition that is no longer applicable as a result of the change;
 - (d) the permit shield shall not apply to any Section 502(b)(10) change. (Ref.: APC-S-6, Section IV.F.)

- 1.18 Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in Regulation APC-S-3, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: APC-S-3)
- 1.19 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations APC-S-2, "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations APC-S-6, "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:
- (a) routine maintenance, repair, and replacement;
 - (b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
 - (c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
 - (d) use of an alternative fuel or raw material by a stationary source which:
 - (1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or
 - (2) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166;
 - (e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or
 - (f) any change in ownership of the stationary source."

- 1.20 Any change in ownership or operational control must be approved by the Permit Board. (Ref.: APC-S-6, Section IV.D.4.)
- 1.21 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission. (Ref.: APC-S-6, Section III.B.1)
- 1.22 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.
- (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.
 - (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.
 - (c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator. (Ref.: APC-S-1, Section 3.7)
- 1.23 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies.
- (a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
 - (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.

- (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
 - (1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - (2) the permitted facility was at the time being properly operated;
 - (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - (4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein. (Ref.: APC-S-6, Section III.G.)

1.24 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, shutdowns and maintenance.

- (a) Upsets (as defined by APC-S-1, Section 2.34)
 - (1) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
 - (i) an upset occurred and that the permittee can identify the cause(s) of the upset;
 - (ii) the source was at the time being properly operated;
 - (iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;

- (iv) the permittee submitted notice of the upset to the DEQ within 5 working days of the time the upset began; and
 - (v) the notice of the upset shall contain a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.
 - (2) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.
 - (3) This provision is in addition to any upset provision contained in any applicable requirement.
- (b) Startups and Shutdowns (as defined by APC-S-1, Sections 2.31 & 2.26)
- (1) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows:
 - (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above;
 - (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or
 - (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.
 - (2) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.
 - (3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply.
- (c) Maintenance.
- (1) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with

emission standards, or other regulatory requirements if the permittee can demonstrate the following:

- (i) the permittee can identify the need for the maintenance;
 - (ii) the source was at the time being properly operated;
 - (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;
 - (iv) the permittee submitted notice of the maintenance to the DEQ within 5 working days of the time the maintenance began or such other times as allowed by DEQ; and
 - (v) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.
- (2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.
 - (3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. (Ref.: APC-S-1, Section 10)

1.25 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation APC-S-1, Section 8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
Natural Gas, On-Spec. Used Oil, Yellow Grease, and Fuel Oil Fired Boilers	
AA-001	51.8 MMBTU/hr Cleaver Brooks Boiler No. 1
AA-002	51.8 MMBTU/hr Cleaver Brooks Boiler No. 2
AA-011	72.8 MMBTU/hr Trane Murray 300 PSI Boiler No. 3
AA-012	72.8 MMBTU/hr Trane Murray 300 PSI Boiler No. 4
Fuel Storage Tanks	
AA-003	15,000 Gallon Fuel Oil Storage Tank
AA-014	7,144 Gallon Fuel Oil Storage Tank
AA-005 – The Ceilcoat HRP-700 Cross Flow Scrubber (Room Air Scrubber) which includes the following equipment and processes:	
AA-004	Ceilcoat Venturi Scrubber and Ceilcoat SPT-136 Packed Tower Scrubber (Both vented through AA-005)
AA-007	3.9 TPH Feather/Blood Line (Vented through AA-005)
AA-009	37.5 TPH Poultry Line (Vented through AA-005)
AA-010	6.75 TPH Red Meat Line (Vented through AA-005)
AA-013	8.75 TPH Grease Line (Vented through AA-005)
AA-018 – The AC Corporation, Model RDS-100 Cross Flow Room Air Scrubber which includes the following equipment and processes:	
AA-016	Non Direct-Fired Dryer Customized Feather/Blood Dryer (with Packed Tower Scrubber for Odor Control, AA-017)

SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. Facility-Wide Emission Limitations & Standards

- 3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).
- (a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.
 - (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour. (Ref.: APC-S-1, Section 3.1)
- 3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Paragraph 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: APC-S-1, Section 3.2)
- 3.A.3 For the entire facility, the permittee shall limit emissions of Nitrogen Oxides (NO_x), Particulate Matter (PM), Particulate Matter of a diameter of 10 micros or less (PM₁₀), and Sulfur Dioxide (SO₂) to no more than 249 tons/year for each pollutant. (Ref.: Permit to Construct No. 1080-00040 issued March 16, 1999)
- 3.A.4 For all processing areas, the permittee shall not cause, permit, or allow the emission from each independent manufacturing process, in any one hour from any point source, particulate matter in total quantities in excess of 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.

An independent process, for the purposes of Griffin Industries, shall be the Feather/Blood Line (AA-007); the Poultry Line (AA-009); and the Red Meat Line and the Restaurant Grease Line (AA-010 and AA-013). Conveyor discharge of coarse solid

matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs. (Ref.: APC-S-1, Section 3.6(a))

3.A.5 For the entire facility, the permittee shall not cause or permit, in each manufacturing process, the emission of gas containing sulfur oxides (measured as sulfur dioxide) in excess of 500 ppm (volume) from any process equipment. (Ref.: APC-S-1, Section 4.2(a))

3.A.6 For the entire facility, the permittee shall not cause or permit the emission of any gas stream from any manufacturing process which contains hydrogen sulfide in excess of one grain per 100 standard cubic feet. (Ref.: APC-S-1, Section 4.2(b))

3.A.7 There shall be no odorous substances in the ambient air in concentrations sufficient to adversely and unreasonably:

- (a) affect human health and well-being;
- (b) interfere with the use or enjoyment of property; or
- (c) affect plant or animal life.

In determining that concentrations of such substances in the ambient air are adversely and unreasonably affecting human well-being or the use or enjoyment of property of plant or animal life, the factors to be considered by the Commission will include, without limiting the generality of the foregoing, the number of complaints or petitioners alleging that such a condition exists, the frequency of the occurrence of such substances in the ambient air as confirmed by the Department of Environmental Quality staff, and the land use of the affected area. (Ref.: APC-S-4, State enforceable only)

3.A.8 The permittee shall not cause, permit, or allow the emission of particles, or any contaminants in sufficient amounts or of such duration from any process as to be injurious to humans, animals, plants, or property, or to be a public nuisance, or create a condition of air pollution.

- (a) No person shall cause or permit the handling or transporting or storage of any material in a manner which allows or may allow unnecessary amounts of particulate matter to become airborne.
- (b) When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than that from which it originated or to violate any other provision of this regulation, the Commission may order such corrected in a way that all air and gases or air and gasborne material leaving the building or equipment are controlled or removed prior to discharge to the open air. (Ref.: APC-S-1, Section 3.3)

B. Emission Point Specific Emission Limitations & Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-001 AA-002 AA-011 AA-012	APC-S-1, Section 3.4(a)(2)	3.B.2	PM	$E = 0.8808 * I^{0.1667}$ or as otherwise limited by facility modification restrictions
	APC-S-1, Section 4.1 (a)(1)	3.B.3	SO ₂	4.8 lbs/MMBTUH or as otherwise limited by facility modification restrictions
	Federally enforceable limit issued herein	3.B.4	PM/PM ₁₀	No more than 162.4 TPY for all combined fuel burning equipment
	Federally enforceable limit issued herein	3.B.10	Fuel Restriction	Only combust natural gas, No. 2 fuel oil, No. 6 fuel oil, on-spec. used oil, and processed fats
AA-001 AA-002 AA-011 AA-012	Federally enforceable limit issued herein	3.B.1	SO ₂ via fuel oil sulfur content	Maximum fuel oil sulfur content of 0.5% by weight
	Federally enforceable limit issued herein	3.B.7	Fuel Restriction	No more than 3,700,000 gallons of on-spec. used oil shall be combusted per calendar year
	Federally enforceable limit issued herein	3.B.8	Fuel Restriction	No more than 4,000,000 gallons total of No. 6 and No. 2 fuel oil shall be combusted per calendar year
	Federally enforceable limit issued herein	3.B.9	Fuel Restriction	No more than 6,300,000 gallons total of No. 6, No. 2, and on-spec. used oil shall be combusted per calendar year
AA-004 AA-005	State enforceable only	3.B.5	Operational Restriction	Control devices must be in operation in accordance with the Operational Plan
AA-017 AA-018	State enforceable only	3.B.6	Operational Restriction	Control devices must be in operation in accordance with the Operational Plan

3.B.1 For Emission Points AA-001, AA-002, AA-011, and AA-012, the permittee shall not combust any fuel that contains greater than 0.5 weight percent sulfur. (Ref.: Permit to Construct No. 1080-00040 issued March 16, 1999)

3.B.2 For Emission Points AA-001, AA-002, AA-011, and AA-012, the permittee shall not allow ash and/or particulate matter to 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.: APC-S-1, Section 3.4(a)(2))

- 3.B.3 For Emission Points AA-001, AA-002, AA-011, and AA-012, the maximum discharge of sulfur oxides from any fuel burning equipment shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. (Ref.: APC-S-1, Section 4.1 (a)(1))
- 3.B.4 For Emission Points AA-001, AA-002, AA-011, and AA-012, the permittee shall limit Particulate Matter (PM) and Particulate Matter of a diameter of 10 microns or less (PM₁₀) for all combined fuel burning equipment to no more than 162.4 tons per year. (Ref.: Permit to Construct No. 1080-00040 issued March 16, 1999 and Title V Operating Permit No. 1080-00040 issued herein)
- 3.B.5 For Emission Points AA-004 and AA-005, the permittee must operate all control devices in accordance with an approved Operational Plan to control odor. Should any control device become non-operational, or deviate with the Operational Plan when processing, the respective process and control devices shall be operated in a manner consistent with the Operational Plan required by Condition 5.B.7. (Ref.: State enforceable only, APC-S-4)
- 3.B.6 For Emission Points AA-017 and AA-018, the permittee must operate the scrubbers at all times when processing to control odor. Should any control device become non-operational, or deviate with the Operational Plan when processing, the respective process and control devices shall be operated in a manner consistent with the Operational Plan required by Condition 5.B.7. (Ref.: State enforceable only, APC-S-4)
- 3.B.7 For Emission Points AA-001, AA-002, AA-011, and AA-012, the permittee shall not allow more than 3,700,000 gallons of on-spec. used oil to be combusted in any calendar year. (Ref.: Permit to Construct No. 1080-00040 issued March 16, 1999 and Title V Operating Permit No. 1080-00040 issued herein)
- 3.B.8 For Emission Points AA-001, AA-002, AA-011, and AA-012, the permittee shall not allow more than 4,000,000 gallons total of No. 2 and No. 6 fuel oil to be combusted in any calendar year. (Ref.: Permit to Construct No. 1080-00040 issued March 16, 1999 and Title V Operating Permit No. 1080-00040 issued herein)
- 3.B.9 For Emission Points AA-001, AA-002, AA-011, and AA-012, the permittee shall not allow more than a combined total of 6,300,000 gallons of No. 2 fuel oil, No. 6 fuel oil, and on-spec. used oil to be combusted in any calendar year. (Ref.: Permit to Construct No. 1080-00040 issued March 16, 1999 and Title V Operating Permit No. 1080-00040 issued herein)
- 3.B.10 For all fuel burning equipment, the permittee shall only combust natural gas, No. 2 fuel oil, No. 6 fuel oil, on-spec. used oil, and processed fats. (Ref.: Federally enforceable fuel restriction established herein)

C. Insignificant and Trivial Activity Emission Limitations & Standards

Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
APC-S-1, Section 3.4(a)(1)	3.C.1 & 1.19	PM	0.6 lbs/MMBTU or as otherwise limited by facility modification restrictions
APC-S-1, Section 4.1(a)	3.C.2 & 1.19	SO ₂	4.8 lbs/MMBTU or as otherwise limited by facility modification restrictions

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

SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:
- (a) the identification of each term or condition of the permit that is the basis of the certification;
 - (b) the compliance status;
 - (c) whether compliance was continuous or intermittent;
 - (d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
 - (e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit. (Ref.: APC-S-6, Section III.C.5.a.,c.,&d.)

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. General Monitoring, Recordkeeping and Reporting Requirements

- 5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.
- 5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:
- (a) the date, place as defined in the permit, and time of sampling or measurements;
 - (b) the date(s) analyses were performed;
 - (c) the company or entity that performed the analyses;
 - (d) the analytical techniques or methods used;
 - (e) the results of such analyses; and
 - (f) the operating conditions existing at the time of sampling or measurement. (Ref.: APC-S-6, Section III.A.3.b.(1)(a)-(f))

- 5.A.3 Except as otherwise specified herein, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. (Ref.: APC-S-6, Section III.A.3.b.(2))
- 5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with APC-S-6, Section II.E. (Ref.: APC-S-6, Section III.A.3.c.(1))
- 5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) days of the time the deviation began. (Ref.: APC-S-6, Section III.A.3.c.(2))
- 5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the DEQ and the EPA.

B. Specific Monitoring and Recordkeeping Requirements

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-007 AA-009 AA-010 AA-013	Raw Materials	Monitor and record production output	5.B.2	APC-S-6, Section III.A.3.
AA-001 AA-002 AA-011 AA-012	PM/PM ₁₀ SO ₂ NO _x	Monitor and record monthly fuel usage	5.B.3	APC-S-6, Section III.A.3.
		Monitor and record a rolling 12-month emission calculation for each pollutant	5.B.4	APC-S-6, Section III.A.3.
		Monitor and maintain fuel supplier certifications in lieu of fuel analysis	5.B.5	APC-S-6, Section III.A.3.
	PM/PM ₁₀ SO ₂ NO _x	Stack testing shall be performed within 60 days of burning No. 6 fuel oil for 7 consecutive days. Stack testing is to be done while the facility is burning No. 6 fuel oil. This stack testing requirement shall not exceed once every 2 years.	5.B.8 & 5.B.9	APC-S-6, Section III.A.3.
AA-001 AA-002 AA-011	Opacity	Monitor and record visible emissions weekly during periods of combusting fuel oil, processed fats, or on spec. used oil.	5.B.6	APC-S-6, Section III.A.3.

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-007 AA-009 AA-010 AA-013	Raw Materials	Monitor and record production output	5.B.2	APC-S-6, Section III.A.3.
AA-012	O&M	Perform routine inspections monthly and keep records of all inspections and maintenance activities.	5.B.1	APC-S-6, Section III.A.3.
AA-004 AA-005 AA-017 AA-018	O&M	Monitor and record operational parameters	5.B.7	APC-S-6, Section III.A.3.

5. B.1 For Emission Points AA-001, AA-002, AA-016, AA-011, AA-012, the permittee shall perform routine inspections on a monthly basis. The permittee shall maintain a record of all inspections and maintenance activities performed in accordance with Condition 5.A.3. These records shall be made available upon request by MDEQ. (Ref.: APC-S-6, Section III.A.3.)
5. B.2 The permittee shall monitor and record on a monthly basis the production output for processes AA-007, AA-009, AA-010, and AA-013. The permittee shall maintain these records in accordance with Condition 5.A.3 and be made available upon request by MDEQ. (Ref.: APC-S-6, Section III.A.3.)
5. B.3 For Emission Points AA-001, AA-002, AA-011, and AA-012, the permittee shall monitor and record monthly, the type, quantity, and quality of fuel used. These records shall be maintained in accordance with Condition 5.A.3. (Ref.: APC-S-6, Section III.A.3.)
5. B.4 For Emission Points AA-001, AA-002, AA-016, AA-011, and AA-012, the permittee shall monitor and record a rolling 12-month total of Nitrogen Oxides (NO_x), Particulate Matter (PM), Particulate Matter of a diameter of 10 micros or less (PM₁₀), and Sulfur Dioxide (SO₂) emissions. The 12-month rolling total for all pollutants shall be based on the stack testing results as required by this permit as well as emission calculations derived from AP-42 emission factors. These records shall be maintained in accordance with Condition 5.A.3 and be made available upon request by MDEQ. (Ref.: APC-S-6, Section III.A.3.)
5. B.5 For Emission Points AA-001, AA-002, AA-011, and AA-012, the permittee shall record and maintain records of the fuel supplier certifications for periods of firing fuel oil. In lieu of fuel supplier certifications, the permittee shall analyze the oil sample to determine the sulfur content of the oil. If a partially empty fuel tank is refilled, a new sample and analysis of the fuel in the tank would be required upon filling. These records shall be maintained in accordance with Condition 5.A.3. (Ref.: APC-S-6, Section III.A.3.)
5. B.6 For Emission Points AA-001, AA-002, AA-011, and AA-012, the permittee shall assure compliance with the opacity limitation by performing weekly visual observations of emissions from the exhaust stack utilizing EPA Reference Method 22 during periods of combusting fuel oil, processed fats, or on-spec. used oil. If any visible emissions are detected during an observation period of 6 consecutive minutes, a visible emission evaluation (VEE) shall be performed utilizing EPA Reference Method 9. If a VEE is performed utilizing EPA Reference Method 9 then a minimum of 18 consecutive minutes shall be performed. Further the permittee shall maintain a record and/or log documenting all visual observation/tests, the nature and cause of any visible emissions that exceed 40%, and corrective actions taken to prevent or minimize the emissions, and the date and time of when the visible emission observations were conducted. These records and/or logs shall be maintained in accordance with Condition 5.A.3 and be made available upon request by MDEQ. (APC-S-6, Section III.A.3)

5. B.7 For Emission Points AA-004, AA-005, AA-017, and AA-018, the permittee shall submit an Operational Plan. This Operational Plan should indicate the steps taken should any control device become non-operational. Additionally, the Operational Plan should include all necessary operational parameters and ranges that will demonstrate a reasonable margin of compliance with Conditions found in Section 3. These operational ranges for each control device shall be derived from stack test data, vendor certification, operational history, visual inspections, and/or olfactory observations, the combination of which demonstrate the proper operation of the equipment in compliance. These ranges, with supporting documentation, shall be submitted to the MDEQ for approval within 180 days of the issuance date of this permit. The operating ranges may be updated using this procedure, following MDEQ approval. (Ref.: State enforceable only, APC-S-4)
5. B.8 For Emission Points AA-001, AA-002, AA-011, and AA-012, the permittee shall demonstrate compliance with PM/PM₁₀ limits by stack testing in accordance with EPA Test Methods 1-5. Stack testing shall be performed for PM/PM₁₀ within sixty (60) days of burning No. 6 fuel oil for seven (7) consecutive days. Stack testing is to be done while the facility is burning No. 6 fuel oil. After the initial test for PM/PM₁₀, the permittee shall perform these tests within sixty (60) days of burning No. 6 fuel oil for seven (7) consecutive days, not to exceed one stack test every two years. (Ref.: APC-S-2.B.10)
5. B.9 For Emission Points AA-001, AA-002, AA-011, and AA-012, the permittee shall also demonstrate compliance with the SO₂ and NO_x limits by stack testing in accordance with EPA Test Method 6 and 7, respectively. Stack testing for SO₂ and NO_x shall be performed within sixty (60) days of burning No. 6 fuel oil for seven (7) consecutive days. All testing is to be done while the facility is burning No. 6 fuel oil. After the initial test for SO₂ and NO_x, the permittee shall perform these tests within sixty (60) days of burning No. 6 fuel oil for seven (7) consecutive days, not to exceed one stack test every two years. (Ref.: APC-S-2.B.10)

C. Specific Reporting Requirements

Emission Point(s)	Pollutant/Parameter Monitored	Reporting Requirement	Condition Number	Applicable Requirement
Facility Wide	O&M	Semiannual reports	5.C.1	APC-S-6, Section III.A.3.c.(1)
AA-001 AA-002 AA-011 AA-012	Fuel Usage	Semiannual reports	5.C.2	APC-S-6, Section III.A.3.c.(1)
	Opacity	Semiannual reports	5.C.3	APC-S-6, Section III.A.3.c.(1)
	PM/PM ₁₀ SO ₂ NO _x	Semiannual reports	5.C.4	APC-S-6, Section III.A.3.c.(1)
	Fuel Certifications	Semiannual reports	5.C.5	APC-S-6, Section III.A.3.c.(1)
AA-001 AA-002 AA-011 AA-012	PM/PM ₁₀ SO ₂ NO _x	Stack test protocol and report submittal	5.C.6	APC-S-6, Section III.A.3.c.(1)

5. C.1 The permittee shall submit a summary report of all monthly maintenance activities performed as required by Condition 5.B.1. This summary shall be submitted semiannually in accordance with Condition 5.A.4. (Ref.: APC-S-6, Section III.A.3.c.(1))
5. C.2 For Emission Points AA-001, AA-002, AA-011, and AA-012, the permittee shall submit a summary report of type, quantity, and quality of fuel used. This summary shall be submitted semiannually in accordance with Condition 5.A.4. (Ref.: APC-S-6, Section III.A.3.c.(1))
5. C.3 For Emission Points AA-001, AA-002, AA-011, and AA-012, the permittee shall submit a summary report of the weekly visible emission observations/evaluations as applicable. This summary shall be submitted semiannually in accordance with Condition 5.A.4. (Ref.: APC-S-6, Section III.A.3.c.(1))
5. C.4 For Emission Points AA-001, AA-002, AA-011, and AA-012, the permittee shall submit a summary report of the rolling 12-month total of Nitrogen Oxides (NO_x), Particulate Matter (PM), Particulate Matter of a diameter of 10 micros or less (PM₁₀), and Sulfur Dioxide (SO₂) emissions. This summary shall be submitted semiannually in accordance with Condition 5.A.4. (Ref.: APC-S-6, Section III.A.3.c.(1))
5. C.5 For Emission Points AA-001, AA-002, AA-011, and AA-012, the permittee shall submit a report of the fuel supplier certifications and/or fuel analysis. The report shall be submitted semiannually in accordance with Condition 5.A.4. (Ref.: APC-S-6, Section II.A.3.c.(1))
5. C.6 The permittee shall submit a stack test report for each required stack test within 30 days of completing the test. As part of the test report, the permittee shall provide the average operating rate during testing of the process associated with the units being tested.

For all required testing, 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 the MDEQ. Also, the permittee shall notify the MDEQ in writing at least ten (10) days prior to the intended test date(s) so that an observer may be afforded the opportunity to witness the test.

After the first successful submittal of an initial written test protocol, the permittee may request that the submittal of a 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. (Ref.: APC -S-6, Section III.A.3.c.(1))

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

SECTION 7. TITLE VI REQUIREMENTS

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

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

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

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

APPENDIX A

List of Abbreviations Used In this Permit

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