



State of Mississippi

FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL PERMIT



Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

THIS CERTIFIES

Elevance Natchez Inc
151 L E Barry Road
Natchez, MS
Adams County

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with the Federal Clean Air Act and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. set., Mississippi Code of 1972), the regulations and standards adopted and promulgated thereunder, and the State Implementation Plan for operating permits for synthetic minor sources.

Mississippi Environmental Quality Permit Board

Mississippi Department of Environmental Quality

Issued/Modified: MAR 04 2013

Expires: FEB 28 2018

Permit No. 0040-00005

Agency Interest # 262

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 Subject Item Inventory
 Permit Number:0040-00005
 Activity ID No.: PER20110005

Subject Item Inventory:

ID	Designation	Description
AREA1	AA-001	Biodiesel Production (Facility-Wide)
AREA3	AA-002	Equipment Leak Fugitives
AREA4	AA-003	Wastewater Fugitives
AREA5	AA-004	Railcar and Truck Loading
EQPT1	AB-001	59.64 MMBtu/hr Natural Gas-Fired Boiler, Ref. B-931
EQPT2	AB-002	76.68 MMBtu/hr Natural Gas-Fired Boiler, Ref. B-932
EQPT24	AC-1000	42,566 Gallon Recovered Biodiesel Surge Process Tank, Ref. T-1000
EQPT35	AC-10000	458,000 Gallon Rainwater Storage Tank, Ref. T-10000
EQPT36	AC-10001	458,000 Gallon Rainwater Storage Tank, Ref. T-10001
EQPT37	AC-10002	1,156,680 Gallon Rainwater Storage Tank, Ref. T-10002
EQPT3	AC-114	37,700 Gallon Biodiesel/Water Decanter Process Tank, Ref. T-114
EQPT4	AC-115	37,700 Gallon Biodiesel/Water Decanter Process Tank, Ref. T-115
EQPT50	AC-116	37,700 Gallon Biodiesel/Water Decanter Process Tank, Ref. T-116
EQPT5	AC-125	21,000 Gallon Citric Acid Storage Tank, Ref. T-125
EQPT38	AC-15070	634,962 Gallon Biodiesel Storage Tank, Ref. T-15070
EQPT39	AC-18350	770,758 Gallon Soybean Oil Storage Tank, Ref. T-18350
EQPT25	AC-2003	85,160 Gallon Methanol Storage Tank, Ref. T-2003
EQPT26	AC-2004	87,041 Gallon Glycerol Storage Tank, Ref. T-2004
EQPT27	AC-2005	87,246 Gallon Glycerol/Free Fatty Acid Separation Process Tank, Ref. T-2005
EQPT28	AC-2006	87,150 Gallon Biodiesel Storage Tank, Ref. T-2006
EQPT56	AC-2008	87,342 Methanol/Water Wash Process Tank, Ref. T-2008
EQPT29	AC-2010	87,425 Gallon Soyoil Day Storage Tank, Ref. T-2010

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ID	Designation	Description
EQPT6	AC-228	37,367 Gallon Sodium Methylate Storage Tank, Ref. T-228, vented to a scrubber (T-921) via tank T-920
EQPT7	AC-307	13,800 Gallon Methanol Day Tank, Ref. T-307
EQPT8	AC-421	12,000 Gallon Glycerine Surge Process Tank, Ref. T-421, vented to a scrubber (T-921) via tank T-920
EQPT53	AC-430	15,500 Gallon Acid Gum Storage Tank, Ref. T-430
EQPT30	AC-5000	211,483 Gallon Biodiesel Storage Tank, Ref. T-5000
EQPT31	AC-5001	211,483 Gallon Biodiesel Storage Tank, Ref. T-5001
EQPT32	AC-5002	211,483 Gallon Biodiesel Storage Tank, Ref. T-5002
EQPT33	AC-5003	211,376 Gallon Soybean Oil Storage Tank, Ref. T-5003
EQPT34	AC-5004	211,537 Gallon Soybean Oil Storage Tank, Ref. T-5004
EQPT9	AC-501	21,168 Gallon Free Fatty Acids Storage Tank, Ref. T-501
EQPT61	AC-511	21,000 Gallon Sodium Sulfate Tank
EQPT10	AC-514	63,588 Gallon Biodiesel Storage Tank, Ref. T-514
EQPT11	AC-520	9,700 Gallon Spent Wash Water Surge Process Tank, Ref. T-520
EQPT54	AC-522	19,500 Methanol/Water Storage Tank, Ref. T-522
EQPT12	AC-600	21,000 Gallon 1st Stage Methanol/Water Wash Process Tank, Ref. T-600
EQPT13	AC-610	21,000 Gallon 2nd Stage Methanol/Water Wash Process Tank, Ref. T-610
EQPT57	AC-6310	1,900 Gallon Acidulated Soy Oil Receiver Process Tank, Ref. T-6310
EQPT15	AC-704	21,138 Gallon Methanol/Water Storage Tank, Ref. T-704
EQPT16	AC-706	20,826 Gallon Methanol/Water Storage Tank, Ref. T-706
EQPT17	AC-750	22,500 Gallon Methanol/Water Feed Storage Tank, Ref. T-750
EQPT19	AC-916	18,500 Gallon API Wastewater (Skimmed Oil) Storage Tank, Ref. T-916
EQPT20	AC-917	19,000 Gallon API Wastewater (Skimmed Oil) Storage Tank, Ref. T-917
EQPT22	AC-920	10,664 Gallon Methanol/Water Process Tank, Ref. T-920, collecting emissions from the Recovered Methanol Drum (D-303B), Tanks T-421 and T-228, Drum D-702, and Exchanger E-474 prior to venting through the water scrubber, T-921

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ID	Designation	Description
EQPT60	AC-995	127,000 Gallon Plant Water Tank
EQPT52	AD-001	Cooling Tower
EQPT59	AD-474	2nd Stage Glycerine/Methanol Receiver Condenser, Ref. E-474
EQPT58	AD-702	4,510 Gallon Condensation Drum, Ref. D-702, vented to a scrubber (T-921) via tank T-920
EQPT40	AD-752	Knock-out Condenser Drum, Ref. D-752, for the methanol/water distillation column (C-751)
CONT2	AD-921	Water Scrubber, Ref. T-921, controlling emissions from T-920 which serves as a condensation tank for methanol-laden gases from the Recovered Methanol Drum (D-303B), Tanks T-421 and T-228, Drum D-702, and Exchanger E-474
AI262	262	Biodiesel Production

Subject Item Groups:

ID	Description	Components
GRPT3	Boiler Standards/Requirements	EQPT1 59.64 MMBtu/hr Natural Gas-Fired Boiler, Ref. B-931 EQPT2 76.68 MMBtu/hr Natural Gas-Fired Boiler, Ref. B-932

Receiving Stream Relationships:

Subject Item	Relationship	Receiving Stream
AI 262 Biodiesel Production	Discharges Into	Mississippi River

KEY

ACT = Activity

AREA = Area

CONT = Control Device

IA = Insignificant Activity

RPNT = Release Point

AI = Agency Interest

CAFO = Concentrated Animal Feeding Operation

EQPT = Equipment

MAFO = Animal Feeding Operation

TRMT = Treatment

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TRMT = Treatment

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AREA0000000001 (AA-001) Biodiesel Production (Facility-Wide):

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		The permittee shall limit the emissions of methanol, a hazardous air pollutant, to less than or equal to 9.9 tons per year, as determined on a 12-month rolling basis. [APC-S-2 Section II.B.10]

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		For storage tanks with potential emissions of methanol, the permittee shall monitor and record the throughput for each tank should the permittee choose to calculate the actual monthly emissions of methanol instead of using the potential to emit. Actual emissions shall be calculated using the most recent version of EPA's TANKS software. [APC-S-2 Section II.B.11]
M-2		The permittee shall monitor and record the actual amount of biodiesel produced during each calendar month. [APC-S-2 Section II.B.11]

Record-Keeping Requirements:

Condition No.	Condition
R-1	The permittee shall calculate and record the emissions of methanol and VOCs for each calendar month and for each consecutive 12-month period. The permittee shall account for all potential sources of methanol and VOCs in these monthly calculations and may either use actual data collected for each emission source or may use the potential emissions, as calculated in the permit application. [APC-S-2 Section II.B.11]

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AREA0000000001 (continued):

Submittal/Action Requirements:

Condition No.	Condition
S-1	In the annual report required by Condition S-2 on page 12 of this permit, the permittee shall submit the monthly and 12-month rolling total methanol and VOC emissions. The permittee shall also provide a summary of the monthly emissions for each emission source of methanol and/or VOCs and supporting calculations showing the data used to determine these emissions. [APC-S-2 Section II.B.11]

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AREA0000000003 (AA-002) Equipment Leak Fugitives:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		For all equipment subject to NSPS Subpart VVa, the permittee shall demonstrate compliance with the requirements of 60.482-1a through 60.482-10a within 180 days of initial startup. The date of initial startup shall be that date following permit issuance when the facility begins producing biodiesel continuously. [40 CFR 60.482-1a]

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		<p>The permittee shall implement and maintain a leak detection and repair (LDAR) plan for complying with NSPS Subpart VVa, as well as for determining VOC and methanol emissions from equipment not applicable to Subpart VVa. This plan shall address all equipment; including each pump, compressor, pressure relief device, sampling connection system, open-ended valve or line, valve, and flange or other connector; in VOC service and shall be made available for review at the facility.</p> <p>For those components in VOC service that are not subject to Subpart VVa, the permittee shall perform monitoring on an annual basis at a minimum, or on the same frequency as that specified in Subpart VVa for a given equipment type. The permittee shall also use the same leak definitions as those specified in Subpart VVa for purposes of determining when leak repair must take place. [APC-S-2 II.B.11, 40 CFR 60.Subpart VVa]</p>

Record-Keeping Requirements:

Condition No.	Condition
R-1	For all equipment in VOC service, including equipment not subject to NSPS Subpart VVa, the permittee shall comply with the recordkeeping requirements of §60.486a. [40 CFR 60.486a, APC-S-2 Section II.B.11]

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AREA0000000003 (continued):

Record-Keeping Requirements:

Condition No.	Condition
R-2	<p>The permittee shall determine emissions of VOCs and methanol from equipment leaks annually following the required annual monitoring event. This emission rate shall be used to demonstrate compliance with the methanol limit for the following 12-month period or until the next monitoring event occurs.</p> <p>The permittee shall use the information gathered from the leak detection monitoring to determine the actual emission rate of VOC's and methanol. To determine an actual emission rate, the permittee shall use the EPA correlation equations found in EPA's "Protocol for Equipment Leak Emission Estimates" (November 1995). When the leak instrument reading is 1 ppmv or less above the background, the permittee may assume a zero leak rate.</p> <p>For those equipment components monitored in accordance with Subpart VVa, the permittee may apply the control efficiencies specified by the Texas Commission on Environmental Quality (TCEQ) for the "28VHP" LDAR program. These control efficiencies shall be applied to the SOCM I Average Emission Factors found in Table 2-1 of EPA's "Protocol for Equipment Leak Emission Estimates" (November 1995) to determine VOC and methanol emissions for the equipment. [APC-S-2 Section II.B.11]</p>

Submittal/Action Requirements:

Condition No.	Condition
S-1	<p>For all equipment in VOC service, including equipment not subject to NSPS Subpart VVa, the permittee shall comply with the reporting requirements of §60.487a. [40 CFR 60.487a, APC-S-2 Section II.B.11]</p>

Narrative Requirements:

Condition No.	Condition
T-1	<p>The permittee is subject to and shall comply with the New Source Performance Standards for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry (SOCMI) for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006 (40 CFR Part 60, Subpart VVa) and any applicable General Provisions (40 CFR Part 60, Subpart A). [40 CFR 60.480a]</p>

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AREA0000000003 (continued):

Narrative Requirements:

Condition No.	Condition
T-2	Equipment that is designated as being in VOC service less than 300 hr/yr is excluded from the requirements of §§60.482-2a through 60.482-11a if it is identified as required in §60.486a(e)(6) and it meets any of the conditions specified in paragraphs (e)(1) through (3) of §60.482-1a. [40 CFR 60.482-1a(e)]

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AREA0000000004 (AA-003) Wastewater Fugitives:

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		On a daily basis when the methanol column (C-751) is in operation, the permittee shall monitor the methanol concentration in the wastewater stream discharged from the bottom of the methanol column by grab sample. The wastewater shall be analyzed in-house using ASTM-D7716, "Standard Test Method for Determination of Residual Methanol in Glycerine by Gas Chromatography", or by an outside laboratory using an approved EPA method suitable for methanol. If the ASTM method is used, the gas chromatograph curve for this test method shall be validated twice per week. The wastewater may be diluted as necessary to ensure samples are within the range of the calibration curve. [APC-S-2 Section II.B.11]
M-2		The permittee shall monitor the wastewater flow and temperature from the methanol column and determine the total flow from the column for each calendar day. [APC-S-2 Section II.B.11]
M-3		For Emission Point AA-003, the monitoring equipment/data acquisition system(s) necessary to comply with conditions M-1 and M-2 shall be installed and operable within 180 days of the permit issuance date. [APC-S-2 II.B.11]

Record-Keeping Requirements:

Condition No.	Condition
R-1	On a daily basis, the permittee shall record the flow, temperature, and methanol concentration for the wastewater discharged from the methanol column and shall record the monthly total flow of wastewater for the on-site wastewater treatment plant. The permittee shall use these values to calculate emissions of methanol from the wastewater treatment system on a monthly basis using EPA's most recent version of the WATER9 model. [APC-S-2 Section II.B.11]

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EQPT0000000052 (AD-001) Cooling Tower:

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		On a monthly basis when the biodiesel plant is in operation, the permittee shall monitor the methanol concentration in the return water line to the cooling tower by collecting three grab samples and averaging the results. The permittee shall perform monitoring of the methanol content at the header to the cooling tower with an EPA-approved test method for methanol, or other equivalent method approved by MDEQ. [APC-S-2 Section II.B.11]
M-2		The permittee shall continuously monitor the inlet flow of water to the cooling tower such that a monthly total flow can be determined. [APC-S-2 Section II.B.11]
M-3		For Emission Point AD-001, the monitoring equipment/data acquisition system(s) necessary to comply with conditions M-1 and M-2 shall be installed and operable within 180 days of the permit issuance date. [APC-S-2 II.B.11]

Record-Keeping Requirements:

Condition No.	Condition
R-1	<p>The permittee shall record the following on a monthly basis:</p> <ol style="list-style-type: none">(1) the methanol concentration of the inlet water and the outlet water (if measured),(2) the total monthly flow to the cooling tower, and(3) the total methanol emissions for each calendar month from the cooling tower. <p>If no methanol is detected at the method detection limit (MDL) of the approved test method, the permittee shall use the AP-42 factor for controlled emissions from cooling towers and the total monthly flow to determine the monthly emission totals of VOC and methanol. If methanol is detected in the inlet water above the MDL, the permittee shall assume all methanol in the inlet to the cooling tower is emitted unless the permittee chooses to monitor the methanol concentration at the outlet of the cooling tower. Should the permittee choose to monitor both the inlet and outlet concentration, the difference in the two may be used to calculate monthly methanol emissions. [APC-S-2 Section II.B.11]</p>

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EQPT0000000040 (AD-752) Knock-out Condenser Drum, Ref. D-752, for the methanol/water distillation column (C-751):

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		The permittee shall perform biennial stack testing for methanol using EPA Test Method 308. Each stack test shall take place no later than 24 months following the previous stack test. The methanol column shall be operating as close to maximum capacity as operating conditions allow. The column feed and wastewater discharge rates shall be recorded for each hour of the stack test. [APC-S-2 Section II.B.11]

Record-Keeping Requirements:

Condition No.	Condition
R-1	The permittee shall develop a methanol emission factor for the methanol column based on the results of the stack test and the column feed and discharge rates recorded during the stack test. This emission factor shall be used to determine monthly emissions of methanol from the column. The determination of the emission factor and the monthly methanol emissions shall be recorded and maintained on site. [APC-S-2 Section II.B.11]

Submittal/Action Requirements:

Condition No.	Condition
S-1	The permittee shall submit a test protocol at least thirty (30) days prior to the scheduled test date to ensure that all test methods and procedures are acceptable to the DEQ. The DEQ must be notified at least ten (10) days prior to the scheduled test date so that an observer may be scheduled to witness the test(s). A stack test report containing the results of the test(s) shall be submitted within forty-five (45) days of completion of the required test(s). [APC-S-2 Section II.B.11]

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CONT0000000002 (AD-921) Water Scrubber, Ref. T-921, controlling emissions from T-920 which serves as a condensation tank for methanol-laden gases from the Recovered Methanol Drum (D-303B), Tanks T-421 and T-228, Drum D-702, and Exchanger E-474:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		The permittee shall operate the water scrubber at all times when the biodiesel plant is in operation. [APC-S-2 Section II.B.10]

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		The permittee shall perform biennial stack testing for methanol using EPA Test Method 308. Each stack test shall take place no later than 24 months following the previous stack test. The biodiesel plant shall be operating as close to maximum capacity as operating conditions allow. The biodiesel production rate shall be recorded for each hour of the stack test. [APC-S-2 Section II.B.11]
M-2		During each stack test, the permittee shall monitor the water flow to the scrubber to determine a minimum flow indicative of efficient operation. The permittee shall monitor and record the scrubber flow each day that the scrubber is operating to ensure that there is sufficient flow to the scrubber. Should the flow to the scrubber fall below the minimum flow established above, the permittee shall take immediate corrective action to increase the flow to that established above. [APC-S-2 Section II.B.11]
M-3		At least annually, the permittee shall perform routine inspections of the scrubber internals, including the spray heads, to ensure proper operation of the scrubber. [APC-S-2 II.B.11]
M-4		For Emission Point AD-921, the monitoring equipment/data acquisition system(s) necessary to comply with condition M-2 shall be installed and operable within 180 days of the permit issuance date. [APC-S-2 II.B.11]

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CONT0000000002 (continued):

Record-Keeping Requirements:

Condition No.	Condition
R-1	The permittee shall develop a methanol emission factor for the scrubber based the results of the stack test and the biodiesel production rate recorded during the stack test. This emission factor shall be used to determine monthly emissions of methanol from the scrubber. The determination of the emission factor and the monthly methanol emissions shall be recorded and maintained on site. [APC-S-2 Section II.B.11]
R-2	The permittee shall keep a record of the following: (1) the date, inspector's name, and any maintenance required for each inspection performed on the scrubber; (2) the minimum scrubber flow indicative of efficient operation, as determined during each stack test, and (3) the date that the water flow to the scrubber fell below the minimum flow established in (2) above and date that the flow was returned to the minimum allowable flow. [APC-S-2 Section II.B.11]

Submittal/Action Requirements:

Condition No.	Condition
S-1	The permittee shall submit a test protocol at least thirty (30) days prior to the scheduled test date to ensure that all test methods and procedures are acceptable to the DEQ. The DEQ must be notified at least ten (10) days prior to the scheduled test date so that an observer may be scheduled to witness the test(s). A stack test report containing the results of the test(s) shall be submitted within forty-five (45) days of completion of the required test(s). [APC-S-2 Section II.B.11]

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GRPT0000000003 (Boilers) Boiler Standards/Requirements:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		The maximum opacity from any point source or emissions at any time shall not exceed 40% as determined by EPA Test Method 9, 40 CFR 60, Appendix A. [APC-S-1 3.2]
L-2		The maximum permissible emission of ash and/or particulate matter from each fossil fuel burning installation equal to or greater than 10 MMBTU/hr 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 lb/MMBTU per hour heat input and I is the heat input in MMBTU/hr. [APC-S-1 3.4(a)2]
L-3		The maximum discharge of sulfur oxides from each 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. [APC-S-1 4.1(a)]
L-4		For Emission Points AB-001 and AB-002, the permittee shall only burn natural gas. [APC-S-2 B.10]

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AI0000000262 (262) Biodiesel Production:

Submittal/Action Requirements:

Condition No.	Condition
S-1	General Condition: Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began. [APC-S-2 II.B(10)]
S-2	Except as otherwise specified herein, the permittee shall Submit a certified annual synthetic minor monitoring report: Due annually, by the 31st of January for preceding calendar year. This report shall address any required monitoring specified in the permit. [APC-S-2 II.B(11)]

Narrative Requirements:

Condition No.	Condition
T-1	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49-17-29 1.b]
T-2	General Condition: The permittee shall at all times maintain in good working order and operate as efficiently as possible all air pollution control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit. [APC-S-2 V.A]
T-3	General Condition: Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering state waters without the proper environmental permits. [Miss. Code Ann. 49-17-29 1.a(i and ii)]
T-4	General Condition: Any diversion from or bypass of collection and control facilities is prohibited except as provided for in Regulation APC-S-1, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. [APC-S-1 Section 10]
T-5	General Condition: 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. [APC-S-2 X]

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AI0000000262 (continued):

Narrative Requirements:

Condition No.	Condition
T-6	<p>General Condition: The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:</p> <p>(a) To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and</p> <p>(b) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission. [Miss. Code Ann. 49-17-21]</p>
T-7	<p>General Condition: After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:</p> <p>(a) Violation of any terms or conditions of this permit</p> <p>(b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or</p> <p>(c) A change in any condition that required either a temporary or permanent reduction or elimination of authorized air emissions. [APC-S-2 II.C]</p>
T-8	<p>General Condition: This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for this permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of the permit. [APC-S-2 II.B(15)b]</p>
T-9	<p>General Condition: Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control. [Miss. Code Ann. 49-17-39]</p>
T-10	<p>General Condition: The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations. [APC-S-2 II.B(15)c]</p>
T-11	<p>General Condition: Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances. [APC-S-2 II.B(7)]</p>

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AI0000000262 (continued):

Narrative Requirements:

Condition No.	Condition
T-12	General Condition: This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board. [APC-S-2 XVI.B]
T-13	General Condition: This permit is for air pollution control purposes only. [APC-S-2 I.D(1)]
T-14	General Condition: This permit is a Federally-approved permit to operate a synthetic minor source as described in Regulation APC-S-2, Section IV.D. [APC-S-2 IV.D]
T-15	General Condition: 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. [APC-S-2 I.D(7)]
T-16	General Condition: The permittee shall furnish to MDEQ within a reasonable time any information MDEQ 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 MDEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to MDEQ along with a claim of confidentiality. [APC-S-2 II.B(15)d]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Elevance Natchez Inc
Facility Requirements
Permit Number:0040-00005
Activity ID No.: PER20110005

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AI0000000262 (continued):

Narrative Requirements:

Condition No.	Condition
T-17	<p>General Condition: This permit does not authorize a modification as defined in APC-S-2, "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment". Modification is defined as "Any physical change in or change in the method of operation of a facility which increases actual emissions or 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:</p> <ul style="list-style-type: none">(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: (i) 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 (ii) the source is approved to use under any permit issued under 40 CFR 52.51 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 52.51, or under regulations approved pursuant to Subpart I or 40 CFR 51.166; or(f) any change in ownership of the stationary source" [APC-S-2 I.D(2)]
T-18	<p>General Condition: It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. [APC-S-2 II.B(15)a]</p>
T-19	<p>General Condition: The permittee shall retain all required records, monitoring data, supported information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to MDEQ as required by Applicable Rules and Regulations or this permit upon request. [APC-S-2 IX]</p>
T-20	<p>General Condition: The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit. [APC-S-2 II.B(5)]</p>

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Elevance Natchez Inc
Facility Requirements
Permit Number:0040-00005
Activity ID No.: PER20110005

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AI0000000262 (continued):

Narrative Requirements:

Condition No.	Condition
T-21	<p>General Condition: Emergencies</p> <p>(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.</p> <p>(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.</p> <p>(c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence as follows: (i) an emergency occurred and that the permittee can identify the cause(s) of the emergency; (ii) the permitted facility was at the time being properly operated; (iii) 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 (iv) the permittee submitted notice of the emergency to MDEQ within two (2) working days of the time when emission limitations were exceeded due to the emergency which contained a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(d) In any enforcement proceeding, the permittee seeking to establish the occurrence of any emergency has the burden of proof.</p> <p>(e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein [APC-S-2 II.B(10)]</p>
T-22	<p>General Condition: Upsets</p> <p>(a) 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 five (5) working days of the time the upset began which contained a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.</p> <p>(c) This provision is in addition to any upset provision contained in any applicable requirement. [APC-S-1 Section 10]</p>

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Elevance Natchez Inc
Facility Requirements
Permit Number:0040-00005
Activity ID No.: PER20110005

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AI0000000262 (continued):

Narrative Requirements:

Condition No.	Condition
T-23	<p>General Condition: Startups and Shutdowns</p> <p>(a) 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.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.</p> <p>(c) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply. [APC-S-1 Section 10]</p>
T-24	<p>General Condition: Maintenance</p> <p>(a) 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 MDEQ within five (5) working days of the time the maintenance began or such other times as allowed by MDEQ, which contained a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.</p> <p>(c) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. [APC-S-1 Section 10]</p>
T-25	<p>General Condition: For renewal of this permit the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board. [APC-S-2 VIII]</p>

GENERAL INFORMATION

Elevance Natchez Inc
151 L E Barry Road
Natchez, MS
Adams County

Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
262	Elevance Natchez, Inc.	Official Site Name	7/26/2012	
2800100005	Elevance Natchez, Inc.	Air-AIRS AFS	10/12/2000	
MSD050999127	Ethyl Petroleum Additives, Inc.	Hazardous Waste-EPA ID	1/20/1999	1/10/2005
004000005	Ethyl Petroleum Additives, Inc.	Air-State Operating	1/11/1994	1/1/1999
004000005	Ethyl Petroleum Additives, Inc.	Air-Title V Operating	12/6/1999	7/19/2004
004000005	Ethyl Petroleum Additives, Inc.	Air-Construction	11/12/1996	7/15/2011
MSR110032	Ethyl Petroleum Additives, Inc.	GP-Sara Title III	10/27/1993	10/30/2000
MS0024376	Ethyl Petroleum Additives, Inc.	Water - NPDES	9/27/1988	9/26/1998
MSP090264	Ethyl Petroleum Additives, Inc.	Water - Pretreatment	8/28/1989	2/27/1994
MSP090264	Ethyl Petroleum Additives, Inc.	Water - Pretreatment	1/24/1995	1/23/2000
MS0024376	Ethyl Petroleum Additives, Inc.	Water - NPDES	6/3/1999	4/30/2004
MSP090264	Ethyl Petroleum Additives, Inc.	Water - Pretreatment	8/5/1999	7/31/2004
MSR110032	Ethyl Petroleum Additives, Inc.	GP-Baseline	10/30/2000	7/19/2004
262	Ethyl Petroleum Additives, Inc.	Historic Site Name	9/27/1988	7/7/2004
004000005	Afton Chemical Corporation	Air-Title V Operating	7/19/2004	12/1/2004
MSR110032	Afton Chemical Corporation	GP-Baseline	7/19/2004	2/22/2006
MSD050999127	Afton Chemical Corporation	Hazardous Waste-EPA ID	1/10/2005	8/3/2006
MSR110032	Afton Chemical Corporation	GP-Baseline	2/22/2006	7/7/2006
262	Afton Chemical Corporation	Historic Site Name	7/7/2004	6/19/2006
MSR110032	Delta Agri-Fuels LLC	GP-Baseline	7/7/2006	12/14/2006
MSD050999127	Delta Agri Fuels LLC	Hazardous Waste-EPA ID	8/3/2006	2/15/2008
262	Delta Agri-Fuels, LLC	Historic Site Name	6/19/2006	12/4/2006
MSR110032	Delta Biofuels, Inc.	GP-Baseline	12/14/2006	1/13/2011

GENERAL INFORMATION

ID	Alternate/Historic Name	User Group	Start Date	End Date
004000005	Delta Biofuels Inc	Air-Construction	3/8/2007	
004000005	Delta Biofuels Inc	Air-Synthetic Minor Operating	3/8/2007	7/15/2011
MSP092137	Delta Biofuels Inc	Water - Pretreatment	3/8/2007	7/15/2011
MSD050999127	Delta Biofuels Inc	Hazardous Waste-EPA ID	2/15/2008	5/24/2012
MSR110032	Delta Biofuels, Inc.	GP-Baseline	1/13/2011	7/15/2011
262	Delta Biofuels, Inc.	Historic Site Name	12/4/2006	6/2/2011
004000005	Elevance Renewable Sciences Inc	Air-Synthetic Minor Operating	7/15/2011	2/28/2012
004000005	Elevance Renewable Sciences Inc	Air-Construction	7/15/2011	
MSP092137	Elevance Renewable Sciences Inc	Water - Pretreatment	7/15/2011	2/28/2012
MSR110032	Elevance Renewable Sciences Inc	GP-Baseline	7/15/2011	9/28/2015
MSD050999127	Elevance Natchez Inc	Hazardous Waste-EPA ID	5/24/2012	
262	Elevance Renewable Sciences, Inc.	Historic Site Name	6/2/2011	7/26/2012
004000005	Elevance Natchez Inc	Air-Construction	7/31/2012	
MSR110032	Elevance Natchez, Inc.	GP-Baseline	7/30/2012	9/28/2015
262	Elevance Renewable Sciences	Air-Notification	10/3/2012	
004000005	Elevance Natchez Inc	Air-Synthetic Minor Operating	3/4/2013	2/28/2018

Basin: South Independent Streams Basin

Location Description:PG- Plant Entrance (General). Data collected by Greg Miller on 11/01/2005. Elevation 118 feet.