

**STATE OF MISSISSIPPI
AND FEDERALLY ENFORCEABLE
AIR POLLUTION CONTROL
PERMIT**

**TO OPERATE AIR EMISSIONS EQUIPMENT AT A
SYNTHETIC MINOR SOURCE**

THIS CERTIFIES THAT

ADLAM Films, LLC
62 County Road 520
Shannon, Lee 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: April 21, 2022

Modified: [DATE]

Permit No.: 1540-00136

Effective Date: As Specified Herein.

Expires: March 31, 2027

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-100	Facility-Wide (ADLAM Films, Inc.)
AA-001a	2.5 MMBTU / Hour Natural Gas-Fired Extrusion Laminator Primer Dryer No. 1
AA-001b	2.5 MMBTU / Hour Natural Gas-Fired Extrusion Laminator Primer Dryer No. 2
AA-003	2.976 MMBTU / Hour Natural Gas-Fired Regenerative Thermal Oxidizer (RTO) [controls emissions from Emission Points AA-003a, AA-003b, AA-003c, and AA-003d]
AA-003a	1.2 MMBTU / Hour Natural Gas-Fired Water- and/or Solvent-Based Ink Press Dryer No. 1
AA-003b	1.2 MMBTU / Hour Natural Gas-Fired Water- and/or Solvent-Based Ink Press Dryer No. 2
AA-003c	1.36 MMBTU / Hour Natural Gas-Fired Water- and/or Solvent-Based Ink Press Dryer System
AA-003d	0.682 MMBTU / Hour Natural Gas-Fired Water- and/or Solvent-Based Ink Press Bridge Dryer System
AA-004	2.4 MMBTU / Hour Natural Gas-Fired Extrusion Laminator with Dryer

SECTION 3 EMISSION LIMITATIONS AND STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limitation / Standard
AA-100	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.1	Opacity	40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.D.(1)(a).	3.2	PM	0.6 lb. / MMBTU
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). (Title V Avoidance Limit)	3.3	VOCs	99.0 tpy (Rolling 12-Month Total)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). (Major Source Avoidance Limits)	3.4	HAPs	9.90 tpy (Individual) 24.90 tpy (Total) (Rolling 12-Month Totals)
AA-003	11 Miss. Admin Code Pt. 2, R. 2.2.B.(10).	3.5	VOCs	95.0% Destruction Removal Efficiency (DRE)
		3.6		Maintain Minimum Combustion Temperature (3-Hour Block Average)
AA-003a through AA-003d	11 Miss. Admin Code Pt. 2, R. 2.2.B.(10).	3.7	Capture Efficiency	Maintain the Appropriate Operating Parameter Value (or Range of Values) for Each Capture System
		3.8	VOCs	Operational Requirement (RTO)

3.1 For Emission Point AA-100 (Facility-Wide), the permittee shall not cause or allow the discharge into the ambient air from any point source emissions or any air contaminant of such opacity as to obscure an observer’s view to a degree in excess of forty (40) percent opacity. This shall not apply to vision obscuration caused by uncombined water droplets.

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

3.2 For Emission Point AA-100 (Facility-Wide), 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 capacity 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).)

3.3 For Emission Point AA-100 (Facility-Wide), the permittee shall limit the emission of volatile organic compounds (VOCs) to no more than 99.0 tons per year (tpy) based on a rolling 12-month period.

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

- 3.4 For Emission Point AA-100 (Facility-Wide), the permittee shall limit the emission of hazardous air pollutants (HAPs) to no more than 9.90 tpy for each individual HAP and no more than 24.90 tpy for all HAPs combined based on a rolling 12-month total.

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

- 3.5 For Emission Point AA-003, the permittee shall operate the thermal oxidizer in such a manner as to achieve (at a minimum) ninety-five (95.0) percent destruction removal efficiency of VOCs across the control device.

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

- 3.6 For Emission Point AA-003, except during periods of start-up and shutdown, the permittee shall maintain the average combustion temperature in any 3-hour period at or above the combustion temperature limit established in accordance with Condition 5.3(b).

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

- 3.7 For Emission Point AA-003a through AA-003d, the permittee shall maintain an operating parameter value [or range of values – specified in Condition 5.7(c)] for the emissions capture system that represents the conditions indicative of proper operation and maintenance of the capture system.

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

- 3.8 For Emission Point AA-003a through AA-003d, the permittee shall direct emissions to the thermal oxidizer (Emission Point AA-003) at all times. In the event that the thermal oxidizer malfunctions or operates below the established operating limit, the permittee shall cease active operation of the applicable dryer systems until such time when the thermal oxidizer is operating in accordance with Condition 3.6.

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

SECTION 4
WORK PRACTICE STANDARDS

THIS SECTION WAS INTENTIONALLY LEFT BLANK SINCE NO WORK PRACTICE
STANDARDS APPLY TO THIS PERMIT ACTION.

SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter	Monitoring / Recordkeeping Requirement
AA-100 (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	Calculate Emissions (Monthly and Rolling 12-Month Total)
AA-003	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.3	Destruction Efficiency	Conduct Routine Performance Testing
			Combustion Temperature	Establish a Minimum Operating Limit
		5.4	Combustion Temperature	Monitor the Combustion Temperature (3-Hour Block Average)
		5.5		Operational Requirements
AA-003a through AA-003d	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.6	Capture Efficiency	Determine for Each Emissions Capture System
		5.7		Develop and Maintain a Capture System Monitoring Plan

5.1 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-100 (Facility-Wide), the permittee shall demonstrate compliance with emission limits specified in Conditions 3.3 and 3.4 by calculating and recording the total emission of volatile organic compounds (VOCs), each individual HAP, and all HAPs combined from all sources that can reasonably emit the pollutant(s) in tons both on a monthly and rolling 12-month total basis.

Unless otherwise specified herein, the permittee shall include all reference data used to validate calculated emissions from each source (e.g. operational data, applicable emission factors, engineering judgement determinations, performance testing results, etc.).

For each coating, solvent, or other VOC- / HAP-containing material used, the permittee shall maintain the following information:

- (a) The product name or identification;
- (b) The quantity used (in gallons or pounds) used on a monthly basis;
- (c) The total VOC / HAP content (by percent weight);
- (d) The density (in pounds per gallon);
- (e) The amount (in gallons) of each solvent recovered on a monthly basis;
- (f) The permittee shall calculate the VOC / HAP emissions from the use of these materials on a monthly basis and shall determine VOC / HAP emissions on a rolling 12-month total basis (i.e. “ T_u ”). VOC / HAP emissions may be reduced using the following equation to account for operation of the thermal oxidizer and recovery of spent solvent:

$$E_a = T_u \left(1 - \left(\frac{DRE}{100} \right) \left(\sum_{i=1} \frac{CE_i}{100} \right) \right) - T_R$$

Where:

- E_a the actual VOC emission rate, individual HAP emission rate, or total HAP emission rate (in tons per year) based on a rolling 12-month total;
- T_u the total VOC usage rate, individual HAP usage rate, or total HAP usage rate (in tons per year) based on a rolling 12-month total;
- DRE the most recently demonstrated VOC destruction removal efficiency, (in percent).
- CE_i the capture efficiency of the emissions capture system attributed to solvent-based ink press dryer system, i , (in percent);
- T_R the total VOC mass emission rate, individual HAP mass emission rate, or total HAP emission rate (in tons per year) from recovered solvent

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

5.3 For Emission Point AA-003, the permittee shall determine and maintain the following information:

- (a) ***Destruction removal efficiency:*** The permittee shall demonstrate compliance with the destruction removal efficiency limitation specified in Condition 3.5 by conducting a routine performance test once every five (5) years [not to exceed sixty

(60) months after the previously completed test] in accordance with the following specifications:

- (1) The permittee shall conduct a minimum of three (3) separate test runs for a performance stack test as specified in 40 CFR 63.7(e)(3); Subpart A.
- (2) Each test run shall be performed such that the inlet and outlet of the thermal oxidizer is evaluated simultaneously in accordance with the specifications outlined in the applicable test method.
- (3) All performance testing shall be conducted in accordance with the applicable EPA-approved test method or an alternative test methods approved by the EPA prior to the test event.
- (4) The permittee shall conduct each performance test under representative operating conditions. Operations during periods of start-up, shutdown, or non-operation do not constitute representative conditions for the purpose of a performance test. Moreover, the permittee may not conduct a performance test during periods of malfunction. The permittee shall record and maintain all applicable process information that is necessary to document operating conditions during a test (i.e. how many solvent-based ink press dryer systems are operating) and explain why the conditions represent normal operation.

- (b) **Operating Limit:** The permittee shall establish a minimum combustion temperature as the operating limit based on the average temperature measured over the span of a corresponding performance test required by paragraph (a) of this condition [i.e. once every fifteen (15) minutes during each of the three (3) test runs].

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

- 5.4 For Emission Point AA-003, the permittee shall demonstrate continuous compliance with the operating limit specified in Condition 3.6(a) by monitoring and recording the combustion chamber temperature within the thermal oxidizer (in degrees Fahrenheit) based on a 3-hour block average.

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

- 5.5 For Emission Point AA-003, the permittee shall install, calibrate, maintain, and operate temperature monitoring equipment in accordance with the manufacturer's specifications.

Additionally, the permittee shall maintain documentation that details the manufacturer's specifications, including any applicable calibration protocol and frequencies.

The permittee shall replace the equipment either if it is chosen not to perform the calibration or if the equipment cannot be calibrated properly. Each temperature monitoring device must be equipped with a continuous recorder.

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

5.6 For Emission Points AA-003a through AA-003d, the permittee shall initially evaluate the capture efficiency of each emissions capture system by utilizing one (1) of the methods specified herein no later than July 31, 2023. Thereafter, the permittee shall conduct a subsequent evaluation once every five (5) years [not to exceed sixty (60) months after the previously completed test]. Additionally, the permittee shall maintain all applicable information.

- (a) For an enclosure that meets the criteria for a permanent total enclosure (PTE), the permittee may assume it achieves 100% capture efficiency.

However, the permittee must confirm that the capture system is a PTE by demonstrating that it meets the requirements outlined in Section 6 of EPA Test Method 204 (or an EPA-approved alternative method) and that all exhaust gases from the enclosure are delivered to the thermal oxidizer.

- (b) The permittee may determine the capture efficiency in accordance with the protocols for testing with temporary total enclosures specified in EPA Test Methods 204A through F.
- (c) The permittee may use any capture efficiency protocol and test methods that satisfy the criteria of either the “Data Quality Objective” or the “Lower Confidence Limit” approach as described in Appendix A of 40 CFR Part 63, Subpart KK – National Emission Standards for the Printing and Publishing Industry. However, the permittee may exclude never-controlled work-stations from such capture efficiency determinations.

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

5.7 For Emission Points AA-003a through AA-003d, the permittee shall demonstrate compliance with the operating limit specified in Condition 3.7 by developing, implementing, and maintaining a Capture System Monitoring Plan (CSMP) for each dryer system that identifies the following information:

- (a) The operating parameter to be monitored to ensure the capture efficiency determined by Condition 5.6;
- (b) The explanation as to why the specified parameter is appropriate for demonstrating on-going compliance;
- (c) The operating limit(s) for the capture system; and
- (d) The specific monitoring procedures.

As deemed necessary, the permittee shall revise the capture system monitoring plan to address changes to applicable operations and/or to incorporate additional best management practices.

(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
AA-100 (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
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.4	Submit an Annual Monitoring Report on Emissions and Deviations (As Applicable)
AA-003 AA-003a through AA-003d	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11) and 2.6.B.(5).	6.5	Submit a Written Performance Testing Protocol
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.6	Submit Performance Test Results
AA-003a through AA-003d	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.7	Submit the Capture System Monitoring Plan

6.1 For Emission Point AA-100 (Facility-Wide), 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. 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 Except as otherwise specified herein, the permittee shall submit a certified annual monitoring report 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.

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

6.3 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).)

- 6.4 For Emission Point AA-100 (Facility-Wide), the permittee shall submit an annual monitoring report (AMR) in accordance with Condition 6.2 that details the following information:
- (a) The total emission of VOCs, each individual HAP, and all HAPs combined on both a monthly and rolling 12-month total basis as well as a report that includes all reference data (e.g. operational data, engineering judgement determinations, performance test results, etc.);
 - (b) A statement that there were no deviations from the operating limits established in accordance with Conditions 3.6 and 3.7 during the reporting period;
 - (c) For each deviation of an operating limit, the report shall include the following information:
 - (1) The number, date, time, duration, and cause of each deviation from the applicable operating limit established in accordance with Condition 3.6 or 3.7 (including an unknown cause – if applicable), and any corrective actions taken; and
 - (2) The total operating time of either all dryer systems (for a deviation of the minimum combustion temperature) or the applicable dryer system (for a deviation of an operating parameter value for the capture system) during the reporting period.
 - (d) Any revisions made to the capture system monitoring plan during the reporting period.

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

- 6.5 For Emission Points AA-003 and AA-003a through AA-003d, the permittee shall submit a written protocol for any testing required by Condition 5.3(a) or 5.6 that details the procedures and test methods to be implemented during the actual test event no later than thirty (30) days prior to the intended test date.

The permittee shall notify the MDEQ in writing at least ten (10) days prior to the intended test date so that a representative from the MDEQ may be afforded the opportunity to observe the performance test / evaluation.

If deemed necessary by the MDEQ, a conference may be required prior to the intended test date to discuss the proposed test methods and procedures outlined in the testing protocol.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11) and R. 2.6.B.(5).)

- 6.6 For Emission Points AA-003 and AA-003a through AA-003d, the permittee shall submit the results for any test / evaluation required by Condition 5.3(a) or 5.6 no later than sixty (60) days after completing the testing event. Additionally, the report shall include the information specified in Condition 1.B.5.

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

- 6.7 For Emission Points AA-003a through AA-003d, the permittee shall submit the initial Capture System Monitoring Plan (CSMP) required by Condition 5.7 no later than sixty (60) days after completing the initial capture efficiency evaluation specified in Condition 5.6.

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