

**STATE OF MISSISSIPPI  
AIR POLLUTION CONTROL  
TITLE V PERMIT**

**TO OPERATE AIR EMISSIONS EQUIPMENT**

**THIS CERTIFIES THAT**

Biltrite Ripley Operations LLC  
16310 Highway 15 North  
Ripley, Mississippi  
Tippah County

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with Title V of the Federal Clean Air Act (42 U.S.C.A. § 7401 - 7671) and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

**Permit Issued:** FEB 08 2016

**Effective Date:** As specified herein.

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**



\_\_\_\_\_  
**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Expires:** January 31, 2021

**Permit No.:** 2620-00046

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### **APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT**

### **APPENDIX B COMPLIANCE ASSURANCE MONITORING (CAM) PLAN**

### **OTHER IMPORTANT DOCUMENTS:**

**40 CFR 63: National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)**

## SECTION 1. GENERAL CONDITIONS

- 1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(a).)
- 1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(b).)
- 1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(c).)
- 1.4
  - (a) This permit shall be reopened and revised under any of the following circumstances:
    - (1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of 3 or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.
    - (2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
    - (3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.
    - (4) The Administrator or the Permit Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
  - (b) Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.
  - (c) Reopenings shall not be initiated before a notice of such intent is provided to the Title

V source by the DEQ at least 30 days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.G)

- 1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(e).)
- 1.6 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(d).)
- 1.7 The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(5).)
- 1.8 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.)
  - (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).)

- (b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D(2).)
  - (c) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.)
  - (d) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.C.)
- 1.9 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(8).)
- 1.10 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)
- 1.11 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:
- (a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- (c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
  - (d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(2).)
- 1.12 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(1).)
- 1.13 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(2).)
- 1.14 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(1).)
- 1.15 Nothing in this permit shall alter or affect the following:
- (a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
  - (b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - (c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
  - (d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(2).)
- 1.16 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.H.)
- 1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is

submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C(2)., R. 6.4.B., and R. 6.2.A(1)(c).)

- 1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:
- (a) the changes are not modifications under any provision of Title I of the Act;
  - (b) the changes do not exceed the emissions allowable under this permit;
  - (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:
    - (1) a brief description of the change(s),
    - (2) the date on which the change will occur,
    - (3) any change in emissions, and
    - (4) any permit term or condition that is no longer applicable as a result of the change;
  - (d) the permit shield shall not apply to any Section 502(b)(10) change. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F(1).)
- 1.19 Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in 11 Miss. Admin. Code Pt. 2, Ch. 3., "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)
- 1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 11 Miss. Admin. Code Pt. 2, Ch. 2., "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations 11 Miss. Admin. Code Pt. 2, Ch. 6., "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny physical change in or

change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

- (a) routine maintenance, repair, and replacement;
- (b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
- (c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
- (d) use of an alternative fuel or raw material by a stationary source which:
  - (1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; 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 51.166;
- (e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or
- (f) any change in ownership of the stationary source."

- 1.21 Any change in ownership or operational control must be approved by the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.D(4).)
- 1.22 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.B(1).)
- 1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and

ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.

- (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.
- (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.
- (c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.G.)

1.24 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies.

- (a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
- (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.
- (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
  - (1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
  - (2) the permitted facility was at the time being properly operated;
  - (3) during the period of the emergency the permittee took all reasonable steps to

minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

- (4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
  - (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.G.)
- 1.25 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, shutdowns and maintenance.
- (a) Upsets (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.KK.)
    - (1) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
      - (i) an upset occurred and that the permittee can identify the cause(s) of the upset;
      - (ii) the source was at the time being properly operated;
      - (iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;
      - (iv) the permittee submitted notice of the upset to the DEQ within 5 working days of the time the upset began; and
      - (v) the notice of the upset shall contain a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.
    - (2) In any enforcement proceeding, the permittee 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.
- (b) Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.HH. & R. 1.2.CC.)
  - (1) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows:
    - (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above;
    - (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or
    - (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.
  - (2) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.
  - (3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply.
- (c) Maintenance.
  - (1) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following:
    - (i) the permittee can identify the need for the maintenance;

- (ii) the source was at the time being properly operated;
  - (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;
  - (iv) the permittee submitted notice of the maintenance to the DEQ within 5 working days of the time the maintenance began or such other times as allowed by DEQ; and
  - (v) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.
- (2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.
- (3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

1.26 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation 11 Miss Admin. Code Pt. 2, R. 1.8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

## SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-001	25.23 MMBTU/hr Wickes 200.3-2 Type A Natural Gas Fired Boiler
AA-007	Three (3) Banbury mixers with three (3) baghouses and Clay and Hi-Sil unload and transport systems each with dust collectors to control emissions. Two (2) dust collectors control emissions from the clay and Hi-Sil unload stations that transport the materials to the silos, and two (2) dust collectors are used to control transfer of the materials from the silos to the weigh scale system.
AA-009	Three (3) Sander/Finishing Stations and Process Lines with three (3) cyclones
AA-010	Adhesive Spray Booth - The booth is used to apply adhesives to metal parts which are then inserted into specialized rubber products produced at the facility and is equipped with fabric filters to control PM emissions.
AA-011	Emergency Generator Engine. LPG-fired; Rated Capacity: 40.23 HP. (0.102 MMBtu/hr), 4SRB; pre-2006 Model

## SECTION 3. EMISSION LIMITATIONS & STANDARDS

### A. Facility-Wide Emission Limitations & Standards

- 3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).
- (a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.
  - (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.A.)
- 3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Paragraph 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)

**B. Emission Point Specific Emission Limitations & Standards**

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-007 AA-009	11 Miss. Admin. Code Pt. 2, R. 1.3. F(1).	3.B.1	PM (filterable only)	$E = 4.1p^{0.67}$
AA-001	11 Miss. Admin. Code Pt. 2, R. 1.4. A(1).	3.B.2	SO <sub>2</sub>	4.8 lbs/MMBTU or as otherwise limited by facility modification restrictions
	11 Miss. Admin. Code Pt. 2, R. 1.3. D(1)(b).	3.B.3	PM (filterable only)	$E = 0.8808 * T^{-0.1667}$ or as otherwise limited by facility modification restrictions
AA-011	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.B.4	PM (filterable only)	0.6 lbs/MMBTU
	40 CFR 63, Subpart ZZZZ (§63.6590)	3.B.5	HAP	Applicability
	40 CFR 63, Subpart ZZZZ (§63.6640(f))	3.B.6		Limit non-emergency engine operation to 100 hours per year.
	40 CFR 63, Subpart ZZZZ (§63.6603, §63.6625(h) and Table 2d)	3.B.7		Minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes

3.B.1 Except as otherwise specified, no person shall cause, permit, or allow the emission of particulate matter in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship

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

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

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

3.B.2 For Emission Point AA-001, the maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. (Ref. 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)

3.B.3 The maximum permissible emission of ash and/or particulate matter for Emission Point AA-001, shall not exceed an emission rate as determined by the relationship

$$E = 0.8808 * I^{0.1667}$$

where E is the emission rate in pounds per million BTU per hour heat input and I is the heat input in millions BTU per hour.

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

3.B.4 For Emission Point AA-011, the maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).)

3.B.5 Emission Point AA-011 is subject to and shall comply with the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR 63, Subpart ZZZZ. Emission Point AA-011 is an existing emergency 4-stroke rich burn spark ignition stationary RICE less than 500 HP located at an area source of HAP emissions. The engine is an emergency stationary RICE provided it meets the definition in §63.6675.

(Ref.: 40 CFR 63.6590, 63.6640(f) and 63.6675, Subpart ZZZZ)

3.B.6 For Emission Point AA-011, the permittee shall operate the emergency stationary RICE according to the following requirements. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per calendar year is prohibited. If the engine(s) is not operated according to these requirements, the engine(s) will not be considered an emergency engine(s) under this subpart and shall meet all requirements for non-emergency engines.

- (a) There is no time limit on the use of emergency stationary RICE in emergency situations.
- (b) The permittee may operate the emergency stationary RICE 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 associated with the engine. Maintenance checks and readiness testing of such units is limited to a maximum of 100 hours per

calendar year. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.

- (c) The permittee may operate the emergency stationary RICE up to 50 hours per calendar year in non-emergency situations, but those 50 hours are counted towards the 100 hours per calendar year for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(Ref.: 40 CFR 63.6640(f), Subpart ZZZZ)

- 3.B.7 For Emission Point AA-011, the permittee shall minimize the engines' time spent at idle during startup and minimize the engines' startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

(Ref.: 40 CFR 63.6603, 63.6625(h) and Table 2d, Subpart ZZZZ)

**C.      Insignificant and Trivial Activity Emission Limitations & Standards**

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

- 3.C.1      The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).)
- 3.C.2      The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)

**D. Work Practice Standards**

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-011	40 CFR 63. Subpart ZZZZ (§63.6603 and Table 2d)	3.D.1	HAP	Change oil and filter every 500 hours of operation or annually; inspect spark plugs every 1,000 hours of operation or annually; and inspect all hoses and belts every 500 hours of operation or annually.
	40 CFR 63. Subpart ZZZZ (§63.6603 and Table 2d)	3.D.2		Oil Analysis Program
	40 CFR 63. Subpart ZZZZ (§63.6625(e), §63.6640(a); §6605 and Table 6)	3.D.3 3.D.4		Operate and maintain engine according to the manufacturer's emission-related written instructions or develop maintenance plan, which must be consistent with good air pollution control practices to minimize emissions.

3.D.1 Emission Point AA-011 is existing spark ignition (SI) emergency stationary RICE with site ratings less than or equal to 500 brake horsepower. This emission point shall comply with the following requirements except during periods of startup:

- (a) Change oil and filter every 500 hours of operation or annually, whichever comes first;
- (b) Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary;
- (c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements according to the schedule listed in (a)–(c) above, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated.

(Ref.: 40 CFR 63.6603 and Table 2d, Subpart ZZZZ)

- 3.D.2 For Emission Point AA-011, the permittee may choose to utilize an oil analysis program as outlined in Section 5.B of this permit in order to extend the specified oil change requirement in (a) above. The permittee may also petition the DEQ for use of an alternative work practice to (c) above and/or to the operational requirements for startup.

(40 CFR 63.6603 and Table 2d of Subpart ZZZZ)

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

(Ref.: 40 CFR 63.6625(e), 63.6640(a), and Table 6 of Subpart ZZZZ)

- 3.D.4 For Emission Point AA-011, the permittee shall comply with the following:

- (a) At all times, be in compliance with the emission limitations, operating limitations, and other applicable requirements in 40 CFR 63, Subpart ZZZZ.
- (b) At all times, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to MDEQ which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(Ref.: 40 CFR 63.6605, Subpart ZZZZ)

## SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:
- (a) the identification of each term or condition of the permit that is the basis of the certification;
  - (b) the compliance status;
  - (c) whether compliance was continuous or intermittent;
  - (d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
  - (e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(5)(a), (c), & (d).)

## SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

### A. General Monitoring, Recordkeeping and Reporting Requirements

- 5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.
- 5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:
- (a) the date, place as defined in the permit, and time of sampling or measurements;
  - (b) the date(s) analyses were performed;
  - (c) the company or entity that performed the analyses;
  - (d) the analytical techniques or methods used;
  - (e) the results of such analyses; and
  - (f) the operating conditions existing at the time of sampling or measurement. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(1).)
- 5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(2).)
- 5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 6.2.E. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)
- 5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such

deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) days of the time the deviation began. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(2).)

- 5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the DEQ and the EPA.
- 5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

**B. Specific Monitoring and Recordkeeping Requirements**

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(3)	5.B.1	Control Equipment	Perform regular maintenance as necessary and maintain a log of malfunctions and downtime
AA-009	40 CFR Part 64	5.B.2	PM/PM <sub>10</sub>	Compliance Assurance Monitoring requirements, as specified in Appendix B.
AA-011	40 CFR 63, Subpart ZZZZ (§63.6625(f))	5.B.3	HAP	Install non-resettable hour meter.
	40 CFR 63, Subpart ZZZZ (§63.6625(j))	5.B.4		Oil analysis program
	40 CFR 63, Subpart ZZZZ (§63.6655(a), (d) and (e))	5.B.5		Recordkeeping – Compliance reporting, maintenance and malfunctions
	40 CFR 63, Subpart ZZZZ (§63.6655(f))	5.B.6		Recordkeeping – Hours of operation
	40 CFR 63, Subpart ZZZZ (§63.6660(a) through (c))	5.B.7		Recordkeeping – General

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

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

- 5.B.2 For Emission Point AA-009, the permittee shall comply with the monitoring and recordkeeping requirements of the Compliance Assurance Monitoring (CAM) Plan contained in Appendix B of this permit. The permittee shall also comply with all applicable requirements in 40 CFR 64.7, 64.8, and 64.9.

(Ref.: 40 CFR Part 64 – *Compliance Assurance Monitoring*)

- 5.B.3 For Emission Point AA-011, the permittee shall install a non-resettable hour meter on the engine if one is not already installed.

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

- 5.B.4 For Emission Point AA-011, the permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement. The oil analysis must be performed at the same frequency specified for changing the oil. The analysis program must at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the permittee must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee must change the oil within 2 business days or before commencing operation, whichever is later. The permittee shall keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

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

- 5.B.5 For Emission Point AA-011, the permittee shall keep the following records:
- (a) A copy of each report that the permittee submitted to comply with Subpart ZZZZ.
  - (b) Records of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment) or the air pollution control and monitoring equipment.
  - (c) Records of all required maintenance performed on the air pollution control and monitoring equipment.
  - (d) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning

process and air pollution control and monitoring equipment to its normal or usual manner of operation.

The permittee shall keep the records required in Table 6 of Subpart ZZZZ to show continuous compliance with each emission or operating limitation that applies to you.

The permittee shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate that it operated and maintained the stationary RICE and after-treatment control device (if any) according to its maintenance plan.

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

- 5.B.6 For Emission Point AA-011, the permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for demand response operation, the permittee must keep records of the notification of the emergency situation, and the time the engine was operated as part of the demand response.

(Ref.: 40 CFR 63.6655 (f), Subpart ZZZZ))

- 5.B.7 For Emission Point AA-011, the permittee shall maintain records as follows:

- (a) Records must be in a form suitable and readily available for expeditious review according to §63.10(b)(1).
- (b) As specified in §63.10(b)(1), keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
- (c) Keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1).

(Ref.: 40 CFR 63.6660(a) through (c), Subpart ZZZZ)

C. Specific Reporting Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Reporting Requirement
AA-009	40 CFR 64.9	5.C.1	CAM Indicators	Report semiannually any excursions and/or exceedances from the limits, indicator ranges and/or conditions listed in the CAM Plans contained in Appendix B.
AA-011	40 CFR 63, Subpart ZZZZ, §63.6640(b) and Table 2d, Footnote 2	5.C.2	HAP	Report Emission and Operating Limitation Deviations and report any failure to perform the work practice on the schedule required.
	40 CFR 63, Subpart ZZZZ (§63.6650(f))	5.C.3		Report all deviations from 40 CFR 63, ZZZZ on Title V semiannual monitoring report.

5.C.1 For Emission Point AA-009, the permittee shall comply with the reporting requirements expressed in §64.9. In particular, the permittee shall submit summary information on the number, duration, and cause of excursions or exceedances and the corrective actions taken, as well as a summary on the number, duration, and cause of monitor downtime incidents. This information shall be submitted with the semiannual reports required by Condition 5.A.4 and shall be retained at the facility as required by Condition 5.A.3.

(Ref.: 40 CFR 64.9)

5.C.2 For Emission Point AA-011, the permittee shall report each instance in which the work practice requirements listed in Condition 3.D.1 were not met. These instances are deviations and must be reported within five (5) business days in accordance with Condition 5.A.5. If the work practices were not performed on the required schedule because it posed an unacceptable risk under Federal, State, or local law at the time of the required scheduled maintenance, the report must include the Federal, State, or local law under which the risk was deemed unacceptable.

(Ref.: 40 CFR 63.6640(b) and Table 2d, Footnote 2 of Subpart ZZZZ)

5.C.3 For Emission Point AA-011, the permittee shall report all deviations as defined in Subpart ZZZZ in the Title V semiannual monitoring report.

(Ref.: 40 CFR 63.6650(f), Subpart ZZZZ)



## SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

## SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act – Stratospheric Ozone Protection. The full text of the referenced regulations may be found on-line at <http://ecfr.gpoaccess.gov> under Title 40, or DEQ shall provide a copy upon request from the permittee.

- 7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A – Production and Consumption Controls.
- 7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.
- 7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E – The Labeling of Products Using Ozone-Depleting Substances, for the following containers and products:
  - (a) All containers in which a class I or class II substance is stored or transported;
  - (b) All products containing a class I substance; and
  - (c) All products directly manufactured with a process that uses a class I substance, unless otherwise exempted by this subpart or, unless EPA determines for a particular product that there are no substitute products or manufacturing processes for such product that do not rely on the use of a class I substance, that reduce overall risk to human health and the environment, and that are currently or potentially available. If the EPA makes such a determination for a particular product, then the requirements of this subpart are effective for such product no later than January 1, 2015.
- 7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F – Recycling and Emissions Reduction:
  - (a) Servicing, maintaining, or repairing appliances;
  - (b) Disposing of appliances, including small appliances and motor vehicle air conditioners; or
  - (c) Refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, persons

selling class I or class II refrigerants or offering class I or class II refrigerants for sale, and persons purchasing class I or class II refrigerants.

- 7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any acceptable alternative that is listed in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR Part 82, Subpart G – Significant New Alternatives Policy Program. The permittee shall also comply with any use conditions for the acceptable alternative substance.
- 7.6 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart H – Halon Emissions Reduction:
- (a) Any person testing, servicing, maintaining, repairing, or disposing of equipment that contains halons or using such equipment during technician training;
  - (b) Any person disposing of halons;
  - (c) Manufacturers of halon blends; or
  - (d) Organizations that employ technicians who service halon-containing equipment.

## APPENDIX A

### List of Abbreviations Used In this Permit

11 Miss. Admin. Code Pt. 2, Ch. 1.	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
11 Miss. Admin. Code Pt. 2, Ch. 2.	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
11 Miss. Admin. Code Pt. 2, Ch. 3.	Regulations for the Prevention of Air Pollution Emergency Episodes
11 Miss. Admin. Code Pt. 2, Ch. 4.	Ambient Air Quality Standards
11 Miss. Admin. Code Pt. 2, Ch. 5.	Regulations for the Prevention of Significant Deterioration of Air Quality
11 Miss. Admin. Code Pt. 2, Ch. 6.	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
11 Miss. Admin. Code Pt. 2, Ch. 7.	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lbs/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards For Hazardous Air Pollutants, 40 CFR 61 or National Emission Standards For Hazardous Air Pollutants for Source Categories, 40 CFR 63
NMVOC	Non-Methane Volatile Organic Compounds
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter less than 10 µm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound

## **APPENDIX B**

### **COMPLIANCE ASSURANCE MONITORING (CAM) PLAN**

COMPLIANCE ASSURANCE MONITORING

Cyclone #3, Cyclone #9 and Cyclone #10

I. Background

A. Emission Unit

Description: Cyclones #3, # 9 and #10 are Cambridge Port HE-1, high efficiency cyclones. Cyclones control particulate matter (PM) emissions from the sanding operations associated with the finishing process (AA-009). .

Identification: AA-009, Cyclone #3  
AA-009, Cyclone #9  
AA-009, Cyclone #10

Facility: Biltrite Ripley Operations LLC  
Ripley, Mississippi

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation No.: 40 CFR 64, CAM

Emission limits: 11 Miss. Admin. Code Pt. 2, R.1.3.F(1),  
 $E = 4.1 (p)^{0.67}$

Monitoring Requirements: Visible Emissions Observations and Control  
Equipment Inspections

C. Control Technology

High efficiency cyclones

II. Monitoring Approach

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

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

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

## JUSTIFICATION

### I. Background

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

### II. Rationale for Selection of Performance Indicators

#### *Visible Emissions Evaluation:*

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

#### *Control Equipment Inspections:*

The cyclones are inspected on a weekly basis to ensure that the sanding operations associated with the finishing process (AA-009) are properly controlled.

### III. Rationale for Selecting Indicator Ranges

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

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

