

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

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

THIS CERTIFIES THAT

International Paper Company, Magnolia Facility
350 Prescott Drive
Magnolia, Mississippi
Pike County

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

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

**AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

Issued:

Permit No.: 2280-00055

Effective Date: As specified herein.

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

Section 1.

A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
2. This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.4.D.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.4.D.)
3. Any activities not identified in the application are not authorized by this permit.

(Ref.: Miss. Code Ann. 49-17-29 1.b)
4. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)
7. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)
8. The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:

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

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

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

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

10. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(7).)

11. This permit does not authorize a modification as defined in Regulation 11 Miss. Admin. Code Pt. 2, Ch.2., "Permit Regulations for the Construction and/or Operation of Air Emission Equipment." A modification may require a Permit to Construct and a modification of this permit. Modification is defined as "Any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

- a. Routine maintenance, repair, and replacement;
- b. Use of an alternative fuel or raw material by reason of an order under Sections 2(a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
- c. Use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
- d. Use of an alternative fuel or raw material by a stationary source which:

- (1) The source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, or 40 CFR 51.166; or
 - (2) The source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, or 40 CFR 51.166;
- e. An increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I or 40 CFR 51.166; or
- f. Any change in ownership of the stationary source.

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

B. GENERAL OPERATIONAL CONDITIONS

1. Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in Regulation, 11 Miss. Admin. Code Pt. 2, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared.

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

2. Any diversion from or bypass of collection and control facilities is prohibited, except as provided for in 11 Miss. Admin. Code Pt. 2, R. 1.10., "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants."

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

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

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

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

- a. Upsets

- (1) For an upset defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:
 - (i) An upset occurred and that the source can identify the cause(s) of the upset;
 - (ii) The source was at the time being properly operated;
 - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
 - (iv) That within 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 by 11 Miss. Admin. Code Pt. 2, R. 1.2.)

- (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
- (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this

regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).

- (3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

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

5. Compliance Testing: Regarding compliance testing:

- a. The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations 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).)

C. PERMIT RENEWAL / MODIFICATION / TRANSFER / TERMINATION

1. For renewal of this permit, the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board. If the applicant submits a timely and complete application pursuant to this paragraph and the Permit Board, through no fault of the applicant, fails to act on the application on or before the expiration date of the existing permit, the applicant shall continue to operate the stationary source under the terms and conditions of the expired permit, which shall remain in effect until final action on the application is taken by the Permit Board. Permit expiration terminates the source's ability to operate unless a timely and complete renewal application has been submitted.

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

2. The permittee shall furnish to the 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).)

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

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

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

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

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

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

SECTION 2
EMISSION POINT DESCRIPTION

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

Emission Point	Description
AA-000	Facility-Wide [International Paper Company, Magnolia Facility]
AA-001	25.11 MMBTU / Hour Natural Gas-Fired Boiler [constructed 1965]
AA-002	110 HP (82 kW) Compression Ignition (CI) Emergency Fire Pump Engine [max. heat input: 0.77 MMBTU / hour; manufacture date: 2023]
AA-003	Starch Storage Silo [equipped with bin vent filters]
AA-004	Cyclone Separator
AA-005	Corrugator, Cutting, Gluing, and Printing Process
AA-006	180-Gallon Diesel Fuel Storage Tank

SECTION 3

EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity (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)	$E = 4.1 \cdot (p^{0.67})$
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.4	HAPs	8.0 tpy (Individual) 23.0 tpy (Total) (Rolling 12-Month Totals)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.5	VOCs	95.0 tpy (Rolling 12-Month Totals)
AA-001	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.6	PM (filterable)	$E = 0.8808 \cdot (I^{0.1667})$
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.7	SO ₂	4.8 lb. / MMBTU Heat Input
AA-002	11 Miss. Admin. Code Pt. 2, R. 1.3.D.(1)(a).	3.8	PM (filterable)	0.6 lb. / MMBTU
	40 CFR Part 63, Subpart ZZZZ – NESHAP for Stationary Reciprocating Internal Combustion Engines 40 CFR 63.6585(a), (c), 63.6590(a)(2)(iii), and (c)(1); Subpart ZZZZ	3.9	HAPs	General Applicability
	40 CFR Part 60, Subpart III – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines 40 CFR 60.4200(a)(2); Subpart III	3.10	NMHC + NO _x PM	General Applicability
	40 CFR 60.4207(b); Subpart III	3.11	Fuel Requirement	15 ppm Sulfur Content (Max.); and

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
				40 Cetane Index (Min.) or 35% Aromatic Content (Max. – by volume)
	40 CFR 60.4209(a); Subpart IIII	3.12	Hours of Operation	Install a Non-Resettable Hour Meter
AA-002	40 CFR 60.4211(f)(1) – (3); Subpart IIII	3.13	Operational Requirements	100 Hours / Calendar Year for Maintenance and Readiness Testing; 50 Hours / Calendar Year for Non-Emergency Situations
	40 CFR 60.4205(c) – Table 4, 60.4206, and 60.4211(c); Subpart IIII	3.14	NMHC + NO _x	4.0 g / kW-hr (3.0 g / HP-hr)
PM			0.30 g / kW-hr (0.22 g / HP-hr)	
AA-003 AA-004	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.15	PM / PM ₁₀ (filterable)	Operate the Cyclone and Pollution Control Equipment at All Times the Process Equipment is in Operation

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 Point AA-000 (Facility-Wide), the permittee shall limit the emission of hazardous air pollutants (HAPs) to no more than 8.0 tons per year (tpy) for any single HAP and no more than 23.0 tpy for all HAPs in total based on rolling 12-month totals.

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

- 3.5 For Emission Point AA-000 (Facility-Wide), the permittee shall limit the emission of volatile organic compounds (VOCs) to no more than 95.0 tons per year (tpy) based on a rolling 12-month total.

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

- 3.6 For Emission Point AA-001, 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).)

- 3.7 For Emission Point AA-001, 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 SO₂) per MMBTU heat input.

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

- 3.8 For Emission Point AA-002, the maximum permissible emission of ash and/or PM from any fossil fuel burning installations with a heat input of less than ten (10) million BTU (MMBTU) per hour shall not exceed 0.6 pounds per MMBTU heat input.

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

- 3.9 For Emission Point AA-002, the permittee is subject to and shall comply with the applicable requirements found in 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE) and 40 CFR Part 63, Subpart A – General Provisions (as required by Table 8 of Subpart ZZZZ).

For the purpose of this permit, stationary RICE is classified as “new” if construction or reconstruction commenced on / after June 12, 2006.

For a new compression-ignition RICE (Emission Points AB-002), the permittee shall comply with Subpart ZZZZ by complying with the applicable requirements in 40 CFR Part 60, Subpart IIII. No further requirements apply for such an engine under Subpart ZZZZ.

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

- 3.10 For Emission Point AA-002, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (CI ICE) and 40 CFR Part 60, Subpart A – General Provisions (as required by Table 8 of Subpart IIII).

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

- 3.11 For Emission Point AA-002, the permittee shall only combust diesel fuel that meets the following requirements (on a per-gallon basis):

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

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

- 3.12 For Emission Point AA-002, the permittee shall install a non-resettable hour meter on each engine.

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

- 3.13 For Emission Point AA-002, any operation of the engine for any reason other than emergency operation, maintenance and testing, and operation in non-emergency situations for fifty (50) hours per year is prohibited. If an engine is not operated in accordance with paragraphs (a) through (c) of this condition, the engine will not be considered an emergency engine under the applicable regulation and shall meet all requirements for a corresponding non-emergency engine.
- (a) There is no time limit on the use of an engine in emergency situations.
 - (b) The permittee may operate an engine for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, or the insurance company accompanied with the engine. Maintenance checks and readiness testing of an engine is limited to a maximum of one hundred (100) hours per calendar year. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing. However, a petition is not required if the permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of the engine beyond 100 hours per calendar year.
 - (c) The permittee may operate an engine for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing. Except as specified in 40 CFR 60.4211(f)(3)(i), the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

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

- 3.14 For Emission Point AA-002, the permittee shall purchase engines certified to the following emission standards:
- (a) Non-Methane Hydrocarbons + Nitrogen Oxides (NMHC + NO_x): 4.0 grams per kilowatt-hour (or 3.0 grams per horsepower-hour); and
 - (b) Particulate Matter (PM): 0.30 grams per kilowatt-hour (or 0.22 grams per horsepower-hour).

The engine shall be installed and configured in accordance with the manufacturer's emission-related specifications. Additionally, the permittee shall operate and maintain

the engine in such a manner to achieve the referenced emission standards over the entire life of the engine.

(Ref.: 40 CFR 60.4205(c), 60.4206, 60.4211(c), and Table 4; Subpart IIII)

- 3.15 For Emission Points AA-003 and AA-004, the permittee shall operate the cyclone and filters at all times while the associated process equipment is in operation. In the event that either the cyclone or a filter malfunctions or becomes non-operational, the permittee shall take actions as expeditiously as possible to bring the device back to the proper working order and functioning at the proper efficiency or cease the operation of the associated process equipment.

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

**SECTION 4
WORK PRACTICES**

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Work Practice
AA-002	40 CFR 60.4211(a); Subpart III	4.1	NMHC + NO _x	Perform Compliance Practices
	40 CFR 60.4211(g)(2); Subpart III	4.2	PM	Perform Compliance Actions (As Applicable)

4.1 For Emission Point AA-002, the permittee shall demonstrate compliance with the emission standards specified in Condition 3.14 by performing the following work practices:

- (a) Operate and maintain the engine and control device (if any) according to the manufacturer's emission-related written instructions;
- (b) Change only those emission-related settings that are permitted by the manufacturer;
- (c) Meet the requirements of 40 CFR Part 1068 (as applicable).
- (d) (Ref.: 40 CFR 60.4211(a); Subpart III)

4.2 For Emission Point AA-002, if the permittee does not operate and maintain the engine according to the manufacturer's emission-related written instructions or the permittee changes emission related settings in a way that is not permitted by the manufacturer, the permittee shall:

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

Any required performance test shall be conducted in accordance with the procedures outlined in 40 CFR 60.4212(a) – (c); Subpart III (as applicable).

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

**SECTION 5
MONITORING AND RECORDKEEPING REQUIREMENTS**

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain Records for a Minimum of Five (5) Years
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2	VOC	Calculate and Record the Emission of Each Pollutant (Monthly and Rolling 12-Month Totals)
		5.3	HAPs	Maintain Information on Inks, Adhesives, Coatings, Solvents, or Other VOC- / HAP-Containing Materials
AA-002	40 CFR 60.4214(b); Subpart III 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.4	Emergency Engine Status	Monitor Hours of Operations Monthly (Emergency and Non-Emergency)
	40 CFR 60.4214(a)(2)(i) – (iii); Subpart III 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.5	NMHC + NO _x PM	Recordkeeping Requirements
AA-003 AA-004	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.6	PM / PM ₁₀ (filterable)	Perform Maintenance Inspection Monthly
		5.7	Opacity	Perform Visible Emission Observation Weekly

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 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 MDEQ 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 Point AA-000 (Facility-Wide), the permittee shall calculate and record the respective emission of volatile organic compounds (VOCs), each individual hazardous air pollutant (HAP), and all combined HAPs in tons based on a monthly basis and on a rolling 12-month total basis.

Unless otherwise specified herein, the permittee shall include all reference data utilized to validate the calculated emissions (e.g. operational data, applicable emission factors, engineering judgement determinations, etc.).

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

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

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

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

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

5.4 For Emission Point AA-002, the permittee shall monitor and record (via a non-resettable hour meter) the hours of operation for the engine on a monthly basis for both emergency and non-emergency service. Additionally, the permittee shall detail (in writing) and maintain what classified each occurrence as either an emergency or a non-emergency.

(Ref.: 40 CFR 60.4214(b); Subpart III)
(11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.5 For Emission Point AA-002, the permittee shall maintain documentation that details the following information:

- (a) All notifications submitted to comply with Subpart III;
- (b) Any maintenance conducted on an engine; and

- (c) Documentation from the manufacturer that indicate an engine is certified to meet the emission standards specified in Condition 3.14.

(Ref.: 40 CFR 60.4214(a)(2)(i) – (iii); Subpart IIII)

- 5.6 For Emission Points AA-003 and AA-004, the permittee shall perform an inspection and any required maintenance on the cyclone and filters to maintain proper operation on a monthly basis (or more often if necessary). The permittee shall maintain on-site (to the best extent practicable) sufficient equipment necessary to repair and/or overhaul the cyclone and filters. In the event that either the cyclone or a filter fails, the permittee shall conduct the necessary maintenance activities to ensure operation of the cyclone and/or filter as originally designed.

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

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

- 5.7 For Emission Points AA-003 and AA-004, the permittee shall demonstrate compliance with the opacity limitation in Conditions 3.2 by performing a weekly visible emissions observation in accordance with EPA Test Method 22 on the exhaust from each stack during daylight hours and during representative operating conditions. Each observation shall be conducted for a minimum period of six (6) consecutive minutes.

If visible emissions are detected during an observation, the permittee shall perform and record a visible emission evaluation (VEE) in accordance with EPA Test Method 9 for (at a minimum) a duration of six (6) consecutive minutes. In the event that a VEE is required but cannot be conducted, the permittee shall record a written explanation as to why it was not possible to perform the VEE. The VEE shall be performed by a person who is certified as a visible emission reader by the MDEQ or an equivalent agency qualified for such services.

The permittee shall maintain all documentation and information specified by EPA Test Method 22 and/or EPA Test Method 9, any corrective actions taken to prevent or minimize emissions as a result of the evaluation, and the date / time when each observation / evaluation was conducted.

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

SECTION 6 REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	Report Permit Deviations within Five (5) Working Days
		6.2	Submit a Certified Annual Monitoring Report
		6.3	All Documents Submitted to the MDEQ Shall Be Certified by a Responsible Official

- 6.1 Except as otherwise specified herein, the permittee shall report 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).)

- 6.2 Except as otherwise specified herein, the permittee shall submit a certified annual synthetic minor monitoring report postmarked no later than 31st of January for the preceding calendar year. This report shall address any required monitoring specified in the permit. All instances of deviations from permit requirements must be clearly identified in the report. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration.

Each AMR shall contain the following information (at a minimum):

- (a) The required monitoring data specified in Conditions 5.2 and 5.3;
- (b) For Emission Point AA-002, the total hours of operation for the engine as well as a report that details the following information:
 - (1) How many hours are spent for emergency operations and what classified the operation as an emergency; and
 - (2) How many hours are spent for non-emergency operation and the reason for the non-emergency operation.
- (c) For Emission Points AA-003 and AA-004, any maintenance action(s) performed on the cyclone and filters, and any periods of time (including the date and duration) in which a device has malfunctioned.

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

- 6.3 Any document required by this permit to be submitted to the MDEQ shall contain a certification signed by a responsible official stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

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