

# STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

## THIS CERTIFIES THAT

Owl's Head Alloys  
535 Industrial Access Road  
West Point, Mississippi  
Clay County

has been granted permission to construct air emissions equipment to comply with the emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with 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.

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

\_\_\_\_\_  
**AUTHORIZED SIGNATURE**  
**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

Issued: \_\_\_\_\_

Permit No.: 0480-00041

## SECTION 1. GENERAL CONDITIONS

- 1.1 This permit is for air pollution control purposes only.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
- 1.1 Any activities not identified in the application are not authorized by this permit.  
(Ref.: Miss. Code Ann. 49-17-29(1)(b))
- 1.2 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 operating without a valid permit pursuant to State Law.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
- 1.3 It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(6).)
- 1.4 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).)
- 1.5 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 the 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).)
- 1.6 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).)
- 1.7 The permit does not convey any property rights of any sort, or any exclusive privilege.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)
- 1.8 The permittee shall furnish to the Department of Environmental Quality (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 permit or, for information claimed to be confidential, the permittee shall furnish such records to the 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. 2.2.B(15)(d).)

- 1.9 *Design and Construction Requirements:* The stationary source shall be designed and constructed so as to operate without causing a violation of an Applicable Rules and Regulations, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards, and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A(1)-(3).)

- 1.10 The necessary facilities shall be constructed to prevent any wastes or other products or substances to be placed in a location where they are likely to cause pollution of the air or waters of the State without the proper environmental permits.

(Ref.: Miss. Code Ann. 49-17-29(1) and (2))

- 1.11 *Fugitive Dust Emissions from Construction Activities:* The construction of the stationary source shall be performed in such a manner so as to reduce fugitive dust emissions from construction activities to a minimum.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A(4).)

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

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

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

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

- 1.13 *Right of Entry:* The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives upon presentation of credentials:
- (a) To enter at reasonable times 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) 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 contaminants or waste waters, fuel, process material, or other material which affects or may affect emission of air contaminants from any source.
- (Ref.: Miss. Code Ann. 49-17-21)
- 1.14 *Permit Modification or Revocation:* After notice and opportunity for a hearing, the Permit Board may modify the permit or revoke it in whole or in part for good cause shown including, but not limited to:
- (a) Persistent violation of any of the 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.)
- 1.15 *Public Record and Confidential Information:* 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)
- 1.16 *Permit Transfer:* This permit shall not be transferred except upon approval of the Permit Board.
- (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B.)
- 1.17 *Severability:* The provisions of this permit are severable. If any provision of the permit, or the application of any provision of the 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).)

- 1.18 *Permit Expiration:* The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance, if construction is suspended for eighteen (18) months or more, or if construction is not completed within a reasonable time. The DEQ may extend the 18-month period upon a satisfactory showing that an extension is justified.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1)., R. 2.5.C(4)., and R. 5.2.)
- 1.19 *Certification of Construction:* A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(3).)
- 1.20 *Beginning Operation:* After certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by 11 Miss. Admin. Code Pt. 2, R. 2.13.G.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).)
- 1.21 *Application for a Permit to Operate:* The application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).)
- 1.22 *Operating Under a Permit to Construct:* Upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).)
- 1.23 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 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 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 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 11 Miss. Admin. Code Pt. 2, R. 1.2., occurs during startup or shutdown, see the upset requirements above.

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

1.24 *General Duty:* All air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants.

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

1.25 *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 or 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).)



**SECTION 2. EMISSION POINT DESCRIPTION**

The permittee is authorized to construct and operate, upon certification of construction, air emissions equipment, as described in the following table.

| Emission Point | Description  |
|----------------|--|
| AA-000         | Facility-Wide [Owl's Head Alloys]  |
| AA-001         | 30.0 MMBTU / hr Natural Gas-Fired Rotary Furnace #1 [equipped with a lime-injected baghouse] |
| AA-002         | 20.0 MMBTU / hr Natural Gas-Fired Rotary Furnace #2 [equipped with a lime-injected baghouse] |
| AA-003         | 30.0 MMBTU / hr Natural Gas-Fired Rotary Furnace #3 [equipped with a lime-injected baghouse] |
| AA-004         | Salt Cake Transfer and Storage [equipped with a baghouse]                                    |
| AA-005         | Scrap and Dross Transfer and Storage   |
| AA-006         | Flux Transfer and Storage  |
| AA-007         | Nine (9) Crucible Preheating Stations [total heat input: 18.0 MMBTU / hr]                    |
| AA-008         | Two (2) Crucible Cleaning Stations [total heat input: 4 MMBTU / hr]                          |
| AA-009         | 4,000 Gallon Diesel Storage Tank and Refueling Station                                       |
| AA-010         | Unpaved Storage Yards  |



**SECTION 3. EMISSION LIMITATIONS AND STANDARDS**

| Emission Point                                 | Applicable Requirement   | Condition Number(s) | Pollutant/Parameter  | Limitation/Standard              |
|--|--|---------------------|--|----------------------------------|
| AA-000<br>(Facility-Wide)                      | 11 Miss. Admin. Code Pt. 2, R. 1.3.A.                                  | 3.1                 | Opacity<br>(Smoke)   | ≤ 40%                            |
|  | 11 Miss. Admin. Code Pt. 2, R. 1.3.B.                                  | 3.2                 | Opacity  | ≤ 40%                            |
|  | 11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).                               | 3.3                 | PM (filterable)  | $E = 4.1 \cdot (p^{0.67})$       |
| AA-001<br>AA-002<br>AA-003<br>AA-007           | 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).                            | 3.4                 | PM (filterable)  | $E = 0.8808 \cdot (I^{-0.1667})$ |
| AA-001<br>AA-002<br>AA-003<br>AA-007<br>AA-008 | 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).                               | 3.5                 | SO <sub>2</sub>  | 4.8 lb. / MMBTU Heat Input       |
| AA-001<br>AA-002<br>AA-003                     | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).                              | 3.6                 | HAP  | Emission Control Requirement     |
| AA-001<br>AA-002<br>AA-003                     | 40 CFR Part 63, Subpart RRR – NESHAP for Secondary Aluminum Production | 3.7                 | PM   | General Applicability            |
|  | 40 CFR 63.1500(a), (b)(8), 63.1501(e), and 63.1505(a); Subpart RRR     |                     | D / F  |                                  |
|  | 40 CFR 63.1505(i)(1), (i)(3), (i)(4), and (i)(6); Subpart RRR          | 3.8                 | HF   |                                  |
|  |  |                     | HCl  |                                  |
|  |  |                     | HCl  |                                  |
| 40 CFR 63.1505(k)(1) – (4); Subpart RRR        | 3.9  | PM<br>HCl<br>D / F  | Commonly-Ducted Emission Limits (3-Day, 24-Hour Rolling Average) |                                  |
| AA-008   | 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).                            | 3.10                | PM (filterable only)   | 0.6 lbs / MMBTU                  |

3.1 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 (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 (1) hour.

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

3.2 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 3.1. This shall not apply to vision obscuration caused by uncombined water droplets.

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

3.3 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).)

3.4 For Emission Points AA-001, AA-002, AA-003, and AA-007, emissions of ash and/or particulate matter (PM) from any fossil fuel burning installation of 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 following 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. 1.3.D(1)(b).)

- 3.5 For Emission Point AA-001, AA-002, AA-003, AA-007, and AA-008, except as otherwise specified or limited herein, 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 or SO<sub>2</sub>) per MMBTU heat input.

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

- 3.6 For Emission Points AA-001, AA-002, and AA-003, the permittee shall operate the lime-injected baghouses at all times the furnaces are in operation.

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

- 3.7 For Emission Points AA-001, AA-002, and AA-003, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 63, Subpart RRR – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Secondary Aluminum Production and 40 CFR Part 63, Subpart A – General Provisions.

This subpart applies to each new and existing secondary aluminum process unit. Emission Points AA-001, AA-002, and AA-003 are new secondary aluminum process units that shall comply with all applicable requirements of 40 CFR 63, Subpart RRR upon Startup.

Emission Points AA-001, AA-002, and AA-003 shall comply at all times with each applicable limit, including periods of startup and shutdown. Table 1 of Subpart RRR summarizes the emission standards for each type of source.

(Ref.: 40 CFR 63.1500(a), (b)(8), 63.1501(e), 63.1505(a), and Table 1; Subpart RRR)

- 3.8 For Emission Points AA-001, AA-002, and AA-003, the permittee shall comply with the following emission standards for a Group 1 Furnace that is not an only clean charge:
- (a) 0.20 kg of PM per Mg (0.40 lb of PM per ton) of feed / charge;
  - (b) 15 µg of D / F TEQ per Mg (2.1 x 10<sup>-4</sup> gr of D / F TEQ per ton) of feed / charge;
  - (c) 0.20 kg of HF per Mg (0.40 lb of HF per ton) of feed / charge;
  - (d) 0.20 kg of HCl per Mg (0.40 lb of HCl per ton) of feed / charge, if uncontrolled, or
  - (e) Ten (10) percent of the uncontrolled HCl emissions, by weight, for a group 1 furnace

Additionally, the permittee may determine the emission standards for a secondary aluminum processing unit (SAPU) by applying the group 1 furnace limits on the basis of the aluminum production weight in each group 1 furnace, rather than on the basis of feed / charge.

(Ref.: 40 CFR 63.1505(i)(1), (i)(3), (i)(4), and (i)(6); Subpart RRR)

3.9 For Emission Points AA-001, AA-002, and AA-003, the permittee shall comply with the following limits for each secondary aluminum unit as calculated by the corresponding equations on a 3-day, 24-hour rolling average basis:

(a) For Particulate Matter (PM):

$$L_{C,PM} = \frac{\sum_{i=1}^n [(L_{t,i}(PM))(T_{t,i})]}{\sum_{i=1}^n (T_{t,i})}$$

Where:

$L_{C,PM}$  = The daily PM emission limit for a secondary aluminum processing unit to be used to calculate the 3-day, 24-hour PM emission limit, in pounds per ton of feed / charge;

$L_{t,i}(PM)$  = The PM emission limit specified in Condition 3.8(a) or 3.8(b) (as applicable) for unit “i”, in pounds per ton of feed / charge; and

$T_{t,i}$  = The mass of feed / charge for twenty-four (24) hours for unit “i”; and

$n$  = The number of units in the secondary aluminum processing unit.

(b) For Hydrogen Chloride (HCl) or Hydrogen Fluoride (HF):

$$L_{C,HCl} = \frac{\sum_{i=1}^n [(L_{t,i}(HCl))(T_{t,i})]}{\sum_{i=1}^n (T_{t,i})}$$

Where:

$L_{C,HCl/HF}$  = The daily HCl emission limit for a secondary aluminum process to be used to calculate the 3-day, 24-hour HCl emission limit, in pounds per ton of feed / charge;

$L_{t,i}(HCl/HF)$  = The HCl emission limit specified in Condition 3.8(c) or Condition 3.9(a) (as applicable) for unit “i”, in pounds per ton of feed / charge; and

$T_{t,i}$  = The mass of feed / charge for twenty-four (24) hours for unit “i”; and

$n$  = The number of units in the secondary aluminum processing unit.

(c) For Dioxins and Furans (D/F):

$$L_{C,D/F} = \frac{\sum_{i=1}^n [(L_{t,i(D/F)})(T_{t,i})]}{\sum_{i=1}^n (T_{t,i})}$$

Where:

$L_{C,D/F}$  = The daily D/F emission limit for a secondary aluminum process to be used to calculate the 3-day, 24-hour D/F emission limit, in pounds per ton of feed / charge;

$L_{t,i(D/F)}$  = The D/F emission limit specified in Condition 3.8(b) (as applicable) for unit “*i*”, in pounds per ton of feed / charge; and

$T_{t,i}$  = The mass of feed / charge for twenty-four (24) hours for unit “*i*”; and

$n$  = The number of units in the secondary aluminum process.

In lieu of complying with the limits calculated by the specified equations, the permittee may comply with the emission limits specified in Condition 3.8(a) – (c) (as applicable) for each individual process unit.

(Ref.: 40 CFR 63.1505(k)(1) – (4); Subpart RRR)

- 3.10 For Emission Point AA-008, the maximum permissible emission of ash and/or particulate matter (PM) from any fossil fuel burning installation 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).)

**SECTION 4. WORK PRACTICES**

| Emission Point             | Applicable Requirement                    | Condition Number(s) | Work Practice                            |
|----------------------------|---|---------------------|--|
| AA-000                     | 40 CFR 63.1506(a)(4); Subpart RRR         | 4.1                 | Table 2 Operational Requirements         |
|                            | 40 CFR 63.1506(a)(5); Subpart RRR         | 4.2                 | General Duty Clause (As Applicable)      |
| AA-001<br>AA-002<br>AA-003 | 40 CFR 63.1506(b)(1) and (2); Subpart RRR | 4.3                 | Post and Maintain Adequate Labeling      |
|                            | 40 CFR 63.1506(d)(1) and (2); Subpart RRR | 4.4                 | Feed / Charge Operational Requirements   |
|                            | 40 CFR 63.1506 (m)(1) – (5); Subpart RRR  | 4.5                 | Operational Requirements (As Applicable) |
|                            | 40 CFR 63.1506(p); Subpart RRR            | 4.6                 | Free-Flowing Lime Corrective Actions     |

4.1 For Emission Point AA-000 (Facility-Wide), the permittee shall comply with all the applicable requirements of Table 2 to Subpart RRR.

(Ref.: 40 CFR 63.1506(a)(4); Subpart RRR)

4.2 For Emission Point AA-000 (Facility-Wide), as applicable, the permittee shall at all times operate and maintain each applicable unit (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 permittee shall determine and implement safety and good air pollution control practices based on the information available to the MDEQ, which may include (but is not limited to) monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and the inspection of the applicable unit.

(Ref.: 40 CFR 63.1506(a)(5); Subpart RRR)

4.3 For Emission Points AA-001, AA-002, and AA-003, the permittee shall post and maintain an easily visible label on each “group 1 furnace” (i.e. the melting furnace):

- (a) The type of unit;
- (b) The applicable emission limits and corresponding means of compliance;
- (c) The applicable operational standard(s) and control method(s) (i.e. work practice or control device) that shall include (but is not limited to) the following information:
  - (1) The type of charge to be used for a furnace (e.g. clean scrap only, all scrap, etc.);
  - (2) The flux materials and addition practices; and

- (3) The applicable operating parameter ranges and requirements as incorporated in the Operations, Maintenance, and Monitoring (OM&M) Plan required by Condition 5.3.

(Ref.: 40 CFR 63.1506(b)(1) and (2); Subpart RRR)

4.4 For Emission Points AA-001, AA-002, and AA-003, the permittee shall comply with the following feed / charge operational requirements:

- (a) The permittee shall install and operate a device that measures and records or otherwise determine the weight of feed / charge (or throughput) for each operating cycle or time period used in the performance test required by Condition 5.15; and
- (b) The permittee shall operate each weight measurement system or other weight determination procedure in accordance with the Operations, Maintenance, and Monitoring (OM&M) Plan required by Condition 5.3.

(Ref.: 40 CFR 63.1506(d)(1) and (2); Subpart RRR)

4.5 For Emission Points AA-001, AA-002, and AA-003, the permittee shall comply with the following operational requirements (as applicable):

- (a) If a bag leak detection system is used to meet the monitoring requirements:
  - (1) The permittee shall both initiate corrective action within one (1) hour of an alarm and complete the corrective action in accordance with the OM&M Plan required in Condition 5.3.
  - (2) The permittee shall operate the baghouse in such a manner that the bag leak detection system alarm does not sound more than five (5) percent of the operating time during a 6-month reporting period.

In calculating this operating time fraction, the permittee does not have to count an alarm time if the corresponding inspection of the baghouse demonstrates that no corrective action is required. However, if corrective action is required, each alarm shall be counted as a minimum of one (1) hour.

If the permittee takes longer than one (1) hour to initiate corrective action, the alarm time shall be counted as the actual amount of time taken by the permittee to initiate corrective action.

- (b) If a continuous opacity monitoring system (COMS) is used to meet the monitoring requirements, the permittee shall both initiate corrective action within one (1) hour of any 6-minute average reading of at least five (5) percent and complete the corrective action in accordance with the OM&M Plan required by Condition 5.3.



- (c) The permittee shall maintain the 3-hour block average inlet temperature to each baghouse at or below the average temperature established in accordance with Condition 5.16(d) plus 25°F.
- (d) The permittee shall maintain the total reactive chlorine flux injection rate for each operating cycle or time period used in the performance test at or below the average rate established in accordance with Condition 5.15 (40 CFR 63.1512(o); Subpart RRR).
- (e) The operation of capture/collection systems and control devices associated with natural gas-fired, propane-fired or electrically heated group 1 furnaces that will be idled for at least 24 hours after the furnace cycle has been completed may be temporarily stopped. Operation of these capture/collection systems and control devices must be restarted before feed/charge, flux or alloying materials are added to the furnace.

(Ref.: 40 CFR 63.1506(m)(1 – 5 and 7); Subpart RRR)

- 4.6 For Emission Points AA-001, AA-002. And AA-003, the permittee shall both maintain free-flowing lime in the hopper to the feed device at all times and maintain the lime feeder setting at or above the level established in accordance with Condition 5.15(e). A corrective action must restore operation of the unit(s) [including the control device] to its normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

Corrective actions taken must include follow-up actions necessary to return the process unit(s) or control device parameter level(s) to the value or range of values established during the most recently completed performance test and steps to prevent the likely recurrence of the cause of a deviation.

(Ref.: 40 CFR 63.1506(p); Subpart RRR)

**SECTION 5. MONITORING AND RECORDKEEPING REQUIREMENTS**

| <b>Emission Point</b>      | <b>Applicable Requirement</b>  | <b>Condition Number(s)</b> | <b>Pollutant/Parameter</b>                | <b>Monitoring/Recordkeeping Requirement</b>                                      |
|----------------------------|--|----------------------------|---|--|
| Facility-Wide              | 11 Miss. Admin. Code Pt. 2, R. 2.9.                                  | 5.1                        | Recordkeeping                             | Maintain Records for a Minimum of Five (5) Years                                 |
| AA-001<br>AA-002<br>AA-003 | 40 CFR 63.1510(a)(1 – 5), (7 – 9), (16), (18), and (19); Subpart RRR | 5.2                        | PM<br><br>D / F<br><br>HCl<br><br>Opacity | Monitoring Requirements  |
|                            | 40 CFR 63.1510(b) and 63.1510(s)(1) – (3); Subpart RRR               | 5.3                        |   | Prepare, Implement, and Maintain a Written OM&M Plan                             |
|                            | 40 CFR 63.1510(c); Subpart RRR                                       | 5.4                        |   | Inspect Labeling Monthly   |
|                            | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).                            |                            |   |  |
|                            | 40 CFR 63.1506(c) and 63.1510(d)(1) and (2); Subpart RRR             | 5.5                        |   | Install, Operate, and Maintain an Emissions Capture / Collection System          |
|                            | 40 CFR 63.1506(d); Subpart RRR                                       | 5.6                        |   | Install, Operate, and Maintain a Weight Measurement Device                       |
| AA-001<br>AA-002<br>AA-003 | 40 CFR 63.1510(e); Subpart RRR                                       | 5.7                        | Material Throughput                       | Measure the Total Weight of the Feed / Charge or Aluminum Production (Each Unit) |
| AA-001<br>AA-002<br>AA-003 | 40 CFR 63.1510(f)(1), (h), and (i); Subpart RRR                      | 5.8                        | PM<br><br>D / F<br><br>HCl<br><br>Opacity | Install, Maintain, and Operate Each Fabric Filter                                |
| AA-001<br>AA-002<br>AA-003 | 40 CFR 63.1510(j)(1) – (5); Subpart RRR                              | 5.9                        | Total Reactive Flux Injection Rate        | Install, Calibrate, Maintain, and Operate Injection System                       |
| AA-001<br>AA-002<br>AA-003 | 40 CFR 63.1510(t); Subpart RRR                                       | 5.10                       | PM<br><br>D / F<br><br>HCl<br><br>Opacity | Calculate 3-Day, 24-Hour Rolling Average for SAPU                                |
|                            | 40 CFR 63.1510(u); Subpart RRR                                       | 5.11                       |   | Alternative Compliance Demonstration   |
|                            | 40 CFR 63.1510(v); Subpart RRR                                       | 5.12                       |   | Alternative Monitoring Method for Lime Addition                                  |
|                            | 40 CFR 63.1510(w); Subpart RRR                                       | 5.13                       |   | Alternative Monitoring Methods   |
|                            | 40 CFR 63.1511(a) and (g)(5); Subpart RRR                            | 5.14                       |   | Prepare a Site-Specific Test Plan for Approval                                   |

| Emission Point             | Applicable Requirement  | Condition Number(s) | Pollutant/Parameter                              | Monitoring/Recordkeeping Requirement                |
|----------------------------|---|---------------------|--|---|
| AA-001<br>AA-002<br>AA-003 | 40 CFR 63.1511(b), (c), (e), (g) and 63.1513(d) – (f); Subpart RRR<br><br>11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).         | 5.15                | PM<br><br>D / F<br><br>HCl<br><br>Opacity        | Conduct Routine Performance Testing                 |
| AA-001<br>AA-002<br>AA-003 | 40 CFR 63.1512(d)(1), (j)(2), (k), (n), and (p); Subpart RRR  | 5.16                | Inlet Gas Temperature<br><br>Lime Injection Rate | Establish an Operating Limit                        |
| AA-001<br>AA-002<br>AA-003 | 40 CFR 63.1513(a – e); Subpart RRR  | 5.17                | PM<br><br>D / F<br><br>HCl                       | Equations for Determining Compliance                |
|                            | 40 CFR 63.1513(f); Subpart RRR  | 5.18                |  | Compliance During Startup and Shutdown              |
|                            | 40 CFR 63.1514; Subpart RRR   | 5.19                |  | Requirements for a Change of Furnace Classification |
| AA-001<br>AA-002<br>AA-003 | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).   | 5.20                | Total (Filterable + Condensable) PM<br><br>CO    | Conduct Performance Testing                         |
| AA-001<br>AA-002<br>AA-003 | 40 CFR 63.1517(a), (b)(1)(i) – (ii), (3), (4)(i) – (ii), (5) – (7), (13), (14), and (16) – (18), (19) and (20); Subpart RRR | 5.21                | PM<br><br>D / F<br><br>HCl<br><br>Opacity        | Recordkeeping Requirements                          |

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. Support information includes, but is not limited to, 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 DEQ as required by Applicable Rules and Regulations or this permit upon request.

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

5.2 For Emission Points AA-001, AA-002, and AA-003, the permittee shall monitor all control equipment and processes according to the requirements listed below:

- (a) The OM&M plan required in Condition 5.3;
- (b) The labeling requirements described in Condition 5.4 pertaining to group 1 furnaces processing other than clean charge;
- (c) The requirements for capture and collection described in Condition 5.5 for each controlled affected source;
- (d) The feed / weight monitoring requirements described in Condition 5.7 applicable to group 1 furnaces processing other than clean charge;
- (e) The bag leak detection system requirements described in Condition 5.8 applicable to all bag leak detection systems installed on fabric filters and lime injected fabric filters used to control each affected source;
- (f) The requirements for monitoring fabric filter inlet temperature described in Condition 5.8 for all lime injected fabric filters used to control group 1 furnaces processing other than clean charge;
- (g) The requirements for monitoring lime injection described in Condition 5.8 applicable to all lime injected fabric filters used to control emissions from group 1 furnaces processing other than clean charge;
- (h) The requirements for monitoring total reactive flux injection described in Condition 5.9 for all group 1 furnaces processing other than clean charge;
- (i) The requirements described in Condition 5.10 for secondary aluminum processing units limited to compliance with limits for emissions of D/F from group 1 furnaces processing other than clean charge;
- (j) The requirements described in Condition 5.12 for alternative lime addition monitoring methods applicable to lime-injected fabric filters used to control emissions from group 1 furnaces processing other than clean charge;
- (k) The requirements described in Condition 5.13 for approval of alternative methods for monitoring group 1 furnaces processing other than clean charge and associated control devices for the control of D/F emissions.

(Ref.: 40 CFR 63.1510(a)(1 – 5), (7 – 9), (16), (18), and (19); Subpart RRR)

5.3 For Emission Points AA-001, AA-002, and AA-003, the permittee shall prepare, implement, and maintain a written Operation, Maintenance, and Monitoring (OM&M) Plan that details the following information:

- (a) The process and control device parameters to be monitored for demonstrating compliance as well as the established operating value(s) or range(s) (as applicable) for each process and control device;

- (b) A monitoring schedule for each applicable unit;
- (c) The procedures for the proper operation and maintenance of each process unit and control device;
- (d) The procedures for the proper operation and maintenance of each monitoring device or system used to determine compliance with emission limits specified in Condition 3.8 [or Condition 3.9(a) – (c)]. The procedures shall also include the following information:
  - (1) The calibration and certification of accuracy of each monitoring device / system conducted at least once every six (6) months and in accordance with the manufacturer's instructions; and
  - (2) The procedures for the quality control and quality assurance of a continuous emission monitoring system or continuous opacity monitoring system (as required by the 40 CFR Part 63, Subpart A).
- (e) The procedures for the monitoring process and control device parameters [including lime injection rates, procedures for the annual inspection of afterburners and (if applicable) the procedure to be used for determining the charge / feed (or throughput) weight if a measurement device is not used];
- (f) The corrective actions to be taken when either the process / operating parameters or control device parameters deviate from the value(s) or range(s) specified in paragraph (a) of this condition. The permittee shall also outline the following information:
  - (1) The procedures for determining and recording both the cause of any deviation (or excursion) and the time in which a deviation (or excursion) begins and ends; and
  - (2) The procedures for recording the corrective action taken, the time the corrective action was initiated, and the date / time that the corrective action was completed.
- (g) A maintenance schedule for each process unit and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance;
- (h) Documentation on the work practice and pollution prevention measures used to achieve compliance with the emission limits specified in Condition 3.8 [or Condition 3.9(a) – (c)]; and
- (i) The procedures to be followed when changing furnace classifications under the specifications outlined in 40 CFR 63.1514; Subpart RRR.

- (j) For each secondary aluminum processing unit, the plan shall include the following information:
- (1) The identification of each process unit within the secondary aluminum processing unit;
  - (2) The specific control technology or pollution prevention measure to be used for each process unit within the secondary aluminum processing unit as well as the date of its installation or application;
  - (3) The emission limit calculated for each secondary aluminum processing unit and the performance test results with supporting calculations that demonstrate initial compliance with each applicable emission limit;
  - (4) The information and data that demonstrates compliance for each process unit with all applicable design, equipment, work practice, or operational standards promulgated by Subpart RRR; and
  - (5) The compliance-related procedures may not contain any of the following provisions:
    - (i) Any averaging among emissions of differing pollutants;
    - (ii) The inclusion of any process unit(s) other than the units found within the secondary aluminum processing unit;
    - (iii) The inclusion of any process unit while it is shutdown; or
    - (iv) The inclusion of any periods of start-up or shutdown in the emission calculations.
  - (6) To revise the SAPU compliance provisions within the OM&M plan prior to the end of the permit term, the permittee must submit a request to the MDEQ containing the information required by Condition 5.3.(j)(1)-(4) and obtain approval of the MDEQ prior to implementing any revisions.

If the permittee determines that any other revisions of the OM&M plan are necessary, such revisions will not become effective until the permittee submits a description of the changes and a revised plan that incorporates them. Additionally, if the MDEQ determines at any time after receipt of the OM&M Plan that any revisions to the plan are necessary to satisfy applicable requirements, the owner or operator must promptly make all necessary revisions and resubmit the revised plan.

(Ref.: 40 CFR 63.1510(b) and (s)(1) – (3); Subpart RRR)

- 5.4 For Emission Point AA-001, AA-002, and AA-003, the permittee shall inspect the labeling required by Condition 4.3 at least once per calendar month to confirm that the posted labels are intact and legible.

Additionally, the permittee shall maintain documentation that details the date / time of each inspection, the results of each inspection, and any corrective actions taken based on the results of inspection.

(Ref.: 40 CFR 63.1510(c); Subpart RRR and 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).)

5.5 For Emission Point AA-001, AA-002, and AA-003, the permittee shall install, operate, and maintain an emissions capture / collection system for each unit in accordance with the following requirements:

- (a) The permittee shall design and install the emissions capture / collection system to meet the engineering standards the minimum exhaust rates or facial inlet velocities as contained in the American Conference of Governmental Industrial Hygienists (ACGIH) guidelines.
- (b) The permittee shall vent captured emissions through a closed system with the exception being that dilution air may be added to an emission stream for the purpose of controlling the temperature at the inlet of the baghouse.
- (c) The permittee shall operate each emissions capture / collection system in accordance with the procedures and requirements outlined in the OM&M Plan required by Condition 5.3.
- (d) The permittee shall perform and record an inspection of each emissions capture / collection system and closed vent system at least once every calendar year to ensure a system is operating in accordance with the operating requirements specified in Condition 5.5.

The permittee shall conduct each inspection in accordance with the following requirements:

- (1) The permittee shall include a volumetric flow rate measurement taken at a location in the ductwork downstream of the hood that is representative of the actual volumetric flow rate without interference (due to leaks, ambient air added for cooling purposes, or a duct from another hood).
- (2) The volumetric flow rate measurement shall be performed in accordance with 40 CFR 63.1510(d)(2)(i), (ii), or (iii), Subpart RRR (as applicable).

However, as an alternative to the flow rate measurement, the permittee may satisfy the requirements of this inspection and the corresponding operating requirements by including a permanent total enclosure verification that is conducted in accordance with 40 CFR 63.1510(d)(2)(i) or (iv), Subpart RRR (as applicable).

For any inspection that fails to successfully demonstrate compliance with the specified operating requirements, the permittee shall perform the following actions:



- (1) Initiate and record repairs and/or adjustments to the system operating conditions; and
- (2) Perform and record a follow-up inspection within forty-five (45) days of the initial inspection to demonstrate compliance with the specified operating requirements.

(Ref.: 40 CFR 63.1506(c) and 63.1510(d)(1) and (2); Subpart RRR)

5.6 For Emission Point AA-001, AA-002, and AA-003, the permittee shall install, operate, and maintain a weight measurement device for each unit in accordance with the following requirements:

- (a) The permittee shall operate each weight measurement system (or weight determination procedure) in accordance with the OM&M Plan required by Condition 5.3.
- (b) The permittee shall measure and record the weight of feed / charge (or throughput) for each operating cycle or the time period used in the most recent performance test required by Condition 5.15.
- (c) As an alternative to paragraph (b) of the condition, the permittee may measure and record the aluminum production weight rather than the feed / charge weight contingent upon meeting the following stipulations:
  - (1) The aluminum production weight – rather than feed / charge weight – is measured and recorded for all units within a secondary aluminum production process; and
  - (2) All calculations to demonstrate compliance with an applicable emission limit are based on aluminum production weight rather than the feed / charge weight.

(Ref.: 40 CFR 63.1506(d); Subpart RRR)

5.7 For Emission Points AA-001, AA-002, and AA-003, the permittee shall measure and record the total weight of either the feed / charge to a process unit or the aluminum production from a process unit over the same operating cycle or the time period used in the most recent performance test required by Condition 5.15.

For the purpose of this condition, the feed / charge or aluminum production within a secondary aluminum production process shall be measured and recorded on a unit-by-unit basis.

As an alternative to a weight measurement device specified by Condition 5.6, the permittee may use a procedure deemed acceptable by the MDEQ to determine the total weight of feed / charge or aluminum production for a process unit.

The permittee shall adhere to the following requirements for any weight measurement device or procedure:

- (a) The accuracy of the device or procedure must be  $\pm 1$  percent of the weight being measured. The permittee may apply to the MDEQ for approval to use a device alternative accuracy if the specified accuracy cannot be achieved as a result equipment layout or charging practices. A device of alternative accuracy will not be approved unless the permittee provides assurance through data and information that the process unit will meet the applicable emission limit.
- (b) The permittee shall verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer. However, if the manufacturer does not specify a calibration schedule, the permittee shall conduct a calibration at least once every six (6) months.

(Ref.: 40 CFR 63.1510(e); Subpart RRR)

5.8 For Emission Points AA-001, AA-002, and AA-003, the permittee shall install, calibrate, maintain, and operate each fabric filter in accordance with the following requirements (as applicable):

- (a) For a Bag Leak Detection System (as applicable):
  - (1) The permittee shall install, calibrate, maintain and continuously operate a bag leak detection system for each exhaust stack of a fabric filter.
  - (2) The permittee shall install, calibrate, operate, and maintain each bag leak detection system in accordance with the manufacturer's operating instructions;
  - (3) A bag leak detection system must be certified by the manufacturer to be capable of detecting PM emissions at concentrations of at least 0.0044 grains per acf.
  - (4) The bag leak detection system sensor must provide the output of relative or absolute PM loadings.
  - (5) The bag leak detection system must be equipped with a device that continuously records the output signal from the sensor specified in paragraph (a)(4) of this condition.
  - (6) The bag leak detection system must be equipped with an alarm system that will sound automatically when an increase in relative PM emissions over a preset level is detected. Additionally, the alarm shall be located where it is easily heard by plant operating personnel.
  - (7) For a positive pressure baghouse, the bag leak detection system must be installed within each baghouse compartment or cell.

For a negative pressure or induced-air baghouse, the bag leak detector must be installed downstream of the baghouse.

- (8) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.
- (9) The baseline output must be established by adjusting the range and the averaging period of the device as well as establishing the alarm set points and the alarm delay time.
- (10) Following initial adjustment of the system, the permittee shall not adjust the sensitivity / range, averaging period, alarm set points, or alarm delay time (except as detailed in the OM&M Plan).

In no case may the sensitivity be increased by more than 100 percent or decreased more than fifty (50) percent over a 365-day period unless such adjustment follows a complete baghouse inspection demonstrates that the baghouse is in good operating condition.

(b) For the inlet temperature of a fabric filter:

- (1) The permittee shall install, calibrate, maintain, and operate a device that continuously monitors and records the temperature of the inlet gases to the baghouse consistent with the requirements for a “continuous monitoring system” outlined in 40 CFR Part, 63, Subpart A.
- (2) The temperature monitoring device must meet the following specifications:
  - (i) The monitoring system must record the temperature in 15-minute block averages. Additionally, the system must calculate and record the average temperature for each 3-hour block period.
  - (ii) The recorder response range must include zero and 1.5 times the average temperature established in accordance with 40 CFR 63.1512(n); Subpart RRR.
  - (iii) The reference method must be a National Institute of Standards and Technology (NIST) calibrated reference thermocouple-potentiometer system or an alternate reference subject to approval by the MDEQ.

(c) For a lime (or other alkaline reagent) injection system:

- (1) The permittee shall verify that lime is always free-flowing in accordance with one of the following methods:
  - (i) Inspect each feed hopper / silo at least once each 8-hour period and record the results of each inspection.

If lime is found not to be free-flowing during any of the 8-hour periods, the permittee shall increase the inspection frequency to at least once every 4-hour period for the next three (3) days. The permittee may return to an inspection schedule of at least once every 8-hour period if the corresponding corrective action results in no further blockages of lime during the 3-day period.

- (ii) Install, operate, and maintain a load cell, a carrier gas / lime flow indicator, a carrier gas pressure drop measurement system, or other system to confirm that lime is free-flowing **subject to the approval of the MDEQ**. If lime is found not to be free-flowing, the permittee shall promptly initiate and complete corrective action.
  - (iii) Install, operate, and maintain a device that monitors the concentration of HCl at the outlet of a fabric filter **subject to the approval of the MDEQ**. If an increase in the concentration of HCl indicates that the lime is not free-flowing, the permittee shall promptly initiate and complete corrective action.
- (2) The permittee shall record the lime feeder setting once each day of operation.
  - (3) The permittee shall verify that the lime injection rate (in pounds per hour) is no less than ninety (90) percent of the rate established during the most recent performance test required by Condition 5.14 at least once per month. However, the permittee may request from the MDEQ an extension of up to 45 additional days for this verification.
  - (4) If a monthly check indicates that the lime injection rate is less than 90%, the permittee shall repair or adjust the lime injection system to restore normal operation within forty-five (45) days of the corresponding check.
  - (5) In the event that a lime feeder is repaired or replaced, the permittee shall calibrate the new lime feeder and restore the lime feed rate (in pounds per hour) to the operating limit established in accordance with Condition 5.14(c) within 45 days of initiating the repair or replacement. However, the permittee may request from the MDEQ and extension of up to 45 additional days to complete the repair / replacement and establish the new lime feeder setting.

(Ref.: 40 CFR 63.1510(f)(1), (h), and (i); Subpart RRR)

- 5.9 For Emission Points AA-001, AA-002, and AA-003, the permittee shall install, calibrate, maintain, and operate each reactive flux injection system in accordance with the following requirements:

- (a) The permittee shall install, calibrate, operate, and maintain a device that continuously measures and records the weight the reactive flux (gaseous or liquid) injected into each process unit.
  - (1) The monitoring system must record the weight for each 15-minute block period during which reactive fluxing occurs and over the same operating cycle (or the time period used in the most recent performance test required by Condition 5.15.
  - (2) The accuracy of the weight measurement device must be  $\pm 1$  percent of the weight for the reactive component of the flux being measured. The permittee may apply to the MDEQ for permission to use a device of alternative accuracy in the case where the reactive flux flow rate is too low as to make the use of a weight measurement device with a  $\pm 1$  percent accuracy impracticable. However, a device of alternative accuracy will not be approved unless the permittee provides assurance through data and information that the process unit will meet the applicable emission limit.
  - (3) The permittee shall verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer. However, if the manufacturer does not specify a calibration schedule, the permittee shall conduct a calibration at least once every six (6) months.
- (b) The permittee shall calculate and record the gaseous or liquid reactive flux injection rate (kg/Mg or lb/ton) for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o).
- (c) The permittee shall record, for each 15-minute block period during each operating cycle or time period used in the performance test during which reactive fluxing occurs, the time, weight, and type of flux for each addition of gaseous or liquid reactive flux other than chlorine and solid reactive flux.
- (d) The permittee shall calculate and record the total reactive flux injection rate for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o). For solid flux that is added intermittently, record the amount added for each operating cycle or time period used in the performance test using the procedures in 40 CFR 63.1512(o).

The permittee may apply to the MDEQ for approval of an alternative method for monitoring and recording the total reactive flux addition rate based on monitoring the weight (or quantity) of reactive flux per ton of feed / charge for each operating cycle or the time period used in the most recent performance test required by Condition 5.15. However, an alternative monitoring method will not be approved unless the permittee provides assurance through data and information that the process unit(s) will meet the applicable emission limit(s) on a continuous basis.

(Ref.: 40 CFR 63.1510(j)(1) – (5); Subpart RRR)

- 5.10 For Emission Point AA-001, AA-002, and AA-003, the permittee shall calculate and record the 3-day, 24-hour rolling average emissions of PM, HCl, and D/F (and HF for uncontrolled group 1 furnaces) for each secondary aluminum processing unit (SAPU) on a daily basis. To calculate the 3-day, 24-hour rolling average, the permittee must:
- (a) The permittee shall calculate and record the total weight of material charged to each emission unit in the SAPU for each 24-hour day of operation using the feed / charge weight information required in Condition 5.6. If the permittee chooses to comply on the basis of weight of aluminum produced by the emission unit, rather than weight of material charged to the emission unit, all performance test emissions results and all calculations must be conducted on the aluminum production weight basis.
  - (b) The permittee shall multiply the total feed/charge weight to the emission unit, or the weight of aluminum produced by the emission unit, for each emission unit for the 24-hour period by the emission rate (in lb/ton of feed/charge) for that emission unit (as determined during the performance test) to provide emissions for each emission unit for the 24-hour period, in pounds.
    - (1) Where no performance test has been conducted, for a particular emission unit, because the permittee has, with the approval of the MDEQ, chosen to determine the emission rate of an emission unit by testing a representative unit, the permittee shall use the emission rate determined from the representative unit in the SAPU emission rate calculation required in paragraph (d).
    - (2) Except as provided in paragraph (3) of this section, if the permittee has not conducted performance tests for HCl (and HF for an uncontrolled group 1 furnace), in accordance with Condition 5.16, the calculation required in section (d) to determine SAPU-wide HCl and HF emissions shall be made under the assumption that all chlorine contained in reactive flux added to the emission unit is emitted as HCl and all fluorine contained in reactive flux added to the emission unit is emitted as HF.
    - (3) Prior to the date by which the initial performance test for HF emissions from uncontrolled group 1 furnaces is conducted, or is required to be conducted, the calculation required in Condition 3.9 to determine the SAPU-wide HF emission limit and the calculation required in section (d) to determine the SAPU-wide HF emission rate must exclude HF emissions from untested uncontrolled group 1 furnaces and feed/charge processed in untested uncontrolled group 1 furnaces.
  - (c) The permittee shall Divide the total emissions for each SAPU for the 24-hour period by the total material charged to the SAPU, or the weight of aluminum produced by the SAPU over the 24-hour period to provide the daily emission rate for the SAPU.

- (d) The permittee shall compute the 24-hour daily emission rate using the equation below:

$$E_{day} = \frac{\sum_{i=1}^n (T_i \times ER_i)}{\sum_{i=1}^n T_i}$$

$E_{day}$  = The daily PM, HCl, and D/F (and HF for uncontrolled group 1 furnaces) emission rate for the secondary aluminum processing unit for the 24-hour period;

$T_i$  = The total amount of feed, or aluminum produced, for emission unit i for the 24-hour period (tons or Mg);

$ER_i$  = The measured emission rate for emission unit i as determined in the performance test (lb/ton or  $\mu\text{g}/\text{Mg}$  of feed/charge); and

$n$  = The number of emission units in the secondary aluminum processing unit.

- (e) The permittee shall calculate and record the 3-day, 24-hour rolling average for each pollutant each day by summing the daily emission rates for each pollutant over the 3 most recent consecutive days and dividing by 3. The SAPU is in compliance with an applicable emission limit if the 3-day, 24-hour rolling average for each pollutant is no greater than the applicable SAPU emission limit determined in accordance with Condition 3.9.

(Ref.: 40 CFR 63.1510(t); Subpart RRR)

- 5.11 For Emission Points AA-001, AA-002, and AA-003, as an alternative to Condition 5.10, the permittee may demonstrate, through performance tests, that each individual emission unit within the secondary aluminum production unit is in compliance with the applicable emission limits for the emission unit.

(Ref.: 40 CFR 63.1510(u); Subpart RRR)

- 5.12 For Emission Points AA-001, AA-002, and AA-003, the permittee of a lime-coated fabric filter that employs intermittent or noncontinuous lime addition may apply to the MDEQ for approval of an alternative method for monitoring the lime addition schedule and rate based on monitoring the weight of lime added per ton of feed/charge for each operating cycle or time period used in the performance test. An alternative monitoring method will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standards on a continuous basis.

(Ref.: 40 CFR 63.1510(v); Subpart RRR)



- 5.13 For Emission Points AA-001, AA-002, and AA-003, if the permittee chooses to use an alternative monitoring method then an application following the procedures and criteria below must be submitted for approval:
- (a) The MDEQ will not approve averaging periods other than those specified in this section.
  - (b) The permittee must continue to use the original monitoring requirement until necessary data is submitted and approval is received to use another monitoring procedure.
  - (c) The permittee shall submit the application for approval of alternative monitoring methods no later than the notification of the performance test. The application must contain the information specified below:
    - (1) Data or information justifying the request, such as the technical or economical infeasibility, or the impracticality of using the required approach.
    - (2) A description of the proposed alternative monitoring requirements, including the operating parameters to be monitored, the monitoring approach and technique, and how the limit is to be calculated; and
    - (3) Data and information documenting that the alternative monitoring requirement(s) would provide equivalent or better assurance of compliance with the relevant emission standard(s).
  - (d) The MDEQ will not approve an alternative monitoring application unless it would provide equivalent or better assurance of compliance with the relevant emission standard(s). Before disapproving any alternative monitoring application, the MDEQ will provide:
    - (1) Notice of the information and findings upon which the intended disapproval is based; and
    - (2) Notice of opportunity for permittee to present additional supporting information before final action is taken on the application. This notice will specify how much additional time is allowed for the permittee to provide additional supporting information.
  - (e) The permittee is responsible for submitting any supporting information in a timely manner to enable the MDEQ to consider the application prior to the performance test. Neither submittal of an application nor the MDEQ's failure to approve or disapprove the application relieves the permittee of the responsibility to comply with any provisions of this subpart.
  - (f) The MDEQ may decide at any time, on a case-by-case basis, that additional or alternative operating limits, or alternative approaches to establishing operating

limits, are necessary to demonstrate compliance with the emission standards of this subpart.

(Ref.: 40 CFR 63.1510(w); Subpart RRR)

- 5.14 For Emission Points AA-001, AA-002, and AA-003, the permittee shall prepare a site-specific test plan that satisfies all of the requirements specified in 40 CFR 63.7(c)(2); Subpart A and must obtain approval of the plan pursuant to the procedures outlined in 40 CFR 63.7; Subpart A **prior** to conducting the initial performance test required by Condition 5.15.

The permittee shall conduct each performance test under such conditions that the MDEQ specifies based on the representative performance of the applicable process unit for the period being tested. Upon request, the permittee shall make available to the MDEQ such records as may be necessary to determine the conditions of a performance test.

If the permittee wants to conduct a new performance test and establish different operating parameter values, the permittee shall submit a revised site-specific test plan and receive approval from the MDEQ.

(Ref.: 40 CFR 63.1511(a) and (g)(5); Subpart RRR)

- 5.15 For Emission Points AA-001, AA-002, and AA-003, the permittee shall demonstrate initial compliance with the PM, HCl, and D/F emission limits in accordance with Condition 3.8 by conducting a performance test no later than one hundred eighty (180) days after the initial start-up of each applicable process unit **and** following approval of the site-specific test plan required by Condition 5.14.

The permittee shall conduct subsequent performance testing under 40 CFR 63 Subpart RRR once every five (5) years and not to exceed sixty-one (61) months after the most recently completed performance test.

Additionally, the permittee shall meet the following requirements:

- (a) The permittee shall perform the performance test in accordance with the specifications outlined in 40 CFR 63.1511(b) – (d), 63.1512(d)(1) – (3), and (j)(2); Subpart RRR (as applicable).
- (b) The permittee shall measure (or otherwise determine) and record the total weight of feed / charge to each applicable process unit (i.e. melting furnace; holding furnace; in-line degasser) attributed to a fabric filter for each of the three (3) test runs in order to calculate the total weight. If the permittee opts to measure on the basis of aluminum production, the permittee shall measure the weight of aluminum produced by each applicable process unit (instead of the feed / charge weight).
- (c) The permittee shall utilize the applicable equations specified in 40 CFR 63.1513(d) and (e), Subpart RRR to determine compliance. However, the

permittee shall exclude periods of start-up and shutdown from these specific calculations.

(Ref.: 40 CFR 63.1511(b), (c), (d), (e), and 63.1513(d) – (f); Subpart RRR)  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.16 For Emission Point AA-001, AA-002, and AA-003, the permittee shall establish an operating value (or range of values) for the feed / charge weight measurement, inlet gas temperature, and lime injection rate during each performance test required by Condition 5.15 in accordance with the following requirements:

(a) For group 1 furnace with add-on air pollution control devices:

(1) The permittee must measure emissions of PM and D/F at the outlet of the control device and emissions of HCl at the outlet (for the emission limit) or the inlet and the outlet (for the percent reduction standard).

(b) For the secondary aluminum processing unit:

(1) The permittee shall measure emissions of PM and D/F and either:

(i) Emissions of HF and HCl (for determining the emission limit); or

(ii) The mass flow rate of HCl at the inlet and outlet from the control device (for the percent reduction standard).

(c) For the feed / charge weight measurement:

(1) The permittee shall measure (or otherwise determine) the total weight of feed / charge or aluminum production for each of the three test runs and calculate and record the total weight.

(d) For the inlet gas temperature:

(1) The permittee shall continuously measure and record the temperature at the inlet to each lime-injected fabric filter every fifteen (15) minutes during the HCl-related performance test and D/F-related performance test;

(2) The permittee shall determine and record the 15-minute block average temperatures each of the three (3) 1-hour runs; and

(3) The permittee shall determine and record the 3-hour block average of the recorded temperature measurements for the three (3) test runs.

(e) For the lime injection rate:

(1) The permittee shall ensure that lime in the feed hopper / silo is free-flowing at all times;

- (2) The permittee shall record the feeder setting and lime injection rate for each of the three (3) 1-hour runs for the HCl-related performance test and D/F-related performance test.

If the feed rate setting and lime injection rate varies between the runs, the permittee shall determine and record the average feed rate and average lime injection rate from the three (3) test runs.

(Ref.: 40 CFR 63.1512(k), (d)(1), (j)(2), (n), and (p); Subpart RRR)

5.17 For Emission Points AA-001, AA-002, and AA-003, the permittee shall use the following equations when determining compliance with the requirements of 40 CFR Part 63, Subpart RRR:

- (a) For determining compliance with an emission limit for PM, HCl, HF, and D/F use the equation in 40 CFR 63.1513(b)(1) and (2).
- (b) For determining compliance with the HCl percent reduction standard use the equation in 40 CFR 63.1513(c).
- (c) For the conversion of D/F measurements to TEQ units use the equation in 40 CFR 63.1513(d).
- (d) Use the procedures of 40 CFR 63.1513(e)(1), (2), and (3) or the procedure in 40 CFR 63.1513(e)(4) to determine compliance with emissions limits for a secondary aluminum processing unit.

(Ref.: 40 CFR 63.1513(b – e); Subpart RRR)

5.18 For Emission Points AA-001, AA-002, and AA-003, the permittee shall demonstrate compliance with paragraphs (a) or (b) of this condition during periods of startup and shutdown.

- (a) For periods of startup and shutdown, records establishing a feed/charge rate of zero, a flux rate of zero, and that the affected source or emission unit was either heated with electricity, propane or natural gas as the sole source of heat or was not heated, may be used to demonstrate compliance with the emission limit, or
- (b) For periods of startup or shutdown, divide your measured emissions in lb/hr or  $\mu\text{g/hr}$  or  $\text{ng/hr}$  by the feed/charge rate in tons/hr or  $\text{Mg/hr}$  from your most recent performance test associated with a production rate greater than zero, or the rated capacity of the affected source if no prior performance test data are available.

Startup and shutdown emissions from group 1 furnaces and in-line fluxers must be calculated individually, and not on the basis of a SAPU. Periods of startup and shutdown are excluded from the calculation of SAPU emission limits in Condition 3.9, the SAPU monitoring requirements in Condition 5.10, and the SAPU emission calculations in Condition 5.17(e).

(Ref.: 40 CFR 63.1513(f); Subpart RRR)

- 5.19 For Emission Points AA-001, AA-002, and AA-003, in the event of a change in operating modes from a group 1 controlled furnace processing other than clean charge, the permittee shall comply with all the applicable requirements outlined in 40 CFR 63.1514.

(Ref.: 40 CFR 63.1514; Subpart RRR)

- 5.20 For Emission Points AA-001, AA-002, and AA-003, the permittee shall conduct routine performance testing of each source in accordance with the following requirements:
- (a) The permittee shall conduct performance testing for biennially (every two years) and no later than twenty-five (25) months after the previously completed performance test.
  - (b) All performance testing shall be conducted in accordance with either applicable U.S. EPA-approved test methods found in Appendix A of 40 CFR Part 60, Appendix M of 40 CFR Part 51, Appendix A of 40 CFR Part 63, or an alternative test method approved by the MDEQ and the U.S. EPA prior to the testing event.
  - (c) The permittee shall measure and record the total weight of aluminum produced by all applicable process units attributed to a fabric filter for each of the three (3) test runs in a performance test.
  - (d) The permittee shall utilize the applicable test methods to evaluate the emission of total PM (filterable + condensable PM) .
  - (e) The permittee shall utilize the applicable test methods to evaluate the emission of CO.

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

- 5.21 For Emission Points AA-001, AA-002, and AA-003, the permittee shall maintain documentation that details the following information (as applicable):
- (a) Records on the feed / charge (or throughput) weights for each operating cycle or the time period used in the most recent performance test required by Condition 5.15;
  - (b) *If a bag leak detection system is used:*
    - (1) The number of total operating hours during each 6-month reporting period;
    - (2) The date / time of each alarm;
    - (3) The date / time that the corrective action(s) was initiated and completed; and

- (4) A brief description of the cause of the alarm and the corrective action(s) taken.
- (c) For each baghouse:
- (1) Records on each 15-minute block average inlet temperature to a fabric filter [including any period when the 3-hour block average temperature exceeds the operating limit required by Condition 4.5(c) as well as a brief explanation on the cause of the excursion and the corrective action(s) taken];
  - (2) Records on each inspection conducted at least once every 8-hour period that verifies lime is present in the feeder hopper / silo and flowing [including any inspection where blockage is found as well as a brief explanation on the cause of the blockage and the corrective action(s) taken]; and
  - (3) If an inspection conducted at least once every 8-hour period discovers a blockage: records on each inspection conducted at least once every 4-hour period for the subsequent three (3) days.
  - (4) If a flow monitor, a pressure drop sensor, or a load cell is used to verify that lime is present in the hopper / silo and flowing: records on all monitor or sensor output [including any event where blockage was found as well as a brief explanation on the cause of the blockage and the corrective action(s) taken];
  - (5) If lime feeder setting is monitored: records on each daily and monthly inspection of feeder setting [including records on any deviation of the feeder setting from the setting used in the performance test required by Condition 5.15 as well as a brief explanation on the cause of the deviation and the corrective action(s) taken]; and
  - (6) If a lime feeder has been repaired or replaced, the permittee shall document this action along with the records on the new feeder calibration and the feed mechanism set points necessary to maintain the operating limit specified in Condition 5.16(e).
- (d) For each rotary furnace:
- (1) Records on each 15-minute block average weight of reactive flux injection (gaseous or liquid);
  - (2) Records on the identity, composition, and weight of each gaseous, liquid or solid reactive flux added; and
  - (3) Records on any period in which the injection rate exceeds the operating limit specified Condition 4.5 and the corrective action(s) taken.

- (e) For each continuous monitoring system (CMS): records required by 40 CFR 63.10(c), Subpart A;
- (f) Records on each monthly inspection that evaluates the proper labeling of each applicable process unit;
- (g) Records on each annual inspection of an emissions capture / collection system or closed vent system unless the permittee opts to use an alternative to the annual flow rate measurement.

If an alternative is used, the permittee shall maintain information on one of the following items:

- (1) Records on the differential pressure; fan RPM or fan motor amperage; or static pressure measurements; or
  - (2) Records on the duct centerline velocity using a hotwire anemometer, ultrasonic flow meter, cross-duct pressure differential sensor, venturi pressure differential monitoring, or an orifice plate equipped with an associated thermocouple (as appropriate)
- (h) A current copy of the OM&M Plan required by Condition 5.3 (including any revisions and records that indicate conformance with specific items in the plan – as applicable);
  - (i) For each secondary aluminum processing unit: records on the total charge weight (or the total aluminum produced) for each 24-hour period as well as the associated calculations for the 3-day, 24-hour rolling average emissions;
  - (j) If the permittee fails to comply with an applicable standard, the permittee shall maintain the following information:
    - (1) Records that detail the emission unit ID, the monitor ID, the pollutant or parameter monitored, the beginning date / time of the event, the end date / time of the event, the cause of the deviation or exceedance, and corrective action(s) taken; and
    - (2) Records on the actions taken during periods of malfunction to minimize emissions in accordance with Condition 4.1 [including corrective actions to restore malfunctioning process units and air pollution control / monitoring equipment to its normal or usual manner of operation].
  - (k) For each period of startup or shutdown for which the permittee chooses to demonstrate compliance for an affected source, the permittee shall comply with 40 CFR 63.1517(b)(19)(i) or (ii).

(Ref.: 40 CFR 63.1517(b)(1)(i) – (ii), (3), (4)(i) – (ii), (5) – (7), (13), (14), and (16) – (19); Subpart RRR)





## SECTION 6. REPORTING REQUIREMENTS

| Emission Point             | Applicable Requirement   | Condition Number(s)                    | Reporting Requirement  |
|----------------------------|--|--|--|
| AA-000<br>(Facility-Wide)  | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).                      | 6.1(a)                                 | Report Deviations Within Five (5) Working Days   |
|                            | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).                      | 6.1(b)                                 | Semi-Annual Reporting Requirements   |
|                            | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).                      | 6.1(c)                                 | Certification by Responsible Official  |
|                            | 11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).                       | 6.1(d)                                 | Notification of Beginning Actual Construction Within 15 Days                                       |
|                            | 11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).                       | 6.1(e)                                 | Submit a Notification When Construction Does Not Begin or is Suspended                             |
|                            | 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).               | 6.1(f)                                 | Submit a Certification of Completion of Construction Prior to Operation                            |
|                            | 11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).                       | 6.1(g)                                 | Submit a Notification of Changes in Construction   |
|                            | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).                      | 6.2                                    | Submit a Notification on the Initial Start-Up of On-Site Operations                                |
| 6.3                        |  | Submit a Semi-Annual Monitoring Report |  |
| AA-001<br>AA-002<br>AA-003 | 40 CFR 63.1516(b)(3)(i)(A); Subpart RRR                        | 6.4                                    | Submit Performance Test Results to EPA via CEDRI   |
|                            | 40 CFR 63.1510(b); Subpart RRR                                 | 6.5                                    | Submit the Initial OM&M Plan for Approval  |
|                            | 40 CFR 63.1515(a)(3); Subpart RRR                              | 6.6                                    | Submit Notifications on the Commencements of Construction and Start-Up                             |
|                            | 40 CFR 63.1515(b); Subpart RRR                                 | 6.7                                    | Submit a Notification of Compliance Status Report  |
|                            | 40 CFR 63.1516(b)(1), (2), (3), and (4); Subpart RRR           | 6.8                                    | Submit a Semi-Annual Compliance Report   |
|                            | 40 CFR 63.1511(a); Subpart RRR<br>40 CFR 63.7(b)(1); Subpart A | 6.9                                    | Submit the Site-Specific Test Plan for Approval  |
|                            | 40 CFR 63.1515(a)(6); Subpart RRR                              | 6.10                                   | Submit a Notification on the Intent to Conduct a Performance Test or Visible Emissions Observation |

### 6.1 General Reporting Requirements:

- (a) 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. 2.2.B(11).)

- (b) Beginning upon issuance of this permit and lasting until issuance or modification of the applicable operating permit, the permittee shall submit reports of any required monitoring by July 31<sup>st</sup> and January 31<sup>st</sup> 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. 2.1.C. 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. For any air emissions equipment not yet constructed and/or operating the report shall so note and include an estimated date of commencement of construction and/or startup, whichever is applicable.

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

- (c) Any document required by this permit to be submitted to the DEQ 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).)

- (d) Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).)

- (e) The permittee must notify DEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).)

- (f) Upon the completion of construction or installation of an approved stationary source or modification, and prior to commencing operation, the applicant shall notify the Permit Board that construction or installation was performed in accordance with the approved plans and specifications on file with the Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).)

- (g) The Permit Board shall be promptly notified in writing of any change in construction from the previously approved plans and specifications or permit. If the Permit Board determines the changes are substantial, it may require the submission of a new application to construct with “as built” plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an “as

built” application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).)

- 6.2 For Emission Point AA-001 (Facility-Wide), the permittee shall notify the MDEQ in writing of the initial start-up of on-site operations no later than fifteen (15) days after the actual start-up date.

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

- 6.3 For Emission Points AA-000 (Facility-Wide), the permittee shall submit a semi-annual monitoring report (SMR) in accordance with Condition 6.1(b) that contains the following information:

- (a) For Emission Points AA-001, AA-002, and AA-003 – the total quantity (in tons) of aluminum produced by each “*melting and casting line*” on both a monthly and rolling 12-month total basis;
- (b) A summary for each parametric continuous monitoring system (CMS) that provides the following information (as applicable):
  - (1) Operation Outside Operating Limit / Operating Limit Range – the specific emission source, the date, the beginning and ending times, the cause(s) for each excursion; and any corrective action taken as a result of the excursion; and
  - (2) CMS Downtime – the specific emission source, the date, the beginning and ending times, the cause(s) for each downtime event; and any corrective action taken as result of a downtime event.

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

- 6.4 For Emission Point AA-000 (Facility-Wide), the permittee shall submit the results from any performance test / visible emissions observation required by Subpart RRR to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). The CEDRI interface can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>).

Additionally, the permittee shall submit the performance test data in a file format generated through the use of the EPA's ERT or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the EPA's ERT website.

(Ref.: 40 CFR 63.1516(b)(3)(i)(A); Subpart RRR)

- 6.5 For Emission Points AA-001, AA-002, and AA-003, the permittee shall submit the initial OM&M Plan required by Condition 5.3 to the MDEQ for approval no later than ninety (90) days after a successful initial performance test required by Condition 5.15.

(Ref.: 40 CFR 63.1510(b); Subpart RRR)

- 6.6 For Emission Points AA-001, AA-002, and AA-003, the permittee shall submit a notification to the MDEQ that details the following information no later than thirty (30) days after the actual event:

- (a) The date in which construction on an applicable unit begins;
- (b) The anticipated date of start-up for a unit; and
- (c) The actual date of start-up for a unit.

(Ref.: 40 CFR 63.1515(a)(3); Subpart RRR)

- 6.7 For Emission Points AA-001, AA-002, and AA-003, the permittee shall submit a “Notification of Compliance Status” report signed and certified by a responsible official to the MDEQ no later than ninety (90) days after conducting the initial performance test required by Condition 5.15,

For the report to be deemed complete, the permittee shall include the following information:

- (a) All information required by 40 CFR 63.9(h), Subpart A;
- (b) A complete performance test report for each process unit (or group of process units) for which a performance test is required by Subpart RRR [a complete performance test report includes all data, associated measurements, and calculations (including visible emission and opacity tests)];
- (c) Unit labeling as described in Condition 4.3 (including the furnace classification and operating requirements);
- (d) The compliant operating parameter value (or range of values) established for each applicable process unit with supporting documentation as well as a description of the procedure used to establish the value(s) (e.g. lime injection rate; total reactive chlorine flux injection rate; fabric filter inlet temperature) and the operating cycle or time period used in the initial performance test required by Condition 5.14;
- (e) The design information and corresponding analysis (including supporting documentation) that demonstrates conformance with the requirements for an emissions capture / collection systems specified in Condition 5.5;

- (f) The analysis (including supporting documentation) that demonstrates conformance with EPA guidance and specifications for a bag leak detection system specified in Condition 5.9; and
- (g) The OM&M Plan required by Condition 5.3.

For this purpose of this condition, the required information may be submitted in an operating permit application, in an amendment to an operating permit application (in a separate submittal), or in any combination. If the permittee submits the required information at different times or in different submittals, the permittee may refer to an earlier submittal within the later submittal of duplicating and resubmitting the information previously submitted.

(Ref.: 40 CFR 63.1515(b); Subpart RRR)

- 6.8 For Emission Point AA-001, AA-002, and AA-003, the permittee shall submit a semi-annual compliance report to the MDEQ and EPA in accordance with Condition 6.1(b) that includes the following information (as applicable):
- (a) Any corrective action not initiated within one (1) hour of a bag leak detection system alarm;
  - (b) Any excursion of a compliant process or operating parameter value (or range of values) (e.g. lime injection rate; total reactive chlorine flux injection rate; baghouse inlet temperature; the definition of “acceptable scrap”);
  - (c) Any source (including an emission unit in a secondary aluminum processing unit) was not operated in accordance with the requirements of Subpart RRR;
  - (d) A deviation from the 3-day, 24-hour rolling average emission limit calculated for a secondary aluminum processing unit in accordance with Condition 3.9;
  - (e) If a holding furnace and/or in-line degasser in-line degasser does not use a reactive flux during a reporting period, the permittee shall include the following certification:  
  
*“Only non-reactive, non-HAP-containing, non-HAP-generating flux gases, agents, or materials were used at any time during this reporting period.”*
  - (f) If the permittee opts to demonstrate compliance during periods of start-up and shutdown in accordance with 40 CFR 63.1513(f)(1); Subpart RRR, the permittee shall include the following certification:  
  
*“During each start-up and shutdown, no flux and no feed / charge were added to a process unit, and electricity, propane or natural gas were used as the sole source of heat or the emission unit was not heated.”*

- (g) If there is a malfunction during the reporting period, the permittee shall include the following information:
- (1) The emission unit identification and/or the monitor identification;
  - (2) The pollutant or parameter monitored;
  - (3) The beginning and ending date / time of each event;
  - (4) The cause of the deviation (or exceedance) as well as the corrective action taken for each malfunction that occurred and which caused (or may have caused) any applicable emission limit to be exceeded;
  - (5) An estimate of the quantity for each regulated pollutant emitted over an applicable emission limit as well as a description of the method used to estimate the emissions – including (but not limited to) product-loss calculations, mass balance calculations, measurements when available, or engineering judgment based on known process parameters; and
  - (6) A description of any actions taken by the permittee during a malfunction to minimize emissions in accordance with Condition 4.1.

When no deviations of parameters have occurred, the permittee shall submit a report stating that no excess emissions occurred during the reporting period.

(Ref.: 40 CFR 63.1516(b)(1), (2), (3), and (4) and 63.1516(d); Subpart RRR)

- 6.9 For Emission Points AA-004, AA-010, AA-016, and AA-022, the permittee shall submit the site-specific test plan required by Condition 5.14 to the MDEQ for approval no later than sixty (60) days prior any initial performance test required by Condition 5.15.

(Ref.: 40 CFR 63.1511(a); Subpart RRR and 40 CFR 63.7(b)(1); Subpart A)

- 6.10 For Emission Points AA-004, AA-010, AA-016, and AA-022, the permittee shall submit a notification on the intent to conduct a performance test required by Condition 5.15 to the MDEQ and EPA no later than sixty (60) days before the test is scheduled.

Additionally, the permittee shall submit a notification in accordance with 40 CFR 63.9(f); Subpart A (as applicable) on the intent to conduct a visible emissions observation required by Condition 5.15 to the MDEQ and EPA no later than thirty (30) days before the observation is scheduled to take place.

(Ref.: 40 CFR 63.1515(a)(6); Subpart RRR)