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

## TO OPERATE AIR EMISSIONS EQUIPMENT

## THIS CERTIFIES THAT

Dart Container Company of Mississippi, LLC
197 Harris Avenue
Quitman, Mississippi
Clarke County

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

**Permit Issued:** FEB 1 4 2019

**Effective Date: As specified herein.**

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

Krystal Rudolph

**AUTHORIZED SIGNATURE**
**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Expires:** JAN 3 1 2024

**Permit No.: 0440-00053**

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**APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT**
**APPENDIX B COMPLIANCE ASSURANCE MONITORING (CAM) PLAN**

## OTHER RELEVANT DOCUMENTS AND/OR REGULATIONS

**40 CFR 60, SUBPART A – NEW SOURCE PERFORMANCE STANDARDS, GENERAL PROVISIONS**

**40 CFR 60, SUBPART Dc – NEW SOURCE PERFORMANCE STANDARDS FOR SMALL INDUSTRIAL-COMMERCIAL-INSTITUTIONAL STEAM GENERATING UNIT**

**40 CFR 60, SUBPART IIII – NEW SOURCE PERFORMANCE STANDARDS FOR STATIONARY COMPRESSION IGNITION INTERNAL COMBUSTION ENGINES (CI ICE)**

**40 CFR 63, SUBPART ZZZZ – NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR STATIONARY RECIPROCATING INTERNAL COMBUSTION ENGINES (RICE)**

**40 CFR 63, SUBPART JJJJJJ – NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR INDUSTRIAL, COMMERCIAL, AND INSTITUTIONAL BOILERS FOR AREA SOURCES**

## SECTION 1. GENERAL CONDITIONS

1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(a).)

1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(b).)

1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(c).)

1.4 Prior to its expiration, this permit may be reopened in accordance with the provisions listed below.

(a) This permit shall be reopened and revised under any of the following circumstances:

(1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of 3 or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.

(2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

(3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.

(4) The Administrator or the Permit Board determines that the permit must be

revised or revoked to assure compliance with the applicable requirements.

(b) Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.

(c) Reopenings shall not be initiated before a notice of such intent is provided to the Title V source by the DEQ at least 30 days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

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

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(e).)

1.6 This permit does not convey any property rights of any sort, or any exclusive privilege.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(d).)

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(5).)

1.8 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.

(a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance

calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).)

(b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).)

(c) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D(2).)

(d) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.)

(e) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.C.)

1.9 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(8).)

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)

1.11 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:

(a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;

(b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

(d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

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

1.12 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere.

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

1.13 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970.

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

1.14 Compliance with the conditions of this permit shall be deemed compliance with any

applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(1).)

1.15 Nothing in this permit shall alter or affect the following:

(a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;

(b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

(c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.

(d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act.

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

1.16 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan.

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

1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C(2)., R. 6.4.B., and R. 6.2.A(1)(c).)

1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:

(a) the changes are not modifications under any provision of Title I of the Act;

(b) the changes do not exceed the emissions allowable under this permit;

(c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:

(1) a brief description of the change(s),

(2) the date on which the change will occur,

(3) any change in emissions, and

(4) any permit term or condition that is no longer applicable as a result of the change;

(d) the permit shield shall not apply to any Section 502(b)(10) change.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F(1).)

1.19 Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in 11 Miss. Admin. Code Pt. 2, Ch. 3., "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)

1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 11 Miss. Admin. Code Pt. 2, Ch. 2., "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations 11 Miss. Admin. Code Pt. 2, Ch. 6., "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

(a) routine maintenance, repair, and replacement;

(b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan

pursuant to the Federal Power Act;

(c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;

(d) use of an alternative fuel or raw material by a stationary source which:

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

(f) any change in ownership of the stationary source.

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

1.21 Any change in ownership or operational control must be approved by the Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.D(4).)

1.22 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.B(1).)

1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet

the following buffer zones.

(a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.

(b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.

(c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator.

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

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

(a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

(b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.

(c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:

(1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;

(2) the permitted facility was at the time being properly operated;

(3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) the permittee submitted notice of the emergency to the DEQ within 2 working

days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

(e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

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

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

(a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)

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

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

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

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

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

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

(2) In any enforcement proceeding by the Commission, the source seeking to

establish the occurrence of an upset has the burden of proof.

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

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

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

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

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

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

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

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

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

# SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

| Emission Point | Description |
|---|---|
| AA-001 | 29.3 MMBTU/hr natural gas or No. 2 fuel oil-fired steam generating boiler. |
| AA-002 | 25.1 MMBTU/hr natural gas or No. 2 fuel oil-fired steam generating boiler. |
| AA-003 | 33.5 MMBTU/hr natural gas or No. 2 fuel oil-fired steam generating boiler. |
| AA-004 | Cup Manufacturing: Pre-Expansion Process Area, consisting of expandable polystyrene (EPS) bead pre-blender dumpers, blenders, holding tanks, pre-expanding equipment, pre-puff screeners, and pre-puff holding bags.<br><br>Captured emissions from this process are vented to Emission Points AA-001, AA-002, and AA-003 for control of VOCs, and uncaptured emissions are vented through the building ventilation system. |
| AA-005 | Cup Manufacturing: Pre-Puff Storage and Steam Chest Molding, where pre-puff is converted to EPS containers. Emissions are vented through the building ventilation system. |
| AA-006 | Cup Printing: Flexographic-type UV printing presses print UV curable ink on EPS containers. |
| AA-007 | Cup Manufacturing: Finished Product Warehouse Area, where packaged cups are stored prior to Shipping. Emissions are vented through the building ventilation system. |
| AA-011 | Parts Cleaners associated with printing machines. |
| AA-012 | Parts Cleaners associated with manufacturing equipment. |
| AA-013 | Parts Cleaners associated with maintaining delivery trucks and forklifts. |
| AA-015 | Scrap Cup Baler |
| AA-016 | Post-Consumer Waste Densifier |
| AA-017 | Scrap Container Densification System |
| EG-001 | 158 hp (118 kW) diesel-fired compression ignition engine (2007 model year) to power backup generator for lights |

# SECTION 3. EMISSION LIMITATIONS & STANDARDS

## A. Facility-Wide Emission Limitations & Standards

3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).

(a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.

(b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour.

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

3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Paragraph 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets.

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

## B. Emission Point Specific Emission Limitations & Standards

| Emission Point(s) | Applicable Requirement | Condition Number(s) | Pollutant/ Parameter | Limit/Standard |
|---|---|---|---|---|
| AA-001<br>AA-002<br>AA-003 | 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b). | 3.B.1 | PM (filterable only) | $E = 0.8808*(I)^{-0.1667}$ |
| | 40 CFR Part 60, Subpart Dc<br><br>(Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units)<br><br>40 CFR 60.40c(a), Subpart Dc | 3.B.2 | $SO_2$ | Applicability |

| Emission Point(s) | Applicable Requirement | Condition Number(s) | Pollutant/ Parameter | Limit/Standard |
|---|---|---|---|---|
| | Permit to Construct issued on May 14, 1997 and modified on October 17, 1997, and<br><br>40 CFR 60.42c(d) and (i), Subpart Dc | 3.B.3 | Fuel Limitation | Combust natural gas, No. 2 fuel oil with a maximum sulfur content of 0.5% (by weight), and/or captured vent gas from the pre-expander process area. |
| | 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1). | 3.B.4 | $SO_2$ | 4.8 lbs/MMBTU |
| | PSD Permit to Construct issued on January 31, 2007 and modified March 23, 2011 | 3.B.5 | VOC | Minimum VOC destruction efficiency of 95% for captured vent gas from the pre-expander process area (BACT Limit) |
| | 40 CFR 63, Subpart JJJJJJ<br><br>(National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources)<br><br>40 CFR 63.11193, Subpart JJJJJJ | 3.B.6 | HAP | Applicability |
| AA-003 | 40 CFR 60.43c(c) & (d), Subpart Dc | 3.B.7 | Opacity | 20% opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. |
| AA-004 | PSD Permit to Construct issued on January 31, 2007, modified March 23, 2011 | 3.B.8 | VOC | Emissions captured and routed to the control device (AA-001, AA-002, and/or AA-003) (BACT Requirement) |
| AA-004<br>AA-005<br>AA-007 | 11 Miss. Admin. Code Pt. 2, R. 1.3.F(1). | 3.B.9 | PM (filterable only) | $E = 4.1p^{0.67}$ |
| EG-001 | 40 CFR 63, Subpart ZZZZ<br><br>(National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines)<br><br>40 CFR 63.6580, Subpart ZZZZ | 3.B.10 | HAP | Applicability |
| | 40 CFR 60, Subpart IIII<br><br>(Standards of Performance for Stationary Compression Ignition Internal Combustion Engines)<br><br>40 CFR 60.4200, Subpart IIII | 3.B.11 | NMHC + NOx<br>CO<br>PM | Applicability |

| Emission Point(s) | Applicable Requirement | Condition Number(s) | Pollutant/ Parameter | Limit/Standard |
|---|---|---|---|---|
| | 40 CFR 60.4205(b), Subpart IIII (referencing 60.4202(a)(2) and subsequently 89.112 and 89.113) | 3.B.12 | NMHC + NOx | ≤ 4.0 g/kW-hr |
| | | | CO | ≤ 5.0 g/kW-hr |
| | | | PM | ≤ 0.3 g/kW-hr |
| | | | Opacity | (1) 20 percent during the acceleration mode;<br><br>(2) 15 percent during the lugging mode; and<br><br>(3) 50 percent during the peaks in either the acceleration or lugging modes. |
| | 40 CFR 60.4207(b), Subpart IIII | 3.B.13 | Fuel Restriction | The permittee shall use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel. |
| Facility-Wide | PSD Permit to Construct issued on January 31, 2007, modified March 23, 2011 | 3.B.14 | VOC | 495 tons per year on a 12-month rolling basis |

3.B.1 For Emission Points AA-001, AA-002, and AA-003, the maximum permissible particulate matter emissions from fossil fuel burning installations equal to or greater than 10 million BTU per hour heat input but less than 10,000 million BTU 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 million BTU per hour heat input and I is the heat input in millions of BTU per hour.

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

3.B.2 Emission Points AA-001, AA-002, and AA-003 are subject to and shall comply with all applicable requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR Part 60, Subpart Dc.

(Ref.: 40 CFR 60.40c(a), Subpart Dc)

3.B.3 For Emission Points AA-001, AA-002, and AA-003, the permittee shall burn the following:

(a) Natural gas,

(b) No. 2 fuel oil with a maximum sulfur content of 0.5% (by weight), and/or

(c) Captured vent gas from the pre-expander process area (AA-004).

All other fuels are prohibited. The fuel oil sulfur limit applies at all times, including periods of startup, shutdown, and malfunction.

(Ref.: Permit to Construct issued on May 14, 1997 and modified on October 17, 1997 and 40 CFR 60.42c(d) and (i))

3.B.4 For Emission Points AA-001, AA-002, and AA-003, the maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.

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

3.B.5 For Emission Points AA-001, AA-002, and AA-003, when oxidizing pentane from Emission Point AA-004, the permittee shall maintain a minimum destruction efficiency of 95%.

(Ref.: PSD Permit to Construct issued on January 31, 2007, and modified on March 23, 2011)

3.B.6 For Emission Points AA-001, AA-002, and AA-003, the permittee is subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR Part 63, Subpart JJJJJJ. Emission Points AA-001, AA-002, and AA-003 are existing oil fired boilers defined in 40 CFR 63.11237.

(Ref.: 40 CFR 63.11194(a)(1) and (b), Subpart JJJJJJ)

3.B.7 For Emission Point AA-003, when combusting fuel oil the permittee shall not cause to be discharged into the atmosphere any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. The opacity standard shall apply at all times, except during periods of startup, shutdown, or malfunction.

(Ref.: 40 CFR 60.43c(c) & (d), Subpart Dc)

3.B.8 For Emission Point AA-004, during all times of operation the permittee shall capture and route emissions to Emission Points AA-001, AA-002, and/or AA-003 for destruction.

(Ref.: PSD Permit to Construct issued on January 31, 2007, and modified on March 23, 2011)

3.B.9 For Emission Points AA-004, AA-005, and AA-007, except as otherwise specified, no person shall cause, permit, or allow the emission of particulate matter in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship:

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

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

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

3.B.10 Emission Point EG-001 is subject to the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR Part 63, Subpart ZZZZ. Emission Point EG-001 meets the definition of a new affected source at an area source under 40 CFR 63, Subpart ZZZZ and must meet the requirements of this subpart by meeting the requirements of 40 CFR 60, Subpart IIII, for compression ignition engines. No further requirements apply for such engines under 40 CFR 63, Subpart ZZZZ.

(Ref.: 40 CFR 63.6590(c)(1), Subpart ZZZZ)

3.B.11 For Emission Point EG-001, the permittee is subject to and shall comply with the applicable requirements of the New Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart IIII and shall comply with the General Provisions (40 CFR 60, Subpart A).

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

3.B.12 For Emission Point EG-001, the permittee must comply with the emission standards for new nonroad compression ignition engines in 40 CFR 60.4202(a)(2). Specifically, the engine shall meet the requirements of a Tier 3 engine ($75 \leq kW < 130$) in Table 1 of 40 CFR 89.112 and the smoke emission standards of 40 CFR 89.113, which are specifically noted in the table above.

(Ref.: 40 CFR 60.4205(b), Subpart IIII)

3.B.13 For Emission Point EG-001, the permittee shall use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel.

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

3.B.14 The permittee shall be limited to facility-wide VOC emissions of 495 tons per year on a 12-month rolling basis.

(Ref.: PSD Permit to Construct issued on January 31, 2007, and modified on March 23, 2011)

C. Insignificant and Trivial Activity Emission Limitations & Standards

| Applicable Requirement | Condition Number(s) | Pollutant/ Parameter | Limit/Standard |
|---|---|---|---|
| 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a). | 3.C.1 | PM | 0.6 lbs/MMBTU |
| 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1). | 3.C.2 | $SO_2$ | 4.8 lbs/MMBTU |

3.C.1 The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input.

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

3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.

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

D. Work Practice Standards

| Emission Point(s) | Applicable Requirement | Condition Number(s) | Pollutant/ Parameter | Limit/Standard |
|---|---|---|---|---|
| AA-001<br>AA-002<br>AA-003 | 40 CFR 63.11201(b), 40 CFR 63.11223(a) and Table 2 of 40 CFR 63, Subpart JJJJJJ | 3.D.1 | Maintenance Requirements | Conduct biennial performance tune-ups. Must be conducted no more than 25 months after the previous tune-up. |
| | 40 CFR 63.11205(a), Subpart JJJJJJ | 3.D.2 | O & M Practices | Operate and maintain units in a manner consistent with safety and good air pollution control practices for minimizing emissions |

3.D.1 For Emission Points AA-001, AA-002, and AA-003, the permittee must conduct a biennial performance tune-up according to (a) through (f) below by March 21, 2013 and biennially thereafter. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. If the units are not operating on the required date for the tune-up, then the tune-up must be conducted within 30 days of startup.

a. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection.

b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.

c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection).

d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject.

e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.

f. Maintain on-site and submit, if requested by MDEQ, a report containing the information below.

i. The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.

ii. A description of any corrective actions taken as a part of the tune-up of the boiler.

iii. The type and amount of fuel used over the 12 months prior to the tune-up of the boiler. Units sharing a fuel meter may estimate the fuel use by each unit.

(Ref.: 40 CFR 63.11201(b), 40 CFR 63.11223(a) and Table 2 of 40 CFR 63, Subpart JJJJJJ)

3.D.2 For Emission Points AA-001, AA-002, and AA-003, the permittee shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.

(Ref.: 40 CFR 63.11205(a), Subpart JJJJJJ)

## SECTION 4. COMPLIANCE SCHEDULE

4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.

4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:

(a) the identification of each term or condition of the permit that is the basis of the certification;

(b) the compliance status;

(c) whether compliance was continuous or intermittent;

(d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;

(e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(5)(a), (c), & (d).)

# SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

## A. General Monitoring, Recordkeeping and Reporting Requirements

5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.

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

5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:

(a) the date, place as defined in the permit, and time of sampling or measurements;

(b) the date(s) analyses were performed;

(c) the company or entity that performed the analyses;

(d) the analytical techniques or methods used;

(e) the results of such analyses; and

(f) the operating conditions existing at the time of sampling or measurement.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(1).)

5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

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

5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 6.2.E.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)

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

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

5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the DEQ and the EPA.

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

5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

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

B. Specific Monitoring and Recordkeeping Requirements

| Emission Point(s) | Applicable Requirement | Condition Number | Pollutant/Parameter Monitored | Monitoring/Recordkeeping Requirement |
|---|---|---|---|---|
| AA-001<br>AA-002<br>AA-003 | 40 CFR 60.48c(g)(2), 60.42c(h)(1), 60.44c(g), 60.48c(e)(11), and 60.48c(f)(1), Subpart Dc | 5.B.1<br>5.B.2 | Fuel | Monitor and maintain the amount of each fuel combusted each calendar month. |
| | 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2). | 5.B.3 | VOC | Testing and Compliance Demonstration – each permit term |
| | 40 CFR 64 (Compliance Assurance Monitoring)<br>40 CFR 64.3(a) | 5.B.4<br>5.B.5<br>5.B.6 | VOC | CAM Plan Requirements in Appendix B. |
| | 40 CFR 64.8 | 5.B.7 | VOC | Development of Quality Improvement Plan (QIP) |
| | 40 CFR 64.9(b) | 5.B.8 | VOC | CAM recordkeeping requirements |
| | 40 CFR 63.11225(c), Subpart JJJJJJ | 5.B.9 | HAP | Maintain specified records |
| AA-001<br>AA-002<br>AA-003<br>AA-004<br>AA-005 | Construction Permit issued May 14, 1997<br><br>PSD Permit to Construct issued on January 31, | 5.B.10 | VOC | Testing and Compliance Demonstration |

| Emission Point(s) | Applicable Requirement | Condition Number | Pollutant/Parameter Monitored | Monitoring/Recordkeeping Requirement |
|---|---|---|---|---|
| AA-007 | 2007, and modified on March 23, 2011 | | | |
| EG-001 | 40 CFR 60.4209(a), Subpart IIII | 5.B.11 | Hours of operation | Install a non-resettable hour meter prior to startup of the engine. |
| | 40 CFR 60.4211(a), Subpart IIII | 5.B.12 | Operating and Maintenance Requirements | Comply with manufacturer's operating and maintenance requirements |
| | 40 CFR 60.4211(c), Subpart IIII | 5.B.13 | NMHC + NOx, CO, PM | Purchase certified engine |
| | 40 CFR 60.4211(f), Subpart IIII | 5.B.14 | Hours of operation | ≤ 100 hours of operation for maintenance, including no more than 50 hours in non-emergency use |
| | 40 CFR 60.4214(b), Subpart IIII | 5.B.15 | Hours of operation | Record hours of operation and reason for operation |
| Facility-Wide | Construction Permit issued May 14, 1997<br><br>PSD Permit to Construct issued on January 31, 2007, and modified on March 23, 2011 | 5.B.16 | VOC | Maintain EPS throughput records on a monthly basis. |
| | | 5.B.17 | VOC/HAP | Maintain monthly records for each solvent, ink, and other VOC or HAP containing material used |
| | | 5.B.18 | VOC | Maintain records on a monthly basis and each consecutive 12-month period |

5.B.1 For Emission Points AA-001, AA-002, and AA-003, the permittee shall monitor and maintain records of the amount of each fuel combusted during each calendar month.

(Ref.: 40 CFR 60.48c(g)(2), Subpart Dc)

5.B.2 For Emission Points AA-001, AA-002, and AA-003, the permittee shall determine compliance with the fuel oil sulfur limits based on a certification from the fuel supplier for each new shipment of fuel oil received, which includes the following information:

(a) The name of the supplier,

(b) A statement from the supplier that the fuel oil complies with the specifications for fuel oil number 2, as defined by the American Society for Testing and Materials in ASTM D396-78, "Standard Specification for Fuel Oils",

(c) The sulfur content or maximum sulfur content of the oil.

(Ref.: 40 CFR 60.42c(h), 60. 44c(g), 60.48c(e)(11), and 60.48c(f)(1), Subpart Dc)

5.B.3 For Emission Points AA-001, AA-002, and AA-003, the permittee shall demonstrate compliance with the 495.0 tons/year emission limitation for VOC by determining inlet concentration, outlet concentration, and destruction efficiency. Testing shall be performed in accordance with approved EPA Reference Methods, and shall be performed while operating at or near capacity for Emission Point AA-004. In addition, the indicators identified in the CAM Plan (i.e., VOC inlet concentration, air flow rate, and stack temperature) shall be monitored continuously during the performance test. The permittee shall use the testing event to verify monitoring equipment accuracy. The stack test event shall occur at a minimum of once per permit term and no later than one year prior to the expiration of this permit. The results of the performance testing shall be submitted to the Mississippi Department of Environmental Quality (MDEQ) within sixty (60) days of the stack test event.

A written test protocol must be submitted at least thirty (30) days prior to the scheduled test date to ensure that all test methods and procedures are acceptable to the MDEQ. Also, the MDEQ must be notified prior to the scheduled test date. At least ten (10) days notice shall be given so that an observer may be scheduled to witness the test(s).

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

5.B.4 For Emission Points AA-001, AA-002, and AA-003, the permittee shall continuously monitor the VOC concentration of the inlet air to the boilers and the combined capture air flow rate from the EPS process to determine capture rates. Equipment downtime shall be documented, summarized and reported in accordance with Conditions 5.A.4 and 5.A.5, if necessary. Records shall be kept on a chart recorder or electronic data acquisition system and made available for review upon request. This shall serve as the method of compliance with 40 CFR 64.3(a) and the permittee's specific Compliance Assurance Monitoring (CAM) Plan. A copy of this plan is attached as Appendix B.

(Ref.: 40 CFR 64.3(a))

5.B.5 For Emission Points AA-001, AA-002, and AA-003, the permittee shall perform daily observations to verify combustion and/or the presence of a flame and record the stack temperature. The permittee shall perform burner inspections once per calendar year. The permittee shall also perform semi-annual combustion checks to determine optimum Oxygen and CO levels. Maintenance shall be performed as necessary to maintain proper operation of the boilers. Records of daily observations, including maintenance records, shall be kept and made available for review upon request. This shall serve as the method of compliance with 40 CFR 64.3(a) and the permittee's specific Compliance Assurance Monitoring (CAM) Plan. A copy of this plan is attached as Appendix B.

(Ref.: 40 CFR 64.3(a))

5.B.6 For Emission Points AA-001, AA-002, and AA-003, the permittee shall comply with the For Emission Points AA-001, AA-002, and AA-003, the permittee shall comply with the following monitoring following monitoring requirements:

(a) Maintain the monitoring systems, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(b) Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the boilers are controlling emissions from AA-004. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(c) Upon detecting an excursion or exceedance, the permittee shall restore operation of the boiler (including the associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. Determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(Ref.: 40 CFR 64.7(b), (c), and (d))

5.B.7 For Emission Points AA-001, AA-002, and AA-003, based upon review of reported excursion or exceedances, MDEQ may require the permittee to develop and implement a Quality Improvement Plan (QIP) in accordance with the requirements of 40 CFR 64.8.

(Ref.: 40 CFR 64.8)

5.B.8 For Emission Points AA-001, AA-002, and AA-003, the permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 CFR Part 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). These records may be maintained in paper form or electronic form, as long as the records are available for expeditious inspection and review.

(Ref.: 40 CFR 64.9(b))

5.B.9 For Emission Points AA-001, AA-002, and AA-003, the permittee shall maintain records of the following information:

(a) A copy of each notification and report submitted to comply with Subpart JJJJJJ and all documentation supporting any Initial Notification or Notification of Compliance Status submitted;

(b) Records identifying each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned;

(c) A copy of the energy assessment report;

(d) Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment; and

(e) Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in Condition 3.D.2 including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.

(Ref.: 40 CFR 63.11225(c), Subpart JJJJJJ)

5.B.10 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, and AA-007, the permittee shall demonstrate compliance with the VOC emission limitations by determining monthly and 12-month rolling total VOC emissions using the monitored VOC concentration and capture air flow rate to determine emissions by the following (or equivalent) equation:

VOC Emissions = [Monthly total pentane content in raw material – (EPS Throughput * 1.38%)] - [(VOC Captured) * (Destruction Efficiency)]

Where 1.38% is the average pentane content left in the cup as determined by engineering test data. The total pentane content shall be determined for each shipment using the manufacturer-supplied % pentane content in the EPS beads multiplied by the weight of the shipment. The average pentane content in the raw material may also be used provided that it is a weighted average based on the total pentane content. The Destruction Efficiency shall be the most recent efficiency demonstrated by testing or the minimum permit limit of 95%.

The above records shall be maintained in written or electronic log form.

(Ref.: Construction Permit issued May 14, 1997 and PSD Permit to Construct issued on January 31, 2007, and modified on March 23, 2011)

5.B.11 For Emission Point EG-001, the permittee shall install a non-resettable hour meter prior to startup of the engine.

(Ref.: 40 CFR 60.4209(a), Subpart IIII)

5.B.12 For Emission Point EG-001, the permittee shall operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions. In addition, the permittee shall only change those settings that are permitted by the manufacturer. The permittee shall also meet the requirements of 40 CFR parts 89, 94, and/or 1068, as they apply.

(Ref.: 40 CFR 60.4211(a), Subpart IIII)

5.B.13 For Emission Point EG-001, the permittee shall purchase an engine certified to the emission standards in 40 CFR 60.4204(b) for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications.

(Ref.: 40 CFR 60.4211(c), Subpart IIII)

5.B.14 For Emission Point EG-001, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described below, is prohibited.

(a) There is no time limit on the use of emergency stationary engine in emergency situations.

(b) The emergency engine may be operated for a maximum of 100 hours per calendar year for non-emergency use. Emergency stationary ICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor,

or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year.

(c) The emergency engine 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.

(Ref.: 40 CFR 60.4211(f), Subpart IIII)

5.B.15 For Emission Point EG-001, the permittee must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The permittee must record the time of operation of the engine and the reason the engine was in operation during that time.

(Ref.: 40 CFR 60.4214(b), Subpart IIII)

5.B.16 The permittee shall maintain monthly EPS throughput records to use in the compliance demonstration for the VOC limitation, as required by in Condition 5.B.10.

(Ref.: Construction Permit issued May 14, 1997)

5.B.17 For the entire facility, the permittee shall demonstrate compliance with the VOC emission limitations by maintaining monthly records of the following for each solvent, ink, and other VOC or HAP containing material used:

(a) Quantity used (lb or gal);

(b) The percentage of VOC and HAP by weight;

(c) The density (lb/gal), unless material usages are measured in lb;

The permittee may utilize data supplied by the manufacturer, or analysis of VOC content by EPA Test Method 24, 40 CFR 60, Appendix A. The above records shall be maintained in log form.

(Ref.: Construction Permit issued May 14, 1997 and PSD Permit to Construct issued on January 31, 2007, and modified on March 23, 2011)

5.B.18 The permittee shall calculate the facility-wide VOC emissions for each calendar month and for each consecutive 12-month period.

(Ref.: Construction Permit issued May 14, 1997 and PSD Permit to Construct issued on January 31, 2007, and modified on March 23, 2011)

C. Specific Reporting Requirements

| Emission Point(s) | Applicable Requirement | Condition Number | Pollutant/Parameter Monitored | Reporting Requirement |
|---|---|---|---|---|
| AA-001<br>AA-002<br>AA-003 | 40 CFR 64.9(a) | 5.C.1 | VOC | CAM Reporting |
| | 40 CFR 63.11225(b), Subpart JJJJJJ | 5.C.2 | HAP | Annual Compliance Report |
| | 40 CFR 60.48c(e)(11), Subpart Dc<br><br>40 CFR 60.48c(j), Subpart Dc | 5.C.3 | VOC | Semi-annual Reporting |
| Facility-wide | 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1). | 5.C.4 | VOC | Semi-annual Reporting |

5.C.1 For Emission Points AA-001, AA-002, and AA-003, the permittee shall submit reports of the following information in accordance with Condition 5.A.4:

(a) Summary information on the number, duration, and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

(b) Summary information on the number, duration, and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

(c) A description of the actions taken to implement a QIP during the reporting period as specified in 40 CFR 64.8. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances.

(Ref.: 40 CFR 64.9(a))

5.C.2 For Emission Points AA-001, AA-002, and AA-003, the permittee shall prepare and submit a biennial compliance certification report by March 15 of year following the biennial tune-up. The report shall include the following information:

(a) Company name and address.

(b) Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant

standards and other requirements of this subpart. The notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:

(1) "This facility complies with the requirements in §63.11223 to conduct a biennial tune-up, as applicable, of each boiler."

(2) "This facility complies with the requirement in §§63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."

(c) If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.

(Ref.: 40 CFR 63.11225(b), Subpart JJJJJJ)

5.C.3 The permittee shall submit reports that include the calendar dates covered in the reporting period, records of fuel supplier certifications received during the reporting period and a certified statement signed by a responsible official that the records of fuel supplier certifications submitted represent all the fuel oil combusted during the reporting period. The reporting period is defined as each six-month period. All reports shall be submitted and postmarked by the 30$^{th}$ day following the end of the reporting period.

(Ref.: 40 CFR 60.48c(e)(11) and 60.48c(j), Subpart Dc)

5.C.4 The permittee shall submit a report of the monthly, facility-wide VOC calculations, and the 12-month rolling totals on a semi-annual basis in accordance with 5.A.4.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)

## SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

## SECTION 7. TITLE VI REQUIREMENTS

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

7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A – Production and Consumption Controls.

7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.

7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E – The Labeling of Products Using Ozone-Depleting Substances, for the following containers and products:

(a) All containers in which a class I or class II substance is stored or transported;

(b) All products containing a class I substance; and

(c) All products directly manufactured with a process that uses a class I substance, unless otherwise exempted by this subpart or, unless EPA determines for a particular product that there are no substitute products or manufacturing processes for such product that do not rely on the use of a class I substance, that reduce overall risk to human health and the environment, and that are currently or potentially available. If the EPA makes such a determination for a particular product, then the requirements of this subpart are effective for such product no later than January 1, 2015.

7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F – Recycling and Emissions Reduction:

(a) Servicing, maintaining, or repairing appliances;

(b) Disposing of appliances, including small appliances and motor vehicle air conditioners; or

(c) Refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, as well

as persons selling, offering for sale, and/or purchasing class I, class II, or non-exempt substitute refrigerants.

7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any acceptable alternative that is listed in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR Part 82, Subpart G – Significant New Alternatives Policy Program. The permittee shall also comply with any use conditions for the acceptable alternative substance.

7.6 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart H – Halon Emissions Reduction:

(a) Any person testing, servicing, maintaining, repairing, or disposing of equipment that contains halons or using such equipment during technician training;

(b) Any person disposing of halons;

(c) Manufacturers of halon blends; or

(d) Organizations that employ technicians who service halon-containing equipment.

# APPENDIX A

## List of Abbreviations Used In this Permit

| | |
|---|---|
| 11 Miss. Admin. Code Pt. 2, Ch. 1. | Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants |
| 11 Miss. Admin. Code Pt. 2, Ch. 2. | Permit Regulations for the Construction and/or Operation of Air Emissions Equipment |
| 11 Miss. Admin. Code Pt. 2, Ch. 3. | Regulations for the Prevention of Air Pollution Emergency Episodes |
| 11 Miss. Admin. Code Pt. 2, Ch. 4. | Ambient Air Quality Standards |
| 11 Miss. Admin. Code Pt. 2, Ch. 5. | Regulations for the Prevention of Significant Deterioration of Air Quality |
| 11 Miss. Admin. Code Pt. 2, Ch. 6. | Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act |
| 11 Miss. Admin. Code Pt. 2, Ch. 7. | Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act |
| BACT | Best Available Control Technology |
| CEM | Continuous Emission Monitor |
| CEMS | Continuous Emission Monitoring System |
| CFR | Code of Federal Regulations |
| CO | Carbon Monoxide |
| COM | Continuous Opacity Monitor |
| COMS | Continuous Opacity Monitoring System |
| DEQ | Mississippi Department of Environmental Quality |
| EPA | United States Environmental Protection Agency |
| gr/dscf | Grains Per Dry Standard Cubic Foot |
| HP | Horsepower |
| HAP | Hazardous Air Pollutant |
| lbs/hr | Pounds per Hour |
| M or K | Thousand |
| MACT | Maximum Achievable Control Technology |
| MM | Million |
| MMBTUH | Million British Thermal Units per Hour |
| NA | Not Applicable |
| NAAQS | National Ambient Air Quality Standards |
| NESHAP | National Emissions Standards for Hazardous Air Pollutants, 40 CFR 61 or National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR 63 |
| NMVOC | Non-Methane Volatile Organic Compounds |
| $NO_x$ | Nitrogen Oxides |
| NSPS | New Source Performance Standards, 40 CFR 60 |
| O&M | Operation and Maintenance |
| PM | Particulate Matter |
| $PM_{10}$ | Particulate Matter less than 10 μm in diameter |
| ppm | Parts per Million |
| PSD | Prevention of Significant Deterioration, 40 CFR 52 |
| SIP | State Implementation Plan |
| $SO_2$ | Sulfur Dioxide |
| TPY | Tons per Year |
| TRS | Total Reduced Sulfur |
| VEE | Visible Emissions Evaluation |
| VHAP | Volatile Hazardous Air Pollutant |
| VOC | Volatile Organic Compound |

# APPENDIX B

## Compliance Assurance Monitoring (CAM) Plan

| | **Indicator No. 1** | **Indicator No. 2** |
|---|---|---|
| I. Indicator | Capture rate (lb of pentane collected/lb of EPS processed in expanders) | Boiler stack temperature using "Trend" thermometer model# TI.52 |
| II. Indicator Range | 0.6 - 1.2% | >340°F |
| III. Performance Criteria | Effective Capture | Boiler operating correctly |
| A. Data Representativeness | Capture rate is determined by monitoring both capture flow rate and concentration. The average concentration and the total daily flow are used to determine the amount captured each day. The monitoring system computer then computes the total amount of pentane captured. This is divided by the amount of EPS processed so that the plant can determine if there are any issues (clogs/blockage/leaks/monitoring equipment calibrations or failures) with the capture system or the monitoring system. Periods of venting are recorded and reported as deviations. Capture rates outside the range trigger an investigation of both monitoring and capture system components to make sure the system is working correctly and optimum collection is occurring. | The stack temperature and flame of each operating boiler are checked daily. These two parameters are used to assure correct operation of the boiler. |
| B. Verification of Operational Status | Chart recorder which records monitoring data is checked for operational status each shift. | Check for appropriate temperature and flame color. Thermometer calibration will be checked once a year. |
| C. QA/QC Practices and Criteria | Flow and concentration monitors are calibrated per manufacturers' recommendations and checked/calibrated if capture rate falls outside expected range. | Semi-annual combustion checks are used to optimize $O_2$ and CO levels. Meter is calibrated prior to use. |
| D. Monitoring Frequency | Flow and concentration are monitored continuously. Daily checks of flow, concentration, and capture amount are done by the production supervisor. The capture and production data are entered into a spreadsheet to determine capture rate as well. If data is outside of the expected range, verification and troubleshooting checks are performed. | Boiler stack temperatures for operating boilers are checked each day by boiler technician or supervisor. |
| E. Data Collection Procedures | Flow and concentration are captured on a chart recorder and computer. Capture rate is calculated manually in a spreadsheet. | Boiler stack temperature is recorded manually each morning, that the boiler is operated, by the boiler technician to assure correct operation during his boiler room walk through.<br>Tune up results are printed for at least 3 firing rates for each boiler during biennial tune ups. |
| F. Averaging Period | Daily | NA |