STATE OF MISSISSIPPI
AND FEDERALLY ENFORCEABLE
AIR POLLUTION CONTROL
PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT AT A SYNTHETIC MINOR SOURCE

THIS CERTIFIES THAT

Holcim US Inc
8677 Highway 45 Alternate South
Artesia, Mississippi
Lowndes County

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

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

Krystal Rudolph

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: OCT 21 2019

Permit No.: 1680-00025

Effective Date: As specified herein.

Expires: September 30, 2024

AI 973 PER20180003

SECTION 1.

A. GENERAL CONDITIONS

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

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

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

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.4.D.)

3. Any activities not identified in the application are not authorized by this permit.

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

4. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit.

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

5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)

6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.

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

7. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

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

8. The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:

a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and

b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission.

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

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

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

10. Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)

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

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

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

a. Routine maintenance, repair, and replacement;

b. Use of an alternative fuel or raw material by reason of an order under Sections 2(a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974

(or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;

c. Use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;

d. Use of an alternative fuel or raw material by a stationary source which:

(1) The source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, or 40 CFR 51.166; or

(2) The source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, or 40 CFR 51.166;

e. An increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I or 40 CFR 51.166; or

f. Any change in ownership of the stationary source.

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

B. GENERAL OPERATIONAL CONDITIONS

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

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

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

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

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

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

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

   a. Upsets

      (1) For an upset defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:

         (i) An upset occurred and that the source can identify the cause(s) of the upset;

         (ii) The source was at the time being properly operated;

         (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;

         (iv) That within 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;

         (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.

      (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.

      (3) This provision is in addition to any upset provision contained in any applicable requirement.

      (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third-party enforcement actions.

   b. Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.)

(1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.

(2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).

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

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

5. Compliance Testing: Regarding compliance testing:

a. The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.

b. Compliance testing will be performed at the expense of the permittee.

c. Each emission sampling and analysis report shall include but not be limited to the following:

(1) Detailed description of testing procedures;

(2) Sample calculation(s);

(3) Results; and

(4) Comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B(3), (4), and (6).)

C. PERMIT RENEWAL / MODIFICATION / TRANSFER / TERMINATION

6. For renewal of this permit, the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the

Mississippi Environmental Quality Permit Board. If the applicant submits a timely and complete application pursuant to this paragraph and the Permit Board, through no fault of the applicant, fails to act on the application on or before the expiration date of the existing permit, the applicant shall continue to operate the stationary source under the terms and conditions of the expired permit, which shall remain in effect until final action on the application is taken by the Permit Board. Permit expiration terminates the source's ability to operate unless a timely and complete renewal application has been submitted.

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

7. The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

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

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

9. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:

   a. Persistent violation of any terms or conditions of this permit.

   b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

   c. A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

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

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

SECTION 2
EMISSION POINT DESCRIPTION

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

Emission Point	Description
AA-000	Hazardous waste storage and transfer facility. Facility receives and blends combustible organic wastes to produce waste derived fuels for use at other RCRA permitted treatment, storage, or disposal (TSD) facilities.
AA-025	The carbon adsorption system which controls emissions from the storage and blending tanks (Emission Points AA-036 through AA-041). Emissions from the tanks are routed to the carbon cannisters when the pressure in the tank system reaches 12 psig, such that venting from the system occurs (Facility Reference No. S-75).
AA-028	Fire Control system with a 311 HP (2.17 MMBTU/hr or 232 kW) diesel-fired John Deere emergency engine (2018 Model 6090HFG84) used to provide water in the event of a fire (Facility Reference No. S-85).
AA-033	Product Loading/Unloading consisting of three truck loading/unloading bays and one bay for railcars. The transfer system has two 500 gal/min (max) pumps and uses submerged filling to control emissions.
AA-034	0.96 MMBtu/hr propane fired Hurst boiler used to heat waste material, as needed, for transfer from transport vehicle to the facility for processing.
AA-036	39,000 gallon waste derived fuel pressurized storage tank. Emissions routed to Emission Point AA-025 (Facility Ref. No. T-4101).
AA-037	39,000 gallon waste derived fuel pressurized storage tank. Emissions routed to Emission Point AA-025 (Facility Ref. No. T-4102).
AA-038	39,000 gallon waste derived fuel pressurized storage tank. Emissions routed to Emission Point AA-025 (Facility Ref. No. T-4103).
AA-039	39,000 gallon waste derived fuel pressurized storage tank. Emissions routed to Emission Point AA-025 (Facility Ref. No. T-4104).
AA-040	90,000 gallon waste derived fuel pressurized storage tank. Emissions routed to Emission Point AA-025 (Facility Ref. No. T-4105).
AA-041	90,000 gallon waste derived fuel pressurized storage tank. Emissions routed to Emission Point AA-025 (Facility Ref. No. T-4106).
AA-042	500 gallon diesel fuel storage tank (Facility Ref. No. TK-01)

SECTION 3
EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limitation/Standard
AA-000	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.1	Waste Fuel Throughput	≤ 22,152,000 gallons of waste fuel throughput determined on a rolling 12-month basis
	Permit to Construct issued April 27, 1993	3.2	Dust Control	Minimize road dust
AA-000	40 CFR 61, Subpart FF National Emission Standard for Benzene Waste Operations 40 CFR 61.340(b), Subpart FF	3.3	Benzene	Applicability
	40 CFR 61.342(f), Subpart FF	3.4		General requirements
	40 CFR 61.343(a)(1), Subpart FF	3.5		Standards for storage tanks
	40 CFR 61.345(a)(1) and (2), Subpart FF	3.6		Standards for containers
	40 CFR 61.349(a)(1)(i), (iii), and (iv) and (a)(2)(ii), and (b), Subpart FF	3.7		Standards for closed-vent systems and control devices
AA-000	Permit to Construct issued April 27, 1993	3.8	Hazardous Waste Derived Fuel	Allowed materials
		3.9		Spill Requirements
AA-028	40 CFR 63, Subpart ZZZZ NESHAP for Stationary Reciprocating Internal Combustion Engines 40 CFR 63.6580, 63.6585(a) and (c), 63.6590(a)(2)(iii) and (c)(1), Subpart ZZZZ	3.10	HAP	Applicability
	40 CFR 60, Subpart IIII Standards of Performance for Stationary Compression Ignition Internal Combustion Engines 40 CFR 60.4200(a)(2)(ii), Subpart IIII	3.11	NMHC+NO_x, PM (filterable only), CO, SO_2	Applicability

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limitation/Standard
AA-028	40 CFR 60.4205(c), 60.4206, and Table 4, Subpart IIII	3.12	$NMHC+NO_x$ CO PM (filterable only)	4.0 g/kW-hr 3.5 g/kW-hr 0.2 g/kW-hr
	40 CFR 60.4207(b), Subpart IIII and 40 CFR 80.510(b), Subpart I	3.13	SO_2 (Diesel Fuel Requirements)	Max sulfur content of diesel fuel ≤15 ppm Min. cetane index of 40 or max aromatic content of 35 volume percent
	40 CFR 60.4211(a)(1)-(3) and (c), Subpart IIII	3.14	$NMHC+NO_x$, PM (filterable only), CO, SO_2	Certified engine requirements
	40 CFR 60.4211(f)(1)-(3), Subpart IIII	3.15		Operating requirements
AA-028 AA-034	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.16	PM (filterable only)	0.6 lbs/MMBTU
AA-034	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.17	SO_2	4.8 lb/MMBtu
AA-036 through AA-041	40 CFR 60, Subpart Kb Standards of Performance for Volatile Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced After July 23, 1984 40 CFR 60.110b(a), Subpart Kb	3.18	VOC	Applicability
	40 CFR 60.112b(a)(3), Subpart Kb	3.19		Control requirements
	40 CFR 60.113b(c)(1) and (2), Subpart Kb	3.20		Operating plan requirements

3.1 The permittee shall limit the waste fuel throughput at the facility to less than 22,152,000 gallons for any consecutive 12-month period.

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

3.2 The permittee shall minimize dust from truck traffic on unpaved access and in-plant roads by water sprinkling or equivalent when conditions warrant.

(Ref.: Permit to Construct issued April 27, 1993)

3.3 For Emission Point AA-000, operations at the facility are subject to and shall comply with the applicable requirements of the National Emission Standard for Benzene Waste Operations, 40 CFR 61, Subpart FF.

(Ref.: 40 CFR 61.340(b), Subpart FF)

3.4 The permittee shall comply with the standards for storage tanks in Condition 3.5 and containers in Condition 3.6 upon receipt of all waste materials and until such time the waste is shipped offsite. Each offsite waste shipment shall include a notice to the recipient that the waste contains benzene which is required to be managed and treated in accordance with the conditions found in 40 CFR 60, Subpart FF.

(Ref.: 40 CFR 61.342(f), Subpart FF)

3.5 The permittee shall install, operate, and maintain a fixed-roof and closed-vent system that routes all organic vapors from the storage tanks (Emission Points AA-036 through AA-041) to a control device (Emission Point AA-025). The fixed-roof on each tank shall comply with the following:

(a) The cover and all openings (e.g., access hatches, sampling ports, and gauge wells) shall be designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined once per year as described in Condition 5.10.

(b) Each opening shall be maintained in a closed, sealed position (e.g., covered by a lid that is gasketed and latched) at all times that waste is in the tank except when it is necessary to use the opening for waste sampling or removal, or for equipment inspection, maintenance, or repair.

The closed-vent system and control device shall be designed and operated in accordance with Condition 3.7.

(Ref.: 40 CFR 61.343(a)(1), Subpart FF)

3.6 The permittee shall install, operate, and maintain a cover on each container used to handle, transfer, or store waste in accordance with the following:

(a) The cover and all openings (e.g., bungs, hatches, and sampling ports) shall be designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined once per year as described in Condition 5.10.

(b) Each opening shall be maintained in a closed, sealed position (e.g., covered by a lid that is gasketed and latched) at all times that waste is in the container except when it is necessary to use the opening for waste loading, removal, inspection, or sampling.

(c) When waste is transferred into a container by pumping, the permittee shall transfer the material using a submerged fill pipe. The outlet of the submerged fill pipe shall extend to within two (2) fill pipe diameters of the bottom of the container while the container is being loaded. During loading of the container, the cover shall remain in place and all openings shall be maintained in a closed, sealed position except for those openings required for the submerged fill pipe and those openings required for venting of the container to prevent physical damage or permanent deformation of the container or cover.

(Ref.: 40 CFR 61.345(a)(1) and (2), Subpart FF)

3.7 The permittee shall properly design, install, operate, and maintain a closed-vent system and control device (Emission Point AA-025) meeting the following requirements:

(a) The closed-vent system shall be designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determine once per year as described in Condition 5.10.

(b) All gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.

(c) For the closed-vent system, one or more devices which vent directly to the atmosphere may be used on the closed vent system provided each device remains in a closed, sealed position during normal operations except when the device needs to open to prevent physical damage or permanent deformation of the closed-vent system resulting from malfunction of the unit in accordance with good engineering and safety practices for handling flammable, explosive, or other hazardous materials.

(d) The carbon adsorption system shall recover or control the organic emissions vented to it with an efficiency of 95 weight percent or greater or shall recover or control the benzene emission vented to it with an efficiency of 98 weight percent or greater.

The closed-vent system and control device shall be operated at all times when waste is in the storage tanks vented to the control device except when maintenance or repair of the waste management unit cannot be completed without a shutdown of the control device.

(Ref.: 40 CFR 61.349(a)(1)(i), (iii), and (iv), (a)(2)(ii), and (b), Subpart FF)

3.8 For Emission Point AA-000 all hazardous waste derived fuel must be obtained in bulk quantities (tank truck or railcar) from distributors, marketers, and/or generators subject to and in compliance with all requirements of Mississippi and USEPA regulations and standards promulgated for marketers and/or generators of hazardous waste derived fuel. Hazardous waste fuel may only be accepted directly from generators with a current Waste Pre-Qual Form on file at the facility.

(Ref.: Permit to Construct issued April 27, 1993)

3.9 Any spillage from the unloading of waste derived fuel at the receiving area shall be promptly managed in accordance with the requirements of the Resource Conservation and Recovery Act.

(Ref.: Permit to Construct issues April 27, 1993)

3.10 Emission Point AA-028 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.

For purposes of this subpart, Emission Point AA-028 is considered a new, emergency, compression ignition (CI) stationary RICE located at an area source of HAP emissions. As such, the permittee shall comply with Subpart ZZZZ by complying with the applicable requirements of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart IIII.

(Ref.: 40 CFR 63.6580, 63.6585(a) and (c), 63.6590(a)(2)(iii) and (c)(1), Subpart ZZZZ)

3.11 Emission Point AA-028 is subject to and shall comply with all applicable requirements of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart IIII.

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

3.12 For Emission Point AA-028, the permittee shall operate and maintain the engine such that it achieves the following emission standards for the life of the engine:

(a) Non-methane hydrocarbon and nitrogen oxides (NMHC + NO_x) $\leq$ 4.0 g/kW-hr

(b) Carbon monoxide (CO) $\leq$ 3.5 g/kW-hr

(c) PM $\leq$ 0.2 g/kW-hr

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

3.13 For Emission Point AA-028, the permittee shall use diesel fuel that meets the following per gallon standards:

(a) Maximum sulfur content of $\leq$ 15 ppm, and

(b) Minimum cetane index of 40 or a maximum aromatic content of 35 volume percent

(Ref.: 40 CFR 60.4207(b), Subpart IIII and 40 CFR 80.510(b), Subpart I)

3.14 For Emission Point AA-028, the permittee shall comply with the emission standards contained in 40 CFR 89 by purchasing, installing, operating, and maintaining an engine certified to meet the emission standards. The permittee shall operate and maintain the engine in accordance with the manufacturer's emission-related written instructions and can only change the emission-related settings that are permitted by the manufacturer.

(40 CFR 60.4211(a)(1)-(3) and (c), Subpart IIII)

3.15 For Emission Point AA-028, the engine shall be considered an emergency stationary RICE under Subpart IIII provided the engine only operates in an emergency, during maintenance and testing, and during non-emergency situations for 50 hours per year as described in (c) below. If the permittee does not operate the engine according to the requirements in (a)-(c) below, the engine will not be considered an emergency engine under Subpart IIII and it must then meet all requirements for non-emergency engines.

(a) There is no limit on the use of the engine during an emergency situation.

(b) The permittee may operate the engine for maintenance checks and readiness testing for a maximum of 100 hours per calendar year provided the tests are recommended by federal, state, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or insurance company associated with the engine. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating the federal, state, or local standards require maintenance testing of an engine beyond 100 hours per calendar year.

(c) Emergency engines may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in paragraph (b). Except as provided in 40 CFR 60.4211 (f)(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 an electric grid or otherwise supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(Ref.: 40 CFR 60.4211(f)(1), (2)(i), and (3), Subpart IIII)

3.16 For Emission Points AA-028 and AA-034, 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).)

3.17 For Emission Point AA-034, the permittee shall not discharge SO_2 from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer in excess of 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.

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

3.18 Emission Points AA-036 through AA-041 are subject to the requirements of the Standards of Performance for Volatile Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced After July 23, 1984.

(Ref.: 40 CFR 60.110b(a), Subpart Kb)

3.19 For Emission Points AA-036 through AA-041, the permittee shall equip each storage tank with a closed-vent system and control device (Emission Point AA-025) that meets the following specifications:

(a) The closed-vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background and visible inspections as determined using EPA Reference Method 21 from Appendix A of 40 CFR 60.

(b) The control device shall be designed and operated to reduce inlet VOC emissions by 95 percent or greater.

(Ref.: 40 CFR 60.112b(a)(3), Subpart Kb)

3.20 For Emission Points AA-036 through AA-041 the permittee shall prepare and submit an operating plan that contains the following information:

(a) Documentation that the control device (Emission Point AA-025) will achieve the required control efficiency during maximum loading conditions. This documentation shall include a description of the gas stream which enters the control device, including flow and VOC content under varying liquid level conditions and manufacturer's design specifications for the control device.

(b) A description of the parameter or parameters to be monitored to ensure that the control device will be operated in conformance with its design and an explanation of the criteria used for selection of that parameter.

The permittee shall operate the closed-vent system and control device and monitor the parameters in accordance with the operating plan.

(Ref.: 40 CFR 60.113b(c)(1) and (2), Subpart Kb)

SECTION 4
WORK PRACTICES

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Work Practice
AA-000	Permit to Construct issued April 27, 1993	4.1	Hazardous Waste	Employee training

4.1 The permittee shall ensure all plant personnel responsible for handling hazardous waste are trained in hazardous waste spill control and containment to provide rapid response and cleanup of hazardous waste spills occurring within the facility.

(Ref.: Permit to Construct issued April 27, 1993)

SECTION 5
MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number	Pollutant/ Parameter	Monitoring/Recordkeeping Requirement
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain records for a minimum of 5 years.
AA-000	11 Miss. Admin. Code Pt. 2, R. 2.2.B (10).	5.2	Waste Fuel Throughput	Monitor and record waste fuel throughput
	40 CFR 61.343(c) and (d) and 61.356(g), Subpart FF	5.3	Benzene	Quarterly visual inspections (storage tanks)
	40 CFR 61.345(b) and (c) and 61.356(g), Subpart FF	5.4		Quarterly visual inspections (containers)
	40 CFR 61.349(c)(1), Subpart FF	5.5		Monitor reductions are achieved via calculation
	40 CFR 61.349(f) and (g) and 61.356(g), Subpart FF	5.6		Quarterly visual inspections (closed vent system and control device)
	40 CFR 61.354(d), Subpart FF	5.7		Monitoring requirement (carbon adsorption system)
	40 CFR 61.355(a)(2), (b)(3), and (5)-(7), Subpart FF	5.8		Monitor benzene quantity on an annual basis
	40 CFR 61.355(c)(1)(i)(C), (c)(1)(iv) and (v), (c)(2) and (3), Subpart FF	5.9		Monitor flow-weighted annual average benzene concentration
	40 CFR 61.355(h) and 61.356(h), Subpart FF	5.10		Monitor equipment for detectable emissions (storage tanks, containers, closed vent system and control device)
	40 CFR 61.356(a), Subpart FF	5.11		Records retention and accessibility
	40 CFR 61.356(b)(1), Subpart FF	5.12		Records documenting waste streams
	40 CFR 61.356(c), Subpart FF	5.13		Records documenting shipments of waste
	40 CFR 61.356(d) and (f)(1) and (f)(2)(i)(G), Subpart FF	5.14		Engineering design documents for control device
	40 CFR 61.356(j)(1), (2), (3), (9), and (10)	5.15		Monitor control device operations
AA-000	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). and Permit to Construct issued April 27, 1993	5.16	Hazardous Waste Derived Fuel	Recordkeeping

Emission Point	Applicable Requirement	Condition Number	Pollutant/ Parameter	Monitoring/Recordkeeping Requirement
AA-000	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	5.17	Hazardous Waste Derived Fuel	Documentation concerning spills
AA-028	40 CFR 60.4209(a) and 60.4214(b), Subpart IIII	5.18	NMHC + NO_x PM (filterable only) CO SO_2	Install non-resettable hour meter and record hours of operation
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.19		Records concerning specifications of diesel fuel
AA-036 through AA-041	40 CFR 60.115b(c), Subpart Kb	5.20	VOC	Recordkeeping
	40 CFR 60.116b(a), (b), and (g), Subpart Kb	5.21		

5.1 The permittee shall retain all required records, monitoring data, supporting information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to MDEQ as required by Applicable Rules and Regulations or this permit upon request.

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

5.2 For Emission Point AA-000, to demonstrate compliance with the annual waste fuel throughput limit, the permittee shall continuously monitor and record the total throughput of waste fuel. These records shall be used to calculate the monthly and rolling 12-month total throughputs.

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

5.3 The permittee shall visually inspect each fixed-roof, seal, access door, and all other openings on each storage tank quarterly to ensure that no cracks or gaps occur and that the access doors and other openings are closed and gasketed properly. When a broken seal or gasket or other problem is identified, or when detectable emissions are measured, first efforts at repair shall be made as soon as practicable but no later than 45 calendar days after identification. The permittee may delay a repair; provided the repair is technically impossible without a complete or partial facility or unit shutdown. The repair shall be completed before the end of the next facility or unit shutdown.

The permittee shall keep records documenting each visual inspection that identifies a problem (i.e., broken seal, gap, or other problem) which could result in benzene emissions. The record shall include the date of the inspection, waste management unit and control equipment location where the problem is identified; a description of the

problem; a description of the corrective action taken; and the date the corrective action was completed.

(Ref.: 40 CFR 61.343(c) and (d), 61.350, and 61.356(g), Subpart FF)

5.4 The permittee shall visually inspect each cover and opening on any container in which waste is placed on a quarterly basis to ensure they are closed and gasketed properly. When a broken seal or gasket or other problem is identified, first efforts of repair shall be made as soon as practicable, but not later than 15 calendar days after identification. The permittee may delay a repair provided the repair is technically impossible without a complete or partial facility or unit shutdown. The repair shall be completed before the end of the next facility or unit shutdown.

The permittee shall keep records documenting each visual inspection that identifies a problem (i.e., broken seal, gap, or other problem) which could result in benzene emissions. The record shall include the date of the inspection, waste management unit and control equipment location where the problem is identified; a description of the problem; a description of the corrective action taken; and the date the corrective action was completed.

(Ref.: 40 CFR 61.345(b) and (c), 61.350, and 40 CFR 61.356(g), Subpart FF)

5.5 The permittee shall use engineering calculations to demonstrate that the control device (Emission Point AA-025) achieves either the organic or benzene removal efficiency.

(Ref.: 40 CFR 61.349(c)(1), Subpart FF)

5.6 For Emission Point AA-000 the permittee shall visually inspect the ductwork, piping, and connections to covers and control devices quarterly for evidence of visible defects such as holes in the ductwork or piping or for any loose connections on the closed-vent system and control device. If visible defects are observed during an inspection, if other problems are identified, or if detectable emissions are measured, a first effort to repair the closed-vent system and control device shall be made as soon as practicable but no later than 5 calendar days after detection. Repair shall be completed no later than 15 calendar days after the emissions are detected or the visible defect is observed. The permittee may delay a repair provided the repair is technically impossible without a complete or partial facility or unit shutdown. The repair shall be completed before the end of the next facility or unit shutdown.

The permittee shall keep records documenting each visual inspection that identifies a problem (i.e., broken seal, gap, or other problem) which could result in benzene emissions. The record shall include the date of the inspection, waste management unit and control equipment location where the problem is identified, a description of the problem, a description of the corrective action taken, and the date the corrective action was completed.

(Ref.: 40 CFR 61.349(f) and (g), 61.350, and 61.356(g), Subpart FF)

5.7 For Emission Point AA-000 the permittee shall monitor either the concentration level of the organic compounds or the concentration level of benzene in the exhaust vent stream from the carbon adsorption system (Emission Point AA-025) on a regular schedule, and the existing carbon shall be replaced with fresh carbon immediately when carbon breakthrough is indicated. The control device shall be monitored on a daily basis or at intervals no greater than 20 percent of the design carbon replacement interval, whichever is greater. As an alternative to this monitoring, the permittee may replace the carbon with fresh carbon at a regular predetermined time interval that is less than the carbon replacement interval that is determined by the maximum design flow rate and either the organic or benzene concentration in the gas stream vented to the carbon adsorption system.

(Ref.: 40 CFR 61.354(d), Subpart FF)

5.8 For Emission Point AA-000 the permittee shall determine the annual benzene quantity from facility waste by determining the annual benzene quantity for each waste stream generated during the year. To determine the annual benzene quantity, the permittee shall determine the annual waste quantity for all wastes that are received at the storage facility at the point where waste enters the facility. This determination shall be made using one of the following methods:

(a) Use the highest annual quantity of waste managed from historical records representing the most recent 5 years of operation;

(b) Use the maximum design capacity of the waste management unit; or

(c) Use measurements that are representative of maximum waste generation rates.

(Ref.: 40 CFR 61.355(a)(2), (b)(3), and (5)-(7), Subpart FF)

5.9 For Emission Point AA-000 the permittee shall determine the flow-weighted annual average benzene concentration at the point where the waste enters the storage facility. For any wastes with multiple phases, the determination shall provide the weighted-average benzene concentration based on the benzene concentration for each phase of the waste and the relative proportion of the phases.

The permittee shall provide sufficient information to document the flow-weighted annual average benzene concentration of each waste stream. Examples of information that could constitute knowledge of the waste include material balances, record of chemical purchases, or previous test results provided the results are still relevant to the current waste stream conditions. If test data is used, the permittee shall provide documentation describing the test protocol and the means by which sampling variability and analytical variability were accounted for in the determination of the flow-weighted annual average benzene concentration for the waste stream. If the MDEQ does not agree with the

determination of the flow-weighted annual average benzene concentration based on the knowledge of the waste, the procedures from 61.355(c)(3) shall be used to resolve the issue.

(Ref.: 40 CFR 61.355(c)(1)(i)(C), (c)(1)(iv) and (v), (c)(2) and (3), Subpart FF)

5.10 For Emission Point AA-000, the permittee shall test the storage tanks, containers, and closed vent system with control device for detectable emissions in accordance with the following:

(a) Monitoring shall comply with Method 21 from Appendix A of 40 CFR 60.

(b) The detection instrument shall meet the performance criteria of Method 21.

(c) The instrument shall be calibrated before use on each day of its use by the procedures specified in Method 21.

(d) The calibration gases shall be:

(i) Zero air (less than 10 ppm of hydrocarbon in air), and

(ii) A mixture of methane or n-hexane and air at a concentration of approximately, but less than, 10,000 ppm methane or n-hexane.

(e) The background level shall be determined using Method 21.

(f) The instrument probe shall be traversed around all potential leak interfaces as close as possible to the interface as described in Method 21.

(g) The arithmetic difference between the maximum concentration indicated by the instrument and the background level is compared to 500 ppm for determining compliance.

The permittee shall keep records of each test of no detectable emissions that includes the date the test is performed, background level measured during the test, and maximum concentration indicated by the instrument reading measure for each potential leak interface. If detectable emissions are measured at a leak interface, then the records shall also include the waste management unit, control equipment, and leak interface location where detectable emissions were measured, a description of the problem, a description of the corrective action taken, and the date the corrective action was completed.

(Ref.: 40 CFR 61.355(h) and 61.356(h), Subpart FF)

5.11 For Emission Point AA-000, the permittee shall maintain all records required by Subpart FF in a readily accessible location at the facility for a period not less than five years (see Condition 5.1).

(Ref.: 40 CFR 61.356(a), Subpart FF)

5.12 For Emission Point AA-000, the permittee shall maintain records which identify each waste stream at the facility that is subject to the requirements of Subpart FF and indicate whether or not the waste stream is controlled for benzene emissions in accordance with Subpart FF. For each waste stream not controlled for benzene emissions, the records shall include all test results, measurements, calculations, and other documentation used to determine the following for the waste stream: waste stream identification, water content, whether or not the waste stream is a process wastewater stream, annual waste quantity, range of benzene concentrations, annual average flow-weighted benzene concentration, and annual benzene quantity.

(Ref.: 40 CFR 61.356(b)(1), Subpart FF)

5.13 For Emission Point AA-000, the permittee shall keep records of each offsite waste shipment that includes the date and quantity of the waste shipped offsite, name and address of the facility receiving the waste, and a copy of the notice sent with the waste shipment.

(Ref.: 40 CFR 61.356(c), Subpart FF)

5.14 For Emission Point AA-000 the permittee shall maintain the engineering design documentation for all control equipment installed on the waste management unit(s). The documentation shall be retained for the life of the control equipment. In addition to the design documentation, the permittee shall keep the following records:

(a) A signed and dated statement certifying that the closed-vent system and control device is designed to operate at the documented performance level when the waste management unit(s) vented to the control device is or would be operating at the highest load or capacity expected to occur.

(b) Records documenting the design analysis which include, but are not limited to:

(i) Specifications, drawings, schematics, and piping and instrumentation diagrams that describe the control device design based on acceptable engineering texts.

(ii) The design analysis shall address the vent stream characteristics and control device operating parameters such as vent stream composition, constituent concentration, flow rate, relative humidity, and temperature. The design analysis shall also establish the design exhaust vent stream organic compound or benzene concentration level, capacity of carbon bed, type and working capacity of activated carbon used for carbon bed, and design carbon replacement interval based on the total carbon working capacity of the control device and source operating schedule.

(Ref.: 40 CFR 61.356(d) and (f)(1) and (f)(2)(i)(G), Subpart FF)

5.15 For Emission Point AA-000, the permittee shall maintain records which document the following information regarding the operation of the control device:

(a) Dates of startup and shutdown of the closed-vent and control device.

(b) A description of the operating parameter(s) to be monitored to ensure that the control device will be operated in conformance with Subpart FF requirements and with the control device's design specifications and an explanation of the criteria used for selection of that parameter(s). Such records shall be kept for the life of the control device.

(c) Periods where the closed-vent system and control device are not operated as designed.

(d) Records from the monitoring device indicating the organic or benzene concentration in the outlet gas stream from the control device. If the concentration of organics or benzene is monitored, the permittee shall record all 3-hour periods of operation where the applicable concentration is more than 20 percent greater than the design value. If the carbon bed regeneration interval is monitored, then the permittee shall record each occurrence when the vent stream continues to flow through the control device beyond the predetermined carbon bed regeneration time.

(e) Dates and times when the control device is monitored, when breakthrough is measured, and shall record the date and time the existing carbon in the control device is replaced with fresh carbon.

(Ref.: 40 CFR 61.356(j)(1), (2), (3), (9), and (10), Subpart FF)

5.16 For Emission Point AA-000, the permittee shall keep records documenting that each shipment of hazardous waste derived fuel received at the facility originated from a generator with a current Waste Pre-Qual Form on file at the facility. Each shipment of hazardous waste derived fuel shall be manifested as to its composition. A copy of the manifest shall be kept on site in accordance with Condition 5.1.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). and Permit to Construct issued April 27, 1993)

5.17 For Emission Point AA-000, the permittee shall keep records documenting that spills of hazardous waste derived fuel during the unloading process were managed in accordance with the requirements of the Resource Conservation and Recovery Act. Such information shall include, but not be limited to, date and time of the spill, quantity spilled, identification of the material spilled, and all other details concerning the facility's response, including the time it took to clean the spill and how the materials generated from the cleanup of the spill were disposed.

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

5.18 For Emission Point AA-028, the permittee shall install a non-resettable hour meter on the engine (if not already installed). The permittee shall keep records of the hours of operation of the engine that are recorded through the hour meter. The records shall indicate 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 60.4209(a) and 60.4214(b), Subpart IIII)

5.19 For Emission Point AA-028, the permittee shall maintain records documenting the diesel fuel meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel.

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

5.20 For Emission Points AA-036 through AA-041, the permittee shall keep the following records for the closed-vent system and control device:

(a) A copy of the operating plan.

(b) A record of the measured values of the parameters monitored per Condition 3.15.

(Ref.: 40 CFR 60.115b(c), Subpart Kb)

5.21 For Emission Points AA-036 through AA-041, the permittee shall keep readily accessible records which document the dimensions of each storage vessel and contain an analysis indicating what the capacity for each storage vessel is. These records shall be kept for the life of the source.

(Ref.: 40 CFR 60.116b(a), (b), and (g), Subpart Kb)

SECTION 6
REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	Report permit deviations within five (5) working days
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.2	Submit certified annual monitoring report
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.3	All documents submitted to MDEQ shall be certified by a Responsible Official
AA-000	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.4	Report rolling 12-month waste fuel throughputs
	40 CFR 61.357(b)-(d)	6.5	Annual report or change in total annual benzene waste
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.6	Report shipments of hazardous waste derived fuel from a generator with no Waste Pre-Qual Form on file at the facility
		6.7	Summary report for spills

6.1 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began.

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

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

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

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

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

6.4 For Emission Point AA-000, the permittee shall submit information summarizing the monthly and rolling 12-month throughput totals for waste fuel in accordance with Condition 6.2.

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

6.5 For Emission Point AA-000, the permittee shall submit an annual report to the MDEQ in accordance with the applicable reporting requirement from 40 CFR 61.357(b)-(d) or whenever there is a change in the process generating the waste stream that causes the total annual benzene quantity from the facility waste to change.

(Ref.: 40 CFR 61.357(b)-(d), Subpart FF)

6.6 For Emission Point AA-000, the permittee shall report any instance a shipment of hazardous waste derived fuel is received from a generator that does not have a Waste Pre-Qual Form on file at the facility. Such information shall be included in the annual report required in Condition 6.2.

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

6.7 For Emission Point AA-000, in the report required by Condition 6.2, the permittee shall include any details recorded in the event there were any spills during the reporting period. If there are no spills during the reporting period, the report should include a statement that no spills occurred during the reporting period.

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