

STATE OF MISSISSIPPI AND FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL PERMIT

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

THIS CERTIFIES THAT

Warren Paving, Inc. – Gulfport Plant
11211 Reichold Road
Gulfport, Harrison County, Mississippi

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

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: _____

Permit No.: 1020-00120

Effective Date: As specified herein.

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

SECTION 1

A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
2. This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.4.D.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.4.D.)
3. Any activities not identified in the application are not authorized by this permit.
(Ref.: Miss. Code Ann. 49-17-29 1.b)
4. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)
7. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)
8. The permittee shall allow the Mississippi Department of Environmental Quality (MDEQ) 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 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 [a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

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

- (1) The source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 3 – "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 Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 1.10 – "Provisions for Upsets, Startups, and Shutdowns".

(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, start-ups, 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 five (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 twenty-four (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 the EPA or third party enforcement actions.
- (b) Start-ups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.)
 - (1) Start-ups and shutdowns are part of normal source operation. Emission limitations apply during start-ups and shutdowns unless source specific emission limitations or work practice standards for start-ups 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 1, the Department

will consider establishing source specific emission limitations or work practice standards for start-ups and shutdowns. Source specific emission limitations or work practice standards established for start-ups 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 of 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 MDEQ within a reasonable time any information the MDEQ 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 MDEQ 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 MDEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

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

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

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

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

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

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

SECTION 2 EMISSION POINT DESCRIPTION

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

Emission Point	Description
AA-100	Facility-Wide (Warren Paving, Inc. – Gulfport Plant)
AA-001	350 Tons / Hour Parallel-Flow Drum Mix Asphalt Plant [equipped with a 110 MMBTU / hour dual fuel-fired (90% natural gas and 10% used fuel oil) burner; emissions from the plant are routed to a baghouse]
AA-002	2 MMBTU / Hour Natural Gas-Fired Hot Oil Heater
AA-003	30,000 Gallon Liquid Asphalt Cement (AC) Storage Tank
AA-004	30,000 Gallon Liquid AC Storage Tank
AA-005	20,000 Gallon Fuel Oil Storage Tank
AA-006	180 Tons / Hour Impact Crusher [reduces the size of rock and recycled asphalt pavement (RAP)]
AA-007	2,000 Gallon Liquid Anti-Strip Additive Storage Tank
AA-008	2,000 Gallon Anti-Strip Additive Storage Tank
AA-009	1,500 Gallon Portable Waste Oil Storage Tank
AA-010	1,200 Gallon Waste Oil Storage Tank
AA-011	1,000 Gallon Hydraulic Oil Storage Tank
AA-012	1,000 Gallon Motor Oil Storage Tank
AA-013	1,000 Gallon Gear Oil Storage Tank
AA-014	2,000 Gallon Gasoline Storage Tank
AA-015	8,000 Gallon Diesel Fuel Storage Tank
AA-016	Hot-Mix Asphalt (HMA) Load-Out Operations
AA-017	HMA Storage Silo
AA-018	Transport Truck Load-Out Operations

Emission Point	Description
AA-019	Reclaimed Asphalt Pavement (RAP) Processing
AA-020	Aggregate Handling and Storage Area
AA-021	Lime Storage Silo [equipped with a simple fabric filter]
AA-022	Paved Roads
AA-023	Unpaved Roads

SECTION 3 EMISSION LIMITATIONS AND STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limitation/Standard
AA-100	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity (Smoke)	≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2	Opacity	
	11 Miss. Admin. Code Pt. 2, R. 1.3.C.	3.3	Air Pollutants	General Nuisance Clause
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.4	PM (filterable)	$E = 4.1 (p^{0.67})$
	40 CFR Part 60, Subpart I – Standards of Performance for Hot Mix Asphalt Facilities 40 CFR 60.90(a); Subpart I	3.5	PM Opacity	General Applicability
AA-001 AA-021	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.6	PM (filterable) PM ₁₀ / PM _{2.5} (filterable only)	Operational Requirements (Baghouse and Fabric Filter)
AA-001	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.7	PM (filterable)	$E = 0.8808 (I^{-0.1667})$
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). (Title V Avoidance Limit)	3.8	Asphalt Production	1,000,000.0 tpy (Rolling 12-Month Total)
	40 CFR 60.92(a)(1) – (2); Subpart I	3.9	PM	90 mg / dscm (or 0.04 gr. / dscf)
			Opacity	< 20%
AA-002	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.10	PM	0.6 Pounds / MMBTU Heat Input
AA-006	40 CFR Part 60, Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants 40 CFR 60.670(a)(1); Subpart OOO	3.11	PM Opacity	General Applicability
	40 CFR 60.672(b) and Table 3; Subpart OOO	3.12	Opacity	≤ 15%

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limitation/Standard
AA-014	40 CFR Part 63, Subpart CCCCCC – NESHAP for Source Category: Gasoline Dispensing Facilities 40 CFR 63.11111(a), (b), and (i); Subpart CCCCCC	3.13	HAPs	General Applicability

3.1 For Emission Point AA-100 (Facility-Wide), except as otherwise specified or limited herein, the permittee shall not cause or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process that exceeds forty percent (40%) opacity subject to (a) and (b) below:

- (a) Start-up operations may produce emissions, which exceed 40% opacity for up to fifteen (15) minutes per start-up in any one (1) hour and not to exceed three (3) start-ups per stack in any twenty-four (24) hour period.
- (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed sixty percent (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 in any one (1) hour.

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

3.2 For Emission Point AA-100 (Facility-Wide), the permittee shall not cause or allow the discharge into the ambient air from any point source emissions or 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 Emission Point AA-100 (Facility-Wide), the permittee shall not cause or allow the emission of particles or any contaminants in sufficient amounts or of such duration from any process as to be injurious to humans, animals, plants, or property, or to be a public nuisance, or create a condition of air pollution.

- (a) The permittee shall not cause or permit the handling, transporting, or storage of any material in a manner which allows or may allow unnecessary amounts of particulate matter to become airborne.
- (b) When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a

nuisance to property other than that from which it originated or to violate any other provision of 11 Miss. Admin. Code Pt. 2, Ch. 1, the Commission may order such corrected in a way that all air and gases or air and gas-borne material leaving the building or equipment are controlled or removed prior to discharge to the open air.

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

- 3.4 For Emission Point AA-100 (Facility-Wide), except as otherwise specified herein or limited herein, the permittee shall not cause or allow the emission of particulate matter (PM) in total quantities in any one (1) hour from any manufacturing process (which includes any associated stacks, vents, outlets, or combination thereof) to exceed the amount determined by the following relationship:

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

Where “E” is the emission rate in pounds per hour and “p” is the process weight input rate in tons per hour. Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs.

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

- 3.5 For Emission Point AA-100 (Facility-Wide), the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 60, Subpart I – Standards of Performance for Hot Mix Asphalt Facilities.

(Ref.: 40 CFR 60.90(a); Subpart I)

- 3.6 For Emission Points AA-001 and AA-021, the permittee shall at all times operate the baghouse and fabric filter associated with each process equipment during active operations to minimize the emission of filterable particulate matter. In the event that a baghouse malfunctions or becomes non-operational, the permittee shall cease activity at the corresponding operation until the baghouse returns to service.

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

- 3.7 For Emission Point AA-001, the maximum permissible emission of ash and/or particulate matter (PM) from fossil fuel burning installations equal to or greater than ten (10) million BTU (MMBTU) per hour heat input but less than 10,000 MMBTU per hour heat input shall not exceed an emission rate as determined by the relationship:

$$E = 0.8808 (I^{-0.1667})$$

where “E” is the emission rate in pounds per MMBTU per hour heat input and “I” is the heat input in MMBTU per hour.

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

- 3.8 For Emission Point AA-001, the permittee shall limit the production of hot-mix asphalt to no more than 1,000,000.0 tons per year (tpy) based on a rolling 12-month total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). – Title V Avoidance Limit)

- 3.9 For Emission Point AA-001, the permittee shall only discharge into the atmosphere gases that comply with the following standards:

(a) No more than 90 milligrams (mg) of particulate matter (PM) per dry standard cubic meter (dscm) [or 0.04 grains (gr.) of PM per dry standard cubic foot (dscf)]; and

(b) An opacity of less than twenty (20) percent.

(Ref. 40 CFR 60.92(a)(1) – (2); Subpart I)

- 3.10 For Emission Point AA-002, the maximum permissible emission of ash and/or particulate matter (PM) from a fossil fuel burning installation of less than ten (10) MMBTU per hour heat input shall not exceed 0.6 pounds per MMBTU per hour heat input.

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

- 3.11 For Emission Point AA-006, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 60, Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants.

(Ref.: 40 CFR 60.670(a)(1); Subpart OOO)

- 3.11 For Emission Point AA-006, the permittee shall not cause to be discharged into the atmosphere fugitive emissions that exceed fifteen (15) percent in opacity.

For the purpose of this permit, truck dumping into any screening operation, feed hopper, or crusher is exempt from the noted opacity standard.

(Ref.: 40 CFR 60.672(b) and Table 3; Subpart OOO)

- 3.12 For Emission Point AA-014, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 63, Subpart CCCCCC – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Category: Gasoline Dispensing Facilities (GDFs).

Unless otherwise specified, the permittee (i.e. the GDF) has a monthly gasoline throughput of less than 10,000 gallons.

(Ref.: 40 CFR 63.11111(a), (b), and (i); Subpart CCCCCC)

SECTION 4 WORK PRACTICE STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Work Practice
AA-014	40 CFR 63.11115(a); Subpart CCCCCC	4.1	HAPs	Perform Best Management Practices
	40 CFR 63.11116(a); Subpart CCCCCC	4.2		Minimize Vapor Releases

- 4.1 For Emission Point AA-014, the permittee shall at all times operate and maintain each gasoline dispensing unit (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 determination of whether such operation and maintenance procedures are being used will be based on information available to the 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 storage tank.

(Ref.: 40 CFR 63.11115(a); Subpart CCCCCC)

- 4.2 For Emission Point AA-014, the permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. The measures to be taken include (but are not limited to) the following practices:

- (a) Minimize gasoline spills;
- (b) Clean up spills as expeditiously as possible;
- (c) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; and
- (d) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices (such as oil / water separators).

(Ref.: 40 CFR 63.11116(a); Subpart CCCCCC)

SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant / Parameter	Monitoring / Recordkeeping Requirement
AA-100 (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	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2	PM / PM ₁₀ / PM _{2.5} (filterable only)	Evaluate the Pressure Drop on Each Baghouse Monthly
AA-001 AA-021		5.3		Perform a Monthly Inspection on Each Control Device
AA-001	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.4	Asphalt Production	Monitor the Quantity Produced (Monthly)
	40 CFR 60.93(a) and (b); Subpart I 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.5	PM Opacity	Conduct Routine Performance Testing
AA-006	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.6	Opacity	Perform Routine Visible Emissions Evaluations
AA-014	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.7	HAPs	Monitor the Monthly Gasoline Throughput and Malfunction-Related Information

- 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. Supporting 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 the MDEQ as required by Applicable Rules and Regulations of this permit upon request.

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

- 5.2 For Emission Points AA-001, the permittee shall monitor and record the differential pressure drop (in inches of water) across each baghouse monthly during active operation of the corresponding process equipment. If a monitored pressure drop is outside of the range established in accordance with Condition 5.5 (for Emission Point AA-001) or the recommended range outlined by the manufacturer's specifications (for Emission Point AA-021), the permittee shall perform and record the necessary maintenance to return a baghouse to normal operation.

Additionally, for Emission Point AA-021, the permittee shall maintain documentation for the baghouse that details the recommended differential pressure drop range specified by the manufacturer.

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

- 5.3 For Emission Points AA-001 and AA-021, the permittee shall perform a monthly inspection on each control device. If any problem is noted during an inspection, the permittee shall perform and record the necessary maintenance activities to ensure operation of a control device as originally designed. Additionally, preventative maintenance shall be performed (as necessary) to maintain proper operation of a control device.

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

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

- 5.4 For Emission Point AA-001, the permittee shall monitor and record the quantity (in tons) of hot-mix asphalt produced on a monthly basis.

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

- 5.5 For Emission Point AA-001, the permittee shall determine compliance with the emission standards specified in Condition 3.9 by conducting routine performance testing once every five (5) years and no later than sixty (60) months after the previously completed test. Each performance test shall be conducted in accordance with the following specifications (unless otherwise permitted in 40 CFR 60.8(b), Subpart A):

- (a) *For the particulate matter standard* – the permittee shall utilize EPA Test Method 5 (found in Appendix A of 40 CFR Part 60). The sampling time and sample volume for each run shall be at least sixty (60) minutes and 0.90 dscm (or 31.8 dscf).
- (b) *For the opacity standard* – the permittee shall utilize EPA Test Method 9 (found in Appendix A) and the procedures specified in 40 CFR 60.11, Subpart A.

For each performance test conducted in accordance with paragraph (a), the permittee shall establish a differential pressure drop range for the baghouse by continuously monitoring the pressure drop during each test run. The established range shall be the respective average of the minimum and maximum pressure drop readings during the total runs.

(Ref.: 40 CFR 60.93(a) and (b); Subpart I and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 5.6 For Emission Point AA-006, the permittee shall demonstrate compliance with the opacity standard specified in Condition 3.12 by performing a visible emission evaluation (VEE) in accordance with EPA Test Method 9 once every five (5) years and not to exceed sixty (60) months after the previously completed test. If the span since the last evaluation exceeds five (5) years, the permittee shall perform a VEE no later than one (1) year after issuance of this permit.

Each evaluation shall be conducted during daylight hours and during representative operating conditions. The overall observation period for a VEE shall last thirty (30) consecutive minutes [i.e. five (5) 6-minute averages], and the overall result shall be the average of the five (5) respective 6-minute averages.

The permittee shall maintain all documentation and information specified by EPA Test Method 9, any corrective actions taken to prevent or minimize emissions as a result of the evaluation, and the date / time when each evaluation was conducted. Additionally, in the event that a VEE is required but not performed, the permittee shall record a written explanation as to why it was not possible to perform the VEE.

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

- 5.7 For Emission Point AA-014, the permittee shall maintain documentation on the following information:

- (a) The total monthly gasoline throughput from the storage tank;
- (b) The occurrence and duration of each malfunction for all equipment, which includes (but not limited to) process equipment, air pollution control equipment, and monitoring equipment; and
- (c) The action(s) taken during each period of malfunction to minimize emissions in accordance with Condition 4.2, which includes any corrective action(s) taken to restore the malfunctioning equipment (including – but not limited to – process equipment, air pollution control equipment, and monitoring equipment) to its normal or usual manner of operation.

(Ref.: 40 CFR 63.11111(e) and 63.11125(d); Subpart CCCCCC)

SECTION 6 REPORTING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Reporting Requirement
AA-100 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	Report Permit Deviations Within Five (5) Working Days
		6.2	Submit A Certified Annual Monitoring Report
		6.3	All Documents Submitted to the MDEQ Shall Be Certified by a Responsible Official
AA-001	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11) and 2.6.B(5).	6.4	Submit Performance Testing Protocol Submit 10-Day Notification of Performance Testing Event
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11) and 2.6.B(6).	6.5	Submit Performance Test Results and Additional Information
AA-006	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.6	Submit VEE Results

- 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. The 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 monitoring report postmarked no later than January 31 of each calendar year for the preceding calendar year. This report shall address any required monitoring specified in Section 6 of the permit. All instances of deviations from permit requirements must be clearly identified in the report. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration.

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

- (a) The quantity (in tons) of hot-mix asphalt produced both on a monthly and rolling 12-month basis;
- (b) Any occurrence when a required visible emission evaluation (VEE) was not conducted and an explanation as to why it was not performed;

(c) Any maintenance action(s) performed on a baghouse and any periods of time (including date and duration) in which a baghouse was non-operational; and

(d) The throughput of gasoline (in gallons) on a monthly basis;

(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-001, the permittee shall submit a written performance test protocol for testing required by Condition 5.5 that details the procedures and test methods to be implemented during the actual testing event no later than thirty (30) days prior to the intended testing date.

The permittee shall notify the MDEQ in writing at least ten (10) days prior to the intended testing date so that a representative from the MDEQ may be afforded the opportunity to observe the stack testing.

If deemed necessary by the MDEQ, a conference may be required prior to the intended testing date to discuss the proposed test methods and procedures outlined in the performance testing protocol.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11) and 2.6.B(5).)

6.5 For Emission Point AA-001, the permittee shall submit a report for any conducted performance test no later than sixty (60) days after completing the testing event. The report (at a minimum) shall include the information specified in Section 1.B.5 and the following information:

(a) The hourly hot-mix asphalt throughput; and

(b) The differential pressure drop range established for the associated baghouse.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11) and 2.6.B(6).)

6.6 For Emission Point AA-006, the permittee shall submit the results of a visible emission evaluation (VEE) required by Condition 5.6 no later than sixty (60) days after completing the VEE.

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