

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

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

**PROFILE Products, LLC
County Road 706
Blue Mountain, Tippah 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 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: December 6, 2021

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

Krystal Rudolph

AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: November 30, 2026

Permit No.: 2620-00020

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SECTION 1. GENERAL CONDITIONS

1.1 The permittee must comply with all conditions of this permit. Any permit non-compliance 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 three (3) or more years. Such a reopening shall be completed no later than eighteen (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 the 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) Re-openings shall not be initiated before a notice of such intent is provided to the Title V source by the Mississippi Department of Environmental Quality (MDEQ) at least thirty (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 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 permittee or, for information 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. 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 MDEQ 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 6 – “Air Emissions Operating Permit Regulations for Purposes of Title V of the Federal Clean Air Act”.

- (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 MDEQ 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 MDEQ 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 MDEQ, 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, 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 Operating Permit (TVOP). If the permittee submits a timely and complete application, the failure to have a TVOP 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 MDEQ 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 timeframe as provided in other regulations for emergencies] and the notification includes the following:
 - (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 MDEQ 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, 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 2 – “Permit Regulations for the Construction and/or Operation of Air Emissions Equipment” – and may require modification of this permit in accordance with Mississippi Administrative Code, Title 11, Part 2, Chapter 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 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).)

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, silvi-cultural 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 an Emergency Air Pollution Episode Alert imposed by the Executive Director of the MDEQ and must meet the following buffer zones.

- (a) Open burning without a forced-draft air system must not occur within five hundred (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 fifty (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 non-compliance 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 Part (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 MDEQ within two (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, start-ups, 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 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 non-compliance, 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 EPA or third party enforcement actions.
- (b) Start-ups and Shutdowns (as defined in 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 this 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 1.10.B.(2)(a) through (e).
 - (3) Where an upset as defined in Rule 1.2 occurs during start-up 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 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.)

- 1.27 Regarding compliance testing (if applicable):

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

- (b) Compliance testing will be performed at the expense of the permittee.
- (c) Each emission sampling and analysis report shall include (but not be limited to) the following:
 - (1) Detailed description of testing procedures;
 - (2) Sample calculation(s);
 - (3) Results; and
 - (4) Comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

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

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-000	Facility-Wide (PROFILE Products, LLC)
AA-001	<p>Jesco / IMC Venturi Wet Scrubber No. 1 (Ref. SR-1) – controls emissions from the following sources:</p> <ul style="list-style-type: none"> ▪ 35 Tons / Hour Pre-Dryer [equipped with 40.5 MMBTU / hour dual fuel-fired (natural gas and No. 2 fuel oil) burner] ▪ Conveyor (Ref. C-8) ▪ Cooler (Ref. COL) <p>* (process units within this emission point were constructed in 1966)</p>
AA-002	<p>Jesco / IMC Venturi Wet Scrubber No. 2 (Ref. SR-2) – controls emissions from a 18 Tons / Hour Calciner [constructed in 1966; equipped with 21.5 MMBTU / hour dual fuel-fired (natural gas and No. 2 fuel oil) burner]</p>
AA-003	<p>50 Tons / Hour Bulk Loading Process [equipped with a dust collector (Ref. DC-1)] – controls emission from the following sources:</p> <ul style="list-style-type: none"> ▪ Bucket Elevator (Ref. BE-7) ▪ Bucket Elevator (Ref. BE-8) ▪ Bucket Elevator (Ref. BE-9) ▪ Belt Conveyor (Ref. C-13) ▪ Belt Conveyor (Ref. C-15) ▪ Belt Conveyor (Ref. C-19) ▪ Belt Conveyor (Ref. C-20) ▪ Belt Conveyor (Ref. C-29) ▪ Belt Conveyor (Ref. C-30) ▪ Kice Aspirator (Ref. K-2) ▪ Kice Aspirator (Ref. K-3) ▪ Sweco Screens (Ref. SW-1) ▪ Sweco Screens (Ref. SW-2) ▪ Bagging Scale (Ref. PK-7) ▪ Bagging Scale (Ref. PK-9) ▪ Storage Bin (Ref. BN-5) ▪ Storage Bin (Ref. BN-6) ▪ Storage Bin (Ref. BN-9) ▪ Storage Bin (Ref. BN-10) ▪ Rail / Truck Bulk Loading Operation <p>* (process units within this emission point were constructed in 1985)</p>
AA-004	<p>Calcined Packaging Process [equipped with a dust collector (Ref. DC-2)] – controls emissions the following sources:</p> <ul style="list-style-type: none"> ▪ Calcined Packer (Ref. PK-1) ▪ 25 lb. Valve Packer (Ref. PK-2) <p>* (process units within this emission point were constructed in 1984)</p>

Emission Point	Description
AB-001	3.5 Tons / Hour MPM Conveyor System and Storage Bin (Ref. BN-3) [constructed in 1989; equipped with a dust collector (Ref. DC-3)]
AB-002	<p>15 Tons / Hour Materials Processing, Handling, Storage, and Packaging Area [equipped with a dust collector baghouse (Ref. DC-4)] – controls emissions from the following sources:</p> <ul style="list-style-type: none"> ▪ Belt Conveyor – Head Pulley Only (Ref. C-14) ▪ Bucket Elevator (Ref. BE-3) ▪ Bagging Scale (Ref. PK-8) ▪ Bagging Scale (Ref. PK-10) ▪ Sweco Screen (Ref. SW-3) ▪ Continental Rollo-Mixer (Ref. CM-1) ▪ Surge Bin (Ref. SB-1) ▪ Storage Bin (Ref. BN-1) ▪ Storage Bin (Ref. BN-2) ▪ Storage Bin (Ref. BN-4) <p>* (process units within this emission point were constructed in 1989)</p>
AB-003	<p>25 Tons / Hour Pet Litter Manufacturing Operations [equipped with a dust collector baghouse (Ref. DC-5)] – controls emissions from the following sources:</p> <ul style="list-style-type: none"> ▪ Ferrell-Ross Mill – Model No. 12×52RH (Ref. RM-5) ▪ Conveyor (Ref. PC-2) ▪ Storage Bin (Ref. BN-7) ▪ Storage Bin (Ref. BN-8) ▪ Conveyor (Ref. C4-A) ▪ Bucket Elevator (Ref. PE-1) ▪ Bucket Elevator (Ref. PE-3) ▪ Bucket Elevator (Ref. PE-4) ▪ Kice Aspirator (Ref. K-1) ▪ Duplex Scale (Ref. PK-4) <p>* (process units within this emission point were constructed in 2000)</p>

Emission Point	Description
AB-004	<p>15 Tons / Hour Calcined Processing Operations [equipped with a dust collector (Ref. DC-6)] – controls emissions from the following sources:</p> <ul style="list-style-type: none"> ▪ No. 1 and No. 2 Derrick Screens (Ref. DR-1 and DR-2) ▪ No. 5 and No. 6 Rotex Screens (Ref. RS-5 and RS-6) ▪ No. 5 and No. 6 SWECO Screens (Ref. SW-5 and SW-6) ▪ Bucket Elevator (Ref. BE-1) ▪ Bucket Elevator (Ref. BE-2) ▪ Bucket Elevator (Ref. BE-4) ▪ Bucket Elevator (Ref. BE-5) ▪ Bucket Elevator (Ref. BE-6) ▪ Conveyor (Ref. SC-3) ▪ Belt Conveyor (Ref. C-6) ▪ Belt Conveyor (Ref. C-7) ▪ Belt Conveyor (Ref. C-11) ▪ Belt Conveyor (Ref. C-12) ▪ Belt Conveyor (Ref. C-13) ▪ Belt Conveyor - Tail Pulley (Ref. C-14) ▪ Belt Conveyor (Ref. C-28) ▪ Belt Conveyor (Ref. C-32) ▪ Slurry Tank (Ref. ST-2) ▪ No. 4 Ross Mill (Ref. RM-4) ▪ MPM Blower (Ref. BAV) <p>* (process units within this emission point were constructed in 2015)</p>
AB-006	<p>35 Tons / Hour Midwest / Tyler Circuit [equipped with two (2) baghouses (Ref. DC-7 and DC-8)] – both baghouses exhaust to a common stack and each baghouse controls emissions from the following sources:</p> <ul style="list-style-type: none"> ▪ Baghouse No. 1 (Ref. DC-7) <ul style="list-style-type: none"> – Bucket Elevator (Ref. PE-6) – Tyler Screen (Ref. TC-1) ▪ Baghouse No. 2: (Ref. DC-8) <ul style="list-style-type: none"> – Midwest Screen (Ref. MDW) – Roakamp-Champion Roller Mill (Ref. RK-1) – Conveyor (Ref. C4-B) – Conveyor (Ref. C-5) – Bucket Elevator (Ref. PE-2) <p>* (process units within this emission point were constructed in 1994)</p>
AB-007	<p>20 Tons / Hour Materials Storage Bin (Ref. BN-11) [constructed in 2000; equipped with a dust collector (Ref. DC-9)]</p>
AB-008	<p>115 kW (154 HP) Diesel-Fired Emergency Generator Engine (Ref. EG-1) [manufactured in 1966; max. heat input: 0.56 MMBTU / hour]</p>

Emission Point	Description
AB-009	20 Tons / Hour Process Fines Collection and Raw Materials Bin (Ref. BN-12) and Pneumatic Conveying System (Ref. PN-1) [constructed in 2008; equipped with a dust collector (Ref. DC-10)]
AB-010	Bulk Sack Filling Operations [constructed in 2020; equipped with a dust collector (Ref. DC-11)]
AB-012	<p>New Size Material Operations [equipped with a dust collector (Ref. DC-12); constructed in 2013] – controls emissions from the following sources:</p> <ul style="list-style-type: none"> ▪ Bucket Elevator (Ref. PE-7) ▪ Bucket Elevator (Ref. PE-8) ▪ Bucket Elevator (Ref. PE-9) ▪ Small Rotex Screen ▪ Large Rotex Screen ▪ RMS Crusher ▪ Screw Conveyor (Ref. SC-5) ▪ Screw Conveyor (Ref. SC-6) ▪ Screw Conveyor (Ref. SC-7) ▪ Screw Conveyor (Ref. SC-8) <p>* (process units within this emission point were constructed in 2013)</p>

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 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 the following exceptions:

- (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 (i.e. ash removal) 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.A.2 Except as otherwise specified or limited herein, the permittee shall not cause or allow the discharge into the ambient air from any point source 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.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.)

3.A.3 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.)

B. Emission Point Specific Emission Limitations & Standards

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-000	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.B.1	PM	$E = 4.1(p^{0.67})$
AA-001 through AA-004 AB-001 through AB-004 AB-006 AB-007 AB-009 AB-010 AB-012	11 Miss. Admin. Code, Pt. 2, R. 2.2.B(10), as established in the Title V Operating Permit issued December 6, 2021 (PSD Avoidance Limit)	3.B.2	PM (filterable) PM ₁₀ / PM _{2.5} (filterable only)	Operational Requirement (Control Devices)
AA-001 through AA-004 AB-002 AB-003 AB-004 AB-006 AB-009 AB-012	40 CFR Part 64 – Compliance Assurance Monitoring (CAM) 40 CFR 64.2(a), CAM	3.B.3	PM (filterable) PM ₁₀ / PM _{2.5} (filterable + condensable)	General Applicability
AA-001 AA-002	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.B.4	PM	$E = 0.8808 (I^{-0.1667})$
AA-003 AB-002 AB-003 AB-004 AB-006 AB-007 AB-009 AB-010 AB-012	40 CFR Part 60, Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants 40 CFR 60.670(a)(1) and (e); Subpart OOO	3.B.5	PM Opacity	General Applicability
AA-003 AB-002 AB-003 AB-006 AB-007 AB-009	40 CFR 60.672(a), (b), (d), (f), Table 2, and Table 3; Subpart OOO	3.B.6(a)	PM	0.022 grains / dscf (or 0.05 grams / dscm)
		3.B.6(b)	Opacity	≤ 10% (fugitive and building emissions)
		3.B.6(c)		≤ 7% (stack emissions)
AB-004 AB-010 AB-012	40 CFR 60.672(a), (b), (d), (f), Table 2, and Table 3; Subpart OOO	3.B.7(a)	PM	0.014 grains / dscf (or 0.032 grams / dscm)

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AB-004 AB-010 AB-012	40 CFR 60.672(a), (b), (f), Table 2, and Table 3; Subpart OOO	3.B.7(b)	Opacity	≤ 7% (stack and building emissions)
AB-008	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.B.8	PM	0.6 lbs. / MMBTU
	40 CFR Part 63, Subpart ZZZZ – NESHAP for Stationary Reciprocating Internal Combustion Engines 40 CFR 63.6585(a), (c), 63.6590(a)(1)(iii), and Table 8; Subpart ZZZZ	3.B.9	HAPs	General Applicability
	40 CFR 63.6640(f)(1) – (3); Subpart ZZZZ	3.B.10	Operational Requirements	100 Hours / Calendar Year for Maintenance and Readiness Testing; 50 Hours / Calendar Year for Non-Emergency Situations

3.B.1 For Emission Point AA-000 (Facility-Wide), except as otherwise specified, 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 determine by the relationship:

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

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

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

3.B.2 For Emission Points AA-001 through AA-004, AB-001 through AB-004, AB-006, AB-007, AB-009, AB-010, and AB-012, the permittee shall at all times operate each air pollution control device during the active operation of associated process equipment to minimize the emission of filterable particulate matter. If the event that a control device malfunctions or becomes non-operational, the permittee shall cease activity at the applicable operation(s) until the control device returns to service.

(Ref.: Ref.: 11 Miss. Admin. Code, Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permit issued December 6, 2021 – PSD Avoidance Limit)

3.B.3 For Emission Points AA-001 through AA-004, AB-002, AB-003, AB-004, AB-006, AB-

009, and AB-012, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 64 – Compliance Assurance Monitoring (CAM).

(Ref.: 40 CFR 64.2(a), Compliance Assurance Monitoring)

- 3.B.4 For Emission Points AA-001 and AA-002, the maximum permissible emission of ash and/or particulate matter (PM) shall not exceed an emission rate as determined by the relationship:

$$E = 0.8808 \cdot (I^{0.1667})$$

where “E” is the emission rate in pounds per MMBTU 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.B.5 For Emission Points AA-003, AB-002, AB-003, AB-004, AB-006, AB-007, AB-009, AB-010, and AB-012, the permittee is subject to and shall comply with the 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) and (e); Subpart OOO)

- 3.B.6 For Emission Points AA-003, AB-002, AB-003, AB-006, AB-007, and AB-009, the permittee shall not cause to be discharged into the atmosphere from any transfer point on a belt conveyor or from any stack emissions that exceed the following standards (as applicable):

- (a) 0.022 grains of particulate matter (PM) per dry standard cubic feet (dscf) [or 0.05 grams of PM per dry standard cubic meter (dscm)];
- (b) More than ten percent (10%) opacity for fugitive emissions (including those emitted from a building); and
- (c) More than seven percent (7%) opacity for emissions from the stack of a control device.

Truck dumping into any screening operation, feed hopper, or crusher is exempt from all noted standards. Additionally, Emission Point AB-007 (which encompasses a dust collector that controls emissions from an individual storage bin) is exempt from the noted PM emission limitation.

(Ref.: 40 CFR 60.672(a), (b), (d), (f), Table 2, and Table 3; Subpart OOO)

- 3.B.7 For Emission Points AB-004, AB-010, and AB-012, the permittee shall not cause to be discharged into the atmosphere from any transfer point on a belt conveyor or from any

stack emissions that exceed the following standards (as applicable):

- (a) 0.014 grains of PM per dry standard cubic feet (dscf) [or 0.032 grams of PM per dry standard cubic meter (dscm)]; and
- (b) More than seven percent (7%) opacity for emissions from the stack of a control device and fugitive emissions (including those emitted from a building).

Truck dumping into any screening operation, feed hopper, or crusher is exempt from all noted standards. Additionally, Emission Point AB-010 (which encompasses a dust collector that controls emissions from an individual storage bin) is exempt from the noted PM emission limitation.

40 CFR 60.672(a), (b), (d), (f), Table 2, and Table 3; Subpart OOO

- 3.B.8 For Emission Point AB-008, the maximum permissible emission of ash and/or particulate matter (PM) shall not exceed 0.6 pounds MMBTU per hour heat input.

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

- 3.B.9 For Emission Point AB-008, the permittee is subject to and shall comply with the applicable requirements found in 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE) and 40 CFR Part 63, Subpart A – General Provisions (as found in Table 8).

For the purpose of this permit, Emission Point AB-008 is an existing compression-ignition emergency stationary RICE located at an area source for hazardous air pollutants (HAPs).

(Ref.: 40 CFR 63.6585(a), (c), 63.6590(a)(1)(iii), and Table 8; Subpart ZZZZ)

- 3.B.10 For Emission Point AB-008, any operation of the engine for any reason other than emergency operation, maintenance and testing, and operation in non-emergency situations for fifty (50) hours per year is prohibited. If the engine is not operated in accordance with paragraphs (a) through (c) of this condition, the engine will not be considered an emergency engine under the referenced regulation and shall meet all requirements for a corresponding non-emergency engine.

- (a) There is no time limit on the use of an engine in emergency situations.
- (b) The permittee may operate an engine 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 accompanied with the engine. Maintenance checks and readiness testing of an engine is limited to a maximum of one hundred (100) hours per calendar year. The permittee may

petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing. However, a petition is not required if the permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of the engine beyond 100 hours per calendar year.

- (c) The permittee may operate an engine 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 63.6640(f)(1) – (3); Subpart ZZZZ)

C. INSIGNIFICANT AND TRIVIAL ACTIVITY EMISSION LIMITATIONS & STANDARDS

Applicable Requirement	Condition Number	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 (PM) from fossil fuel burning installations 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.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 or SO₂) per MMBTU 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	Pollutant / Parameter	Limit / Standard
AB-008	40 CFR 63.6603(a), 63.6625(i), and Table 2d (Item 4); Subpart ZZZZ	3.D.1	HAPs	Conduct Routine Maintenance
	40 CFR 63.6625(e)(3) and 63.6640(a); Subpart ZZZZ	3.D.2		Operational Requirements
	40 CFR 63.6625(h); Subpart ZZZZ	3.D.3		Minimize Start-Up Periods

3.D.1 For Emission Point AB-008, except during periods of start-up, the permittee shall meet the following maintenance requirements:

- (a) Change the oil and filter every five hundred (500) hours of operation or annually (whichever comes first).

The permittee also has the option of utilizing an oil analysis program in order to extend the noted oil change requirement in accordance with the following provisions:

- (1) The oil analysis shall be performed at the same frequency specified for changing the oil as outlined in paragraph (a) of this condition;
- (2) The analysis program shall (at a minimum) analyze the Total Base Number, viscosity, and percent water content. The condemning limits for each noted parameter are as follows:
 - (i) Total Base Number is less than thirty percent (30%) of the Total Base Number of the oil when new;
 - (ii) Viscosity of the oil has changed by more than twenty percent (20%) from the viscosity of the oil when new; and
 - (ii) Percent water content (by volume) is greater than 0.5.

If none of the condemning limits are exceeded, the permittee is not required to change the oil. However, if any of the limits are exceeded, the permittee shall change the oil within two (2) business days of receiving the results of the analysis. If the engine is not in operation when the results of the analysis are received, the permittee shall change the oil within two (2) business days or before commencing operation (whichever is later).

The permittee shall keep records of the parameters that are analyzed as part of the

program, the results of the analysis, and the oil changes for the engine. Additionally, the analysis program shall be part of the maintenance plan for the engine.

- (b) Inspect the air cleaner every one thousand (1,000) hours of operation or annually (whichever comes first), and replace as necessary.
- (c) Inspect all hoses and belts every 500 hours of operation or annually (whichever comes first), and replace as necessary.

If the engine is operating during an emergency situation and it is not possible to perform the oil change on the required schedule or if performing the oil change on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the oil change can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The oil change should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. The permittee shall report any failure to perform the oil change on the schedule required and the Federal, State, or local law under which the risk was deemed unacceptable..

(Ref.: 40 CFR 63.6603(a), 63.6625(i), and Table 2d (Item 4); Subpart ZZZZ)

3.D.2 For Emission Point AB-008, the permittee shall comply with one of the following work practice options:

- (a) Operate and maintain the engine and the after-treatment control device (if any) according to the manufacturer's emission-related written instructions; or
- (b) Develop a site-specific maintenance plan, which shall provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

(Ref.: 40 CFR 63.6625(e)(3) and 63.6640(a); Subpart ZZZZ)

3.D.3 For Emission Point AB-008, the permittee shall minimize the time spent at idle during engine start-up and minimize the start-up time to a period needed for appropriate and safe loading of the engine, not to exceed thirty (30) minutes, after which time the non-startup emission limitations apply.

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

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. If the permit was reissued or modified during the course of the preceding calendar year, the certification of compliance shall address each version of the permit. 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 of each calendar year 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 6, Rule 6.2.E.

For applicable periodic reporting requirements in 40 CFR Parts 60, 61, and 63, the permittee shall comply with the deadlines in this condition for reporting conducted on a semiannual basis. Additionally, any required quarterly reports shall be submitted by the end of the month following each calendar quarter (i.e. April 30, July 31, October 31, and January 31) and any required annual reports shall be submitted by January 31 following each calendar year.

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

(Ref.: 40 CFR 60.19(c), 61.10(g), and 63.10(a)(5); Subpart A)

- 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. The report shall be made within five (5) working 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 MDEQ 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).)

- 5.A.8 Unless otherwise specified in Section 4, upon permit issuance, the monitoring, testing, recordkeeping, and reporting requirements of Section 5 herein supersede the requirements of any preceding permit to construct and/or operate.

(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-003 AA-004 AB-001 through AB-004 AB-006 AB-007 AB-009 AB-010 AB-012	40 CFR 60.674(c); Subpart OOO 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.1	Opacity	Perform Visible Emission Inspections Quarterly
AA-001 through AA-004 AB-002 AB-003 AB-004 AB-006 AB-009 AB-012	40 CFR 64.7(b) and (c); CAM	5.B.2	Operation & Maintenance	Operation and Maintenance Requirements for Monitoring System(s)
	40 CFR 64.7(d); CAM	5.B.3	Corrective Action	Perform Corrective Action Response to an Excursion / Exceedance of CAM Indicator
	40 CFR 64.8; CAM	5.B.4	QIP	Develop a Quality Improvement Plan (QIP) (Upon Request)
	40 CFR 64.9(b); CAM	5.B.5	CAM Records	Record and Maintain CAM Records (As Specified)
AA-001 AA-002	40 CFR 64.3(a), (b), and 64.6(c); CAM	5.B.6	Pressure Drop Flowrate	<i>CAM Requirements:</i> Daily Monitoring of Pressure Drop and Scrubber Liquid Flow Rate
AA-003 AA-004 AB-002 AB-003 AB-004 AB-006 AB-009 AB-012	40 CFR 64.3(a), (b), and 64.6(c); CAM	5.B.7	Pressure Drop	<i>CAM Requirements:</i> Daily Monitoring of Pressure Drop
AB-001 AB-010	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.8	PM / PM ₁₀ / PM _{2.5} (filterable only)	Evaluate the Pressure Drop for Each Dust Collector Daily
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.9		Perform a Weekly Inspection on Each Dust Collector
AB-008	40 CFR 63.6625(f) and 63.6655(f)(1); Subpart ZZZZ	5.B.10	Emergency Engine Status	Record Hours of Operation (Emergency and Non-Emergency)
	40 CFR 63.6655(a)(1), (2), (4), (5), and (e)(2); Subpart ZZZZ	5.B.11	HAPs	General Recordkeeping Requirements

5.B.1 For Emission Points AA-003, AA-004, AB-001 through AB-004, AB-006, AB-007, AB-009, AB-010, and AB-012, the permittee shall perform the following visible emission inspections in accordance with EPA Test Method 22 (i.e. Method 22) and the outlined specifications:

- (a) For each dust collector and baghouse, the permittee shall perform a 30-minute Method 22 test on the respective exhaust quarterly. Additionally, each Method 22 test shall be conducted while a corresponding dust collector or baghouse is operating.

The permittee may establish a different baghouse-specific success level for the visible emissions test (other than no visible emissions) by conducting a PM performance test simultaneously with a Method 22 test to determine what constitutes normal visible emissions from a corresponding baghouse when it is in compliance with an applicable PM concentration limitation. Upon determining the results, the revised visible emissions success level must be incorporated into the permit.

- (b) For each building that encloses a grinding mill, screening operation, bucket elevator, belt conveyor, bagging operation, storage bin, or truck / railcar loading station, the permittee shall perform a 6-minute Method 22 test on any exhaust released to the ambient air via openings quarterly. Additionally, each Method 22 test shall be conducted while the applicable equipment contained within a corresponding building is operating.

A test is considered successful if no visible emissions are observed. However, if any visible emissions are observed during an inspection, the permittee shall initiate corrective action within twenty-four (24) hours to either return a dust collector / baghouse to normal operation or prevent fugitive emissions from escaping a building.

The permittee shall record each Method 22 test (including the date, time, and any corrective actions taken) in a logbook (in written or electronic format) maintained on-site that shall be made available to MDEQ personnel upon request.

(Ref.: 40 CFR 60.674(c); Subpart OOO)

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

5.B.2 For Emission Points AA-001 through AA-004, AB-002 through AB-004, AB-006, AB-009, and AB-012, the permittee shall comply with the following requirements for the monitoring required by the CAM Plan found in Appendix B:

- (a) *Proper Maintenance*: The permittee shall maintain the monitoring, including (but not limited to) maintaining necessary parts for routine repairs of the monitoring equipment at all times.

- (b) *Continued Operation*: Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities [including calibration checks and required zero adjustments, and required span adjustments (as applicable)], the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. The data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used [including in data averaging and calculations or in fulfilling a minimum data availability requirement (as 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.

(Ref.: 40 CFR 64.7(b) and (c); Compliance Assurance Monitoring)

- 5.B.3 For Emission Points AA-001 through AA-004, AB-002 through AB-004, AB-006, AB-009, and AB-012, upon detecting an excursion or exceedance, the permittee shall restore operation of the pollutant-specific emissions unit (including the control device and 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 start-up, 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(d); Compliance Assurance Monitoring)

- 5.B.4 For Emission Points AA-001 through AA-004, AB-002 through AB-004, AB-006, AB-009, and AB-012, in addition to the excursion threshold outlined in each CAM Plan, the MDEQ may require the permittee to develop and implement a Quality Improvement Plan (QIP) that contains the elements specified in 40 CFR 64.8(b).

The QIP shall be developed and implemented within one hundred eighty (180) days of written notification from the MDEQ that a QIP is required. The MDEQ may require the permittee make reasonable changes to the QIP if the QIP fails to address the cause of the control device performance problem or fails to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The implementation of a QIP shall not excuse the permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that applies.

(Ref.: 40 CFR 64.8; Compliance Assurance Monitoring)

- 5.B.5 For Emission Points AA-001 through AA-004, AB-002 through AB-004, AB-006, AB-009, and AB-012, the permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written QIP required pursuant to Condition 5.B.3 and any activities undertaken to implement a QIP, data used to document the adequacy of monitoring, and monitoring maintenance or corrective actions (as applicable).

As applicable, the records of monitoring data and monitoring performance data should include the date and time, who performed the analysis, analytical techniques or methods used, results and operating conditions at the time of the sampling or measurement. These records may be maintained in hard copy form or electronically, provided they are available for expeditious inspection and review.

(Ref.: 40 CFR 64.9(b); Compliance Assurance Monitoring)

- 5.B.6 For Emission Points AA-001 and AA-002, the permittee shall monitor and record both the differential pressure drop across the scrubber and scrubber liquid flow rate daily in accordance with the CAM Plan found in Appendix B.

(Ref.: 40 CFR 64.3(a), (b), and 64.6(c); Compliance Assurance Monitoring)

- 5.B.7 For Emission Points AA-003, AA-004, AB-002, AB-003, AB-004, AB-006, AB-009, and AB-012, the permittee shall monitor and record the differential pressure drop across each dust collector and/or baghouse in accordance with the CAM Plan found in Appendix B.

(Ref.: 40 CFR 64.3(a), (b), and 64.6(c); Compliance Assurance Monitoring)

- 5.B.8 For Emission Points AB-001 and AB-010, the permittee shall monitor and record the differential pressure drop (in inches of water) across each dust collector daily during active corresponding operations. If a monitored recording is outside the differential pressure drop range established during applicable performance testing, the permittee

shall perform and record necessary maintenance to return the dust collector to normal operation.

Additionally, the permittee shall maintain documentation for each dust collector that details the differential pressure drop rant established during performance testing.

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

- 5.B.9 For Emission Points AB-001 and AB-010, the permittee shall perform a weekly inspection on each dust collector. If any problem is noted during an inspection, the permittee shall perform and record the necessary maintenance activities to ensure operation of the dust collector as originally designed. Additionally, preventative maintenance shall be performed (as necessary) to maintain proper operation of a dust collector.

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

- 5.B.10 For Emission Point AB-008, the permittee shall monitor and record (via a non-resettable hour meter) the hours of operation on a monthly basis for both emergency and non-emergency service. Additionally, the permittee shall detail what classified each occurrence as either an emergency or a non-emergency.

(Ref.: 40 CFR 63.6625(f) and 63.6655(f)(1); Subpart ZZZZ)

- 5.B.11 For Emission Point AB-008, the permittee shall maintain documentation that contains the following information (as applicable):
- (a) A copy of each notification and report submitted to comply with Subpart ZZZZ (including all supporting documentation);
 - (b) Records on the occurrence and duration of each malfunction of the engine or monitoring equipment;
 - (c) Records on all required maintenance performed on the air pollution control and monitoring equipment;
 - (d) Records on the actions taken during periods of malfunction to minimize emissions, including corrective actions taken to restore equipment to its normal and usual manner of operation; and
 - (e) Records of all maintenance done on each engine in order to demonstrate that the engine was operated and maintained in accordance with the maintenance plan

specified in Condition 3.D.2(b).

(Ref.: 40 CFR 63.6655(a)(1), (2), (4), (5), and (e)(2); Subpart ZZZZ)

C. SPECIFIC REPORTING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Reporting Requirement
AA-000	40 CFR 60.670(d) and 60.676; Subpart OOO 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.C.1	PM	Submit a Notification on the Replacement of Process Equipment
AA-001 through AA-004 AB-001 through AB-004 AB-006 AB-007 AB-009 AB-010 AB-012	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.2	PM / PM ₁₀ / PM _{2.5} (filterable only)	Submit a Semi-Annual Report on Operational Data about Control Devices
AA-001 through AA-004 AB-002 AB-003	40 CFR 64.9(a); CAM	5.C.3	CAM Reporting	Submit Semi-Annual Reports
AB-004 AB-006 AB-009 AB-012	40 CFR 64.7(e); CAM	5.C.4	CAM Modification	Promptly Notify the MDEQ of Failure to Achieve Limit / Standard (Though no Excursion or Exceedance was Indicated By Approved Monitoring)
AB-001 AB-010	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.5	PM / PM ₁₀ / PM _{2.5} (filterable only)	Submit a Semi-Annual Report on Excursions / Exceedances for Control Devices
AB-008	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1). 40 CFR 63.6640(b) and 63.6650(f); Subpart ZZZZ	5.C.6	HAPs	Submit Semi-Annual Monitoring Report on Hours of Operation and All Deviations From Applicable Operating Limitations

5.C.1 For Emission Point AA-000 (Facility-Wide), the permittee shall submit a written notification to the MDEQ on the following information about both any existing process unit replaced and the corresponding replacement equipment no later than fifteen (15) days after the actual replacement occurs:

(a) For a crusher, grinding mill, bucket elevator, bagging operation, or enclosed truck or railcar loading station:

(1) The rated capacity in tons per hour of the existing facility being replaced; and

- (2) The rated capacity in tons per hour of the replacement equipment.
- (b) For a screening operation:
 - (1) The total surface area of the top screen of the existing screening operation being replaced; and
 - (2) The total surface area of the top screen of the replacement screening operation.
- (c) For a conveyor belt:
 - (1) The width of the existing belt being replaced; and
 - (2) The width of the replacement conveyor belt.
- (d) For a storage bin:
 - (1) The rated capacity in tons of the existing storage bin being replaced; and
 - (2) The rated capacity in tons of replacement storage bins.

(Ref.: 40 CFR 60.670(d) and 60.676(a); Subpart OOO)

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

- 5.C.2 For Emission Points AA-001 through AA-004, AB-001 through AB-004, AB-006, AB-007, AB-009, AB-010, and AB-012, the permittee shall submit a semi-annual monitoring report (SMR) in accordance with Condition 5.A.4 that details any maintenance action(s) performed on an air pollution control device and any periods of time (including date and duration) in which a control device was non-operational during active operations.

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

- 5.C.3 For Emission Points AA-001 through AA-004, AB-002, AB-003, AB-004, AB-006, AB-009, and AB-012, the permittee shall submit a semi-annual monitoring report (SMR) in accordance with Condition 5.A.4 that details the following information (as applicable):

- (a) Summary information on the number, duration, and cause (including any 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 any 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 Condition 5.B.4. 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); Compliance Assurance Monitoring)

- 5.C.4 For Emission Points AA-001 through AA-004, AB-002, AB-003, AB-004, AB-006, AB-009, and AB-012, if the permittee identifies a failure to achieve compliance with the emission limitation or standard for which the approved CAM monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes.

Such a modification may include (but is not limited to) reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or monitoring additional parameters.

(Ref.: 40 CFR 64.7(e); Compliance Assurance Monitoring)

- 5.C.5 For Emission Points AB-001 and AB-010, the permittee shall submit a semi-annual monitoring report (SMR) in accordance with Condition 5.A.4 that details the following information:
 - (a) Summary information on the number, duration, and cause (including any unknown cause, if applicable) of excursions or exceedances (as applicable) and the corrective actions taken; and
 - (b) Summary information on the number, duration, and cause (including any unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable).

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

- 5.C.6 For Emission Point AB-008, the permittee shall submit a semi-annual monitoring report in accordance with Condition 5.A.4 that details the hours of operation for the engine. The report shall include how many hours are spent for emergency operation, what classified the operation as an emergency, how many hours are spent for non-emergency operation, and the reason for the non-emergency operation.

The report shall also include a detail of all deviations from any applicable operating limitation, which shall include any failure to perform the work practice on the required schedule. In the event a work practice is delayed because the engine is operating during

an emergency or if performing the work practice on the required work schedule posed an unacceptable risk under federal, state, or local law, the permittee shall include in the report the reason for the delay.

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

(Ref.: 40 CFR 63.6640(b), 63.6650(f), and Table 2c – Footnote 1; Subpart ZZZZ)

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
lb/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards for Hazardous Air Pollutants, 40 CFR 61 or National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR 63
NM VOC	Non-Methane Volatile Organic Compounds
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM ₁₀	Particulate Matter less than 10 µm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound

APPENDIX B

SITE-SPECIFIC COMPLIANCE ASSURANCE MONITORING (CAM) PLANS

CAM Plan for Emission Points AA-001 and AA-002 (Wet Scrubbers)

	Indicator No. 1	Indicator No. 2	Indicator No. 3
Indicator	Pressure Differential	Scrubber Liquid Flow Rate	Operational Inspection
Measurement Approach	Pressure differential is measured using a differential pressure gauge.	Flow rate is measured using a commercial flow meter.	Equipment is inspected for proper operation.
Monitoring Methods and Location	Pressure differential checks are performed to ensure equipment is operating properly and filter media is not clogged or deteriorating.	Flow rate is recorded to ensure that scrubber recirculation is within acceptable ranges.	The equipment will be inspected by qualified technical personnel to ascertain the operational status.
Indicator Range	Pressure Drop: Plus or minus 30% deviation from the average obtained during the most recent stack test.	Flow Rate: Plus or minus 30% deviation from the average obtained during the most recent stack test.	Equipment is to be operating properly within acceptable levels.
Data Collection Frequency	Daily checks: Record the pressure differential once daily.	Daily checks: Record the scrubbing liquid flow rate once daily.	Weekly inspections
Averaging Period	Use the average obtained during the most recent stack test as a baseline.	Use the average obtained during the most recent stack test as a baseline.	None
Recordkeeping	Records kept of daily differential pressure readings. Maintain records of weekly inspections and all required maintenance activities.	Records kept of daily flow rate readings. Maintain records of weekly inspections and all required maintenance activities.	Document each inspection on the prepared forms. Correct and document any items discovered. Maintain records of all required maintenance activities.
QA / QC	Inspect each system once weekly to confirm proper operation and function. The differential pressure gauge is to be periodically checked by connecting a U-tube manometer in parallel with it and comparing the two (2) readings.	Inspect each system once weekly to confirm proper operation and function. Flow meter periodically calibrated according to manufacturer's recommendations.	Review all weekly inspection forms from the current month at month's end. This will ensure that all problems have been attended to and will help to identify any developing trends.
Quality Improvement Plan (QIP) Threshold	More than six (6) excursions in a semi-annual period.	More than six (6) excursions in a semi-annual period.	

CAM Plan for Emission Points AA-003, AA-004, AB-002, AB-003, AB-004, AB-006, AB-009, and AB-012 (Dust Collectors and Baghouses)

	Indicator No. 1	Indicator No. 2	Indicator No. 3
Indicator	Pressure Differential	Operational Inspection	Opacity
Measurement Approach	Pressure differential is measured using a differential pressure gauge.	Equipment is inspected for proper operation	Visual emissions are observed using Method 22.
Monitoring Methods and Location	Pressure differential checks are performed to ensure equipment is operating properly and filter media is not clogged or deteriorating.	The equipment will be inspected by qualified technical personnel to ascertain the operational status.	Visible emissions evaluation (VEE) checks are performed to ensure equipment is operating properly and filter media is not deteriorating.
Indicator Range	Pressure Drop: Plus or minus 30% deviation from the average obtained during the most recent stack test.	Equipment is to be operating properly within acceptable levels.	Stack: 7% Fugitive: 10% Non NSPS (General): 40%
Data Collection Frequency	Daily checks: Record the pressure differential once daily.	Weekly inspections	Daily observations using Method 22. If visible emissions are observed on two (2) consecutive days, then Method 9 required.
Averaging Period	Use the average obtained during the most recent stack test as a baseline.	None	Averaging per EPA Method 9 (if required).
Recordkeeping	Records kept of daily differential pressure readings. Maintain records of weekly inspections and all required maintenance activities.	Document each inspection on the prepared forms. Correct and document any items discovered. Maintain records of all required maintenance activities.	Records must be kept daily of all VEEs.
QA / QC	Inspect each system once weekly to confirm proper operation and function. The differential pressure gauge is to be periodically checked by connecting a U-tube manometer in parallel with it and comparing the two (2) readings.	Review all weekly inspection forms from the current month at month's end. This will ensure that all problems have been attended to and will help to identify any developing trends.	Opacity observer trained in VEE and if a Method 9 evaluation is required, observer must be certified.
Quality Improvement Plan (QIP) Threshold	More than six (6) excursions in a semi-annual period.	More than six (6) excursions in a semi-annual period.	