



State of Mississippi



AIR POLLUTION CONTROL PERMIT

Permit To Construct Air Emissions Equipment

THIS CERTIFIES

International Converter
1309 Paul Edmondson Drive
Iuka, MS
Tishomingo 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 07 2012**

Expires:

Permit No. 2640-00011

Agency Interest # 878

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Other Relevant Documents:

Permit To Construct Air Emissions Equipment

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Subject Item Inventory
Permit Number:2640-00011
Activity ID No.: PER20110001

Subject Item Inventory:

ID	Designation	Description
AI878	878	Foil and Paper Laminated Products Mfg. Facility
EQPT8	AA-007	Diesel Fired Engine (Fire Pump)
EQPT10	AA-005	Laminator No. 5: includes a drying oven equipped with four (4) natural gas-fired burners with a total heat input capacity of 10.5 MMBTU/hr
IA1		0.51 MMBTU/hr Pressure Washer

KEY

ACT = Activity

AREA = Area

CONT = Control Device

IA = Insignificant Activity

RPNT = Release Point

AI = Agency Interest

CAFO = Concentrated Animal Feeding Operation

EQPT = Equipment

MAFO = Animal Feeding Operation

TRMT = Treatment

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AI0000000878 (878) Foil and Paper Laminated Products Mfg. Facility:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		The permittee shall limit volatile organic compound (VOC) emissions to no more than 249.0 tons/year (TPY) as determined for each consecutive 12-month period for the entire facility. [Title V Permit to Operate issued October 16, 2004]. [APC-S-2 II.B(10)]

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		For the entire facility, the permittee shall determine for each coating, adhesive, solvent or other VOC containing material used: a) the quantity used (gallons or pounds); b) the percentage of VOCs by weight; c) and the density (lbs/gal), unless material usages are measured in pounds. The permittee may utilize data supplied by the manufacturer, or analysis of VOC content by EPA Test Method 24, 40 CFR 60, Appendix A. [APC-S-6 III.A(3)a]

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AI0000000878 (continued):

Record-Keeping Requirements:

Condition No.	Condition
R-1	For the entire facility, the permittee shall maintain sufficient records to document: a) the identification and the total quantity used of each coating adhesive, solvent, or other VOC containing material used on a monthly basis and in any consecutive 12-month period; b) the VOC content(s) of each coating, adhesive, solvent, or other VOC containing material used with a description of the method used to determine the VOC content(s); c) and the density of each coating, adhesive, solvent, or other VOC containing material, unless material usages are measured in pounds. The permittee shall maintain copies of all records and reports on site for at least five (5) years and shall make them available upon request by Mississippi Department of Environmental Quality (MDEQ) personnel. [APC-S-6 III.A(3)]

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. [APC-S-2 V.D]
S-2	Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun. [APC-S-2 V.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. [APC-S-2 V.C(3)]

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AI0000000878 (continued):

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. [APC-S-2 V.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]
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 APC-S-1, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. [APC-S-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. [APC-S-2 II.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]

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AI0000000878 (continued):

Narrative Requirements:

Condition No.	Condition
T-8	General Condition:This permit is for air pollution control purposes only. [APC-S-2 I.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. [APC-S-2 II.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. [APC-S-2 I.D(6)]
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. [APC-S-2 II.B(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. [APC-S-2 II.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. [APC-S-2 II.B(15)b]
T-14	General Condition: The permit does not convey any property rights of any sort, or any exclusive privilege. [APC-S-2 II.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. [APC-S-2 II.B(15)d]
T-16	General Condition: This permit shall not be transferred except upon approval of the Permit Board. [APC-S-2 XVI.B]

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Narrative Requirements:

Condition No.	Condition
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. [APC-S-2 I.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. [APC-S-2 V.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. [APC-S-2 V.D(3)]
T-20	General Condition: Except as prohibited in APC-S-2, Section V.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 APC-S-2, Section XIII.G. [APC-S-2 V.D(4)]
T-21	General Condition: Except as otherwise specified in APC-S-2, Section V.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. [APC-S-2 V.D(5)]
T-22	General Condition: Except as otherwise specified in APC-S-2, Section V.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. [APC-S-2 V.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. [APC-S-2 V.D(7)]

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AI0000000878 (continued):

Narrative Requirements:

Condition No.	Condition
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. [APC-S-2 VI.B(3, 4 and 6)]
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. [APC-S-2 V.A(4)]

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EQPT0000000008 (AA-007) Diesel Fired Engine (Fire Pump):

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Particulate Matter	Particulate Matter: 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. [APC-S-1 3.4(a)1]
L-2		Beginning May 3, 2013, for Emission Point AA-007, the permittee is subject to and shall comply with National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines and General Provisions (40 CFR 63, Subparts ZZZZ and A). [40 CFR 63.6585]
L-3		For an emergency stationary CI RICE the permittee shall: (a) change oil and filter every 500 hours of operation or annually, whichever comes first, (b) inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and (c) inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. [40 CFR 63.6603(Table 2d)]
L-4		The permittee shall operate and maintain the emergency stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR 63.6625(e)]
L-5		The permittee shall install a non-resettable hour meter if one is not already installed. [40 CFR 63.6625(f)]
L-6		The permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to Subpart ZZZZ apply. [40 CFR 63.6625(h)]

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EQPT0000000008 (continued):

Limitation Requirements:

Condition No.	Parameter	Condition
L-7		The permittee shall operate the emergency stationary RICE in accordance with the following requirements: (a) There is no time limit on the use of the emergency stationary RICE in emergency situations. (b) The emergency stationary RICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year. (c) The emergency stationary RICE may be operated up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that owners and operators may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by the conditions of this requirement, as long as the power provided by the financial arrangement is limited to emergency power. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in the conditions of this requirement, is prohibited. If the engine is not operated according to conditions (a)-(c) in this requirement, the engine will not be considered an emergency engine under Subpart ZZZZ and will need to meet all requirements for non-emergency engines. [40 CFR 63.6640(f)]

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EQPT0000000008 (continued):

Limitation Requirements:

Condition No.	Parameter	Condition
L-8		The permittee is subject to and shall comply with Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. [40 CFR 60_Subpart IIII]
L-9		For Emission Point AA-007, fire pump engines with a displacement of less than 30 liters per cylinder must comply with the emission standards in table 4 of 40 CFR 60 Subpart IIII. [40 CFR 60_Subpart IIII.4205(c)]
L-10		Beginning June 1, 2012, owners and operators of stationary CI ICE subject to this subpart with a displacement of greater than or equal to 30 liters per cylinder are no longer subject to the requirements of paragraph (a) of this section, and must use fuel that meets a maximum per-gallon sulfur content of 1,000 parts per million (ppm). [40 CFR 60_Subpart IIII.4207(d)]
L-11		For Emission Point AA-007 and the 0.51 MMBTU/hr pressure washer (insignificant source), the permittee shall not operate these units in excess of 500 hours per year per unit. [APC-S-2 II.B(10)]

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		For compliance with emission and operating limits, the permittee shall monitor and collect data according to the following: (a) Except for monitor malfunctions, associated repairs, required performance evaluations, and required quality assurance or control activities, the permittee shall monitor continuously at all times that the stationary RICE is operating. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. (b) The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels. The permittee must, however, use all the valid data collected during all other periods. [40 CFR 63.6635]

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EQPT0000000008 (continued):

Monitoring Requirements:

Condition No.	Parameter	Condition
M-2		For the Emission Point AA-007 and the 0.51 MMBTU/hr pressure washer (insignificant source), the permittee shall monitor hours of operation and maintain sufficient records to ensure the units do not operate in excess of 500 hours per year as required by Condition L-11of EQPT0000000008 in any consecutive 12-month period. [APC-S-2 II.B(10)]

Record-Keeping Requirements:

Condition No.	Condition
R-1	The permittee shall keep the following records: (a) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in §63.10(b)(2)(xiv) (b) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment (c) Records of performance tests and performance evaluations as required in §63.10(b)(2)(viii) (d) Records of all required maintenance performed on the air pollution control and monitoring equipment (e) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [40 CFR 63.6655(a)]
R-2	The permittee shall operate and maintain the emergency stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or develop and follow their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in manner consistent with good air pollution control practice for minimizing emissions. [40 CFR 63.6655(d)]
R-3	The permittee shall keep records of the maintenance conducted on the emergency stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to your the permittee's maintenance plan. [40 CFR 63.6655(e)]

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EQPT0000000008 (continued):

Record-Keeping Requirements:

Condition No.	Condition
R-4	The permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, the permittee shall keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response. [40 CFR 63.6655(f)]
R-5	If the stationary CI internal combustion engine is an emergency stationary internal combustion engine, the permittee is not required to submit an initial notification. Starting with the model years in table 5 of Subpart IIII, if the emergency engine does not meet the standards applicable to non-emergency engines in the applicable model year, the permittee shall keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The permittee shall record the time of operation of the engine and the reason the engine was in operation during that time. [40 CFR 60_Subpart IIII.4214(b)]
R-6	If the stationary CI internal combustion engine is equipped with a diesel particulate filter, the owner or operator must keep records of any corrective action taken after the backpressure monitor has notified the owner or operator that the high backpressure limit of the engine is approached. [40 CFR 60_Subpart IIII.4214(c)]

Submittal/Action Requirements:

Condition No.	Condition
S-1	The permittee shall report each instance in which the operating limit in Table 2d of Subpart ZZZZ was not met. These instances are deviations from the emission and operating limitations of the subpart. These deviations must be reported according to the requirements in 40 CFR 63.6550. [40 CFR 63.6640(b)]
S-2	The permittee shall submit an annual compliance report covering the annual reporting period from January 1 through December 31. The first compliance report shall be postmarked or delivered no later than January 31 following the end of the first calendar year after the compliance date, and each subsequent report shall be postmarked or delivered no later than January 31 following the reporting period. [40 CFR 63.6650(a)]

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EQPT0000000008 (continued):

Submittal/Action Requirements:

Condition No.	Condition
S-3	The Compliance report shall contain the following information: (a) Company name and address. (b) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report. (c) Date of report and beginning and ending dates of the reporting period. (d) If you had a malfunction during the reporting period, the compliance report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by the permittee during a malfunction of an affected source to minimize emissions in accordance with §63.6605(b), including actions taken to correct a malfunction. (e) The total operating time of the stationary RICE at which the deviation occurred during the reporting period. (f) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. [40 CFR 63.6650(c)]

Narrative Requirements:

Condition No.	Condition
T-1	For Emission Point AA-007, the permittee shall install a non-resettable hour meter prior to startup of the engine. [40 CFR 60_Subpart IIII.4209(a)]

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EQPT0000000008 (continued):

Narrative Requirements:

Condition No.	Condition
T-2	For Emission Point AA-007, the permittee shall operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer. In addition, the permittee may only change those settings that are permitted by the manufacturer. The permittee shall also meet the requirements of 40 CFR parts 89, 94 and/or 1068, as they apply. [40 CFR 60_Subpart IIII.4211(a)]
T-3	For Emission Point AA-007, the permittee shall demonstrate compliance according to the following requirements: (1) Conducting an initial performance test to demonstrate initial compliance with the emission standards as specified in 40 CFR 60.4213 (Condition T-8). (2) Establishing operating parameters to be monitored continuously to ensure the stationary internal combustion engine continues to meet the emission standards. The permittee shall petition the MDEQ for approval of operating parameters to be monitored continuously. The petition must include the information described in paragraphs (i) through (v). (i) Identification of the specific parameters you propose to monitor continuously; (ii) A discussion of the relationship between these parameters and NOX and PM emissions, identifying how the emissions of these pollutants change with changes in these parameters, and how limitations on these parameters will serve to limit NOX and PM emissions; (iii) A discussion of how you will establish the upper and/or lower values for these parameters which will establish the limits on these parameters in the operating limitations; (iv) A discussion identifying the methods and the instruments you will use to monitor these parameters, as well as the relative accuracy and precision of these methods and instruments; and (v) A discussion identifying the frequency and methods for recalibrating the instruments you will use for monitoring these parameters. [40 CFR 60_Subpart IIII.4211(d)]

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EQPT0000000008 (continued):

Narrative Requirements:

Condition No.	Condition
T-4	Emergency stationary ICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. There is no time limit on the use of emergency stationary ICE in emergency situations. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency ICE beyond 100 hours per year. Emergency stationary ICE may operate up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply non-emergency power as part of a financial arrangement with another entity. For owners and operators of emergency engines, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as permitted in 40 CFR 60.4211, is prohibited. [40 CFR 60_Subpart IIII.4211(f)]
T-5	For Emission Point AA-007, if the permittee does not install, configure, operate, and maintain the engine and control device according to the manufacturer's emission-related written instructions, or the emission-related settings are changed in a way that is not permitted by the manufacturer, the permittee must keep a maintenance plan and records of conducted maintenance to demonstrate compliance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, if you do not install and configure the engine and control device according to the manufacturer's emission-related written instructions, or you change the emission-related settings in a way that is not permitted by the manufacturer, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of such action. [40 CFR 60_Subpart IIII.4211(g)]
T-6	For Emission Point AA-007, the permittee shall required peformance in accordance with 40 CFR 60.4212(a) through (e). [40 CFR 60_Subpart IIII.4212]

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EQPT0000000010 (AA-005) Laminator No. 5: includes a drying oven equipped with four (4) natural gas-fired burners with a total heat input capacity of 10.5 MMBTU/hr:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Particulate Matter	Particulate Matter: The maximum permissible emission of ash and/or particulate matter from each fossil fuel burning installations equal to or greater than 10 million BTU per hour heat input but less than 10,000 million BTU per hour 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. [APC-S-1 3.4(a)2]
L-2	HAP, Total (Limit)	HAP, Total (Limit): For Emission Point AA-005, the permittee shall limit organic HAP emissions to no more than 4 percent of the mass of coating materials applied for each month. [40 CFR 63.3320(b)(2)]

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		For Emission Point AA-005, the permittee shall demonstrate that the total monthly organic HAP applied is less than the calculated equivalent allowable organic HAP. [40 CFR 63.3370(a)(3)]

Permit To Construct Air Emissions Equipment

International Converter

Facility Requirements

Permit Number:2640-00011

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EQPT0000000010 (continued):

Monitoring Requirements:

Condition No.	Parameter	Condition
M-2		For Emission Point AA-005, the permittee shall demonstrate that the total monthly organic HAP applied (Hm) is less than the calculated allowable HAP (Ha) by performing the following: a) determine the total monthly organic HAP applied (Hm) by using equation 6 in §63.3370(d); b) determine the values needed to calculate the monthly allowable organic HAP limit (Ha) by following the procedures in 5.B.6, then; c) calculate Ha using Equation 13a in §63.3370(1) based on the following: 1) Materials applied containing greater than or equal to 20 mass percent coating solids complying with the kg HAP/kg solids coating limit, and 2) Materials applied containing less than 20 mass percent coating solids complying with the kg HAP/kg coating limit. [40 CFR 63.3370(d)]

Record-Keeping Requirements:

Condition No.	Condition
R-1	For Emission Point AA-005, the permittee shall maintain all records specified in 40 CFR 63.10(b)(2) of all measurements needed to demonstrate compliance. These records are to be maintained on a monthly basis in accordance with the requirements of 40 CFR 63.10(b)(1). [40 CFR 63.3410(a)]

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EQPT0000000010 (continued):

Submittal/Action Requirements:

Condition No.	Condition
S-1	For the entire facility, the permittee shall submit semi-annual reports providing: a) the identification of each coating, adhesive, solvent, or other VOC containing material used; b) the VOC content(s) of each coating, adhesive, solvent, or other VOC containing material used; c) the total quantity used of each coating, adhesive, solvent, or other VOC containing material used in any consecutive 12-month period; d) and the total VOC emission rate in tons/year for each consecutive 12-month period. [APC-S-6 III.A(3)a]
S-2	For Emission Point AA-005, the permittee shall submit a semi-annual compliance report in accordance with 40 CFR 63.3400(c)(1) and (c)(2). [40 CFR 63.3400]

Narrative Requirements:

Condition No.	Condition
T-1	For Emission Point AA-005, the permittee is subject to and shall comply the National Emission Standards for Hazardous Air Pollutants for Paper and other Web Coatings and the General Provisions (40 CFR 63, Subparts JJJJ, and A). [40 CFR 63.3290]
T-2	For Emission Point AA-005, the permittee shall perform the following: a) determine the mass of each coating applied on an as-purchased basis; b) determine the "as-purchased" coating solids content of each coating material applied in accordance with 63.3360(d)(1)-(2); c) determine the as-purchased mass fraction of each coating material applied at greater than or equal to 20 mass percent coating solids content; d) determine the total mass of each solvent , diluent, thinner, or reducer added to the coating materials which were applied at less than 20 mass percent coating solids content. [40 CFR 63.3370(l)]

GENERAL INFORMATION

International Converter
1309 Paul Edmondson Drive
Iuka, MS
Tishomingo County

Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
878	International Converter	Official Site Name	1/2/2007	
2814100011	International Converter	Air-AIRS AFS	10/12/2000	
MSD007038995	Ormet Aluminum Mill Products Corporation	Hazardous Waste-EPA ID	3/13/1995	3/9/2004
264000011	Ormet Aluminum Mill Products Corporation	Air-Title V Operating	6/17/1999	11/25/2003
MSR000457	Ormet Aluminum Mill Products Corporation	GP-Baseline	11/24/1992	7/13/1997
MS0022144	Ormet Aluminum Mill Products Corporation	Water - NPDES	12/17/1996	12/16/2001
MS0022144	Ormet Aluminum Mill Products Corporation	Water - NPDES	10/17/2001	11/25/2003
MSR000457	Ormet Aluminum Mill Products Corporation	GP-Baseline	11/3/2000	11/25/2003
878	Ormet Aluminum Mill Products Corporation	Historic Site Name	11/24/1992	11/12/2003
264000011	Iuka, Incorporated	Air-Title V Operating	11/25/2003	6/1/2004
MS0022144	Iuka, Incorporated	Water - NPDES	11/25/2003	9/30/2006
MSR000457	Iuka, Incorporated	GP-Baseline	11/25/2003	3/7/2006
MSD007038995	Iuka, Inc	Hazardous Waste-EPA ID	3/9/2004	2/23/2007
264000011	Iuka, Incorporated	Air-Title V Operating	10/26/2004	2/7/2007
MSR000457	International Converter, Inc, Iuka, Incorporated	GP-Baseline	3/7/2006	2/8/2007
264000011	Iuka, Incorporated	Air-Title V Fee Customer	11/25/2003	
878	Iuka, Incorporated	Historic Site Name	11/12/2003	1/2/2007
264000011	International Converter	Air-Title V Operating	2/7/2007	9/30/2009
MSR000457	International Converter	GP-Baseline	2/8/2007	1/25/2011
MSD007038995	International Converter	Hazardous Waste-EPA ID	2/23/2007	
878 001	Alusuisse Flexible Packing, Consolidated Aluminum Corp	GARD	4/18/1986	
264000011	International Converter	Air-Title V Operating	1/7/2010	12/31/2014
MSR000457	International Converter	GP-Baseline	1/25/2011	9/28/2015

GENERAL INFORMATION

ID	Alternate/Historic Name	User Group	Start Date	End Date
264000011	International Converter	Air-Construction	5/7/2012	

Basin: Tennessee River Basin

Location Description:PG- Plant Entrance (General). Data collected by Dewayne Headrick on 2/23/2001.