

STATE OF MISSISSIPPI AND FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT AT A
SYNTHETIC MINOR SOURCE

THIS CERTIFIES THAT

Olin Winchester, LLC
411 County Road 101
Oxford, Lafayette County, Mississippi

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

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: _____

Permit No.: 1420-00029

Effective Date: As specified herein.

Expires: **[No more than 5 years from the issue date.]**

SECTION 1

A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
2. This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.4.D.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.4.D.)
3. Any activities not identified in the application are not authorized by this permit.
(Ref.: Miss. Code Ann. 49-17-29 1.b)
4. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)
7. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)
8. The permittee shall allow the Mississippi Department of Environmental Quality (MDEQ) Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:

- (a) To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and
- (b) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission.

(Ref.: Miss. Code Ann. 49-17-21)

9. Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control.

(Ref.: Miss. Code Ann. 49-17-39)

10. 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. 2.1.D(7).)

11. This permit does not authorize a modification as defined in Mississippi Administrative Code, Title 11, Part 2, Chapter 2 – “Permit Regulations for the Construction and/or Operation of Air Emission Equipment”. A modification may require a Permit to Construct and a modification of this permit.

“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 Part 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 Part 51 – 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).)

B. GENERAL OPERATIONAL CONDITIONS

- 1. 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 3 – "Regulations for the Prevention of Air Pollution Emergency Episodes" – for the level of emergency declared.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.10.)

- 2. Any diversion from or bypass of collection and control facilities is prohibited, except as provided for in Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 1.10 – "Provisions for Upsets, Startups, and Shutdowns".

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

- 3. Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits.

(Ref.: Miss. Code Ann. 49-17-29 1.a(i and ii).)

- 4. Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, start-ups, and shutdowns.

- (a) Upsets

- (1) For an upset defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., 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 five (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 twenty-four (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 the EPA or third party enforcement actions.
- (b) Start-ups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.)
 - (1) Start-ups and shutdowns are part of normal source operation. Emission limitations apply during start-ups and shutdowns unless source specific emission limitations or work practice standards for start-ups 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 1, the Department

will consider establishing source specific emission limitations or work practice standards for start-ups and shutdowns. Source specific emission limitations or work practice standards established for start-ups 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.)

5. *Compliance Testing*: Regarding compliance testing:

- (a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations of this permit and in units of mass per time.
- (b) Compliance testing will be performed at the expense of the permittee.
- (c) Each emission sampling and analysis report shall include but not be limited to the following:
 - (1) Detailed description of testing procedures;
 - (2) Sample calculation(s);
 - (3) Results; and
 - (4) Comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B(3), (4), and (6).)

C. PERMIT RENEWAL / MODIFICATION / TRANSFER / TERMINATION

1. For renewal of this permit, the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board.

If the applicant submits a timely and complete application pursuant to this paragraph and the Permit Board, through no fault of the applicant, fails to act on the application on or before the expiration date of the existing permit, the applicant shall continue to operate the stationary source under the terms and conditions of the expired permit, which shall remain in effect until final action on the application is taken by the Permit Board. Permit expiration terminates the source's ability to operate unless a timely and complete renewal application has been submitted.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.8.)

2. The permittee shall furnish to the MDEQ within a reasonable time any information the MDEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the MDEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the MDEQ 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. 2.2.B(15)(d).)

3. The permit and/or any part thereof may be modified, revoked, reopened and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).)

4. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including (but not limited to):
 - (a) Persistent violation of any terms or conditions of this permit.
 - (b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
 - (c) A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

5. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B.)

SECTION 2 EMISSION POINT DESCRIPTION

The permittee is authorized to operate air emissions equipment, as described in the following table:

Emission Point	Description
AA-000	Facility-Wide [Olin Winchester, LLC]
AA-001	Billet System [includes 4 sow melt kettles, 4 billet melt kettle furnaces, 3 tundishes, 3 hydron continuous billet casters; the emissions from all units are routed to 4 baghouses]
AA-002	Bonded Bullet Operations [includes 4 lines (BB-1 to BB-4); emissions are from all lines are routed to a common baghouse]
AA-004	Cobmeal Bullet Tumblers with Solvent [includes 7 tumblers (3 with filter collection systems and 4 without pollution control devices)]
AA-005	Cobmeal Bullet Tumblers without Solvent [includes 4 tumblers]
AA-008	Ballistic Test Ranges [includes Rimfire ranges (R-1 to R-4) and Centerfire ranges (C-1 to C-8)]
AA-009	Baird Tubs for Brass Cleaning [includes 66 tubs]
AA-010	Extrusion Presses and Tumblers [includes 7 presses (EP-1 to EP-7) and 7 tumblers (EPT-1 to EPT-7)]
AA-011	Progressive Die Press [includes 14 presses (PDP-1 to PDP-14)]
AA-012	Bulk Sulfuric Acid Storage Tanks [includes 2 tanks (SAT-1 and SAT-2)]
AA-013	Lime Storage Silo (S-1) [emissions are routed through a fabric filter dust collector (FF-1)]
AA-014	Metallic Shell-Case Polishers [includes 2 polishers]
AA-015	Cooling Towers [includes 4 towers (CT-1 to CT-4)]
AA-016	Spin Prime Process [includes 20 lines]
AA-017	Carton and Can Printers [includes 2 units]
AA-018	High Explosives Production Line No. 1
AA-019	High Explosives Production Line No. 2
AA-020	Vibratory Polisher
AA-021	Cement Tumbler

Emission Point	Description
AA-022	Draw Operations
AA-023	Buckshot Tumbler without Solvent
AB-000	Fuel Burning Equipment
AB-001	10.2 MMBTU / Hour Natural Gas-Fired Package Boiler B-1 [manufactured in 2011]
AB-002	10.2 MMBTU / Hour Natural Gas-Fired Package Boiler B-2 [manufactured in 2011]
AB-003	16.3 MMBTU / Hour Natural Gas-Fired Package Boiler B-3 [manufactured in 2011]
AB-004	2.0 MMBTU / Hour (150 kW) Natural Gas-Fired Emergency Generator Engine [manufactured in 2011]
AB-005	0.887 MMBTU / Hour (260 kW) Diesel-Fired Emergency Fire Pump Engine [manufactured in 1970]
AB-006	Facility-Wide Natural Gas-Fired Process Heaters, Dryers, Boilers, Ovens, and Furnaces [total heat input: 28.96 MMBTU / hour; manufactured in 2011]
AB-007	Facility-Wide Natural Gas-Fired Space Heaters [used for climate control; total heat input: 13.73 MMBTU / hour; manufactured in 2011]
AB-008	0.85 MMBTU / Hour (250 kW) Diesel-Fired Emergency Wastewater Generator Engine [manufactured in 2008]
AC-000	Coating, Solvent Usage, and/or Degreasing Operations
AC-001	Power Tool Loaders [includes 4 loading complexes (LC-1 to LC-4)]
AC-002	Gauge and Weigh Lines [includes 25 lines (GW-1 to GW-25)]
AC-003	Cappers [includes 85 units (CAP-1 to CAP-85)]
AC-004	50 Caliber Cappers [includes 3 units (50CA-1 to 50CA-3)]
AC-005	Tip ID Process (includes 4 lines (TIP-1 to TIP-4)]
AC-007	Bullet Swaging Process [includes 50 units (SW-1 to SW-50)]
AC-008	Cleaning Solvent Usage Activities
AC-009	Deprime Operations [includes: 1 tank (DP-1)]
AC-010	Steel Headers [includes 6 units]

SECTION 3 EMISSION LIMITATIONS AND STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limitation / Standard
AA-000 (Facility-Wide)	11 Miss. Admin. Code, Pt. 2, R. 2.2.B(10). (Title V Avoidance Limits)	3.1	VOCs	99.0 tpy (Rolling 12-Month Total)
			HAPs	9.9 tpy (Individual) 24.9 tpy (Total) (Rolling 12-Month Totals)
	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.2	Opacity (smoke)	≤40%
	11 Miss Admin. Code Pt. 2, R. 1.3.B.	3.3	Opacity	
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.4	PM (filterable)	$E = 4.1 \cdot (p^{0.67})$
AA-013	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.5	PM (filterable)	Operational Requirements (Fabric Filter)
AB-000	11 Miss Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.6	PM	0.6 lbs. / MMBTU per Hour
AB-001 AB-002 AB-003	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.7	SO ₂	4.8 lbs. / MMBTU
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.8	PM	$E = 0.8808 \cdot (I^{-0.1667})$
	40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units 40 CFR 60.40c(a); Subpart Dc	3.9	SO ₂	General Applicability
	40 CFR Part 63, Subpart ZZZZ – NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE) 40 CFR 63.6585(a) and (c), 63.6590(a)(1)(iii), (a)(2)(iii), and (c)(1); Subpart ZZZZ	3.10	HAPs	General Applicability
AB-004 AB-005 AB-008	40 CFR 63.6640(f)(1) – (3); Subpart ZZZZ 40 CFR 60.4211(f)(1) – (3); Subpart IIII) 40 CFR 60.4243(d)(1) – (3); Subpart JJJJ)	3.11	Operational Requirements	50 Hours Per Calendar Year – Non Emergency Operations 100 Hours Per Calendar Year – Maintenance and Testing

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limitation / Standard
AB-004	40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines 40 CFR 60.4230(a)(4), Subpart JJJJ	3.12	NO _x CO VOCs	General Applicability
	40 CFR 60.4233(e), 60.4234, and Table 1, Subpart JJJJ	3.13	NO _x	2.0 Grams / Horsepower-Hour
			CO	4.0 Grams / Horsepower-Hour
			VOCs	1.0 Grams / Horsepower-Hour
	40 CFR 60.4243(e); Subpart JJJJ	3.14	Alternative Fuel Usage	Combust Propane for 100 Hours / Calendar Year
AB-008	40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines 40 CFR 60.4200(a)(2); Subpart IIII	3.15	NMHC + NO _x CO PM	General Applicability
	40 CFR 60.4205(c), 60.4206 and Table 4; Subpart IIII	3.16	NMHC + NO _x	4.0 Grams / Kilowatt-Hour (or 3.0 Grams / Horsepower-Hour)
			CO	3.5 Grams / Kilowatt-Hour (or 2.6 Grams / Horsepower-Hour)
			PM	0.20 Grams / Kilowatt-Hour (or 0.15 Grams / Horsepower-Hour)
	40 CFR 60.4207(b), Subpart IIII	3.17	Fuel Requirement	15 ppm Sulfur Content (Max.); and 40 Cetane Index (Min.) or 35% Aromatic Content (Max. – by volume)

- 3.1 For Emission Point AA-000 (Facility-Wide), the permittee shall limit the respective emission of volatile organic compounds (VOCs) to no more than 99.0 tons per year (tpy), each individual hazardous air pollutant (HAP) to no more than 9.9 tpy, and all HAPs in total to no more than 24.9 tpy all based on a rolling 12-month total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). – Title V Avoidance Limits)

- 3.2 For Emission Point AA-000 (Facility-Wide), except as otherwise specified or limited herein, the permittee shall not cause or allow the emission of smoke into the open air from a point source of any manufacturing, industrial, commercial, or waste disposal process that exceeds forty (40) percent opacity subject to the following exceptions:

- (a) Start-up operations may produce emissions that exceed 40% opacity for up to fifteen (15) minutes per start-up in any one (1) hour and not to exceed three (3) start-ups per stack in any twenty-four (24) hour period.
- (b) Emissions resulting from soot blowing operations (i.e. ash removal) shall be permitted provided such emissions do not exceed sixty percent (60%) 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 (1) hour.

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

- 3.3 For Emission Point AA-000 (Facility-Wide), except as otherwise specified or limited herein, the permittee shall not cause or allow the discharge into the ambient air from any point source any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40%, equivalent to that provided in Condition 3.2. This shall not apply to vision obscuration caused by uncombined water droplets.

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

- 3.4 For Emission Point AA-000 (Facility-Wide), except as otherwise specified herein or limited herein, the permittee shall not cause or allow the emission of particulate matter (PM) in total quantities in any one (1) hour from any manufacturing process (which includes any associated stacks, vents, outlets, or combination thereof) to exceed the amount determined by the following relationship:

$$E = 4.1 \cdot (p^{0.67})$$

Where “E” is the emission rate in pounds per hour and “p” is the process weight input rate in tons per hour. 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).)

- 3.5 For Emission Point AA-013, the permittee shall at all times operate the fabric filter dust collector during active loading operations to minimize the emission of filterable particulate matter (PM). In the event the fabric filter malfunctions, the permittee shall cease loading activities until the fabric filter dust collector returns to service.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

- 3.6 For Emission Point Group AB-000, the maximum permissible emission of ash and/or particulate matter (PM) from any fossil fuel burning installation of less than ten (10) MMBTU per hour heat input shall not exceed 0.6 pounds per MMBTU per hour heat input.

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

- 3.7 For Emission Points AB-001, AB-002, and AB-003, the maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by in-direct heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per MMBTU heat input.

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

- 3.8 For Emission Points AB-001, AB-002, and AB-003, the maximum permissible emission of ash and/or PM from any installation equal to / greater than ten (10) MMBTU per hour heat input but less than 10,000 MMBTU per hour heat input shall not exceed an emission rate as determined by the relationship:

$$E = 0.8808 \cdot (I^{-0.1667})$$

where “E” is the emission rate in pounds per MMBTU per hour heat input and “I” is the heat input in MMBTU per hour.

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

- 3.9 For Emission Points AB-001, AB-002, and AB-003, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

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

- 3.10 For Emission Points AB-004, AB-005, and AB-008, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE) and 40 CFR Part 63, Subpart A – General Provisions (as required in Table 8 of Subpart ZZZZ).

For the purpose of this permit, stationary RICE is classified as “new” if construction commenced on / after June 12, 2006. Therefore, the permittee shall comply with Subpart ZZZZ for new compression-ignition RICE (i.e. Emission Point AB-008) by complying with the applicable requirements found in 40 CFR Part 60 – Subpart IIII and for new spark-ignition RICE (i.e. Emission Point AB-004) by complying with 40 CFR Part 60 – Subpart JJJJ. No further requirements apply under Subpart ZZZZ.

(Ref.: 40 CFR 63.6585(a) and (c), 63.6590(a)(1)(iii), (a)(2)(iii), and (c)(1); Subpart ZZZZ)

- 3.11 For Emission Points AB-004, AB-005, and AB-008, any operation of an engine for any reason other than emergency operation, maintenance and testing, and operation in non-emergency situations for fifty (50) hours per year is prohibited. If an engine is not operated in accordance with paragraphs (a) through (c) of this condition, the engine will not be

considered an emergency engine under the referenced regulation and shall meet all requirements for a corresponding non-emergency engine.

- (a) There is no time limit on the use of an engine in emergency situations.
- (b) The permittee may operate an engine for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, or the insurance company accompanied with the engine. Maintenance checks and readiness testing of an engine is limited to a maximum of one hundred (100) hours per calendar year. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing. However, a petition is not required if the permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of the engine beyond 100 hours per calendar year.
- (b) The permittee may operate an engine 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. The 50 hours per calendar 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) – (3); Subpart ZZZZ)

(Ref.: 40 CFR 60.4211(f)(1) – (3); Subpart IIII)

(Ref.: 40 CFR 60.4243(d)(1) – (3); Subpart JJJJ)

- 3.12 For Emission Point AB-004, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines and 40 CFR Part 60, Subpart A – General Provisions (as required in Table 3 of Subpart JJJJ).

(Ref.: 40 CFR 60.4230(a)(4); Subpart JJJJ)

- 3.13 For Emission Point AB-004, the permittee shall comply with the following emission standards:

- (a) Nitrogen Oxides (NO_x): 2.0 grams per horsepower-hour;
- (b) Carbon Monoxide (CO): 4.0 grams per horsepower-hour; and
- (c) Volatile Organic Compounds (VOCs): 1.0 grams per horsepower-hour.

The permittee shall operate and maintain the engine in such a manner to achieve the noted emission standards over the entire life of the engine.

(Ref.: 40 CFR 60.4233(e), 60.4234, and Table 1; Subpart JJJJ)

- 3.14 For Emission Point AB-004, the permittee may operate the engine with propane as an alternative fuel for a maximum of one hundred (100) hours per calendar year only during emergency operations.

(Ref.: 40 CFR 60.4243(e); Subpart JJJJ)

- 3.15 For Emission Point AB-008, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 60, Subpart IIII – New Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines (CI ICE) and 40 CFR Part 60, Subpart A – General Provisions (as required in Table 8 of Subpart IIII).

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

- 3.16 For Emission Point AB-008, the permittee shall comply with the following emission standards:

- (a) Non-Methane Hydrocarbons + Nitrogen Oxides (NMHC + NO_x): 4.0 grams per kilowatt-hour (or 3.0 grams per horsepower-hour);
- (b) Carbon Monoxide (CO): 3.5 grams per kilowatt-hour (or 2.6 grams per horsepower-hour); and
- (c) Particulate Matter (PM): 0.2 grams per kilowatt-hour (or 0.15 grams per horsepower-hour).

The permittee shall operate and maintain the engine in such a manner to achieve the referenced emission standards over the entire life of the engine.

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

- 3.17 For Emission Point AB-008, the permittee shall only combust diesel fuel within the engine that meets the following requirements (on a per-gallon basis):

- (a) A maximum sulfur content of fifteen (15) ppm; and
- (b) A minimum cetane index of forty (40) or a maximum aromatic content of thirty-five (35) volume percent.

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

SECTION 4 WORK PRACTICE STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Work Practice
AB-005	40 CFR 63.6605(b); Subpart ZZZZ	4.1	HAPs	General Duty Clause
	40 CFR 63.6603(a), 63.6625(i), Table 2d (Item 4); Subpart ZZZZ	4.2		Conduct Routine Maintenance
	40 CFR 63.6625(e)(3), (h), and Table 6 (Item 9); Subpart ZZZZ	4.3		Operate in Accordance with Work Practice Standards
AB-008	40 CFR 60.4211(a); Subpart IIII	4.4	NMHC + NO _x CO PM	Perform Best Management Practices

- 4.1 For Emission Point AB-005, the permittee shall operate and maintain the engine (including associated air pollution control equipment and monitoring equipment) in a manner consistent with safety and good pollutant control practices for minimizing emissions at all times.

The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this subpart has been achieved. The determination of whether such operation and maintenance procedures are being used will be based on information available to the MDEQ, which may included (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(b); Subpart ZZZZ)

- 4.2 For Emission Point AB-005, except during periods of start-up, the permittee shall meet the following routine maintenance requirements:

- (a) Change the oil and filter every five hundred (500) hours of operation or annually (whichever comes first).

The permittee also has the option of utilizing an oil analysis program in order to extend the noted oil change requirement in accordance with the following provisions:

- (1) The oil analysis shall be performed at the same frequency specified for changing the oil as outlined in paragraph (a) of this condition;
- (2) The analysis program shall (at a minimum) analyze the Total Base Number, viscosity, and percent water content. The condemning limits for each noted

parameter are as follows:

- (i) Total Base Number is less than thirty percent (30%) of the Total Base Number of the oil when new;
- (ii) Viscosity of the oil has changed by more than twenty percent (20%) from the viscosity of the oil when new; and
- (iii) Percent water content (by volume) is greater than 0.5.

If none of the condemning limits are exceeded, the permittee is not required to change the oil. However, if any of the limits are exceeded, the permittee shall change the oil within two (2) business days of receiving the results of the analysis. If the engine is not in operation when the results of the analysis are received, the permittee shall change the oil within two (2) business days or before commencing operation (whichever is later).

The permittee shall keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. Additionally, the analysis program shall be part of the maintenance plan for the engine.

- (b) Inspect the air cleaner every one thousand (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.

If the engine is operating during an emergency and it is not possible to shut the engine down in order to perform maintenance on the required schedule, or if performing maintenance on the required schedule would otherwise pose an unacceptable risk under Federal, state, or local law, the maintenance can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated.

(Ref.: 40 CFR 63.6603(a), 63.6625(i), Table 2d (Item 4); Subpart ZZZZ)

4.3 For Emission Point AB-005, the permittee shall comply with the following work practice requirements:

- (a) The permittee shall either operate / maintain the engine in accordance with the manufacturer's emission-related instructions or develop / follow a maintenance plan that is consistent with good air pollution control practices for minimizing emissions; and
- (b) The permittee shall minimize the engine's time spent at idle during start-up and minimize the engine's start-up time to a period need for appropriate and safe loading

of the engine [not to exceed thirty (30) minutes]. After which time, the emission standards applicable to all times other than start-up apply.

(Ref.: 40 CFR 63.6625(e)(3), (h), and Table 6 (Item 9); Subpart ZZZZ)

4.4 For Emission Point AB-008, the permittee shall adhere to the following work practices:

- (a) Operate and maintain each engine and control device (if any) according to the manufacturer's emission-related written instructions;
- (b) Change only those emission-related settings that are permitted by the manufacturer; and
- (c) Meet the requirements of 40 CFR Part 1068 (as applicable).

(Ref.: 40 CFR 60.4211(a); Subpart IIII)

SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Monitoring / Recordkeeping Requirement
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain Records For a Minimum of Five (5) Years
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2	VOCs HAPs	Maintain Information on Coatings, Adhesives, Solvents, or Other VOC- or HAP-Containing Materials
		5.3	VOCs HAPs	Calculate and Record Emissions (Monthly and 12-Month Rolling Total)
AA-001 AA-002 AA-004 AA-013	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.4	PM	Perform a Monthly Inspection on Each Control Device
AA-001 AA-002 AA-004	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.5	PM	Monitor the Pressure Drop Across Each Control Device Weekly
AB-001 AB-002 AB-003	40 CFR 60.48c(g)(2); Subpart Dc	5.6	SO ₂	Monitor the Volume of Fuel Combusted (Monthly)
AB-004 AB-005 AB-008	40 CFR 63.6625(f) and 63.6655(f); Subpart ZZZZ 40 CFR 60.4209(a) and 60.4214(b); Subpart IIII 40 CFR 60.4237 and 60.4245(b); Subpart JJJJ 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.7	Emergency Engine Status	Record Hours of Operation (Emergency and Non-Emergency)
AB-004 AB-008	40 CFR 60.4214(a)(2); Subpart IIII 40 CFR 60.4245(a); Subpart JJJJ	5.8	NO _x NMHC + NO _x CO PM VOCs	Recordkeeping Requirements
AB-004	40 CFR 60.4243(a)(2)(ii); Subpart JJJJ	5.9	NO _x CO VOCs	Compliance Demonstration Actions (if Engine is Not Installed, Operated, or Maintained According to Specifications)
AB-005	40 CFR 63.6655(a)(1), (2), (4), (5), and (e)(2); Subpart ZZZZ	5.10	HAPs	Recordkeeping Requirements

AB-008	40 CFR 60.4211(g)(2); Subpart III	5.11	NHMC + NO _x CO PM	Compliance Demonstration Actions (if Engine is Not Installed, Operated, or Maintained According to Specifications)
Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Monitoring / Recordkeeping Requirement
AC-003 AC-004	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.12	Methylene Chloride	Monitor the Quantity of Mouth Waterproofing Compound Used (Monthly)

- 5.1 For Emission Point AA-000 (Facility-Wide), the permittee shall retain all required records, monitoring data, supporting information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to the MDEQ as required by Applicable Rules and Regulations of this permit upon request.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.9.)

- 5.2 For Emission Point AA-000 (Facility-Wide), the permittee shall documentation that details the following information for each coating, adhesive, solvent, or other material that contains a volatile organic compound (VOC) or hazardous air pollutant (HAP) used on a monthly basis::

- (a) The quantity or volume used;
- (b) The product name or identification;
- (c) The VOC and/or HAP weight content as well as a description of the method used to determine the VOC and/or HAP content; and
- (d) The density (in pounds per gallon).

The permittee may utilize data supplied by either the manufacturer, an analysis of the VOC and/or HAP content by an applicable test method (i.e. EPA Test Method 24, EPA Test Method 311, and/or an alternative EPA-approved test method), or assign a one hundred (100) percent VOC and/or HAP content (by weight) to the material.

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

- 5.3 For Emission Point AA-000 (Facility-Wide), the permittee shall calculate and record the total emission of VOCs, each individual HAP, and all HAPs in total in tons both on a monthly and rolling 12-month total basis.

Unless otherwise specified herein, the permittee shall maintain documentation on all reference data utilized to validate calculated emissions (e.g. operational data, the applicable

emission factors presented in the corresponding application, engineering judgement determinations, etc.).

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

- 5.4 For Emission Points AA-001, AA-002, AA-004, and AA-013, the permittee shall perform an inspection of each control device on a monthly basis. If any problem is noted during an inspection, the permittee shall conduct the necessary maintenance activities to ensure operation of a control device as originally designed.

Additionally, preventative maintenance shall be performed as necessary to maintain proper operation of the control device and the permittee shall maintain on-hand at all times sufficient equipment necessary to repair the device.

The permittee shall maintain documentation that details the date / time each inspection is performed, any noted problem experienced, any maintenance (either corrective or preventative) performed to return a device to operation as originally designed, and periods of time (including the date and duration) in which a control device is non-operational.

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

- 5.5 For Emission Points AA-001, AA-002, and AA-004, the permittee shall monitor and record the differential pressure drop (in inches of water) across each control device weekly during active corresponding operations. If a monitored recording is outside the pressure drop range outlined by the manufacturer's specifications / recommendations, the permittee shall perform and record the necessary maintenance to return the control device to normal operation.

Additionally, the permittee shall maintain documentation for each control device that details the recommended differential pressure drop range specified by the respective manufacturer.

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

- 5.6 For Emission Points AB-001, AB-02 and AB-003, the permittee shall record and maintain the volume (in cubic feet or gallons) of each fuel combusted during each calendar month.

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

- 5.7 For Emission Point AB-004, AB-005, and AB-008, the permittee shall monitor and record (via a non-resettable hour meter) the hours of operation for the engine on a monthly basis for both emergency and non-emergency service. Additionally, the permittee shall detail (in writing) and maintain what classified each occurrence as either an emergency or a non-emergency.

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

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

(Ref.: 40 CFR 60.4237 and 40 CFR 60.4245(b); Subpart JJJJ)

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

5.8 For Emission Points AB-004 and AB-008, the permittee maintain records that detail the following information:

- (a) All notifications submitted to comply with either Subpart IIII or Subpart JJJJ (including all documentation that supports a notification);
- (b) Any maintenance conducted on an engine; and
- (c) Documentation from the manufacturer that an engine is certified to meet the respective emission standards specified in Condition 3.13 or 3.16 (as applicable).

(Ref.: 40 CFR 60.4214(a)(2); Subpart IIII and 40 CFR 60.4245(a); Subpart JJJJ)

5.9 For Emission Point AB-004, if the permittee does not operate and maintain the engine in accordance with the manufacturer's emission-related written instructions or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee shall demonstrate compliance with the emission standards specified in Condition 3.13 through the following actions:

- (a) Keep a maintenance plan;
- (b) Maintain records of conducted maintenance;
- (c) Maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions (to the extent practicable); and
- (d) Conduct an initial performance test in accordance with 40 CFR 60.4244, Subpart JJJJ within one (1) year of engine start-up.

(Ref.: 40 CFR 60.4243(a)(2)(ii); Subpart JJJJ)

5.10 For Emission Point AB-005, the permittee shall maintain documentation that contains the following information:

- (a) A copy of each notification and report submitted to comply with Subpart ZZZZ (including all supporting documentation);
- (b) Records on the occurrence and duration of each malfunction of the engine or monitoring equipment;
- (c) Records on all required maintenance performed on the air pollution control and monitoring equipment;

- (d) Records on the actions taken during periods of malfunction to minimize emissions, including corrective actions taken to restore equipment to its normal and usual manner of operation; and
- (e) Records of all maintenance done on each engine in order to demonstrate that the engine was operated and maintained in accordance with either the manufacturer's emission-related written instructions or the site-specific maintenance plan

(Ref.: 40 CFR 63.6655(a)(1), (2), (4), (5), and (e)(2); Subpart ZZZZ)

5.11 For Emission Point AB-008, if the permittee does not operate and maintain the engine according to the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee shall demonstrate compliance through the following actions:

- (a) Keep a maintenance plan and records of conducted maintenance and must (to the extent practicable) maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions; and
- (b) Conduct an initial performance test to demonstrate compliance with the applicable emission standards within one (1) year of start-up, or within one (1) year after each engine is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after the permittee changes emission-related settings in a way that is not permitted by the manufacturer.

(Ref.: 40 CFR 60.4211(g)(2); Subpart IIII)

5.12 For Emission Points AC-003 and AC-004, the permittee shall monitor the quantity (in gallons) of mouth waterproofing compound used for each unit on a monthly basis.

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

SECTION 6 REPORTING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Reporting Requirement
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	Report Permit Deviations Within Five (5) Working Days
		6.2	Submit a Certified Annual Monitoring Report
		6.3	All Documents Submitted to the MDEQ Shall Be Certified by a Responsible Official

- 6.1 Except as otherwise specified herein, the permittee shall report any deviation (defined as, any exceedance that does not meet the applicable limitation or standard detected by monitoring or recordkeeping data) from applicable requirements associated with any malfunction or breakdown of process, fuel burning, or emissions control equipment, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. The report shall be made within five (5) working days of the time the deviation began.

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

- 6.2 For Emission Point AA-000 (Facility-Wide), except as otherwise specified herein, the permittee shall submit a certified annual monitoring report (AMR) postmarked no later than January 31 of each year for the preceding calendar year. This report shall address any required monitoring specified in Section 6 of this permit. All instances of deviations from permit requirements must be clearly identified in the report. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration.

The AMR shall contain the following information (at minimum):

- (a) The total emission of VOCs, each individual HAP, and all HAPs in total in tons based on a monthly and rolling 12-month total basis (including the supporting documentation used to determine emissions);
- (b) For each coating, adhesive, solvent, or other material that contains a volatile organic compound (VOC) or hazardous air pollutant (HAP) used:
 - (i) The product name or identification;
 - (ii) The VOC and/or HAP content; and
 - (iii) The total quantity (in gallons) used both on a monthly and rolling 12-month basis.

- (c) For Emission Points AA-001, AA-002, AA-004, and AA-013, any maintenance action(s) performed on an air pollution control device and any periods of time (including the date and duration) in which a control device has malfunctioned;
- (d) For Emission Points AB-004, AB-005, and AB-008, the total hours of operation for each engine as well as a report that details the following information:
 - (i) How many hours are spent for emergency operation and what classified the operation as an emergency; and
 - (ii) How many hours are spent for non-emergency operation and the reason for the non-emergency operation.

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

- 6.4 Any document required by this permit to be submitted to the MDEQ shall contain a certification signed by a responsible official stating 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. 2.2.B(11).)