

STATE OF MISSISSIPPI AIR POLLUTION CONTROL TITLE V PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Kingsford Manufacturing Company
2387 Highway 72 East
Glen, Mississippi
Alcorn 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: _____

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: [Date not to exceed 5 years from issuance]

Permit No.: 0060-00051

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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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(c).)

- 1.4 Prior to its expiration, this permit may be reopened in accordance with the provisions listed below.

(a) This permit shall be reopened and revised under any of the following circumstances:

- (1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of 3 or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.
- (2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
- (3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.

- (4) The Administrator or the Permit Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- (b) Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.
- (c) Reopenings shall not be initiated before a notice of such intent is provided to the Title V source by the DEQ at least 30 days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.G.)

- 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(e).)

- 1.6 This permit does not convey any property rights of any sort, or any exclusive privilege.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(d).)

- 1.7 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(5).)

- 1.8 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 11 Miss. Admin. Code Pt. 2, Ch. 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.: 11 Miss. Admin. Code Pt. 2, R. 6.6.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.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).)

- (c) 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.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D(2).)

- (d) 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.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.)

- (e) 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.: 11 Miss. Admin. Code Pt. 2, R. 6.6.C.)

- 1.9 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(8).)

- 1.10 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.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)

- 1.11 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(2).)

- 1.12 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.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(1).)

- 1.13 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.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(2).)

- 1.14 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(1).)

1.15 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(2).)

1.16 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.H.)

1.17 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.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C(2)., R. 6.4.B., and R. 6.2.A(1)(c).)

1.18 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.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F(1).)

- 1.19 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 11 Miss. Admin. Code Pt. 2, Ch. 3., "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)

- 1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 11 Miss. Admin. Code Pt. 2, Ch. 2., "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations 11 Miss. Admin. Code Pt. 2, Ch. 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, Subpart I, or 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 Part 51, Subpart I, or 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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.C(15).)

- 1.21 Any change in ownership or operational control must be approved by the Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.D(4).)

- 1.22 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.B(1).)

- 1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet

the following buffer zones.

- (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.
- (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.
- (c) Burning must not occur within 500 yards of commercial airport property, private airfields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.G.)

1.24 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.G.)

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

- (a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
 - (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:
 - (i) An upset occurred and that the source can identify the cause(s) of the upset;
 - (ii) The source was at the time being properly operated;
 - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
 - (iv) That within 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
 - (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
 - (2) In any enforcement proceeding by the Commission, the source 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.
 - (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- (b) Startups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
 - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).
 - (3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

- 1.26 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 11 Miss Admin. Code Pt. 2, R. 1.8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

(Ref.: 11 Miss Admin. Code Pt. 2, R. 1.8.)

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-000	Char Manufacturing Process consisting of a rotary wood dryer equipped with four (4) cyclones in parallel for recovery of wood fines and a charcoal retort furnace equipped with (4) cyclones in parallel for recovery of char fines. The retort furnace is equipped with four (4) natural gas-fired burners (2 rated at 1.0 MMBtu/hr each, and 2 rated at 3.0 MMBtu/hr each). Emissions are routed to AA-002 for control of PM, CO, and VOC.
AA-001A	Wood Receipt Area which includes a partially enclosed truck dump area and a concrete pad for unloading walking-floor trailers.
AA-001B	Wood Storage Area which includes wood management and transfer by bulldozer to a drag chain system feeding a covered belt conveyor transfer system.
AA-002	After Combustion Chamber (ACC) natural gas-fired Thermal Oxidizer equipped with two (2) ACC burners rated at 50.0 MMBtu/hr each. Controls emissions from the rotary wood dryer and charcoal retort furnace.
AA-003	Char Truck Loadout operation for loading of shipping containers with char. The loadout is equipped with a telescoping chute and seal for control of PM emissions and a baghouse (currently not in use).
AA-005	1.26 MMBtu/hr natural gas-fired boiler
AD-001	Fugitive emissions from roads (paved/unpaved)
AD-002	100 HP (0.7 MMBtu/hr; 74.6 kW) diesel-fired emergency generator (manufactured March 18, 2006)
AD-003	110 HP (0.77 MMBtu/hr; 82.0 kW) diesel-fired fire water pump (manufactured May 2007)
AD-004	360 HP (2.52 MMBtu/hr; 268.5 kW) diesel-fired fire water pump (manufactured April 2007)
AD-005	360 HP (2.52 MMBtu/hr; 268.5 kW) diesel-fired fire water pump (manufactured April 2007)
AD-006	300-gallon gasoline storage tank (throughput < 10,000 gal/month)

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.: 11 Miss. Admin. Code Pt. 2, R. 1.3.A.)

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 Condition 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)

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

(a) The permittee shall not cause or permit the handling, transporting, or storage of any material in a manner which allows or may allow unnecessary amounts of particulate matter to become airborne.

(b) When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than that from which it originated or to violate any other provision of 11 Miss. Admin. Code Pt. 2, Ch. 1, the Commission may order such corrected in a way that all air and gases or air and gasborne material leaving the building or equipment are controlled or removed prior to discharge to the open air.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.C.)

B. Emission Point Specific Emission Limitations & Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
Facility-wide	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.B.1	PM (filterable)	$E = 4.1p^{0.67}$
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the PSD Permit to Construct issued September 9, 2005	3.B.2	Operating requirement	Operate control devices at all times emission units are operating
AA-001A AA-001B	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the PSD Permit to Construct issued September 9, 2005	3.B.3	Operating requirement	Wet wood received and stored limited to 600,000 tons per year (12-month rolling total)
AA-002	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued September 9, 2005 (PSD BACT Limit)	3.B.4	PM (filterable)	2.02 lbs/ton of dry wood (3-hr rolling average)
			PM ₁₀ (filterable)	1.62 lbs/ton of dry wood (3-hr rolling average)
			SO ₂	0.72 lbs/ton of dry wood (3-hr rolling average)
			NO _x	3.10 lbs/ton of dry wood (3-hr rolling average)
	11 Miss. Admin. Code Pt. 2, Ch.5., as established in the PSD Permit to Construct issued September 9, 2005	3.B.5	Operating requirement	Temperature in ACC combustion chamber > 1,400 °F on a 3-hour rolling average
		3.B.6	Fuel restriction	Burn natural gas only
		3.B.4	CO	0.24 lbs/ton of dry wood (3-hr rolling average)
			VOC	0.24 lbs/ton of dry wood (3-hr rolling average)
		3.B.7	Operating requirement	Dry wood throughput limited to 33.6 tons/hr (daily average) and 210,000 tons/year (12-month rolling total)
AA-002 (ACC burners)	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.B.8	PM (filterable)	$E = 0.8808 * I^{-0.1667}$
AA-002	11 Miss. Admin. Code Pt. 2, R. 1.4.B(1).	3.B.9	SO ₂	≤ 500 ppmv
AA-003	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued September 9, 2005, and modified October 6, 2008	3.B.10	PM/PM ₁₀ (Operating requirement)	Operate control devices for control of emissions

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard	
	(PSD BACT Limit)				
AA-005	11 Miss. Admin. Code Pt. 2, Ch.5., as established in the PSD Permit to Construct issued September 9, 2005, and modified May 30, 2012	3.B.11	Operating restriction	Boiler shall be fired with natural gas only and have a rated capacity of ≤ 10 MMBtu/hr	
AA-005	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.B.12	PM (filterable)	0.6 lbs/MMBtu	
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.B.13	SO ₂	4.8 lbs/MMBtu	
AA-000 AD-002 AD-003 AD-004 AD-005	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.B.12	PM (filterable)	0.6 lbs/MMBtu	
AD-002 AD-003 AD-004 AD-005	40 CFR 63, Subpart ZZZZ NESHAP for Stationary Reciprocating Internal Combustion Engines 40 CFR 63.6580, 6585(a) and (c), 63.6590(a)(1)(iii), (a)(2)(iii), and (c)(1), and 63.6605, Subpart ZZZZ	3.B.14	HAP	Applicability	
	AD-002 40 CFR 63.6640(f)(1), (2), and (4), Subpart ZZZZ	3.B.15		Operating requirements	
AD-003 AD-004 AD-005	40 CFR 60, Subpart IIII Standards of Performance for Stationary Compression Ignition Internal Combustion Engines 40 CFR 60.4200(a)(2)(ii), Subpart IIII	3.B.16	NMHC+NO _x CO PM (filterable) SO ₂	Applicability	
	40 CFR 60.4205(c), 60.4206, and Table 4, Subpart IIII	3.B.17	NMHC+NO _x CO PM (filterable)	<u>AD-003</u> 10.5 g/kW-hr 5.0 g/kW-hr 0.80 kW-hr	<u>AD-004/005</u> 10.5 g/kW-hr 3.5 g/kW-hr 0.54 kW-hr
	40 CFR 60.4207(b), Subpart IIII and 40 CFR 80.510(b), Subpart I	3.B.18	SO ₂ (Diesel fuel requirements)	Sulfur content of 15 ppm max AND Minimum cetane index of 40 OR maximum aromatic content of 35 volume percent	
AD-003 AD-004 AD-005	40 CFR 60.4211(a)(1) and (2) and (b)(1), Subpart IIII	3.B.19	NMHC+NO _x , CO, PM, (filterable) SO ₂	Certified engine requirements	
	40 CFR 60.4211(f)(1), (2)(i), and (3),	3.B.20	NMHC+NO _x CO, PM	Operating requirements	

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
	Subpart IIII		(filterable) SO ₂	
AD-006	40 CFR 63, Subpart CCCCCC NESHAP for Source Category: Gasoline Dispensing Facilities 40 CFR 63.11110, 63.11111(a) and (b), and Table 3, Subpart CCCCCC	3.B.21	HAP	Applicability
AA-002	40 CFR 64 Compliance Assurance Monitoring (CAM) 40 CFR 64.2(a), CAM	3.B.22	PM	Applicability

- 3.B.1 The permittee shall not 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:

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

where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour. Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).)

- 3.B.2 For each emission unit with a pollution control device, the permittee shall operate the control device at all times when the emission unit is operating unless otherwise specified in this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the PSD Permit to Construct issued September 9, 2005)

- 3.B.3 For Emission Points AA-001A and AA-001B, the permittee shall limit the amount of wet wood received and stored to no more than 600,000 tons per year (12-month rolling total).

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the PSD Permit to Construct issued September 9, 2005)

- 3.B.4 For Emission Point AA-002, the permittee shall comply with the following emission limitations:

- (a) PM (filterable) – 2.02 lbs/ton of dry wood (3-hour rolling average) [PSD BACT limit];
- (b) PM₁₀ (filterable) – 1.62 lbs/ton of dry wood (3-hour rolling average) [PSD BACT limit];
- (c) SO₂ – 0.72 lbs/ton of dry wood (3-hour rolling average) [PSD BACT limit];
- (d) NO_x – 3.10 lbs/ton of dry wood (3-hour rolling average) [PSD BACT limit];
- (e) CO – 0.24 lbs/ton of dry wood (3-hour rolling average); and
- (f) VOC - 0.24 lbs/ton of dry wood (3-hour rolling average).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch 5 and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued September 9, 2005)

- 3.B.5 For Emission Point AA-002, the permittee shall maintain the ACC combustion chamber operating temperature above 1,400 °F on a 3-hour rolling average during normal operations, not to include periods of startup, shutdown, or malfunction. Normal operation is defined as any time char is being produced.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch 5 and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued September 9, 2005 [PSD BACT limit])

- 3.B.6 For Emission Point AA-002, the permittee shall be limited to burning natural gas only.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch 5 and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued September 9, 2005 [PSD BACT limit])

- 3.B.7 For Emission Point AA-002, the permittee shall limit the amount of dry wood exiting the rotary wood dryer and entering the charcoal retort furnace to 33.6 tons per hour (daily average) and 210,000 tons per year (12-month rolling total).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch 5, as established in the PSD Permit to Construct issued September 9, 2005)

- 3.B.8 For Emission Point AA-002 (ACC burners), the maximum permissible emission of ash and/or particulate matter from the ACC burners 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.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).)

- 3.B.9 For Emission Point AA-002, the permittee shall not cause or permit the emission of gas

containing sulfur oxides (measured as sulfur dioxide) in excess of 500 ppm (volume) from any process equipment constructed after January 25, 1972.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.B(1).)

- 3.B.10 For Emission Point AA-003, the permittee shall use a telescoping chute and seal system and/or a fabric filter system to control PM/PM₁₀ emissions. Either system may be used without prior approval from the DEQ.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued September 9, 2005, and modified October 6, 2008 [PSD BACT Limit])

- 3.B.11 For Emission Point AA-005, the boiler shall have a design capacity of less than 10 MMBtu/hr and shall be limited to firing natural gas only.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch.5., as established in the PSD Permit to Construct issued September 9, 2005, and modified May 30, 2012)

- 3.B.12 For Emission Points AA-000 (burners), AA-005, AD-002, AD-003, AD-004, and AD-005, 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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).)

- 3.B.13 For Emission Point AA-005, 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.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)

- 3.B.14 Emission Points AD-002, AD-003, AD-004, and AD-005 are subject to and shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR 63, Subpart ZZZZ and the applicable General Provisions, 40 CFR 63, Subpart A.

For purposes of this subpart, Emission Point AD-002 is considered an existing, emergency compression ignition stationary RICE located at an area source of HAP emissions and is subject to the applicable requirements of Subpart ZZZZ.

Emission Points AD-003, AD-004, and AD-005 are considered new, emergency compression ignition stationary RICE located at an area source of HAP emissions and per

40 CFR 63.6590(c)(1), the engines shall meet the requirements of Subpart ZZZZ by meeting the applicable requirements of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart IIII.

At all times, Emission Point AD-002 shall be in compliance with the applicable requirements of Subpart ZZZZ and the permittee shall operate and maintain the engine in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by Subpart ZZZZ have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the DEQ which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspections of the source.

(Ref.: 40 CFR 63.6580, 6585(a) and (c), 63.6590(a)(1)(iii), (a)(2)(iii), and (c)(1), and 63.6605, Subpart ZZZZ)

3.B.15 Emission Point AD-002 shall be considered an emergency stationary RICE under 40 CFR 63, Subpart ZZZZ provided the engine only operates in an emergency, during maintenance and testing, and during non-emergency situations for 50 hours per year as described in (c) below. If the permittee does not operate the engine according to the requirements in (a)-(c) below, the engine will not be considered an emergency engine under Subpart ZZZZ and must meet all applicable requirements for non-emergency engines.

- (a) There is no limit on the use of the engine during an emergency situation.
- (b) The permittee may operate the engine for maintenance checks and readiness testing for a maximum of 100 hours per calendar year provided the tests are recommended by federal, state, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or insurance company associated with the engine. The permittee may petition the DEQ 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 the federal, state, or local standards require maintenance testing of the engine beyond 100 hours per calendar year.
- (c) The emergency engine may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in paragraph (b). Except as provided in 40 CFR 63.6640(f)(4)(i) and (ii), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(Ref.: 40 CFR 63.6640(f)(1), (2), and (4), Subpart ZZZZ)

- 3.B.16 Emission Points AD-003, AD-004, and AD-005 are subject to and shall comply with all applicable requirements of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (ICE), 40 CFR 60, Subpart IIII and the General Provisions, 40 CFR 60, Subpart A as specified in Table 8 of Subpart IIII. For purposes of this subpart, these engines are considered fire pump engines.

(Ref.: 40 CFR 60.4200(a)(2)(ii), Subpart IIII)

- 3.B.17 For Emission Points AD-003, AD-004, and AD-005, the permittee shall operate and maintain the engines such that they achieve the emission standards listed below for the life of the engine:

AD-003 (110 HP)

- (a) $\text{NMHC} + \text{NO}_x \leq 10.5 \text{ g/kW-hr}$
- (b) $\text{CO} \leq 5.0 \text{ g/kW-hr}$
- (c) $\text{PM (filterable)} \leq 0.80 \text{ g/kW-hr}$

AD-004/AD-005 (360 HP each)

- (a) $\text{NMHC} + \text{NO}_x \leq 10.5 \text{ g/kW-hr}$
- (b) $\text{CO} \leq 3.5 \text{ g/kW-hr}$
- (c) $\text{PM (filterable)} \leq 0.54 \text{ g/kW-hr}$

(Ref.: 40 CFR 60.4205(c), 60.4206, and Table 4, Subpart IIII)

- 3.B.18 For Emission Points AD-003, AD-004, and AD-005, the permittee shall use diesel fuel that meets the following per gallon standards:

- (a) Maximum sulfur content of 15 ppm **AND**
- (b) Minimum cetane index of 40 **OR** maximum aromatic content of 35 volume percent.

(Ref.: 40 CFR 60.4207(b), Subpart IIII and 40 CFR 80.510(b), Subpart I)

- 3.B.19 For Emission Points AD-003, AD-004, and AD-005, the permittee shall comply with the applicable emission standards by purchasing, installing, operating, and maintaining engines that are certified to meet the applicable emission standards. The permittee shall operate and maintain the engines in accordance with the manufacturer's emission-related written instructions and can only change the emission-related settings that are permitted by the manufacturer.

(Ref.: 40 CFR 60.4211(a)(1) and (2) and (b)(1), Subpart IIII)

- 3.B.20 For Emission Points AD-003, AD-004, and AD-005, the engines shall be considered emergency stationary ICE under 40 CFR 60, Subpart IIII provided the engines only operate in an emergency, during maintenance and testing, and during non-emergency situations for

50 hours per year as described in (c) below. If the permittee does not operate an engine in accordance with the requirements in (a)-(c) below, the engine will not be considered an emergency engine under Subpart IIII and it must then meet all applicable requirements for non-emergency engines.

- (a) There is no limit on the use of the engines during an emergency situation.
- (b) The permittee may operate the engines for maintenance checks and readiness testing for a maximum of 100 hours per calendar year provided the tests are recommended by federal, state, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or insurance company associated with the engines. The permittee may petition the DEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating the federal, state, or local standards require maintenance testing of the engine beyond 100 hours per calendar year.
- (c) The emergency engines may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in paragraph (b). Except as provided in 40 CFR 60.4211 (f)(3)(i), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(Ref.: 40 CFR 60.4211(f)(1), (2)(i), and (3), Subpart IIII)

- 3.B.21 For Emission Point AD-006, the permittee is subject to the NESHAP for Gasoline Dispensing Facilities, 40 CFR 63, Subpart CCCCCC, and the applicable requirements of the General Provisions, 40 CFR 63, Subpart A, as noted in Table 3 of Subpart CCCCCC. This gasoline storage tank has a monthly throughput of less than 10,000 gallons; therefore, the permittee is only required to comply with the work practice standards in Condition 3.D.3 and the recordkeeping requirement in Condition 5.B.10.

(Ref.: 40 CFR 63.11110, 63.11111(a) and (b), and Table 3, Subpart CCCCCC)

- 3.B.22 For Emission Point AA-002, the permittee is subject to and shall comply with all applicable requirements of 40 CFR 64, Compliance Assurance Monitoring (CAM).

(Ref.: 40 CFR 64.2(a), Compliance Assurance Monitoring)

C. Insignificant and Trivial Activity Emission Limitations & Standards

There are no other requirements applicable to the insignificant activities listed in the source's Title V permit application.

D. Work Practice Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AD-002	40 CFR 63.6603(a) and Table 2d, Subpart ZZZZ	3.D.1	HAP	Maintenance requirements
	40 CFR 63.6625(e)(3) and (h), 63.6640(a), and Table 6, Subpart ZZZZ	3.D.2		Operating requirements
AD-006	40 CFR 63.11116(a) and 63.11115(a), Subpart CCCCCC	3.D.3	HAP	General requirements

3.D.1 For Emission Point AD-002, the permittee shall comply with the following requirements:

- (a) Change oil and filter every 500 hours of operation or annually, whichever comes first or perform an oil analysis at the same frequency in order to extend the oil change requirement in accordance with 40 CFR 63.6625(i).
- (b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace when necessary.
- (c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace, as necessary.

If the engine is operating during an emergency and it is not possible to shut down the engine in order to perform the maintenance practice according to the schedule listed in (a)-(c) above, or if performing the maintenance practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The maintenance practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated.

(Ref.: 40 CFR 63.6603(a) and Table 2d, Subpart ZZZZ)

3.D.2 For Emission Point AD-002, the permittee shall operate and maintain the engine according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practices for minimizing emissions. The permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

(Ref. 40 CFR 63.6625(e)(3) and (h), 63.6640(a), and Table 6, Subpart ZZZZ)

3.D.3 For Emission Point AD-006, the permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Such preventive measures shall include:

- (a) Minimize gasoline spills;
- (b) Clean up spills as expeditiously as practicable;
- (c) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; and
- (d) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

The permittee must, at all times, operate and maintain the affected source in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the DEQ which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspections of the source.

(Ref.: 40 CFR 63.11116(a) and 63.11115(a), Subpart CCCCCC)

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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

- 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(1).)

- 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.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 11 Miss. Admin. Code Pt. 2, R. 6.2.E.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.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) working days of the time the deviation began.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

B. Specific Monitoring and Recordkeeping Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
Facility-wide	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2), as established in PSD Permit to Construct issued September 9, 2005	5.B.1	PM, CO, VOC	Conduct inspections and/or maintenance monthly, or more often if needed
AA-001A AA-001B	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2), as established in PSD Permit to Construct issued September 9, 2005	5.B.2	Wet wood received/stored	Monitor and record amount of wet wood received
AA-002	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.3	PM, PM ₁₀ , SO ₂ , NO _x , CO, VOC, Opacity	Performance testing requirements
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2), as established in PSD Permit to Construct issued September 9, 2005	5.B.4	Wood feed rate and moisture content	Monitor and record wet wood feed rate (tons/hr), the moisture content of wet wood daily and dry wood monthly and calculate the amount of dry wood charred daily.
		5.B.5	Operating requirement	Monitor and record hours of operation for auxiliary burner each month
AA-005	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.6	Fuel monitoring	Monitor and record monthly fuel usage
AD-002	40 CFR 63.6625(f) and 63.6655(f)(2), Subpart ZZZZ	5.B.7	HAP	Install non-resettable hour meter and record hours of operation
	40 CFR 63.6655(a)(1), (2), and (5) and (e)(3) and 63.6660, Subpart ZZZZ	5.B.8		General recordkeeping
AD-003 AD-004 AD-005	40 CFR 60.4209(a) and 60.4214(b), Subpart IIII	5.B.9	NMHC + NO _x , PM (filterable), CO, SO ₂	Install non-resettable hour meter and record hours of operation
AD-006	40 CFR 63.11111(e) and 63.11116(b), Subpart CCCCCC	5.B.10	HAP	Recordkeeping
AA-002	40 CFR 64.3(a) and (b), 64.6(c), CAM	5.B.11	PM/PM ₁₀ , CO, VOC	Continuous temperature monitoring; visual observations
	40 CFR 64.7(b) and (c), CAM	5.B.12		Operation and maintenance requirements for monitoring systems

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
AA-002	40 CFR 64.7(d), CAM	5.B.13	PM/PM ₁₀ , CO, VOC	Corrective action response to an excursion/exceedance of a CAM indicator
	40 CFR 64.8, CAM	5.B.14		Develop a Quality Improvement Plan (QIP), upon proper request
	40 CFR 64.9(b), CAM	5.B.15		Maintain CAM records as specified

5.B.1 The permittee shall perform regular inspections and maintenance each month, or more often as needed, to maintain proper operation of the emissions equipment and control devices. All such equipment shall be operated and maintained in accordance with the manufacturer's specifications or the plant's standard operating procedures. The permittee shall keep records of the inspections and maintenance activities in log form and readily available for review.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)., as established in PSD Permit to Construct issued September 9, 2005)

5.B.2 For Emission Points AA-001A and AA-001B, the permittee shall record the amount of wet wood received daily in tons and shall calculate the total amount received each month and each consecutive 12-month period.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)., as established in PSD Permit to Construct issued September 9, 2005)

5.B.3 For Emission Point AA-002, the permittee shall demonstrate compliance with the PM/PM₁₀, NO_x, and Opacity limits by conducting a performance test biennially no later than 25 months after the previous test and with the SO₂, CO, and VOC limits by conducting a performance test once every five (5) years but no later than 61 months after the previous test.

Should two consecutive performance tests for PM/PM₁₀ or NO_x result in emissions of less than 50% of the permitted emission limits specified in Section 3.B, the permittee may waive the following performance test for that pollutant. If a performance test is waived for a pollutant, the next required performance test for that pollutant shall be within 49 months of the previous performance test. The permittee shall notify the DEQ in writing prior to waiving a performance test under this condition in accordance with Condition 5.C.2(d).

The permittee shall test in accordance with the reference methods listed below, or their approved equivalents that are in effect upon permit issuance. All performance testing shall be done when the rotary wood dryer and charcoal retort furnace are operating as close to

their maximum capacities as operating conditions allow. During the performance test, the permittee shall also monitor and record the throughput of wet wood and compute the throughput of dry wood in tons per hour and the hourly average temperature of the ACC to determine compliance with the emission and operational limitations.

To demonstrate compliance with the opacity limit, the visible emission evaluations shall be completed during the performance tests.

Particulate Matter (PM)	EPA Test Methods 1-5
PM ₁₀	EPA Test Method 201 or 201A
Sulfur Dioxide (SO ₂)	EPA Test Method 6
Nitrogen Oxides (NO _x)	EPA Test Method 7
Carbon Monoxide (CO)	EPA Test Method 10
Volatile Organic Compounds (VOC)	EPA Test Method 18 or 25A
Opacity	EPA Test Method 9

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

5.B.4 For Emission Point AA-002, the permittee shall monitor and keep records of the following:

- (a) Monitor the amount of wet wood fed to the rotary wood dryer in tons per hour and sample the wet wood daily to determine the moisture content.
- (b) Sample the dry wood exiting the rotary wood dryer no less than monthly to determine the moisture content.
- (c) Maintain a log of the daily average amount of wet wood fed to the rotary wood dryer in tons per hour, the daily moisture content of the wood, the monthly average moisture content of the dry wood, and the corresponding daily average amount of dry wood in tons per hour. The daily amount of dry wood shall be computed based on the amount of wet wood fed, the daily moisture content of the wet wood, and the monthly average moisture content of the dry wood.
- (d) Record the total amount of dry wood charred in tons per year for each consecutive 12-month period.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)., as established in PSD Permit to Construct issued September 9, 2005)

5.B.5 For Emission Points AA-000 and AA-002, the permittee shall maintain records of the hours that any auxiliary burners were operated during each month, including the reason for operation, and the amount and type of fuel combusted.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)., as established in PSD Permit to Construct issued September 9, 2005)

5.B.6 For Emission Point AA-005, the permittee shall maintain records of the design heat input

capacity for the boiler and monitor and record the amount of natural gas combusted each month.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

- 5.B.7 For Emission Point AD-002, the permittee shall install a non-resettable hour meter on the engine, if one is not already installed. The permittee shall keep records of the hours of operation of the engine that are recorded through the hour meter. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency, and how many hours are spent for non-emergency operation.

(Ref.: 40 CFR 63.6625(f) and 63.6655(f)(2), Subpart ZZZZ)

- 5.B.8 For Emission Point AD-002, the permittee shall keep the following records:
- (a) A copy of each notification and report submitted to comply with Subpart ZZZZ;
 - (b) Records of the occurrence and duration of each malfunction of the engine or hour meter;
 - (c) Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore a malfunctioning engine or hour meter to its normal manner of operation; and
 - (d) Records of the maintenance conducted on the engine in order to demonstrate the engines were operated and maintained in accordance with the maintenance plan.

All records shall be in a form suitable and ready for expeditious review for a period of five (5) years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. These records may be kept in an electronic or hard copy format.

(Ref.: 40 CFR 63.6655(a)(1), (2), and (5) and (e)(3) and 63.6660, Subpart ZZZZ)

- 5.B.9 For Emission Points AD-003, AD-004, and AD-005, the permittee shall install a non-resettable hour meter on each engine, if one is not already installed. The permittee shall keep records of the operation of each engine in emergency and non-emergency service that are recorded through the hour meters. The permittee shall record the time of operation and the reason the engines were in operation during that time.

(Ref.: 40 CFR 60.4209(a) and 60.4214(b), Subpart IIII)

- 5.B.10 For Emission Point AD-006, the permittee shall keep records to demonstrate that the monthly throughput of gasoline is less than the 10,000 gallon threshold level. The permittee is not required to submit any records or notifications but must be able to produce such records within 24 hours of a request by the DEQ.

(Ref.: 40 CFR 63.11111(e) and 63.11116(b), Subpart CCCCCC)

- 5.B.11 For Emission Point AA-002, the permittee shall continuously monitor the ACC combustion temperature and conduct daily/weekly visual emission observations or visible emissions evaluations (VEE) in accordance with the CAM Plan found in Appendix C. The visual observation frequency is determined in accordance with the criteria established in the CAM Plan.

(Ref.: 40 CFR 64.3(a) and (b), and 64.6(c), Compliance Assurance Monitoring)

- 5.B.12 For Emission Point AA-002, the permittee shall comply with the following requirements for the monitoring required by the approved CAM Plan:

- (a) *Proper maintenance.* At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- (b) *Continued operation.* Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used, including in data averaging and calculations or in fulfilling a minimum data availability requirement, as applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(Ref.: 40 CFR 64.7(b) and (c), Compliance Assurance Monitoring)

- 5.B.13 For Emission Point AA-002, upon detecting an excursion or exceedance, the permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

Determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(Ref.: 40 CFR 64.7(d), Compliance Assurance Monitoring)

- 5.B.14 For Emission Point AA-002, based on the results of a determination made under Condition 5.B.13, the DEQ may require the permittee to develop and implement a Quality Improvement Plan (QIP) containing the elements specified in 40 CFR 64.8(b). The QIP shall be developed and implemented within 180 days of written notification from DEQ that a QIP is required. The DEQ may require the permittee make reasonable changes to the QIP if the QIP fails to address the cause of the control device performance problem or fails to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Implementation of a QIP shall not excuse the permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that applies.

(Ref.: 40 CFR 64.8, Compliance Assurance Monitoring)

- 5.B.15 For Emission Point AA-002, the permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written QIP required pursuant to Condition 5.B.14 and any activities undertaken to implement a QIP, data used to document the adequacy of monitoring, and monitoring maintenance or corrective actions, as applicable. As applicable, records of monitoring data and monitoring performance data should include date and time, who performed the analysis, analytical techniques or methods used, results and operating conditions at the time of the sampling or measurement. These records may be maintained in hard copy form or electronically, provided they are available for expeditious inspection and review.

(Ref.: 40 CFR 64.9(b), Compliance Assurance Monitoring)

C. Specific Reporting Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Reporting Requirement
AA-001A AA-001B	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)., as established in PSD Permit to Construct issued September 9, 2005	5.C.1	Wet wood received	Semiannual report
AA-002	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c).	5.C.2	PM, PM ₁₀ , SO ₂ , NO _x , CO, VOC, Opacity	Submittal of test notice, protocol, and test results
AA-002	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)., as established in PSD Permit to Construct issued September 9, 2005	5.C.3	Dry wood throughput	Semiannual report
			Dry wood charred	
			Auxiliary burner operation	
AD-002	40 CFR 63.6640(b), 63.6650(f), and Footnote 2 to Table 2d, Subpart ZZZZ, and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.4	Hours of operation	Semiannual report
AD-003 AD-004 AD-005	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)	5.C.5		
AA-002	40 CFR 64.9(a), CAM	5.C.6	PM/PM ₁₀ , CO, VOC	Semiannual reporting requirements
	40 CFR 64.7(e), CAM	5.C.7		Promptly notify DEQ of failure to achieve limit/standard though no excursion or exceedance was indicated by approved monitoring

5.C.1 For Emission Points AA-001A and AA-001B, the permittee shall submit a semiannual report in accordance with Condition 5.A.4 that contains the amount of wet wood received (tons/year) for each consecutive 12-month period during the reporting period.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)., as established in PSD Permit to Construct issued September 9, 2005)

5.C.2 For Emission Point AA-002, the permittee shall submit the following notifications and/or documents for each performance test:

- (a) A written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the DEQ. After the first successful submittal of a written test protocol in conjunction with a compliance test, the permittee may request that the resubmittal of the testing protocol be waived for subsequent testing by certifying in writing at least thirty (30) days prior to subsequent testing that all conditions for testing remain unchanged such that the original protocol can and will be followed.
- (b) A notification of the scheduled test date(s) should be submitted ten (10) days prior to the scheduled test date(s) so that an observer may be afforded the opportunity to witness the test(s).
- (c) The results from each performance test shall be submitted to the DEQ within sixty (60) days following the completion of the test(s).
- (d) In the event the permittee meets the criteria in Condition 5.B.3 to waive a performance test, the permittee shall notify the DEQ in writing no later than sixty (60) days before the due date for the next test. Any such notification should include documentation confirming the previous test results have met the waiver criteria.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c).)

5.C.3 For Emission Point AA-002, the permittee shall submit a semiannual report in accordance with Condition 5.A.4 that contains the following information:

- (a) The daily average and daily maximum amount of dry wood processed (tons/hour) for each month and sample calculations for determining the amount of dry wood based on the moisture content of the wet wood fed to the rotary wood dryer;
- (b) The total amount of dry wood charred (tons/year) for each consecutive 12-month period in the reporting period; and
- (c) The number of hours and reason why the auxiliary burners were operated during each month. This information shall also include the amount of fuel combusted.

(Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.A(3)(c)., as established in PSD Permit to Construct issued September 9, 2005)

5.C.4 For Emission Point AD-002, the permittee shall submit semiannual reports in accordance with Condition 5.A.4 summarizing the hours of operation of the engine in the calendar year. This report shall also include what hours were for emergency use and what constituted the emergency and what hours were for non-emergency use.

This report shall also include all deviations from any emission or operating limitation of Subpart ZZZZ. Such deviations shall include any failure to perform the work practice on the required schedule. In the event a work practice is delayed because the engine is operating during an emergency or if performing the work practice on the required work

schedule posed an unacceptable risk under federal, state, or local law, the permittee shall include in the report the reason for the delay.

(Ref.: 40 CFR 63.6640(b), 63.6650(f), and Footnote 2 to Table 2d, Subpart ZZZZ and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)

- 5.C.5 For Emission Points AD-003, AD-004, and AD-005, the permittee shall submit semiannual reports in accordance with Condition 5.A.4 summarizing the hours of operation of the engines in the calendar year. This report shall also include what hours were for emergency use and what constituted the emergency and what hours were for non-emergency use.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)

- 5.C.6 For Emission Point AA-002, the permittee shall submit reports in accordance with Condition 5.A.4 of the following information, as applicable:

- (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 Condition 5.B.14. 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.

(Ref.: 40 CFR 64.9(a), Compliance Assurance Monitoring)

- 5.C.7 For Emission Point AA-002, if the permittee identifies a failure to achieve compliance with the emission limitation or standard for which the approved CAM monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or monitoring additional parameters.

(Ref.: 40 CFR 64.7(e), Compliance Assurance Monitoring)

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://www.ecfr.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, as well as persons selling, offering for sale, and/or purchasing class I, class II, or non-exempt substitute 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

11 Miss. Admin. Code Pt. 2, Ch. 1.	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
11 Miss. Admin. Code Pt. 2, Ch. 2.	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
11 Miss. Admin. Code Pt. 2, Ch. 3.	Regulations for the Prevention of Air Pollution Emergency Episodes
11 Miss. Admin. Code Pt. 2, Ch. 4.	Ambient Air Quality Standards
11 Miss. Admin. Code Pt. 2, Ch. 5.	Regulations for the Prevention of Significant Deterioration of Air Quality
11 Miss. Admin. Code Pt. 2, Ch. 6.	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
11 Miss. Admin. Code Pt. 2, Ch. 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
NMVOC	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 µm 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

List of Regulations Referenced In this Permit

11 Miss. Admin. Code, Part 2, Ch. 1. – Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants (Amended November 10, 2016)

11 Miss. Admin. Code, Part 2, Ch. 2. – Permit Regulations for the Construction and/or Operation of Air Emissions Equipment (Amended July 28, 2005)

11 Miss. Admin. Code, Part 2, Ch. 6. – Air Emission Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act (Amended June 28, 2012)

40 CFR 82, Protection of Stratospheric Ozone

40 CFR 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

40 CFR 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

40 CFR 63, Subpart CCCCCC, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities

40 CFR 64, Compliance Assurance Monitoring

APPENDIX C

Compliance Assurance Monitoring Plan

CAM Plan for ACC Thermal Oxidizer

Emission Point AA-002

	Indicator No. 1 (PM/PM₁₀, CO, VOC)	Indicator No. 2 (PM/PM₁₀)
Indicator	ACC Temperature	Visual observations
Measurement Approach	ACC combustion temperature is measured with a Type K thermocouple.	Visible observations followed by opacity determination, if necessary.
Monitoring Methods and Location	Continuous monitoring (i.e., every second) displayed in control room with two thermocouples located in representative locations of the ACC stack.	Visual observations for any visible emissions and opacity determined per EPA Reference Method 9.
Indicator Range	An on-screen alarm shall be displayed in the control room if the ACC temperature during normal operations is less than 1,400 °F (3-hour average). An exceedance of the permit limit is defined as a 3-hour rolling average temperature less than 1,400 °F.	If any visible emissions are observed, the opacity shall be determined immediately. An exceedance of the permit limit is defined as a 6-minute opacity average greater than 40%.
Data Collection Frequency	Data shall be collected every 15 seconds and averaged each hour	Visual observations shall be made for a period of six (6) consecutive minutes daily for six (6) consecutive weeks. If visible emissions are less than or equal to 20% opacity during these six (6) weeks, visual observations may be reduced to weekly. If any visible emissions of an opacity greater than 20% are observed during the weekly observations, the frequency shall revert to daily for at least six (6) consecutive weeks.
Data Collection Frequency	A summary of readings will be included in the semiannual report	Weekly Method 9 VEEs will be recorded and filed. A summary of observations will be included in the semiannual report.
Averaging Period	3-hour rolling average shall be determined each hour using the average hourly data.	6-minute average
Recordkeeping	The ACC temperature shall be recorded at least every 15 minutes and the average hourly and 3-hour rolling average for all periods when the ACC is operating shall be recorded.	The permittee shall maintain a log of the daily or weekly visual observations, any Method 9 opacity determinations, and any corrective actions taken.
QA/QC Practices	The thermocouples shall be maintained to the manufacturer's specifications, which shall be kept on site. Should readings from the two thermocouples differ by more than 100 °F, the permittee shall immediately take action to determine the cause and correct this discrepancy and shall keep records of such incidences and the action taken.	The stack observer shall be certified per EPA Reference Method 9