

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

**TO OPERATE AIR EMISSIONS EQUIPMENT**

**THIS CERTIFIES THAT**

Cooper Tire and Rubber Company, Clarksdale  
2205 Martin Luther King Junior Drive  
Clarksdale, Mississippi  
Coahoma 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: OCT 30 2012

Effective Date: As specified herein.

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

  
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**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

Expires: SEP 30 2017

Permit No.: 0540-00013

**TABLE OF CONTENTS**

SECTION 1. GENERAL CONDITIONS ..... 3  
SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES..... 12  
SECTION 3. EMISSION LIMITATIONS & STANDARDS ..... 13  
SECTION 4. COMPLIANCE SCHEDULE ..... 18  
SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS ..... 19  
SECTION 6. ALTERNATIVE OPERATING SCENARIOS..... 24  
SECTION 7. TITLE VI REQUIREMENTS..... 25

**APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT**

**IMPORTANT DOCUMENTS:**

**NEW SOURCE PERFORMANCE STANDARDS FOR SMALL INDUSTRIAL-COMMERCIAL-INSTITUTIONAL STEAM GENERATING UNIT – 40 CFR 60, SUBPART Dc**

**NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS: INDUSTRIAL, COMMERCIAL, AND INSTITUTIONAL BOILERS FOR AREA SOURCES -- 40 CFR 63, SUBPART JJJJJ**

## 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 judgments where such judgments 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 2.37)
- (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 2.34 & 2.29)
- (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	Facility Reference	Description
Significant Emission Sources		
AA-002	BL-01	20.4 MMBTU/hr Cleaver Brooks Boiler – Primary boiler used for process steam. Fires natural gas or No. 2 fuel oil.
AA-003	BL-02	27.2 MMBTU/hr Springfield Boiler – Back-up boiler used or process steam. Fires natural gas or No. 2 fuel oil.
AA-004	MX-01A	Rubber Mixing and Carbon Black Handling Baghouse
AA-005	MX-01B	Rubber Mixing Baghouse
AA-006	BE-01	Bladder/Envelope Making Operations – Uncured rubber strips or slugs are placed or fed into the curing presses which are heated until the product is cured. The finished product is cooled and may be buffed before being inspected, packaged, and shipped.

APC-S-6 Reference	Facility Reference	Description
Insignificant Emission Sources		
VII.B.6	RM-01	Rubber milling operations with no powder materials or organic liquids used
VII.B.7	TF-01	Fixed roof oil tanks
VII.D.1,2	EX-01	Rubber Extrusion
VII.D.1,2	BE-01B	Bladder Buffing with filters
VII.D.1,2	MX-01C	Carbon Black Handling with baghouse
VII.D.1,2	AC-01	Automated Compounding with cyclone with after-filters

**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)

**B. Emission Point Specific Emission Limitations & Standards**

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
Mixing Operations	APC-S-1, Section 3.6(a)	3.B.1	PM (filterable only)	$E = 4.1p^{0.67}$
AA-002 AA-003	APC-S-1, Section 3.4(a)(2)	3.B.2	PM (filterable only)	$E = 0.8808 * T^{0.1667}$
	APC-S-1, Section 4.1(a)	3.B.3	SO <sub>2</sub>	4.8 lb/MMBTU
AA-002 AA-003	40 CFR 60.42c(d), Subpart Dc (for AA-003 only) and Federally Enforceable Construction Permit issued on November 14, 1995	3.B.4	Fuel Restriction	< 0.5% Sulfur by weight

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-004 AA-005	Title V Operating Permit issued October 29, 2012	3.B.5	Opacity	Operate baghouse at all times when emissions may be vented
AA-002 AA-003	40 CFR 63.11194(a)(1), Subpart JJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers for Area Sources	3.B.6	HAP	Applicability Only
	40 CFR 63.11201(b), 63.11196(a), and Table 2, Subpart JJJJJ	3.B.7		Comply with each applicable work practice standard and management practice specified in 40 CFR 63, Subpart JJJJJ, Table 2.
	40 CFR 63.11223(a), Subpart JJJJJ	3.B.8		Conduct a biennial performance tune-up

3.B.1 For the Mixing Operations, including AA-004 and AA-005, the permittee shall not cause, permit, or allow the emission of particulate matter (filterable only) in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship

$$E = 4.1p^{0.67}$$

where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour.

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.B.2 For Emission Points AA-002 and AA-003, the maximum permissible emission of ash and/or particulate matter (filterable only) from fossil fuel burning installations greater than 10 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.

(Ref.: APC-S-1, Section 3.4(a)(2))

3.B.3 For Emission Points AA-002 and AA-003, 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.

(Ref.: APC-S-1, Section 4.1(a))

- 3.B.4 For Emission Points AA-002 and AA-003, the permittee is restricted to No. 2 fuel oil containing no more than 0.5 percent sulfur by weight.

(Ref.: 40 CFR 60.42c(d), Subpart Dc and Federally Enforceable Construction Permit issued on November 14, 1995)

- 3.B.5 For Emission Points AA-004 and AA-005, the permittee shall operate the baghouses when emissions are vented to them.

(Ref.: Title V Operating Permit issued October 29, 2012)

- 3.B.6 For Emission Points AA-002 and AA-003, the permittee is subject to and shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers and General Provisions (40 CFR 63, Subparts JJJJJ and A).

(Ref.: 40 CFR 63.11194(a)(1), Subpart JJJJJ)

- 3.B.7 For Emission Points AA-002 and AA-003, the permittee shall comply with each applicable work practice standard, emission reduction measure, and management practice specified in this Condition and Condition 3.B.8.

(Ref.: 40 CFR 63.11201(b), Subpart JJJJJ)

For existing oil boilers with heat input capacity of 10 MMBTU/hr or greater, the permittee shall have a one-time energy assessment performed by a qualified energy assessor. The energy assessment must be completed no later than March 21, 2014. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements satisfies the energy assessment requirement. The energy assessment shall include:

- (1) A visual inspection of the boiler system,
- (2) An evaluation of operating characteristics of the facility, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints,
- (3) Inventory of major systems consuming energy from affected boilers,

- (4) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage,
- (5) A list of major energy conservation measure,
- (6) A list of the energy saving potential of the energy conservation measure identified,
- (7) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.

(Ref.: 40 CFR 63.11196(a) and Table 2, Subpart JJJJJ)

3.B.8 For Emission Points AA-002 and AA-003, the permittee shall conduct a tune-up of the boiler biennially as specified in the following. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.

- (1) As applicable, inspect the burner, and clean or replace any components of the burner as necessary,
- (2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
- (3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly.
- (4) Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available.
- (5) Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made).
- (6) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within one week of startup.

(Ref.: 40 CFR 63.11223, Subpart JJJJJ)

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	PM	0.6 lbs/MMBTU
APC-S-1, Section 4.1(a)	3.C.2	SO <sub>2</sub>	4.8 lbs/MMBTU

- 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 where a longer duration is specified in an applicable requirement, 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.

5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

**B. Specific Monitoring and Recordkeeping Requirements**

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-002	Fuel	Fuel quantity and sulfur content	5.B.1	Federally Enforceable Construction Permit issued November 14, 1995
AA-003	Fuel	Fuel supplier certification	5.B.2	40 CFR 60.48c(f), Subpart Dc
	Fuel	Quantity of fuel combusted	5.B.3	40 CFR 60.48c(g), Subpart Dc
	Fuel	Semi-annual reporting	5.B.4	40 CFR 60.48c(j), Subpart Dc
AA-004 AA-005	Visible Emissions Observations	Weekly Monitoring and Recordkeeping	5.B.5	APC-S-6, Section III.A.3(a)(2)
AA-002 AA-003	Notification of Compliance Status	Reporting	5.B.6	40 CFR 63.11214(c), Subpart JJJJJJ
	Notifications	Reporting	5.B.7	40 CFR 63.11225(a), Subpart JJJJJJ
	Biennial Compliance Report	Reporting	5.B.8	40 CFR 63.11225(b), Subpart JJJJJJ
	Recordkeeping	Recordkeeping	5.B.9	40 CFR 63.11225(c), Subpart JJJJJJ
	Fuels	Notification of fuel switch	5.B.10	40 CFR 63.11225(g), Subpart JJJJJJ

5.B.1 For Emission Point AA-002, records must be kept for all fuel oil shipments received and be available to MDEQ personnel upon request. These records should include quantity of each shipment and the sulfur content of the fuel oil.

(Ref.: Federally Enforceable Construction Permit issued November 14, 1995)

5.B.2 For Emission Point AA-003, records must be kept for all fuel shipments received. The fuel supplier certification shall include the following information:

- (a) The name of the oil supplier;
- (b) A statement from the oil supplier that the oil complies with the specification under the definition of distillate oil in 40 CFR 60.41c; and
- (c) The sulfur content of the oil.

(Ref.: 40 CFR 60.48c(f), Subpart Dc)

5.B.3 For Emission Point AA-003, the permittee shall record and maintain records of the amount of fuel combusted during each calendar month.

(Ref.: 40 CFR 60.48c(g)(2), Subpart Dc)

5.B.4 For Emission Point AA-003, the permittee shall submit semi-annual reports stating the amount of fuel oil combusted each month, as well as a statement certifying that fuel supplier certifications showing the fuel combusted was below 0.5 weight percent sulfur. The fuel supplier certifications shall be made available to MDEQ personnel upon request.

(Ref.: 40 CFR 60.48c(e)(11) and 60.48c(g)(2), Subpart Dc)

5.B.5 For Emission Points AA-004 and AA-005, the permittee shall perform weekly visible emissions observation for each emission source. The permittee shall perform these observations during material processing, handling, and/or transferring operations and during daylight hours. The permittee shall maintain a log for each emission source of the date and time of the observation and whether any air emissions were visible. If air emissions were visible, the permittee shall record the cause of the visible emissions and any corrective action taken. Upon detecting visible emissions, the permittee shall immediately inspect the control device and take appropriate corrective action.

(Ref.: APC-S-6, Section III.A.3.a(2))

5.B.6 For Emission Point AA-002 and AA-003, the permittee shall submit a signed certification in the Notification of Compliance Status report (see Condition 5.B.7) that an energy assessment of the boiler and its energy use systems was completed and submitted, upon request, the energy assessment report.

(Ref.: 40 CFR 63.11214(c), Subpart JJJJJ)

5.B.7 For Emission Points AA-002 and AA-003, the permittee shall submit the following:

- (1) All of the notifications in 40 CFR 63.7(b); 63.8(e) and (f); 63.9(b) through (e); and 63.9(g) and (h) that apply by the dates specified in those sections.
- (2) The Notification of Compliance Status in accordance with 40 CFR 63.9(h) no later than 120 days after the applicable compliance date specified in 40 CFR 63.11196. In addition to the information required in 40 CFR 63.9(h)(2), the notification shall include the following certification(s) of compliance, as applicable, and signed by a responsible official:
  - (i) “This facility complies with the requirements in 40 CFR 63.11214 to conduct an initial tune-up of the boiler.”
  - (ii) “This facility has had an energy assessment performed according to 40 CFR 63.11214(c).”

(Ref.: 40 CFR 63.11225(a), Subpart JJJJJ)

5.B.8 For Emission Points AA-002 and AA-003, the permittee shall prepare and submit by March 1 a biennial compliance report containing the following:

- (1) Company name and address.
- (2) Statement by a responsible official, with the official's name, title, phone number, e-mail address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart.
- (3) If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.
- (4) The total fuel use by each affected boiler subject to an emission limit, for each calendar month within the reporting period, including, but not limited to, a description of the fuel, whether the fuel has received a non-waste determination by you or EPA through a petition process to be a non-waste under §241.3(c), whether the fuel(s) were processed from discarded non-hazardous secondary

materials within the meaning of §241.3, and the total fuel usage amount with units of measure.

(Ref.: 40 CFR 63.11225(b), Subpart JJJJJ)

5.B.9 For Emission Points AA-002 and AA-003, the permittee shall maintain the following records:

- (1) As required in 40 CFR 63.10(b)(2)(xiv), the permittee shall keep a copy of each notification and report that was submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted.
- (2) Keep records to document conformance with the work practices, emission reduction measures, and management practices required by §63.11214 as specified below:
  - (i) Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
  - (ii) Records documenting the fuel type(s) used monthly by each boiler, including, but not limited to, a description of the fuel, including whether the fuel has received a non-waste determination by you or EPA, and the total fuel usage amount with units of measure.

(Ref.: 40 CFR 63.11225(c), Subpart JJJJJ)

5.B.10 For Emission Points AA-002 and AA-003, if the permittee intends to switch fuels, and this fuel switch may result in the applicability of a different subcategory or a switch out of subpart JJJJJ due to a switch to 100 percent natural gas, the permittee shall provide 30 days prior notice of the date upon which you will switch fuels. The notification must identify:

- (1) The name of the owner or operator of the affected source, the location of the source, the boiler(s) that will switch fuels, and the date of the notice.
- (2) The currently applicable subcategory under this subpart.
- (3) The date on which you became subject to the currently applicable standards.
- (4) The date upon which you will commence the fuel switch.

(Ref.: 40 CFR 63.11225(g), Subpart JJJJJ)

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 <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter less than 10 Fm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound