

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

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Mississippi Polymers, Inc.
2733 South Harper Road
Corinth, MS
Alcorn 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: NOV 27 2017

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: OCT 31 2022

Permit No.: 0060-00019

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APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT

OTHER IMPORTANT DOCUMENTS:

40 CFR 60, Subpart IIII – New Source Performance Standards for Stationary Compression Ignition Combustion Engines

40 CFR 60, Subpart JJJJ – New Source Performance Standards for Stationary Spark Ignition Combustion Engines

40 CFR 63, Subpart KK – National Emission Standards for Hazardous Air Pollutants for the Printing and Publishing Industry

40 CFR 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters

40 CFR 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

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 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).)
- 1.3 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).)
- 1.4 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).)
- 1.5 Prior to its expiration, this permit may be reopened in accordance with the provisions listed below.
 - (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)

- 1.6 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).)
- 1.7 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).)
- 1.8 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).)
- 1.9 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.)
- 1.10 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).)
- 1.11 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.)
- 1.12 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).)

- 1.13 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).)
- 1.14 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).)
- 1.15 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).)
- 1.16 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).)

- 1.17 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.)
- 1.18 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).)
- 1.19 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).)

- 1.20 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.)

- 1.21 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.

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

- 1.22 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).)
- 1.23 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).)
- 1.24 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.)
- 1.25 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.)

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

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

- (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
 - (iv) That within 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
 - (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
 - (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
 - (3) This provision is in addition to any upset provision contained in any applicable requirement.
 - (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- (b) Startups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
 - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in 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.)

- 1.27 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.
(Ref.: 11 Miss Admin. Code Pt. 2, R. 1.8.)

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
MP-000	THE ENTIRE FACILITY
AA-000	COLOR WEIGHT OPERATION Various colors of pigments are blended in the Color Weight Operation
AA-001	Pre-Mix Color Mixers (Comprised of three (3) mixers) and a Large Color Weighed Scale, which vent to a single baghouse)
AA-002	Color Weight Operation Portion of the Manufacturing Building, which includes Two Large Color Mixers equipped with a single baghouse that vents inside the building
AA-003	Color Weight Bench equipped with a baghouse
AB-000	BLENDING OPERATION PVC resins, fillers, stabilizers, plasticizers, additives, and other processing aids are weighed and mixed according to product formulation
AB-001	No. 3 Railcar Resin Unloading System equipped with a baghouse
AB-002	No. 4 Railcar Resin Unloading System equipped with a baghouse
AB-003	Resin Storage Silo No. 1 equipped with a baghouse
AB-004	Resin Storage Silo No. 2 equipped with a baghouse
AB-005	Resin Storage Silo No. 3 equipped with a baghouse
AB-006	Filler Storage Silo equipped with a baghouse
AB-007	Resin and Filler Scale Tanks equipped with a baghouse
AB-010	Blenders 5 and 6 Holding Tank equipped with a baghouse
AB-011	Blenders 7, 8, and 9 Holding Tank equipped with a baghouse
AB-012	Blenders 1, 2, 3, and 4 equipped with a single baghouse. Air emissions include those generated from four blenders, Calender No. 1 Banbury Mixers, and Calender No. 2 Banbury Mixers.
AB-013	Blenders 5 and 6 equipped with a single baghouse
AB-014	Blenders 7, 8, & 9 equipped with a single baghouse.
AB-015	Blending Operation Portion of the Manufacturing Plant that vents inside the building, which includes:

Emission Point	Description
	<p>Blenders 1 and 2 Holding Tank equipped with a baghouse which vents inside the building (formerly AB-008)</p> <p>Blenders 3 and 4 Holding Tank equipped with a baghouse which vent inside the building (formerly AB-009)</p> <p>Calender No. 3's Titanium Dioxide (TiO₂) Scale Tank equipped with a baghouse which vents inside the building (formerly AB-013(b))</p> <p>Calender No. 4's Titanium Dioxide (TiO₂) Scale Tank equipped with a baghouse which vents inside the building (formerly AB-014(b))</p> <p>Calender No. 3's and Calender No. 4's Titanium Dioxide (TiO₂) Super Sack Loading Areas equipped with a baghouse which vents inside the building (formerly AB-013(c) and AB-014(c))</p>
AC-000	<p style="text-align: center;">CALENDER OPERATION</p> <p style="text-align: center;">Pre-mix from blenders is pressed into rolled (continuous sheet) vinyl ready for shipment or further processing</p>
AC-010	Calender No. 1 – comprised of a calender, holding tank, scale tank, two (2) banbury mixers, roll mill and an extruder. Process emissions, except from banbury mixers, are vented through a baghouse and building exhaust. Emissions from the two (2) banbury mixers are vented to Emission Point AB-012
AC-020	Holding tank, scale tank, two (2) banbury mixers, roll mill and an extruder. Process emissions, except from banbury mixers, are vented through a baghouse and building exhaust. Emissions from the two (2) banbury mixers are vented to Emission Point AB-012
AC-030	Calender No. 3 – comprised of a calender, roll mill and an extruder. Process emissions vented through building exhaust.
AC-040	Calender No. 4 – comprised of a calender, roll mill and an extruder. Process emissions vented through building exhaust.
AC-050	Calender No. 5 – comprised of a calender, four (4) holding tanks, scale tank, high speed mixer, continuous mixer, two (2) banbury mixers, roll mill, and extruder. Process emissions are vented through a holding tank baghouse and building exhaust.
AE-000	<p style="text-align: center;">PRINTING OPERATION</p>
AE-001	Rotogravure Printer No. 4 and Dryer – Process emissions are vented through building exhaust.
AE-002	Rotogravure Printer No. 5 and Dryer – Process emissions are vented through building exhaust.
AE-003	Rotogravure Printer No. 6 and Dryer – Process emissions are vented through building exhaust.
AE-004	Rotogravure Printer No. 7 and Dryer – Process emissions are vented through building exhaust.
AF-000	<p style="text-align: center;">LAMINATING OPERATION</p> <p style="text-align: center;">A polyester non-woven and woven fabric is applied to the back of the vinyl sheeting for support.</p>
AF-001	Laminator No. 1 – Process emissions vented through building exhaust.

Emission Point	Description
AF-002	Laminator No. 2 – Process emissions vented through building exhaust.
AF-004	Laminator No. 4 – Process emissions vented through building exhaust.
AF-005	Laminator No. 5 – Process emissions vented through building exhaust.
AG-000	INK PREPARATION Inks are received and mixed for used in the Printing Operation
AG-001	Ink Preparation Room – Process emissions vented through building exhaust.
AH-000	NORTH AND SOUTH COLOR MIX ROOMS Topcoats and adhesives used in the Printing Operation and pigment dispersions used in the Calender Operations are prepared depending on the formulation required
AH-002	Mix Tanks equipped with a single baghouse
AH-003	Ventilation System (EAST) – Floor sweep and mix tank exhaust ventilation system used to remove process emissions from the work areas.
AH-004	Ventilation System (WEST) – Floor sweep and mix tank exhaust ventilation system used to remove process emissions from the work areas.
AN-000	FUEL BURNING EQUIPMENT
AN-001	Hot Oil Heater Boiler No. 1 (Heat Input Capacity 1.02 MMTU/HR) fueled by natural gas only.
AN-002	Hot Oil Heater Boiler No. 2 (Heat Input Capacity 1.02 MMBTU/HR) fueled by natural gas only.
AN-003	Steam Boiler (Heat Input Capacity 8.4 MMBTU/HR) fueled by natural gas only.
AN-005	144 hp Emergency Diesel Fire Pump Engine, installed in 2014.
AN-006	Generac 22 KW (29.5hp) Natural Gas-fired emergency lighting generator, installed in May 2017

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
MP-000 (<i>Entire Facility</i>)	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1)	3.B.1	PM (filterable only)	E = 4.1(p) ^{0.67}
AA-001, AA-003, AB-001, AB-002, AB-003, AB-004, AB-005, AB-006, AB-007, AB-010, AB-011, AB-012, AB-013, AB-014, AC-010, AC-020, AC-050 and AH-002 (<i>Facility-Wide Baghouses</i>)	Title V Operating Permit issued May 21, 2012	3.B.2	PM (filterable only)	Operate baghouses at all times when emissions may be vented.
AE-000, AF-000, AG-000 and AH-000 (<i>Printing, Laminating, Ink Prep and Coloring Operations</i>)	NESHAP, 40 CFR 63, Subpart A – General Provisions for National Emission Standards for Hazardous Air Pollutants and Subpart KK – National Emission Standards for the Printing and Publishing Industry			
	40 CFR 63.825(b), Subpart KK	3.B.3	HAP	Limit organic HAP emissions to no more than 4 percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials on a monthly average “as-applied” basis.
AN-001, AN-002, AN-003, and AN-006 (<i>Boilers and Generator</i>)	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a)	3.B.4	PM (filterable only)	0.6 lbs/MMBTU
AN-001 and AN-002 (<i>Boilers No. 1 and No. 2</i>)	11 Miss. Admin. Code Pt. 2, R. 1.4.A(3)	3.B.5	SO ₂	2.4 lbs/MMBTU
AN-003 (<i>Steam Boiler</i>)	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1)	3.B.6	SO ₂	4.8 lbs/MMBTU
AN-001, AN-002, and AN-003 (<i>Boilers</i>)	40 CFR 63, Subpart DDDDD - NESHAP for Major Sources: Industrial, Commercial, and institutional Boilers and Process Heaters, 40 CFR 63.7485, 63.7490 and 63.7499	3.B.15	HAP	NESHAP Applicability
	40 CFR 63.7500, 63.7540(a)(10) and Table 3, Subpart DDDDD	3.B.16		Tune-ups

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AN-005 (Fire Pump)	40 CFR 60, Subpart III – NSPS for Stationary Compression Ignition Combustion Engines– 40 CFR 60.4200(a)(2)(ii)	3.B.7	NSPS	Applicability
	40 CFR 63, Subpart ZZZZ – NESHAP for Reciprocating Internal Combustion Engines– 40 CFR 63.6590(c)(7)	3.B.8	HAP	Comply with NSPS Subpart III
	40 CFR 60.4205(c), and Table 4, Subpart III	3.B.9	NMOC + NOx)	3.0 g/HP-hr
			PM (filterable only)	0.22 g/HP-hr
	40 CFR 60.4206 and 60.4211(a), Subpart III	3.B.10	NSPS	Operate and Maintain Stationary CI ICE
	40 CFR 60.4207(b), Subpart III	3.B.11	Fuel Requirement	Maximum diesel sulfur content of 15ppm
				Minimum cetane index of 40, or maximum aromatic content of 35 volume percent.
	40 CFR 60.4209(a), Subpart III	3.B.12	Operating Requirements	Install a non-resettable hour meter
40 CFR 60.4211(c), Subpart III	3.B.13	Certified Engine		
40 CFR 60.4211(f) , Subpart III	3.B.14	Limit non-emergency operation to 100 hours per year		
AN-006 (Natural Gas Engine)	40 CFR 60, Subpart JJJJ – NSPS for Stationary Spark Ignition Combustion Engines, 40 CFR 60.4230(a)(4)(iv)	3.B.17	CO, NOx, and VOC	Applicability
	40 CFR 63.6590(c)(3), Subpart ZZZZ	3.B.18		Comply with NSPS Subpart JJJJ
	40 CFR 60.4233(d) and Table 1, and 60.4324 and 60.4236(c), Subpart JJJJ	3.B.19	NOx + HC	10 g/HP-hr
			CO	387 g/HP-hr
40 CFR 60.4243(d), Subpart JJJJ	3.B.20	Operating Time	Limit non-emergency operation to 100 hours	

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
				per year

- 3.B.1 For Emission Point MP-000 (*Entire Facility*), except as otherwise specified, the permittee shall not 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

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

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.B.2 For Emission Points AA-001, AA-003, AB-001, AB-002, AB-003, AB-004, AB-005, AB-006, AB-007, AB-010, AB-011, AB-012, AB-013, AB-014, AC-010, AC-020, AC-050, and AH-002 (*Facility-Wide Baghouses*), the permittee shall operate the baghouses at any time when emissions are vented. For each baghouse, the permittee will maintain a baghouse pressure differential consistent with historical operating conditions indicative of good control practices. (Ref.: Title V Operating Permit issued May 21, 2012)

- 3.B.3 For Process Areas AE-000, AF-000, AG-000, and AH-000 (*Printing, Laminating, Ink Prep and Coloring Operations*), the permittee shall comply with the National Emission Standards for Hazardous Air Pollutant Emissions, 40 CFR Part 63, Subpart KK – National Emission Standards for the Printing and Publishing Industry and Subpart A – General Provisions for National Emission Standards for Hazardous Air Pollutants. A copy of the National Emission Standards for the Printing and Publishing Industry may be found online at <http://ecfr.gpoaccess.gov>.

More specifically, the permittee shall limit emissions to no more than 4 percent of the mass of the inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month. (Ref.: 40 CFR 63.820(a)(1) and 63.825(b), 40 CFR 63, Subpart A)

- 3.B.4 For Emissions Points AN-001, AN-002, AN-003, and AN-006 (*Boilers and Generators*), 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 For Emission Points AN-001 and AN-002 (*Boiler No. 1 and No. 2*), the maximum discharge of sulfur dioxide from any modified fuel burning unit whose generation capacity is less than 250 million BTU per hour and in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 2.4 pounds (measured as sulfur

dioxide) per million BTU heat input. For the purposes of this limitation, "modification" shall mean any physical change in an Air Contaminant Source which increases the amount of any air pollutant (to which a standard applies) emitted by such source or which results in the emission of any air pollutant (to which a standard applies) not previously emitted. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(3))

- 3.B.6 For Emission Point AN-003 (*Steam Boiler*), 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.7 For Emission Point AN-005 (*Fire Pump*), the permittee is subject to and shall comply with New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines (40 CFR 60, Subpart IIII) and the General Provisions (40 CFR 60, Subpart A). (Ref.: 40 CFR 60.4200(a)(2)(ii), Subpart IIII)
- 3.B.8 For Emission Point AN-005 (*Fire Pump*), the permittee shall meet the requirements of 40 CFR 63, Subpart ZZZZ by meeting the requirements of 40 CFR part 60 subpart IIII. No further requirements apply for such engines under Subpart ZZZZ. (Ref.: 40 CFR 63.6590(c)(7), Subpart ZZZZ)
- 3.B.9 For Emission Point AN-005 (*Fire Pump*), the permittee, for the life of the engine, shall not have emissions of non-methane hydrocarbons and nitrogen oxides (NMHC+NO_x) combined greater than 3.0 g/HP-hr and filterable particulate matter (PM) greater than 0.22 g/HP-hr. (Ref.: 40 CFR 60.4205(c) and Table 4, Subpart IIII)
- 3.B.10 For Emission Point AN-005 (*Fire Pump*), the permittee must operate and maintain these engines according to the manufacturer's written instructions or procedures developed by the permittee that are approved by the engine manufacturer over the entire life of the engine. In addition, the permittee may only change those settings that are permitted by the manufacturer. (Ref.: 40 CFR 60.4206 and 60.4211(a), Subpart IIII)
- 3.B.11 For Emission Point AN-005 (*Fire Pump*), the permittee shall use diesel fuel that meets the following requirements.
- (a) Maximum sulfur content of 15ppm.
 - (b) Minimum cetane index of 40 or maximum aromatic content of 35 volume percent.
- (Ref.: 40 CFR 60.4207(b), Subpart IIII and 80.510(b))
- 3.B.12 For Emission Point AN-005 (*Fire Pump*), the permittee shall install a non-resettable hour meter prior to startup of the engine. (Ref.: 40 CFR 60.4209(a), Subpart IIII)

- 3.B.13 For Emission Point AN-005 (*Fire Pump*), the permittee shall comply by purchasing an engine certified to the emission standards in 40 CFR 60.4205(c) for the same model year and maximum (or in the case of fire pumps, NFPA nameplate) engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications. (Ref.: 40 CFR 60.4211(c), Subpart IIII)
- 3.B.14 For Emission Point AN-005 (*Fire Pump*), 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 60.4211(f), Subpart IIII))

- 3.B.15 For Emission Point AN-001, AN-002, and AN-003 (*Boilers*), the permittee is subject to and shall comply with the applicable provisions of 40 CFR 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. Emission Points AN-001, AN-002, and AN-003 (Boilers) do not have any emission limits and only have to to comply with the Work Practice Standards in 3.B.16 of this permit. (Ref: 40 CFR 63.7485, 63.7490(a)(1) and (d), 63.7499(l), and 63.7500(a)(1), Subpart DDDDD)

3.B.16 For Emission Point AN-001 and AN-002 (*Boilers*), the permittee shall complete a tune-up of the boilers every 5 years beginning from the date of the initial tune-up. Each subsequent tune-up shall be completed no more than 61 months after the previous one.

For Emission Point AN-003 (*Boilers*), the permittee shall complete a biennial tune-up of the boiler beginning from the date of the initial tune-up. Each subsequent tune-up shall be completed no more than 25 months after the previous one.

If the unit is not operating on the required date of the tune-up, the tune-up must be conducted within 30 calendar days of startup. The tune-up must be completed in accordance with (a) through (f) below

- (a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown not to exceed 72 months from the previous burner inspection). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;
- (b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;
- (c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown).
- (d) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_x requirement to which the unit is subject;
- (e) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and
- (f) Maintain on-site and submit, if requested by MDEQ, a report containing the following information listed in (1) through (3) of this section:
 - (1) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.

- (2) A description of any corrective actions taken as a part of the tune-up of the boiler.
- (3) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.

(Ref.: 40 CFR 63.7515(d), 63.7540(a)(10)(i)-(vi), (11), (12), and(13), and Table 3 of Subpart DDDDD)

- 3.B.17 For Emission Point AN-006 (*Natural Gas Engine*), the permittee is subject to and shall comply with the New Source Performance Standards for Stationary Spark Ignition Internal Combustion Engines (40 CFR 60, Subpart JJJJ) and the General Provisions (40 CFR 60, Subpart A). (Ref.: 40 CFR 60.4230(a)(4)(iv), Subpart JJJJ)
- 3.B.18 For Emission Point AN-006 (*Natural Gas Engine*), the permittee shall meet the requirements of 40 CFR 63, Subpart ZZZZ by meeting the requirements of 40 CFR part 60 subpart JJJJ. No further requirements apply for such engines under Subpart ZZZZ. (Ref.: 40 CFR 63.6590(c)(3), Subpart ZZZZ)
- 3.B.19 For Emission Point AN-006 (*Natural Gas Engine*), the permittee shall, for the life of the engine, have emissions of carbon monoxide (CO) less than 387 g/HP-hr and exhaust emissions of nitrogen oxides (NO_x) and hydrocarbons (HC) combined less than 10 g/HP-hr. (Ref.: 40 CFR 60.4233(d), 60.4324, 60.4236(c) and Table 1 of 40 CFR 60, Subpart JJJJ)
- 3.B.20 For Emission Point AN-006 (*Natural Gas Engine*), the permittee shall operate the emergency stationary ICE 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 ICE in emergency situations.
 - (b) The permittee may operate the emergency stationary ICE 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 ICE beyond 100 hours per calendar year.

- (c) The permittee may operate the emergency stationary ICE up to 50 hours per calendar year in non-emergency situations, but those 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 provided in 60.4243(d)(3)(i), 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 60.4243(d)(1-3), Subpart JJJJ)

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 (filterable only)	0.6 lbs/MMBTU, or as otherwise limited by facility modification restrictions
11 Miss. Admin. Code Pt. 2, R. 1.4.A(1)	3.C.2	SO ₂	4.8 lbs/MMBTU, or as otherwise limited by facility modification restrictions

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))

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

5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

B. General Monitoring, Recordkeeping and Reporting Requirements

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-001, AA-003, AB-001, AB-002, AB-003, AB-004, AB-005, AB-006, AB-007, AB-012, AB-013, AB-014, AC-010, AC-020, AC-030, AC-040, AC-050, AH-002, AH-003 and AH-004	Visible Emissions	Weekly visible emissions observations	5.B.1	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)
AA-001, AA-003, AB-001, AB-002, AB-003, AB-004, AB-005, AB-006, AB-007, AB-010, AB-011, AB-012, AB-013, AB-014, AC-010, AC-020, AC-050, AH-002 (Facility-Wide Baghouses)	Pollution Control Equipment	Weekly inspections and/or maintenance	5.B.2	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)
AN-001, AN-002, AN-003, and AN-006 <i>(Boilers and Generators)</i>	Fuel	Monthly usage records	5.B.3	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)
AN-001, AN-002, and AN-003 <i>(Boilers)</i>	HAP	40 CFR 63, Subpart DDDDD - Recordkeeping	5.B.8	40 CFR 63.7555(a)(1) and (h), 63.7560, and 63.10(b)(2), Subpart DDDDD
AE-000, AF-000, AG-000, and AH-000 <i>(Printing, Laminating, Ink Prep and Coloring Operations)</i>	HAPs	Monthly usage monitoring	5.B.4	40 CFR Part 63, Subpart KK
		Testing	5.B.5	
		Monthly recordkeeping	5.B.6	
AN-005 <i>(Fire Pump)</i>	Hours of Operation	Recordkeeping	5.B.7	40 CFR 60.4214(b), Subpart IIII

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AN-006 (Natural Gas Engine)	NOx + HC and CO	Comply by purchasing a certified engine or conducting a performance test	5.B.9	40 CFR 60.4243(b)(1), Subpart JJJJ
		Recordkeeping	5.B.10	40 CFR 60.4245(a), Subpart JJJJ
		Maintain hours of operation recorded through the non-resettable hour meter	5.B.11	40 CFR 60.4245(b), Subpart JJJJ, and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)

5.B.1 For Emission Points AA-001, AA-003, AB-001, AB-002, AB-003, AB-004, AB-005, AB-006, AB-007, AB-012, AB-013, AB-014, AC-010, AC-020, AC-030, AC-040, AC-050, AH-002, AH-003, and AH-004, the permittee shall conduct visual observations for visible emissions from all exhaust stacks on a weekly basis and whenever there is a public complaint of visible emissions. Each visual observation shall be conducted for a minimum of six (6) consecutive minutes. Visual observations shall be conducted during daylight hours and during conditions representative of normal operation. If any visible emissions (not including condensed water vapor) are observed, the permittee shall:

- (a) Take corrective action that eliminates the visible emissions within 24 hours;
- (b) Verify that the air emissions equipment and/or any associated air pollution equipment is operating normally, in accordance with design and standard procedures, and under the same conditions in which compliance was achieved in the past; and
- (c) Perform an additional visual observation of six consecutive minutes within three (3) business days.

If the corrective action does not result in “no visible emissions” being observed from the emission point, the permittee shall notify DEQ in writing within five (5) business days and shall have a certified visual emissions observer perform a visible emissions observation using EPA Reference Method 9 within five (5) business days.

The permittee shall record and maintain records documenting the following:

- (a) Identification of stack and/or Emission Point;
- (b) Results of all required visual observations, including Method 9 testing results when applicable;

- (c) Description of corrective action taken and a statement of verification that the emission unit and the associated pollution control device are operating normally; and
- (d) Date and time any visible emissions were abated.

A log of these records shall be maintained in accordance with Condition 5.A.3 and a summarized report submitted in accordance with Condition 5.A.4 and made available upon request by DEQ. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2))

- 5.B.2 For Emission Points AA-001, AA-003, AB-001, AB-002, AB-003, AB-004, AB-005, AB-006, AB-007, AB-010, AB-011, AB-012, AB-013, AB-014, AC-010, AC-020, AC-050, and AH-002 (*Facility-Wide Baghouses*), the permittee shall perform regular inspections and/or maintenance each week, or more often if necessary, to maintain proper operation of the pollution control equipment. The permittee shall maintain on hand at all times sufficient equipment as is necessary to repair and/or replace the pollution control equipment.

The permittee shall measure and monitor the pressure drop weekly across each baghouse control system and ensure the pressure differential is consistent with the pressure drop ranges established and documented, and updated as necessary to reflect current operating conditions.

A log of the Emission Point, date and time of the weekly maintenance inspection and pressure drop reading, and the documented pressure drop range shall be maintained at the facility. Records of the inspections and pressure drop readings shall be kept in log form and maintained in accordance with Condition 5.A.3 and shall be made available upon request by DEQ personnel. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2))

- 5.B.3 For Emission Points AN-001, AN-002, AN-003, and AN-006 (*Boilers and Generators*), the permittee shall maintain monthly usage records. The records shall contain information on the quantity of natural gas combusted maintained for a facility-wide total. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2))

- 5.B.4 For Process Areas AE-000, AF-000, AG-000, and AH-000 (*Printing, Laminating, Ink Prep and Coloring Operations*), the permittee shall limit HAP emissions to no more than 4 percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.

The permittee shall comply with this standard by demonstrating that each ink, coating, varnish, adhesive, primer, solvent, diluent, reducer, thinner, and other material applied during the month contains no more than 0.04 weight-fraction organic HAP, on a monthly average as-applied basis. (Ref.: 40 CFR 63.825(b)(1), Subpart KK)

- 5.B.5 For Process Areas AE-000, AF-000, AG-000, and AH-000 (*Printing, Laminating, Ink Prep and Coloring Operations*), the permittee shall determine the organic HAP weight fraction

of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, diluents, and other materials applied by following the procedures in 40 CFR 63.827(b)(2)(iii). (Ref.: 40 CFR 63.827(b)(2), Subpart KK)

- 5.B.6 For Process Areas AE-000, AF-000, AG-000, and AH-000 (*Printing, Laminating, Ink Prep and Coloring Operations*), the permittee shall maintain records specified in § 63.10(b)(2) of all measurements needed to demonstrate compliance with this standard, records of the occurrence and duration of each malfunction of operation, and records of actions taken during periods of malfunction to minimize emissions, on a monthly basis in accordance with the requirements of 40 CFR 63.10(b). (Ref.: 40 CFR 63.829, Subpart KK)
- 5.B.7 For Emission Point AN-005 (*Fire Pump*), the permittee shall keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The permittee shall record the time of operation of the engine and the reason the engine was in operation during that time. (Ref.: 40 CFR 60.4214(b), Subpart IIII)
- 5.B.8 For Emission Points AN-001, AN-002, and AN-003 (*Boilers*), the permittee must keep all records readily available for review. The permittee shall keep a copy each notification and report submitted to comply with Subpart DDDDD, including all documentation supporting the Notification of Compliance Status or compliance report. These records shall be retained for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. The permittee is required to keep the records on site for a period of 2 years after the event and then they may be kept offsite for the remaining three years. (Ref.: 40 CFR 63.7555(a)(1) and (h), 63.7560, and 63.10(b)(2), Subpart DDDDD)
- 5.B.9 For Emission Point AN-006 (*Natural Gas Engine*), the permittee shall demonstrate compliance with the emission standards specified in 40 CFR 60.4233(d) by purchasing an engine certified according to procedures specified in 40 CFR Subpart JJJJ, for the same model year and demonstrating compliance according to one of the methods specified in 60.4243(a). If the permittee operates and maintains the certified engine according to the manufacturer's emission-related written instructions, compliance may be demonstrated by keeping records of conducted maintenance, and no performance testing is required. If the permittee does not operate and maintain the certified engine and control device according to the manufacturer's emission-related written instructions, the engine will be considered a non-certified engine, and the permittee must demonstrate compliance according to 60.4243(a)(2)(iii). (Ref.: 40 CFR 60.4243(b)(1), Subpart JJJJ)
- 5.B.10 For Emission Point AN-006 (*Natural Gas Engine*), the permittee shall keep records of the following:
 - (a) All notifications submitted to comply with Subpart JJJJ and all documentation supporting any notification.
 - (b) Maintenance conducted on the engine.

- (c) Maintain documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR parts 90, 1048, 1054, and 1060, as applicable.
 - (d) If the engine is operated in a non-certified manner, documentation that the engine meets the emission standards. (Ref.: 40 CFR 60.4245(a), Subpart JJJJ)
- 5.B.11 For Emission Point AN-006 (*Natural Gas Engine*), the permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee 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. (Ref.: 40 CFR 60.4245(b), Subpart JJJJ and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2))

C. Specific Reporting Requirements

Emission Point(s)	Pollutant/Parameter Monitored	Reporting Requirement	Condition Number	Applicable Requirement
AA-001, AA-003, AB-001, AB-002, AB-003, AB-004, AB-005, AB-006, AB-007, AB-012, AB-013, AB-014, AC-010, AC-020, AC-030, AC-040, AC-050, AH-002, AH-003 and AH-004 <i>(Facility-Wide Operations)</i>	Visible Emissions	Visible emissions observations records	5.C.1	11 Miss. Admin. Code Pt. 2, R. 6.3.C(1)
AA-001, AA-003, AB-001, AB-002, AB-003, AB-004, AB-005, AB-006, AB-007, AB-010, AB-011, AB-012, AB-013, AB-014, AC-010, AC-020, AC-050 and AH-002 <i>(Facility-Wide Baghouses)</i>	Pollution Control Equipment	Inspections and/or maintenance records	5.C.1	11 Miss. Admin. Code Pt. 2, R. 6.3.C(1)
AE-000, AF-000, AG-000 and AH-000 <i>(Printing, Laminating, Ink Prep and Coloring Operations)</i>	HAP	Usage monitoring, testing, and recordkeeping	5.C.2	40 CFR Part 63, Subpart KK
AN-001, AN-002 and AN-003 <i>(Boilers)</i>	HAP	Compliance Report	5.C.3	40 CFR 63.7550(a)(b), and (c)(5)(i)-(iii),(xiv), and (xvii) and Table 9, Subpart DDDDD

5.C.1 The permittee shall submit a report summarizing the required recordkeeping and monitoring specified in Conditions 5.B.1 and 5.B.2, in accordance with Condition 5.A.4. The report shall include, at a minimum, any visible emissions detected, any corrective action undertaken, results of any Method 9 opacity observations, any weekly inspections that were not performed, and any pressure drop readings not within the established pressure drop range. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(1))

5.C.2 For Process Areas AE-000, AF-000, AG-000, and AH-000, the permittee shall submit the reports specified in 40 CFR Part 63 Subpart A and 40 CFR 63.830(b)(1) through (b)(6). All notifications and reports shall be submitted semi-annually in accordance with 5.A.4, unless otherwise specified in 40 CFR Part 63 Subpart A or 40 CFR 63.830. (Ref.: 40 CFR 63.830)

5.C.3 For Emission Points AN-001, AN-002 and AN-003 (*Boilers*), the permittee shall submit the information listed in (a) through (e) in accordance with the next required report per Condition 5.A.4 once the tune-up required in Condition 3.B.16 has been completed.

- (a) Company and Facility name and address
- (b) Process unit information
- (c) Date of report and beginning and ending dates of reporting period.
- (d) The date of the most recent tune-up for Emission Points AN-001, AN-002 and AN-003. Include the date of the most recent burner inspection, if it was not done annually and was delayed until the next scheduled or unscheduled unit shutdown.
- (e) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
(Ref.: 40 CFR 63.7550(a), (b), and (c)(5)(i)-(iii), (xiv), and (xvii) and Table 9 of Subpart DDDDD)).

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
NM VOC	Non-Methane Volatile Organic Compounds
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM ₁₀	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 ₂	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound