STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
TITLE V PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Biltrite Ripley Operations LLC
16310 Highway 15 North
Ripley, Mississippi
Tippah 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.: 2620-00046**

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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-007	Three (3) Banbury Mixers with Three (3) Baghouses and Clay/Hi-Sil Unloading and Transport Systems each with Dust Collectors. Two (2) dust collectors control emissions from the clay and Hi-Sil unload stations that transport the materials to the silos, and two (2) dust collectors control emissions from transfer of the materials from the silos to the weigh scale system.
AA-009	Three (3) Sander/Finishing Stations and Process Lines with Three (3) Cyclones
AA-010	Adhesive Spray Booth used to apply adhesives to metal parts which are then inserted into specialized rubber products produced at the facility and equipped with fabric filters to control PM emissions
AA-011	40.23 HP, 4SRB, LPG-fired Emergency Generator Engine (Pre-2006)
AA-012	16.8 MMBTU/hr Natural Gas-fired Boiler

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.)

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. 2.15.C., as established in the Title V Operating Permit issued XXXX	3.B.1	PM PM_{10} $PM_{2.5}$	≤ 249.0 tpy
AA-007 AA-009	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.B.2	PM (filterable only)	$E = 4.1 \times p^{0.67}$
AA-009	40 CFR 64, Compliance Assurance Monitoring (CAM) 40 CFR 64.2(a), CAM	3.B.3		CAM Applicability
AA-011	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.B.4		≤ 0.6 lb/MMBTU
	40 CFR 63, Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines) 40 CFR 63.6590, Subpart ZZZZ	3.B.5	HAP	Applicability
	40 CFR 63.6603(a), 63.6625(j), and Item 5 of Table 2d, Subpart	3.B.6		Operating Requirements

DRAFT/PROPOSED

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
	ZZZZ			
	40 CFR 63.6605(a) and (b), Subpart ZZZZ	3.B.7		Compliance Requirements
	40 CFR 63.6625(e)(3), Subpart ZZZZ	3.B.8		Operate and maintain according to manufacturer's emission-related instructions or develop maintenance plan
	40 CFR 63.6625(h), Subpart ZZZZ	3.B.9		Minimize time spent at idle
	40 CFR 63.6625(f), Subpart ZZZZ	3.B.10		Install and maintain non-resettable hour meter
	40 CFR 63.6640(f), Subpart ZZZZ	3.B.11		Emergency operation
AA-012	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.B.12	PM	$E = 0.8808 \times I^{-0.1667}$
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.B.13	SO_2	≤ 4.8 lb/MMBTU
	11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued XXXX	3.B.14	Fuel	Natural Gas Only
	40 CFR 60, Subpart Dc (Standards of Performance for Small-Industrial-Commercial-Institutional Steam Generating Units) 40 CFR 60.40c(a), Subpart Dc	3.B.15		Applicability

3.B.1 For the entire facility, the permit shall not emit more than 249.0 tons per year (tpy) of particulate matter (PM), particulate matter less than 10 microns (PM_{10}), and particulate matter less than 2.5 microns ($PM_{2.5}$) as determined monthly and for each consecutive 12-month period on a rolling monthly basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued XXXX, PSD Avoidance Limit)

3.B.2 For Emission Points AA-007 and AA-009, except as otherwise specified, no person shall cause, permit, or allow the emission of particulate matter in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship:

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

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

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

3.B.3 For Emission Point AA-009, 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)

3.B.4 For Emission Point AA-011, the permittee shall limit the 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.5 For Emission Point AA-011, the permittee is subject to and shall comply with all the applicable requirements of the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) and the General Provisions as specified in Table 8 (40 CFR 63, Subpart A).

(Ref.: 40 CFR 63.6590, Subpart ZZZZ)

3.B.6 For Emission Point AA-011, the permittee shall comply with the following:

(a) Change oil and filter every 500 hours of operation or annually, whichever comes first;

(b) Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and

(c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

The permittee may extend the specified oil changes requirements of (a) above by utilizing the oil analysis program outlined in 40 CFR 63.6625(j), Subpart ZZZZ. If an engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practices according to the schedule in (a)-(c) above, or if performing the management 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 management 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), 63.6625(j), and Item 5 of Table 2d, Subpart ZZZZ)

3.B.7 For Emission Point AA-011, the permittee shall be in compliance with the emission limitations, operating limitations, and other requirements of 40 CFR 63, Subpart ZZZZ, that apply at all times. At all times the permittee must operate and maintain the sources, including associated air pollution control equipment and monitoring equipment, 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 have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to DEQ which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(Ref.: 40 CFR 63.6605(a) and (b), Subpart ZZZZ)

3.B.8 For Emission Point AA-011, the permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

(Ref.: 40 CFR 63.6625(e)(3), Subpart ZZZZ)

3.B.9 For Emission Point AA-011, 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(h), Subpart ZZZZ)

3.B.10 For Emission Point AA-011, the permittee shall install, operate, and maintain a non-resettable hour meter.

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

3.B.11 For Emission Point AA-011, the permittee shall operate the emergency stationary RICE according to the following paragraphs to be considered an emergency stationary RICE. Any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described below, is prohibited. If the permittee does not operate the engines according to the requirements below, the engine will not be considered an emergency engine and must meet all the applicable requirements for non-emergency engines of 40 CFR 63, Subpart ZZZZ.

(a) There is no time limit on the use of emergency stationary RICE in emergency situations.

(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 an 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 an engine beyond 100 hours per calendar year. Any operation for non-emergency situations as allowed in paragraph (c) counts as part of the 100 hours per calendar year allowed by this paragraph.

The emergency stationary RICE 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 and emergency demand response provided in paragraph (b) of this condition. (Ref.: 40 CFR 63.6640(f), Subpart ZZZZ)

3.B.12 For Emission Point AA-012, the permittee shall not exceed an emission rate of ash and/or particulate matter as determined by the relationship below:

$E = 0.8808 \times I^{-0.1667}$

Where "E" is the emission rate in pounds per million BTU per hour heat input, and "I" is the heat input in million BTU per hour.

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

3.B.13 For Emission Point AA-012, the permittee shall limit the emission of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer to 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 For Emission Point AA-012, the permittee shall only combust natural gas.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued XXXX)

3.B.15 For Emission Point AA-012, the permittee is subject to and shall comply with all the applicable requirements of the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60, Subpart Dc) and the General Provisions (40 CFR 60, Subpart A).

(Ref.: 40 CFR 60.40c(a), Subpart Dc)

C. Insignificant and Trivial Activity Emission Limitations & Standards

Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.C.1	PM	0.6 lbs/MMBTU
11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.C.2	SO_2	4.8 lbs/MMBTU

3.C.1 The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input.

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

3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.

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

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)(3).	5.B.1	Control Equipment	Perform regular maintenance as necessary and maintain a log of malfunctions and downtime
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.B.2	PM	Monitor and record emissions
AA-009	40 CFR 64, Compliance Assurance Monitoring (CAM) 40 CFR 64.3(a) and (b), 64.6(c), CAM	5.B.3		CAM Requirement: Weekly Visible Emissions Evaluations (VEE) and Control Equipment Inspections
	40 CFR 64.7(b) and (c), CAM	5.B.4		Operation and maintenance requirements for monitoring system(s)
	40 CFR 64.7(d), CAM	5.B.5		Corrective Action response to an excursion/exceedance of a CAM indicator
	40 CFR 64.8, CAM	5.B.6		Upon request by DEQ, develop a Quality Improvement Plan (QIP)
	40 CFR 64.9(b), CAM	5.B.7	CAM Records	Maintain CAM records as specified
AA-011	40 CFR 63, Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines) 40 CFR 63.6655(a), (d), and (e), Subpart ZZZZ	5.B.8	Operation	Recordkeeping
	40 CFR 63.6660, Subpart ZZZZ	5.B.9	Records	
	40 CFR 63.6655(f), Subpart ZZZZ	5.B.10	Hours of Operation	
AA-012	40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) 40 CFR 60.48c(g)(1) and (2) and 60.48c(i), Subpart Dc	5.B.11	Fuel	

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5.B.1 For the entire facility, the permittee shall perform regular maintenance as necessary to maintain proper operation of the pollution control equipment. The permittee shall maintain a log of control equipment malfunctions and downtime, including the date, time, duration, and cause of the malfunction or downtime and corrective and/or preventative action(s) taken as a result of the malfunction or downtime. These records must be made available for review upon request by DEQ personnel.

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

5.B.2 For the entire facility, the permittee shall monitor, calculate, and record the total PM, PM_{10}, and $PM_{2.5}$ emission rates in tons per year on a monthly basis and for each consecutive 12-month period on a rolling basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.B.3 For Emission Point AA-009, the permittee shall monitor the cyclone performance visual observation of the exhaust performed weekly while the process is operating in accordance with the CAM Plan found in Appendix B of the permit.

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

5.B.4 For Emission Point AA-009, 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.5 For Emission Point AA-009, 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.6 For Emission Point AA-009, based on the results of a determination made under Condition 5.B.5, 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.7 For Emission Point AA-009, the permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written QIP required pursuant to Condition 5.B.6 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)

5.B.8 For Emission Point AA-011, the permittee shall maintain the records below:

(a) A copy of each notification and report submitted to comply with 40 CFR 63, Subpart ZZZZ.

(b) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.

(c) Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

(d) The maintenance plan as required by Condition 3.B.8.

(e) Records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and control device (if any) according to the maintenance plan.

(Ref.: 40 CFR 63.6655(a), (d), and (e), Subpart ZZZZ)

5.B.9 For Emission Point AA-011, the permittee shall comply with the following:

(a) Records must be in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1), Subpart A.

(b) As specified in 40 CFR 63.10(b)(1), records must be kept for five (5) years following the date of each occurrence measurement, maintenance, corrective action, report, or record.

(c) Keep each record readily accessible in hard copy or electronic form for at least five (5) years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to 40 CFR 63.10(b)(1).

(Ref.: 40 CFR 63.6660, Subpart ZZZZ)

5.B.10 For Emission Point AA-011, the permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must 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 63.6655(f), Subpart ZZZZ)

5.B.11 For Emission Point AA-012, the permittee shall comply with the following:

(a) Except as provided in paragraph (b) of this condition, the permittee shall record and maintain records of the amount of each fuel combusted during each operating day.

(b) As an alternative to meeting the requirements of paragraph (a) of this condition, the permittee may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

All records required by this condition shall be maintained by the permittee for a period of two years following the date of such record.

(Ref.: 40 CFR 60.48c(g)(1) and (2) and 60.48c(i), Subpart Dc)

C. Specific Reporting Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Reporting Requirement
AA-009	40 CFR 64, Compliance Assurance Monitoring 40 CFR 64.9(a), CAM	5.C.1	CAM Reporting	Semiannual reporting requirements
	40 CFR 64.7(e), CAM	5.C.2	CAM Modification	Promptly notify DEQ of failure to achieve limit-standard though no excursion or exceedance was indicated by approved monitoring

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Reporting Requirement
AA-011	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.2	Hours	Report hours of operation
	40 CFR 63, Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines) 40 CFR 63.6640(b) and 63.6650(a) through (d), Subpart ZZZZ	5.C.3	Deviations	Reporting

5.C.1 For Emission Point AA-009, 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.6. 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.2 For Emission Point AA-009, 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)

5.C.3 For Emission Point AA-011, the permittee shall submit semiannual reports in accordance with Condition 5.A.4 summarizing the hours of operation for the engine in the preceding six months. This report shall also include which hours were for emergency use and which were for non-emergency use.

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

5.C.4 For Emission Point AA-011, the permittee shall report each instance in which each of the applicable operating limitations in Conditions 3.B.6 and 3.B.11 were not met in accordance with Condition 5.A.4. These deviations shall be reported according the following requirements:

(a) If there were no deviations from any applicable operating limitations, a statement shall be included that there were no deviations from the emission limitations or operating limitations during the reporting period; or

(b) If there was a deviation from any operating limitation during the reporting period, then the compliance report shall contain the following information:

(1) Company name and address.

(2) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.

(3) Date of report and beginning and ending dates of the reporting period.

(4) The total operating time of the stationary RICE at which the deviation occurred during the reporting period.

(5) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

(c) If there was a malfunction during the reporting period, the compliance report shall include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report shall also include a description of actions taken by the permittee during a malfunction of an affected source to minimize emissions, including actions taken to correct a malfunction.

(Ref.: 40 CFR 63.6640(b) and 63.6650(a) through (d), Subpart ZZZZ)

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
lb/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: COMPLIANCE ASSURANCE MONITORING (CAM) PLAN

Cyclone #3, Cyclone #9, and Cyclone #10

I. Background

A. Emission Unit

Description:	Cyclones #3, #9, and #10 are Cambridge Port HE-1, high efficiency cyclones. Cyclones control particulate matter (PM) emissions from the sanding operations associated with the finishing process (Emission Point AA-009).
Identification:	AA-009, Cyclone #3
	AA-009, Cyclone #9
	AA-009, Cyclone #10
Facility:	Biltrite Ripley Operations LLC
	Ripley, Mississippi

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation No.:	40 CFR 64, CAM
Emission Limits:	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).
	$E = 4.1 \times p^{0.67}$
Monitoring Requirements:	Visible Emission Observations and Control Equipment Inspections

C. Control Technology

High efficiency cyclones

II. Monitoring Approach

The key elements of the monitoring approach are presented in Table A.

Table A: Monitoring Approach for Emission Point AA-009, Cyclone #3, Cyclone #9, and Cyclone #10 for Controlling PM

	Indicator No. 1	*Indicator No. 2*
I. Indicator	Visible Emissions Evaluation (VEE)	Control Equipment Inspections
Measurement Approach	A visual observation of the cyclone exhaust will be performed weekly while the process is operating. When any emissions are observed, EPA Reference Method 9 will be performed.	The cyclones will be inspected on a weekly basis to ensure that the sanding operations are being properly controlled.
II. Indicator Range	An excursion is defined as an opacity of greater than 20%.	An excursion is defined as control equipment malfunctions.
QIP Threshold	Not more than six (6) excursions in any semi-annual reporting period.	Not more than six (6) excursions in any semi-annual reporting period.
III. Performance Criteria		
A. Data Representativeness	Measurements are being made at the cyclone exhaust.	Inspections and maintenance are being conducted on the cyclones
B. Verification of Operational Status	Recorded each week of operation.	N/A
C. QA/QC Practices and Criteria	Person performing the VEE in accordance with EPA Reference Method 9 will be properly certified twice per year	Weekly inspections any any required maintenance are performed as necessary.
D. Monitoring Frequency	Visible observations will be performed each week. If emissions are visible, then an EPA Reference Method 9 will be performed.	Weekly
Data Collection Procedure	Opacity observations and/or EPA Reference Method 9 VEEs will be recorded weekly and kept in log form.	Weekly inspections are performed and documented by the observer. Any required maintenance is logged.
Averaging Period	EPA Reference Method: 3-six minute runs	N/A

Justification

I. Background

The pollutant-specific emission units are Cyclone #3, Cyclone #9, and Cyclone #10, which are control equipment for Emission Point AA-009 associated with the finishing process.

II. Rationale for Selection of Performance Indicators

a. *Visible Emissions Evaluation:* Visible emissions were selected as a performance indicator because it is indicative of good operation and maintenance of the cyclones. When the cyclones are operating properly, there will be minimum visible emissions from the cyclone exhaust. Visible emissions from the cyclones may indicate reduced performance or efficiency of the particulate matter control device. Therefore, the presence of visible emissions is used as a performance indicator.

b. *Control Equipment Inspections:* The cyclones are inspected on a weekly basis to ensure that the sanding operations associated with the finishing process (Emission Point AA-009) are properly controlled.

III. Rational for Selecting Indicator Ranges

The indicator range chosen for visible emissions is an opacity of less than 20%. When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action required to correct the situation. All excursions will be documented and reported, as necessary. An indicator range of 20% opacity was selected because: (1) an increase in visible emissions is indicative of an increase in particulate matter; (2) it is a monitoring technique that has been approved and accepted by the US EPA and most State permitting authorities.

The indicator range for the weekly control equipment inspections is the discovery of a control equipment malfunction or necessary preventive maintenance. Weekly inspections and maintenance of the cyclones will ensure that the control equipment is being operated in accordance with manufacturer specifications, and emissions can be expected to be below allowable regulations and permitted limits. All excursions will be documented and reported, as necessary.