

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

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Dart Container Corporation LLC
197 Harris Avenue
Quitman, MS
Clarke 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: JAN 17 2013

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: December 31, 2017

Permit No.: 0440-00053

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APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT

APPENDIX B COMPLIANCE ASSURANCE MONITORING (CAM) PLAN

OTHER RELEVANT DOCUMENTS AND/OR REGULATIONS

40 CFR 60, SUBPART A – NEW SOURCE PERFORMANCE STANDARDS, GENERAL PROVISIONS

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

40 CFR 60, SUBPART IIII – NEW SOURCE PERFORMANCE STANDARDS FOR STATIONARY COMPRESSION IGNITION INTERNAL COMBUSTION ENGINES (CI ICE)

40 CFR 63, SUBPART ZZZZ – NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR STATIONARY RECIPROCATING INTERNAL COMBUSTION ENGINES (RICE)

40 CFR 63, SUBPART JJJJJJ – NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR INDUSTRIAL, COMMERCIAL, AND INSTITUTIONAL BOILERS FOR AREA SOURCES

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 ordinance. 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 | Description |
|----------------|---|
| AA-001 | 29.3 MMBTU/hr natural gas or No. 2 fuel oil-fired steam generating boiler. |
| AA-002 | 25.1 MMBTU/hr natural gas or No. 2 fuel oil-fired steam generating boiler. |
| AA-003 | 33.5 MMBTU/hr natural gas or No. 2 fuel oil-fired steam generating boiler. |
| AA-004 | <p>Cup Manufacturing: Pre-Expansion Process Area, consisting of expandable polystyrene (EPS) bead pre-blender dumpers, blenders, holding tanks, pre-expanding equipment, pre-puff screeners, and pre-puff holding bags.</p> <p>Captured emissions from this process are vented to Emission Points AA-001, AA-002, and AA-003 for control of VOCs, and uncaptured emissions are vented through the building ventilation system.</p> |
| AA-005 | Cup Manufacturing: Pre-Puff Storage and Steam Chest Molding, where pre-puff is converted to EPS containers. Emissions are vented through the building ventilation system. |
| AA-006 | Cup Printing: Flexographic-type UV printing presses print UV curable ink on EPS containers. |
| AA-007 | Cup Manufacturing: Finished Product Warehouse Area, where packaged cups are stored prior to Shipping. Emissions are vented through the building ventilation system. |
| AA-011 | Parts Cleaners associated with printing machines. |
| AA-012 | Parts Cleaners associated with manufacturing equipment. |
| AA-013 | Parts Cleaners associated with maintaining delivery trucks and forklifts. |
| AA-015 | Scrap Cup Baler |
| AA-016 | Post Consumer Waste Densifier |
| AA-017 | Scrap Container Densification System |
| EG-001 | 158 hp No. 2 fuel-oil fired compression ignition backup generator for lights |

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 |
|----------------------------|---|----------------------------------|-------------------------|---|
| AA-001 AA-002 AA-003 | APC-S-1, Section 3.4(a)(2) | 3.B.1 | PM (filterable only) | $E=0.8808*(I)^{-0.1667}$ |
| | Permit to Construct issued on May 14, 1997, and modified on October 17, 1997. 40 CFR 60.42c(d) | 3.B.2 | Fuel Limitation | Combust natural gas, No. 2 fuel oil with a maximum sulfur content of 0.5% (by weight), and/or captured vent gas from the pre-expander process area. |
| | APC-S-1, Section 4.1(a) | 3.B.3 | SO ₂ | 4.8 lbs/MMBTU |
| | PSD Permit to Construct issued on January 31, 2007 and modified March 23, 2011 | 3.B.4 | VOC | Minimum VOC destruction efficiency of 95% for captured vent gas from the pre-expander process area (BACT Limit) |
| | 40 CFR 63, Subpart JJJJJJ (NESHAP for Industrial, Commercial, and Institutional Boilers for Area Sources) | 3.B.5 3.B.6 3.B.7 3.B.8 | HAP | Work Practice Standards, Emission Reduction Measures, and Management Practices |
| AA-003 | 40 CFR 60.43c(c) & (d) | 3.B.9 | Opacity | 20% opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. |
| AA-004 | PSD Permit to Construct issued on January 31, 2007, modified March 23, 2011 | 3.B.10 | VOC | Emissions captured and routed to the control device (AA-001, AA-002, and/or AA-003) (BACT Requirement) |

| Emission Point(s) | Applicable Requirement | Condition Number(s) | Pollutant/ Parameter | Limit/Standard |
|----------------------------|---|---------------------|---------------------------------|--|
| AA-004 AA-005 AA-007 | APC-S-1, Section 3.6(a) | 3.B.11 | PM (filterable only) | $E=4.1p^{0.67}$ |
| EG-001 | 40 CFR 63, Subpart ZZZZ (NESHAP for Stationary Reciprocating Internal Combustion Engines) | 3.B.12 | HAP | Applicability |
| | 40 CFR 60, Subpart IIII (NSPS for Stationary Reciprocating Internal Combustion Engines) | 3.B.13 | NMHC + NO _x CO PM | Applicability |
| | 40 CFR 60.4205(b) | 3.B.14 | | The permittee shall comply with the emission standards for new nonroad CI engines in §60.4202, for all pollutants. |
| | 40 CFR 60.4207(b) | 3.B.15 | Fuel Restriction | The permittee shall use diesel fuel that meets in the requirements of 40 CFR 80.510(b) for nonroad diesel fuel. |
| Facility-Wide | PSD Permit to Construct issued on January 31, 2007, modified March 23, 2011 | 3.B.16 | VOC | 495 tons per year on a 12-month rolling basis |

- 3.B.1 For Emission Points AA-001, AA-002, and AA-003, the maximum permissible particulate matter emissions from 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. (Ref.: APC-S-1, Section 3.4(a)(2))

- 3.B.2 For Emission Points AA-001, AA-002, and AA-003, the permittee is subject to the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR Part 60, Subpart Dc. The permittee shall burn the following:
- (a) Natural gas,
 - (b) No. 2 fuel oil with a maximum sulfur content of 0.5% (by weight), and/or
 - (c) Captured vent gas from the pre-expander process area (AA-004).

All other fuels are prohibited. The SO₂ fuel oil sulfur limits apply at all times, including periods of startup, shutdown, and malfunction. (Ref.: Permit to Construct issued on May 14, 1997, and modified on October 17, 1997; 40 CFR 60.42c(d) and (i), and 40 CFR 60.44c(g))

- 3.B.3 For Emission Points AA-001, 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-001, AA-002, and AA-003, when oxidizing pentane from Emission Point AA-004, the permittee shall maintain a minimum destruction efficiency of 95%. (Ref.: PSD Permit to Construct issued on January 31, 2007, and modified on March 23, 2011)
- 3.B.5 For Emission Points AA-001, AA-002, and AA-003, the permittee is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers for Area Sources, 40 CFR Part 63, Subpart JJJJJ. Emission Points AA-001, AA-002, and AA-003 are existing oil fired boilers defined in §63.11237. ((Ref.: 40 CFR 63.11194(a)(1) and (b))
- 3.B.6 For Emission Points AA-001, AA-002, and AA-003, the permittee must conduct a biennial performance tune-up according to §63.11223(b) by March 21, 2013 and biennially thereafter. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. (Ref. 40 CFR 63.11201(b), 40 CFR 63.11223(a) and Table 2 of 40 CFR 63, Subpart JJJJJ)
- 3.B.7 For Emission Points AA-001, AA-002, and AA-003, no later than March 21, 2014, the permittee must conduct a one-time energy assessment performed by a qualified energy assessor. The energy assessment must include the following:
 - (a) A visual inspection of the boiler system;
 - (b) An evaluation of operating characteristics of the facility, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints;
 - (c) Inventory of major systems consuming energy from the affected boilers;
 - (d) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage;
 - (e) A list of major energy conservation measures;
 - (f) A list of the energy savings potential of the energy conservation measures identified;

- (g) 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 63.11201(b) and Table 2 of 40 CFR, Subpart JJJJJ)

- 3.B.8 For Emission Points AA-001, AA-002, and AA-003, the permittee shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. (Ref. 40 CFR 63.11205(a))
- 3.B.9 For Emission Points AA-003, when combusting fuel oil the permittee shall not cause to be discharged into the atmosphere any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. The opacity standard shall apply at all times, except during periods of startup, shutdown, or malfunction. (Ref.: 40 CFR 60.43c(c) & (d))
- 3.B.10 For Emission Point AA-004, during all times of operation the permittee shall capture and route emissions to Emission Points AA-001, AA-002, and/or AA-003 for destruction. (Ref.: PSD Permit to Construct issued on January 31, 2007, and modified on March 23, 2011)
- 3.B.11 For Emission Points AA-004, AA-005, and AA-007, except as otherwise specified, no person shall cause, permit, or allow the emission of particulate matter in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship:

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

where E is the emission rate in pounds per hour and P is the process weight input rate in tons per hour. (Ref.: APC-S-1, Section 3.6(a))

- 3.B.12 Emission Point EG-001 is subject to the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ. Emission Point EG-001 meets the definition of a new affected source at an area source under 40 CFR 63, Subpart ZZZZ and must meet the requirements of this subpart by meeting the requirements of 40 CFR 60, Subpart IIII, for compression ignition engines. No further requirements apply for such engines under 40 CFR 63, Subpart ZZZZ. (Ref.: 40 CFR 63.6590(c)(1))
- 3.B.13 For Emission Point EG-001, the permittee is subject to and shall comply with the applicable requirements of the New Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines (CI ICE), 40 CFR 60, Subpart IIII and shall comply with the General Provisions (40 CFR 60, Subpart A). (Ref.: 40 CFR 60.4200(a)(2)(i))
- 3.B.14 For Emission Point EG-001, the permittee must comply with the emission standards for new nonroad CI engines in §60.4202, for all pollutants, for the same model year and maximum engine power for their 2007 model year and later emergency stationary CI ICE. (Ref.: 40 CFR 60.4205(b))
- 3.B.15 For Emission Point EG-001, the permittee shall use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel. (Ref.: 40 CFR 60.4207(b))
- 3.B.16 The permittee shall be limited to facility-wide VOC emissions of 495 tons per year on a 12-month rolling basis. (Ref.: PSD Permit to Construct issued on January 31, 2007, and modified on March 23, 2011)

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 ₂ | 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-001 AA-002 AA-003 | Fuel | Monitor and maintain the amount of each fuel combusted each calendar month. | 5.B.1 5.B.2 | 40 CFR 60.48c(g)(2) 40 CFR 60.42c(h), 60.48c(e)(1) and 60.48c(f)(1) |
| | VOC | Testing and Compliance Demonstration – each permit term | 5.B.3 | APC-S-6, Section III.A.3.a(2) |
| | | CAM Plan Requirements in Appendix B. | 5.B.4 | 40 CFR 64.3(a) |
| | | | 5.B.5 | |
| | | | 5.B.6 | |
| | HAP | Initial Compliance – Energy Assessment | 5.B.7 | 40 CFR 63.11214(c) |
| | HAP | Initial & Continuous Compliance – Biennial Tune-up | 5.B.8 | 40 CFR 63.11225(a) |
| AA-001 AA-002 AA-003 AA-004 AA-005 AA-007 | VOC | Testing and Compliance Demonstration | 5.B.9 | Construction Permit issued May 14, 1997 PSD Permit to Construct issued on January 31, 2007, and modified on March 23, 2011 |
| EG-001 | NMHC + NOx CO PM | Install a non-resettable hour meter prior to startup of the engine. | 5.B.10 | 40 CFR 60.4209(a) |
| | | Compliance Requirements | 5.B.11 | 40 CFR 60.4211(a) |
| | | | 5.B.12 | 40 CFR 60.4211(f) |

| Emission Point(s) | Pollutant/Parameter Monitored | Monitoring/Recordkeeping Requirement | Condition Number | Applicable Requirement |
|-------------------|-------------------------------|---|------------------|--|
| | | Recordkeeping | 5.B.13 | 40 CFR 60.4214(b) |
| Facility-Wide | VOC | Maintain EPS throughput records on a monthly basis. | 5.B.14 | Construction Permit issued May 14, 1997 PSD Permit to Construct issued on January 31, 2007, and modified on March 23, 2011 APC-S-6, Section III.A.3.a(2) |
| | VOC/HAP | Maintain monthly records for each solvent, ink, and other VOC or HAP containing material used | 5.B.15 | |
| | VOC | Maintain records on a monthly basis and each consecutive 12-month period | 5.B.16 | |

5.B.1 For Emission Points AA-001, AA-002, and AA-003, the permittee shall monitor and maintain records of the amount of each fuel combusted during each calendar month.
(Ref.: 40 CFR 60.48c(g)(2))

5.B.2 For Emission Points AA-001, AA-002, and AA-003, the permittee shall determine compliance with the fuel oil sulfur limits based on a certification from the fuel supplier, which includes the following information:

- (a) The name of the supplier,
- (b) A statement from the supplier that the fuel oil complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396-78, "Standard Specification for Fuel Oils",
- (c) The sulfur content or maximum sulfur content of the oil.

(Ref: 40 CFR 60.42c(h), 60.48e(c)(11), and 60.48c(f)(1))

5.B.3 For Emission Points AA-001, AA-002, and AA-003, the permittee shall demonstrate compliance with the VOC emission limitation by determining inlet concentration, outlet concentration, and destruction efficiency. Testing shall be performed in accordance with approved EPA Reference Methods, and shall be performed under normal operating conditions and while operating at or near capacity. In addition, the indicators identified in the CAM Plan (i.e., VOC inlet concentration, air flow rate) shall be monitored continuously during the performance test. The permittee shall use the testing event to verify monitoring equipment accuracy. The stack test event shall occur at a minimum of once per permit term and no later than one year prior to the expiration of this permit. The results of the performance testing shall be submitted to the Mississippi Department of Environmental Quality (MDEQ) within forty-five (45) days of the stack test event.

A written test protocol must be submitted at least thirty (30) days prior to the scheduled test date to ensure that all test methods and procedures are acceptable to the MDEQ. Also, the MDEQ must be notified prior to the scheduled test date. At least ten (10) days notice should be given so that an observer may be scheduled to witness the test(s). (Ref.: APC-S-6, Section III.A.3.a(2))

- 5.B.4 For Emission Points AA-001, AA-002, and AA-003, the permittee shall continuously monitor the VOC concentration of the inlet air to the boilers and the combined capture air flow rate from the EPS process to determine capture rates. Equipment downtime shall be documented, summarized and reported in accordance with 5.A.4 and 5.A.5, if necessary. Records shall be kept on a chart recorder and made available for review upon request. This shall serve as the method of compliance with 40 CFR 64.3(a) and the permittee's specific Compliance Assurance Monitoring (CAM) Plan. A copy of this plan is attached as Appendix B. (Ref.: 40 CFR 64.3(a))
- 5.B.5 For Emission Points AA-001, AA-002, and AA-003, the permittee shall perform daily observations to verify combustion and/or the presence of a flame. The permittee shall perform burner inspections once per calendar year. The permittee shall also perform semi-annual combustion checks to determine optimum Oxygen and CO levels. Maintenance shall be performed as necessary to maintain proper operation of the pollution control equipment. Records of daily observations, including maintenance records, shall be kept and made available for review upon request. This shall serve as the method of compliance with 40 CFR 64.3(a) and the permittee's specific Compliance Assurance Monitoring (CAM) Plan. A copy of this plan is attached as Appendix B. (Ref.: 40 CFR 64.3(a))
- 5.B.6 For Emission Points AA-001, AA-002, and AA-003, the permittee shall comply with any additional applicable monitoring and recordkeeping requirements in 40 CFR 64.7, 64.8, and/or 64.9. (Ref.: 40 CFR 64)
- 5.B.7 For Emission Points AA-001, AA-002, and AA-003, the permittee shall keep a record of the energy assessment report as required by Condition 3.B.7 and submit, upon request, the energy assessment report. (Ref.: 40 CFR 63.11214(c))
- 5.B.8 For Emission Points AA-001, AA-002, and AA-003, the permittee shall keep all records as required §63.11225(c) to demonstrate compliance with the tune-up requirements in Condition 3.B.6. (Ref.: 40 CFR 63.11225)

- 5.B.9 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, and AA-007, the permittee shall demonstrate compliance with the VOC emission limitations on a monthly and 12-month rolling total by using the monitored VOC concentration and capture air flow rate to determine emissions by the following (or equivalent) equation:

$$\text{VOC Emissions} = [\text{Monthly total pentane content in raw material} - (\text{EPS Throughput} * 1.38\%)] - [(\text{VOC Captured}) * (\text{Destruction Efficiency})]$$

Where 1.38% is the average pentane content left in the cup as determined by engineering test data.

The total pentane content shall be determined for each shipment using the manufacturer-supplied % pentane content in the EPS beads multiplied by the weight of the shipment. The average pentane content in the raw material may also be used provided that it is a weighted average based on the total pentane content.

The above records shall be maintained in log form. (Ref.: Construction Permit issued May 14, 1997 and PSD Permit to Construct issued on January 31, 2007, and modified on March 23, 2011)

- 5.B.10 For Emission Point EG-001, the permittee shall install a non-resettable hour meter prior to startup of the engine. (Ref.: 40 CFR 60.4209(a))
- 5.B.11 For Emission Point EG-001, 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 permittee that are approved by the engine manufacturer. In addition, the permittee shall 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. (Ref.: 40 CFR 60.4211(a))
- 5.B.12 For Emission Point EG-001, 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 permittee may petition MDEQ 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 ICE beyond 100 hours per year. Any operation other than emergency operation, and maintenance and testing as permitted, is prohibited. (Ref.: 40 CFR 60.4211(f))
- 5.B.13 For Emission Point EG-001, if the stationary CI internal combustion engine is an emergency stationary internal combustion engine, the permittee is not required to submit an initial notification. The permittee must 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 must record the time of operation of the engine and the reason the engine was in operation during that time. (Ref.: 40 CFR 60.4214(b))

- 5.B.14 The permittee shall maintain monthly EPS throughput records to use in the compliance demonstration for the VOC limitation, as required by in condition 5.B.9. (Ref.: Construction Permit issued May 14, 1997)
- 5.B.15 For the entire facility, the permittee shall demonstrate compliance with the VOC emission limitations by maintaining monthly records of the following for each solvent, ink, and other VOC or HAP containing material used:
- (a) Quantity used (lb or gal);
 - (b) The percentage of VOC and HAP by weight;
 - (c) The density (lbs/gal), unless material usages are measured in lbs;

The permittee may utilize data supplied by the manufacturer, or analysis of VOC content by EPA Test Method 24, 40 CFR 60, Appendix A. The above records shall be maintained in log form. (Ref.: Construction Permit issued May 14, 1997 and PSD Permit to Construct issued on January 31, 2007, and modified on March 23, 2011)

- 5.B.16 The permittee shall calculate the facility-wide VOC emissions for each calendar month and for each consecutive 12-month period. (Ref.: APC-S-6, Section III.A.3.a(2))

C. Specific Reporting Requirements

| Emission Point(s) | Pollutant/Parameter Monitored | Reporting Requirement | Condition Number | Applicable Requirement |
|-------------------|-------------------------------|---|------------------|--|
| AA-001 | VOC | CAM Reporting | 5.C.1 | 40 CFR 64.9(a) |
| AA-002 | HAP | Notification of Compliance Status – Biennial Tune-up | 5.C.2 | 40 CFR 63.11225(a)(4) |
| AA-003 | HAP | Notification of Compliance Status – Energy Assessment | 5.C.3 | 40 CFR 63.11225(a)(4) |
| | HAP | Annual Compliance Report | 5.C.4 | 40 CFR 63.11225(b) |
| | VOC | Semi-annual reporting | 5.C.5 | 40 CFR 60.48c(e)(11) 40 CFR 60.48c(j) |
| Facility-wide | VOC | Semi-annual reporting | 5.C.6 | APC-S-6, Section III.A.3.c(1) |

5.C.1 For Emission Points AA-001, AA-002, and AA-003, the permittee shall submit reports of the following information in accordance with Condition 5.A.4: (Ref.: 40 CFR 64.9(a))

- (a) Summary information on the number, duration, and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- (b) Summary information on the number, duration, and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- (c) A description of the actions taken to implement a QIP during the reporting period as specified in §64.8. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances.

- 5.C.2 The permittee shall submit a Notification of Compliance Stats by July 19, 2013 for Emission Points AA-001, AA-002, and AA-003 upon completion of the initial tune-up required in Condition 3.B.6 of this permit. The notification shall include the required information in §63.9(h)(2) and shall also include the following certification of compliance:

”This facility complies with the requirements in §63.11214 to conduct an initial tune-up of the boiler.”

(Ref.: 40 CFR 63.11225(a)(4))

- 5.C.3 The permittee shall submit a Notification of Compliance Status by July 19, 2014 for Emission Points AA-001, AA-002, and AA-003 upon completion of the initial energy assessment required in Condition 3.B.7 of this permit. The notification shall include the required information in §63.9(h)(2), and shall also include the following certification of compliance signed by a responsible official:

“This facility has had an energy assessment performed according to § 63.11214(c).”

(Ref.: 40 CFR 63.11225(a)(4))

- 5.C.4 For Emission Points AA-001, AA-002, and AA-003, the permittee shall certify compliance with all applicable requirements of 40 CFR 63, Subpart JJJJJ in the annual certificate of compliance report required by Condition 4.2 of this permit. (Ref.: 40 CFR 63.11225(b))

- 5.C.5 The permittee shall submit reports that include a certified statement signed by a responsible official that the records of fuel supplier certifications submitted represent all the fuel combusted during the reporting period. The reporting period is defined as each six-month period. All reports shall be submitted and postmarked by the 30th day following the end of the reporting period. (Ref: 40 CFR 60.48c(e)(11) and 60.48c(j))

- 5.C.6 The permittee shall submit a report of the monthly, facility-wide VOC calculations, and the 12-month rolling totals on a semi-annual basis in accordance with 5.A.4. (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 Fm 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 |

APPENDIX B

Compliance Assurance Monitoring (CAM) Plan

| | Indicator No. 1 | Indicator No. 2 |
|---------------------------------------|--|---|
| I. Indicator | Capture rate (# pentane collected/# of EPS processed in expanders) | Boiler stack temperature using “Trend” thermometer model# TI.52 |
| II. Indicator Range | 0.6 - 1.2% | >340°F |
| III. Performance Criteria | Effective Capture | Boiler operating correctly |
| A. Data Representiveness | Capture rate is determined by monitoring both capture flow rate and concentration. The average concentration and the total daily flow are used to determine the amount captured each day. The monitoring system computer then computes the total amount of pentane captured. This is divided by the amount of EPS processed so that the plant can determine if there are any issues (clogs/blockage/leaks/monitoring equipment calibrations or failures) with the capture system or the monitoring system. Periods of venting are recorded and reported as deviations. Capture rates outside the range trigger an investigation of both monitoring and capture system components to make sure the system is working correctly and optimum collection is occurring. | The stack temperature and flame of each operating boiler are checked daily. These two parameters are used to assure correct operation of the boiler. |
| B. Verification of Operational Status | Chart recorder which records monitoring data is checked for operational status each shift. | Check for appropriate temperature and flame color. Thermometer calibration will be checked once a year. |
| C. QA/QC Practices and Criteria | Flow and concentration monitors are calibrated per manufacturers’ recommendations and checked/calibrated if capture rate falls outside expected range. | Semi-annual combustion checks are used to optimize O ₂ and CO levels. Meter is calibrated prior to use. |
| D. Monitoring Frequency | Flow and concentration are monitored continuously. Daily checks of flow, concentration, and capture amount are done by the production supervisor. The capture and production data are entered into a spreadsheet to determine capture rate as well. If data is outside of the expected range, verification and troubleshooting checks are performed. | Boiler stack temperatures for operating boilers are checked each day by boiler technician or supervisor. |
| E. Data Collection Procedures | Flow and concentration are captured on a chart recorder and computer. Capture rate is calculated manually in a spreadsheet. | Boiler stack temperature is recorded manually each morning, that the boiler is operated, by the boiler technician to assure correct operation during his boiler room walk through. Tune up results are printed for at least 3 firing rates for each boiler during biennial tune ups. |
| F. Averaging Period | Daily | NA |