STATE OF MISSISSIPPI AND FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL

PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT AT A SYNTHETIC MINOR SOURCE

THIS CERTIFIES THAT

Evercompounds LLC 7046 State Line Road Olive Branch, Mississippi Desoto County

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

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: September 4, 2020 **Permit No.: 0680-00114**

Effective Date: As specified herein.

Expires: August 31, 2025

Section 1.

A. GENERAL CONDITIONS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- 8. The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:
 - a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and
 - b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission.

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

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

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

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

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

- 11. This permit does not authorize a modification as defined in Regulation 11 Miss. Admin. Code Pt. 2, Ch.2., "Permit Regulations for the Construction and/or Operation of Air Emission Equipment." A modification may require a Permit to Construct and a modification of this permit. Modification is defined as "Any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:
 - a. Routine maintenance, repair, and replacement;
 - b. Use of an alternative fuel or raw material by reason of an order under Sections 2(a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
 - c. Use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
 - d. Use of an alternative fuel or raw material by a stationary source which:
 - (1) The source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, or 40 CFR 51.166; or
 - (2) The source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, or 40 CFR 51.166;
 - e. An increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I or 40 CFR 51.166; or
 - f. Any change in ownership of the stationary source.

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

B. GENERAL OPERATIONAL CONDITIONS

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

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

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

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

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

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

- 4. Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.
 - a. Upsets
 - (1) For an upset defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:
 - (i) An upset occurred and that the source can identify the cause(s) of the upset;
 - (ii) The source was at the time being properly operated;
 - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
 - (iv) That within 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
 - (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or

caused a general nuisance to the public, the source provided notification to the Department.

- (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
- (3) This provision is in addition to any upset provision contained in any applicable requirement.
- (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- b. Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.)
 - (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
 - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).
 - (3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

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

- 5. Compliance Testing: Regarding compliance testing:
 - a. The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.
 - b. Compliance testing will be performed at the expense of the permittee.
 - c. Each emission sampling and analysis report shall include but not be limited to the following:
 - (1) Detailed description of testing procedures;
 - (2) Sample calculation(s);
 - (3) Results; and
 - (4) Comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

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

C. PERMIT RENEWAL / MODIFICATION / TRANSFER / TERMINATION

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

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

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

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

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

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

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

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

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

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

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SECTION 2 EMISSION POINT DESCRIPTION

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

Emission Point	Description				
	Process Equipment				
AA-001	Raw White Filler and raw Carbon Black truck unloading to storage silos with enclosure				
AA-002	White Filler and Carbon Black silo storage with fabric filter				
AA-003	Pneumatic transfer of White Filler and Carbon Black from silos to day bins (with fabric filter)				
AA-004	White Filler and Carbon Black gravity feed from day bins to Mixer No. 1 with dust collector				
AA-005	Emissions from Mixer No. 1 with dust collector				
AA-006	White Filler and Carbon Black gravity feed from day bins to Mixer No. 2 with dust collector				
AA-007	Emissions from Mixer No. 2 with dust collector				
AA-008	White Filler and Carbon Black gravity feed from day bins to Mixer No. 3 with dust collector				
AA-009	Emissions from Mixer No. 3 with dust collector				
AA-010	White Filler and Carbon Black gravity feed from day bins to Mixer No. 4 with dust collector				
AA-011	Emissions from Mixer No. 4 with dust collector				
AA-012	Rubber milling (2 mills share dedicated central exhaust stack for Line 1)				
AA-013	Rubber batch off for Line 1 Process Central Exhaust Stack				
AA-014	Rubber milling (2 mills share dedicated central exhaust stack for Line 2)				
AA-015	Rubber batch off for Line 2 Process Central Exhaust Stack				
AA-016	Rubber milling (2 mills share dedicated central exhaust stack for Line 3)				
AA-017	Rubber batch off for Line 3 Process Central Exhaust Stack				
AA-018	Rubber milling (2 mills share dedicated central exhaust stack for Line 4)				
AA-019	Rubber batch off for Line 4 Process Central Exhaust Stack				
AA-020	Rubber calendering (1 total for all 4 Lines)				
AA-021	Rubber extruding (1 total for all 4 Lines)				
AA-022	25 m³ mineral oil storage tank (1 of 3)				
AA-023	25 m³ mineral oil storage tank (2 of 3)				
AA-024	25 m³ mineral oil storage tank (3 of 3)				
AA-025	587 hp, diesel-fired emergency backup generator (2005)				
AA-026	100 hp, diesel-fired emergency fire water pump engine (1969)				
AA-037	Small diesel storage day/belly fuel tanks (1 of 2)				
AA-038	Small diesel storage day/belly fuel tanks (2 of 2)				
AA-039	AA-039 Automatic raw materials weighing machine with dust collector				
	Space Heaters				
AB-001	All Comfort Space Heaters				
AA-027	0.1 MMBTU/hr, natural gas-fired comfort space heater (1 of 14)				

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AA-028	0.1 MMBTU/hr, natural gas-fired comfort space heater (2 of 14)			
AA-029	0.1 MMBTU/hr, natural gas-fired comfort space heater (3 of 14)			
AA-030	0.1 MMBTU/hr, natural gas-fired comfort space heater (4 of 14)			
AA-031	0.1 MMBTU/hr, natural gas-fired comfort space heater (5 of 14)			
AA-032	0.1 MMBTU/hr, natural gas-fired comfort space heater (6 of 14)			
AA-033	0.1 MMBTU/hr, natural gas-fired comfort space heater (7 of 14)			
AA-034	0.1 MMBTU/hr, natural gas-fired comfort space heater (8 of 14)			
AA-035	0.1 MMBTU/hr, natural gas-fired comfort space heater (9 of 14)			
AA-036	0.1 MMBTU/hr, natural gas-fired comfort space heater (10 of 14)			
AA-040	0.1 MMBTU/hr, natural gas-fired comfort space heater (11 of 14)			
AA-041	0.1 MMBTU/hr, natural gas-fired comfort space heater (12 of 14)			
AA-042	0.1 MMBTU/hr, natural gas-fired comfort space heater (13 of 14)			
AA-043	0.1 MMBTU/hr, natural gas-fired comfort space heater (14 of 14)			

SECTION 3 EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limitation/Standard
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity	≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2	Equivalent Opacity	≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.3		$E = 4.1 \times p^{0.67}$
AA-001	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.4		≤ 105,600,000 lb/yr
AA-001 AA-002 AA-003 AA-004 AA-005 AA-006 AA-007 AA-008 AA-009 AA-010 AA-011	Permit to Construct issued March 31, 2017	3.5	PM (filterable only)	Operate control devices at all times emissions may be generated
AA-004 AA-005 AA-006 AA-007 AA-008 AA-009 AA-010 AA-011		3.6		Operate dust collector at all times emissions may be generated
AA-005 AA-007 AA-009 AA-011	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.7		≤ 26,400,000 lb/year
AA-025 AA-026 AB-001	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.8		≤ 0.6 lb/MMBTU
AA-025 AA-026	40 CFR 63, Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines)	3.9	НАР	Applicability
	40 CFR 63.6585, Subpart ZZZZ			
	40 CFR 63.6603(a) and Item #4 of Table 2d, Subpart ZZZZ	3.10		Maintenance Schedule
	40 CFR 63.6604(b), Subpart ZZZZ	3.11		Fuel requirement
	40 CFR 63.6605, Subpart ZZZZ	3.12		General requirements
	40 CFR 63.6625(f), Subpart ZZZZ	3.13		Operate and maintain non-resettable hour meter
	40 CFR 63.6625(e), Subpart ZZZZ	3.14		Operate according to maintenance plan

	40 CFR 63.6625(h), Subpart ZZZZ	3.15		Minimize time spent at idle
	40 CFR 63.6625(i), Subpart ZZZZ	3.16		Optional oil analysis program
	40 CFR 63.6640(f), Subpart ZZZZ	3.17		Emergency operation
AB-001	11 Miss. Admin. Code Pt. 2, R. 1.4.A.	3.18	SO ₂	≤ 4.8 lb/MMBTU

- 3.1 For the entire facility, 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) Emission resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60% 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 any one hour.

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

3.2 For the entire facility, 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 Condition 3.1. This shall not apply to vision obscuration caused by uncombined water droplets.

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

3.3 For the 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

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

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

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

3.4 For Emission Point AA-001, the permittee shall limit the unloading of carbon black and white filler to less than 105,600,000 pounds per year on a rolling 12-month basis.

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

3.5 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-007, AA-008, AA-009, AA-010, and AA-011, the permittee shall minimize particulate emissions by operating the emission capture and control systems associated with each emissions point at all times during operation. Furthermore, these emission capture and control systems shall be operated and maintained according to the manufacturers' specifications and instructions.

- (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Construction Permit issued March 31, 2017)
- 3.6 For Emission Points AA-004, AA-005, AA-006, AA-007, AA-008, AA-009, AA-010, and AA-011, the permittee shall operate the dust collector at all times the respective process is in operation.
 - (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Construction Permit issued March 31, 2017)
- 3.7 For Emission Points AA-005, AA-007, AA-009, and AA-011, the permittee shall limit the amount of rubber produced for each mixer to less than 26,400,000 pounds per year on a rolling 12-month basis.
 - (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 3.8 For Emission Points AA-025, AA-026, and AB-001, the permittee shall not exceed the maximum permissible emission rate of ash and/or particulate matter of 0.6 pounds per million BTU per hour heat input from fossil fuel burning installations of less than 10 million BTU per hour heat input.
 - (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).)
- 3.9 For Emission Points AA-025 and AA-026, the permittee is subject to and shall comply with the applicable requirements of the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) and the General Provisions (40 CFR 63, Subpart A).
 - (Ref.: 40 CFR 63.6585, Subpart ZZZZ)
- 3.10 For Emission Points AA-025 and AA-026, the permittee shall comply with the following:
 - (a) Change oil and filter every 500 hours of operation or annually, whichever comes first:
 - (b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
 - (c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

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

- (Ref.: 40 CFR 63.6603(a) and Item #4 of Table 2d, Subpart ZZZZ)
- 3.11 For Emission Points AA-025 and AA-026, the permittee shall only use diesel fuel that meets the requirements in 40 CFR 80.510(b) for nonroad diesel fuel.
 - (Ref.: 40 CFR 63.6604(b), Subpart ZZZZ)

3.12 For Emission Points AA-025 and AA-026, the permittee must be in compliance with the emission limitations, operating limitations, and other requirements of 40 CFR 63, Subpart ZZZZ, that apply at all times. At all times the permittee must operate and maintain the sources, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to MDEQ which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(Ref.: 40 CFR 63.6605, Subpart ZZZZ)

3.13 For Emission Points AA-025 and AA-026, the permittee shall install and maintain a non-resettable hour meter.

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

3.14 For Emission Points AA-025 and AA-026, the permittee must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

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

3.15 For Emission Points AA-025 and AA-026, the permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

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

3.16 For Emission Points AA-025 and AA-026, the permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in paragraph (a) of Condition 3.10. The oil analysis must be performed as specified in 40 CFR 63.6625(i), Subpart ZZZZ.

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

- 3.17 For Emission Points AA-025 and AA-026, the permittee shall operate the emergency stationary RICE according to the requirements below. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year is prohibited. If the permittee does not operate the engine according to the requirements below, the engine will not be considered an emergency engine and must 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 purposes 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 100 hours per year.
- (c) The permittee many operate the emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emerge condition is no longer imminent.

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

3.18 For Emission Point AB-001, the permittee shall not cause, permit, or allow the emission of sulfur oxides (measured as sulfur dioxide) great than 4.8 pounds per million BTU heat input.

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

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SECTION 4 WORK PRACTICES

This section was intentionally left blank since no work practice standards apply to this permit action.

SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	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 five (5) years.
AA-001 AA-002 AA-003 AA-004 AA-005 AA-006 AA-007 AA-008 AA-009 AA-010 AA-011		5.2		Dust collector operation/maintenance
AA-001	11 Miss. Admin. Code Pt. 2, R.	5.3	PM (filterable	Unloaded material recordkeeping
AA-004 AA-005 AA-006 AA-007 AA-008 AA-009 AA-010 AA-011	2.2.B(11).	5.4	only)	Daily inspection for visible emissions
AA-005 AA-007 AA-009 AA-011		5.5		Rubber processed recordkeeping
AA-025 AA-026	40 CFR 63, Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines) 40 CFR 63.6655(a), (d), and (e), and 63.6625(j), Subpart ZZZZ	5.6	Operation and Maintenance	Recordkeeping
	40 CFR 63.6655(f), Subpart ZZZZ	5.7	Hours	
	40 CFR 63.6660, Subpart ZZZZ	5.8	Records Retention	Keep in form suitable for expeditious review

5.1 For the entire facility, 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 DEQ as required by Applicable Rules and Regulations or this permit upon request.

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

5.2 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-007, AA-008, AA-009, AA-010, and AA-011, the permittee shall inspect the air control devices and perform regular maintenance each month, or more often if necessary, to maintain proper operation of the pollution control equipment. Records of this maintenance shall be kept in log form and must be made available for review upon request during any inspection visit by DEQ personnel. In the event of a failure of the pollution control equipment, the permittee shall cease operations until such repairs are made and the proper efficiency of the pollution control equipment is restored. The permittee shall have ready access to equipment sufficient to repair and/or overhaul the pollution control equipment.

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

5.3 For Emission Point AA-001, the permittee shall keep records of the monthly total of carbon black and white filler unloaded to demonstrate compliance with Condition 3.4.

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

5.4 For Emission Points AA-004, AA-005, AA-006, AA-007, AA-008, AA-009, AA-010, and AA-011, the permittee shall conduct a daily visible observation of each unit to determine if visible emissions are present. If visible emissions are observed, the respective operation must be ceased and corrective action must be taken to restore operations to a condition of no visible emissions. The date and time of any visible emissions noted shall be recorded as well as any corrective actions taken.

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

5.5 For Emission Points AA-005, AA-007, AA-009, and AA-010, the permittee shall keep records of the monthly total of rubber produced for each mixer to demonstrate compliance with Condition 3.7.

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

- 5.6 For Emission Points AA-025 and AA-026, the permittee shall keep the following records:
 - (a) A copy of each report submitted to comply with 40 CFR 63, Subpart ZZZZ;
 - (b) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment);
 - (c) Records of maintenance conducted on the engines in order to demonstrate the engines are being operated and maintained according to the manufacturers' emission related operation and maintenance instructions or the permittee's own maintenance plan as required by Condition 3.14;
 - (d) Records of all required maintenance performed in accordance with Condition 3.10.

(Ref.: 40 CFR 63.6655(a), (d), and (e), 40 CFR 63.6625(j), Subpart ZZZ)

5.7 For Emission Point AA-025 and AA-026, the permittee shall keep records of the hours of operation of the engines recorded using the non-resettable hour meter. These records must indicate how many hours are spent in emergency operation, including what classified the operation as an emergency and how many hours are spent in non-emergency operation.

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

5.8 For Emission Point AA-025 and AA-026, the permittee shall keep records required by 40 CFR 63, Subpart ZZZZ, in a form suitable and readily available for expeditious review. These records shall be kept in hard copy or electronic form for five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(Ref.: 40 CFR 63.6660, Subpart ZZZZ)

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.	
		6.2	Submit certified annual monitoring report.	
		6.3	All documents submitted to MDEQ shall be certified by a Responsible Official.	
AA-025 AA-026		6.4	Hours of operation	
	40 CFR 63, Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines) 40 CFR 63.6640(b) and 63.6650(a) through (d), Subpart ZZZZ	6.5	Deviations	

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 Points AA-025 and AA-026, the permittee shall report the hours of operation of the engines that are recorded through the non-resettable hour meter in accordance with Condition 6.2. The report shall contain 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.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

6.5 For Emission Points AA-025 and AA-026, the permittee shall report each instance in which each of the applicable operation limitations in Condition 3.10 and 3.17, were not

met in accordance with Condition 6.2. These deviations shall be reported according to the following requirements:

- (a) If there were no deviations from any applicable operating limitations, a statement shall be included that there were no deviations from the emission limitations or operating limitations during the reporting periods; or
- (b) If there was deviation from any operating limitations during the reporting period, then the compliance report shall contain the following information:
 - (1) Company name and address.
 - (2) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.
 - (3) Date of report and beginning and ending dates of the reporting period.
 - (4) The total operating time of the stationary RICE at which the deviation occurred during the reporting period.
 - (5) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
- (c) If there was a malfunction during the reporting period, the compliance report shall include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report shall also include a description of actions, taken by the permittee during a malfunction of an affected source to minimize emissions, including actions taken to correct a malfunction.

(Ref.: 40 CFR 63.6640(b) and 63.6650(a) through (d), Subpart ZZZZ)