

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

**TO OPERATE AIR EMISSIONS EQUIPMENT**

**THIS CERTIFIES THAT**

ESCO Group, LLC  
9098 Eastside Drive Extension  
Highway 15 North  
Newton, Newton 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: November 1, 2022**

**Effective Date: As Specified Herein.**

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

*Krystal Rudolph*

**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Expires: October 31, 2027**

**Permit No.: 1980-00002**

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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	FACILITY CONTROL I.D.
AA-000	<b>Facility-Wide (ESCO Group, LLC)</b>	—
<b>AB-000</b>	<b>Melting and Refining Operations</b>	—
AB-001	<b>Two (2) Electric Arc Furnaces [EAF-1 and EAF-2]</b> Emissions controlled by two (2) fabric filter baghouses	AA-001a AA-001b
AB-002	<b>One (1) Argon-Oxygen Decarburization Vessel [AOD-1]</b> Emissions controlled by a fabric filter baghouse	AA-002
AB-003	<b>One (1) Argon-Oxygen Decarburization Vessel [AOD-2]</b> Emissions controlled by a fabric filter baghouse	AA-032
<b>AC-000</b>	<b>Mold Making Operations</b>	—
AC-001	<b>Greensand Muller and Mold Making Operation</b> Emissions controlled by a pulse jet baghouse system	AA-003
AC-002	<b>No Bake Mold Mixing and Making Operations</b> Emissions controlled by a fabric filter baghouse	AA-030
<b>AD-000</b>	<b>Core Making Operations</b>	—
AD-001	<b>Cold Box Core Making and Curing – Machine No. 1</b> Emissions controlled by a packed tower wet scrubber	AA-037
AD-002	<b>Cold Box Core Making and Curing – Machine No. 2</b> Emissions controlled by a packed tower wet scrubber	
AD-004	<b>No Bake and Shell Core Making and Curing Operation</b> Emissions are uncontrolled	—
<b>AE-000</b>	<b>Pouring and Cooling Operation</b>	—
AE-001	<b>Greensand Pouring and Cooling Floor</b> Emissions controlled by a fabric filter baghouse	AA-007
AE-002	<b>No Bake Pouring and Cooling Floor</b> Emissions controlled by a fabric filter baghouse	AA-030
<b>AF-000</b>	<b>Shakeout and Sand Reclaim Operations</b>	—
AF-001	<b>Greensand Shakeout Process</b> Emission controlled by a pulse jet baghouse system	AA-006
AF-002	<b>No Bake Shakeout Operation</b> Emissions controlled by two (2) fabric filter baghouses	AA-029 AA-031

EMISSION POINT	DESCRIPTION	FACILITY CONTROL I.D.
AF-004	<b>No Bake and Greensand Sand Reclaim Operations</b> Emissions from the greensand sand cooler controlled by a pulse jet baghouse system (AA-003); Emissions from the greensand magnetic separator, the no bake sand screening, the reclaimer, and the cooler controlled by a pulse jet baghouse system (AA-005)	AA-003 AA-005
<b>AG-000</b>	<b>Material Handling</b>	—
AG-001	<b>Pattern Shop</b> Emissions from wood cutting controlled by a fabric filter baghouse	AA-010
AG-002	<b>Scrap Burn Booth</b>	—
AG-003	<b>Scrap Handling Operations</b> Emissions from scrap handling in the greensand muller process (Emission Point AC-001) controlled by a pulse jet baghouse system (AA-003)	AA-003
AG-004	<b>Slag Handling and Slag Processing Operations</b> Emissions are uncontrolled	—
AG-005	<b>Material Storage</b> Includes various silos and tanks containing bentonite, sand, lime, etc. Emissions controlled by bin vents or baghouses	AA-001 AA-002 AA-003 AA-005 AA-030 AA-032
<b>AH-000</b>	<b>Finishing Operations</b>	—
AH-001	<b>High Temperature Natural Gas-Fired Heat Treat Ovens</b>	—
AH-001a	Eight (8) Ovens [each utilizes burners with a combined heat capacity of 3.3 MMBTU/hour]	—
AH-001b	Seven (7) Ovens [each utilizes burners with a combined heat capacity of 3.3 MMBTU/hour]	—
AH-001c	One (1) Oven [utilizes burners with a combined heat capacity of 3.75 MMBTU/hour]	—
AH-002	<b>Low Temperature Natural Gas-Fired Heat Treat Ovens</b>	—
AH-002a	Six (6) Ovens [each utilizes burners with a combined heat capacity of 1.5 MMBTU/hour]	—
AH-002b	Two (2) ovens, each utilizes burners with a combined heat capacity of 1.5 MMBTU/hour]	—
AH-003	<b>Four (4) Shotblast Machines</b> Emissions controlled by a fabric filter baghouse	AA-004

EMISSION POINT	DESCRIPTION	FACILITY CONTROL I.D.
AH-005	<b>Two (2) Shotblast Machines</b> Emissions controlled by a fabric filter baghouse	AA-034
AH-006	<b>Grinding Operations</b> Eighteen (18) metal grinding stations; emissions are uncontrolled	—
AH-007	<b>Air Arc Cutting and Welding Operations</b> Two (2) air arc cutting stations Three (3) welding stations — emissions controlled by a fabric filter baghouse Four (4) robotic welding stations	AA-035
<b>AI-000</b>	<b>Coating and Miscellaneous Operations</b>	—
AI-001	<b>Powder Coating Operation</b> Includes a 6.0 MMBTU/hour natural gas-fired thermo. set unit	—
AI-002	<b>Core Wash Operation</b>	—
AI-003	<b>Emergency Reciprocating Internal Combustion Engine [ENG-01]</b> For fire pump, 148 HP, diesel-fired, manufactured 1970	—
AI-004	<b>Emergency Reciprocating Internal Combustion Engine [ENG-02]</b> For electric generator, 85 HP, diesel-fired, manufactured 2012	—

### **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 exceptions provided below:

- (a) Start-up operations may produce emissions that 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**

<b>Emission Point(s)</b>	<b>Applicable Requirement</b>	<b>Condition Number</b>	<b>Pollutant / Parameter</b>	<b>Limit / Standard</b>
AA-000	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.B.1	PM	$E = 4.1 \cdot (p^{0.67})$
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10), as established in the PSD Permit to Construct issued June 1, 2012 and modified in the Title V Operating Permit issued November 10, 2022	3.B.2	PM (filterable) PM <sub>10</sub> (filterable and condensable)	95.0 tpy (Rolling 12-Month Totals)
			PM <sub>2.5</sub> (filterable and condensable)	90.0 tpy (Rolling 12-Month Total)
			CO	200.0 tpy (Rolling 12-Month Total)
			NO <sub>x</sub>	39.0 tpy (Rolling 12-Month Total)
			VOCs	120.0 tpy (Rolling 12-Month Total)
			SO <sub>2</sub>	39.0 tpy (Rolling 12-Month Total)
		3.B.3	PM/PM <sub>10</sub> /PM <sub>2.5</sub>	Operate Control Devices At All Times the Associated Emission Source(s) are in Active Operation
	40 CFR Part 63, Subpart EEEEE – NESHAP for Iron and Steel Foundries 40 CFR 63.7681, 63.7682(a) – (c), 63.7760, and Table 1; Subpart EEEEE	3.B.4	HAPs	General Applicability
	40 CFR 63.7710(a); Subpart EEEEE	3.B.5	PM Metal HAPs Opacity	Operate and Maintain Steel Foundry in Accordance with Good Air Pollution Control Practices for Minimizing Emissions
40 CFR 63.7690(a)(7); Subpart EEEEE	3.B.6	Opacity (fugitive emissions)	≤ 20% (6-minute average)	
AB-001	40 CFR 63.7690(a)(1); Subpart EEEEE	3.B.7	PM (or Total Metal HAPs)	0.005 grains/dscf (or 0.0004 grains/dscf)
AB-002 AB-003	40 CFR Part 64 – Compliance Assurance Monitoring (CAM) 40 CFR 64.2(a); CAM	3.B.8	PM (filterable only)	General Applicability

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AB-003	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 1, 2012 <b>(PSD BACT Limit)</b>	3.B.9	CO	2.74 lb/ton of metal poured (3-hour average)
AE-001 AE-002	40 CFR 63.7690(a)(5); Subpart EEEEE	3.B.10	PM (or Total Metal HAPs)	0.010 grains/dscf (or 0.0008 grains/dscf)
AE-002 AF-002	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 1, 2012 <b>(PSD BACT Limit)</b>	3.B.11	CO	6.0 lb/ton of metal poured (3-hour average)
AH-001b	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 1, 2012 <b>(PSD BACT Limit)</b>	3.B.12	CO	0.080 lb/MMBTU/hour
AH-002b	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued August 14, 2015 <b>(PSD BACT Limit)</b>	3.B.13	CO	0.24 lb/hour
AH-001c	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct modified September 27, 2004	3.B.14	CO	2.0 tpy (rolling 12-month total)
AI-001 <i>(powder coating thermo set unit)</i>	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 1, 2012 <b>(PSD BACT Limit)</b>	3.B.15	CO	0.083 lb/MMBTU/hour
AI-003 AI-004	40 CFR Part 63, Subpart ZZZZ – NESHAP for Stationary Reciprocating Internal Combustion Engines 40 CFR 63.6585(a), (b), 63.6590(a)(1)(ii), (2)(ii), 63.6590(c)(6), and Table 8; Subpart ZZZZ	3.B.16	HAPs	General Applicability

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AI-003 AI-004	40 CFR 63.6640(f)(1) – (3); Subpart ZZZZ 40 CFR 60.4211(f); Subpart III	3.B.17	Hours of Operation	100 Hours / Calendar Year for Maintenance and Testing 50 Hours / Calendar Year for Non-Emergency Situations
AI-004	40 CFR Part 60, Subpart III – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines 40 CFR 60.4200(a)(2)(i), 60.4218, and Table 8; Subpart III	3.B.18	NO <sub>x</sub> + NMHC PM CO Smoke (Opacity)	General Applicability
	40 CFR 60.4205(b), 60.4202(a)(2), 60.4206, and 60.4211(a), (c); Subpart III	3.B.19(a)	NO <sub>x</sub> + NMHC	4.7 g/kW-hr
		3.B.19(b)	PM	5.0 g/kW-hr
		3.B.19(c)	CO	0.4 g/kW-hr
		3.B.19(d)	Smoke (Opacity)	20% During the Acceleration Mode 15% During the Lugging Mode 50% During the Peaks in Either the Acceleration or Lugging Modes
40 CFR 60.4207(b); Subpart III	3.B.20	Diesel Fuel Requirements	15 ppm Max. Sulfur Content 40 Min. Cetane Index or 35 vol% Max. Aromatic Content	

3.B.1 For Emission Point AA-000 (Facility-Wide), except as otherwise specified or limited herein, the permittee shall not cause or allow the emission of particulate matter (PM) in total quantities in any one (1) hour from any manufacturing process (which includes any associated stacks, vents, outlets, or combination thereof) to exceed the amount determined by the following relationship:

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

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 Point AA-000 (Facility-Wide), the permittee shall limit the emission of the following pollutants to no more than the corresponding limitations in tons per year (tpy)

based on a rolling 12-month total basis:

- (a) Particulate Matter (PM; filterable): 95.0 tpy;
- (b) Particulate Matter less than 10 microns ( $\mu\text{m}$ ) in diameter ( $\text{PM}_{10}$ ; filterable and condensable): 95.0 tpy;
- (c) Particulate Matter less than 2.5  $\mu\text{m}$  in diameter ( $\text{PM}_{2.5}$ ; filterable and condensable): 90.0 tpy;
- (d) Carbon Monoxide (CO): 200.0 tpy;
- (e) Nitrogen Oxides ( $\text{NO}_x$ ): 51.9 tpy;
- (f) Volatile Organic Compounds (VOCs): 120.0 tpy; and
- (g) Sulfur Dioxide ( $\text{SO}_2$ ): 39.0 tpy.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the PSD Permit to Construct issued June 1, 2012 and modified in the Title V Operating Permit issued November 1, 2022)

- 3.B.3 For Emission Point AA-000 (Facility-Wide), the permittee shall at all times operate the control devices associated with each emission source(s) during active operation. The permittee shall operate the control device in accordance with the manufacturer's design and specification requirements as well as the manufacturer's recommendations.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the PSD Permit to Construct issued June 1, 2012)

- 3.B.4 For Emission Point AA-00 (Facility-Wide), the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 63, Subpart EEEEE – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Iron and Steel Foundries and 40 CFR Part 63, Subpart A – General Provisions (as required in Table 1 of Subpart EEEEE). For the purpose of this permit, applicable sources include the metal melting furnaces, scrap preheaters, pouring areas, pouring stations, automated conveyor and pallet cooling lines, automated shakeout lines, and mold and core making lines. Additionally, Subpart EEEE encompasses fugitive emissions from foundry operations.

(Ref.: 40 CFR 63.7681, 63.7682(a) – (c), 63.7760, and Table 1; Subpart EEEEE)

- 3.B.5 For Emission Point AA-000 (Facility-Wide), the permittee shall always operate and maintain the steel foundry (including air pollution control and monitoring equipment) in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by Subpart EEEEE.

(Ref.: 40 CFR 63.7710(a); Subpart EEEEE)

- 3.B.6 For Emission Point AA-000 (Facility-Wide), the permittee shall not discharge to the atmosphere fugitive emissions from each building or structure housing an applicable steel foundry source that exhibits an opacity greater than twenty (20) percent (based on a 6-minute average), except for one (1) 6-minute average per hour that does not exceed twenty-seven (27) percent opacity.

(Ref.: 40 CFR 7690(a)(7); Subpart EEEEE)

- 3.B.7 For Emission Point AB-001, the permittee shall not discharge to the atmosphere from each electric arc furnace (EAF) emissions that exceed one (1) of the following limitations:

- (a) 0.005 grains of PM per dry standard cubic foot (grains/dscf); or
- (b) 0.0004 grains/dscf of total metal hazardous air pollutants (HAPs).

For the purpose of this permit, the permittee is not restricted in the selection of which applicable emission limitation is used to demonstrate compliance.

(Ref.: 40 CFR 63.7690(a)(1); Subpart EEEEE)

- 3.B.8 For Emission Points AB-002 and AB-003, the permittee is subject to and shall comply with all applicable requirements of 40 CFR Part 64—Compliance Assurance Monitoring (CAM).

(Ref.: 40 CFR 64.2(a); CAM)

- 3.B.9 For Emission Point AB-003, the permittee shall limit the emission of CO to no more than 2.74 pounds per ton (lb/ton) of metal poured based on a 3-hour average.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 1, 2012 – PSD BACT Limit)

- 3.B.10 For Emission Points AE-001 and AE-002, the permittee shall not discharge to the atmosphere from each pouring station emissions that exceed one (1) of the following limitations:

- (a) 0.01 grains/dscf of PM; or
- (b) 0.0008 grains/dscf of total metal HAPs.

For the purpose of this permit, the permittee is not restricted in the selection of which applicable emission limitation is used to demonstrate compliance.

(Ref.: 40 CFR 63.7690(a)(5); Subpart EEEEE)

- 3.B.11 For Emission Points AE-002 and AF-002, the permittee shall limit the emission of CO from each source to no more than 6.0 lb/ton of metal poured based on a 3-hour average.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 1, 2012 – PSD BACT Limit)

- 3.B.12 For Emission Point AH-001b, the permittee shall limit the emission of CO to no more than 0.080 pounds per million BTU per hour (lb/MMBTU/hr).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 1, 2012 – PSD BACT Limit)

- 3.B.13 For Emission Point AH-002b, the permittee shall limit the emission of CO to no more than 0.24 pounds per hour (lb/hr).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued August 14, 2015 – PSD BACT Limit)

- 3.B.14 For Emission Point AH-001c, the permittee shall limit the emission of CO to no more than 2.0 tpy based on a rolling 12-month total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Permit to Construct issued September 27, 2004)

- 3.B.15 For Emission Point AI-001, the permittee shall limit the emission of CO from the thermo. set unit to no more than 0.083 pounds per MMBTU per hour (lb/MMBTU/hr).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 1, 2012 – PSD BACT Limit)

- 3.B.16 For Emission Points AI-003 and AI-004, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 63, Subpart ZZZZ – NESHAP for Stationary Reciprocating Internal Combustion Engines and 40 CFR Part 63, Subpart A – General Provisions (as required in Table 8 of Subpart ZZZZ).

Emission Point AI-004 is a new emergency stationary reciprocating internal combustion engine (RICE) with a site rating of less than 500 brake HP located at a major source of HAP emissions. Therefore, the permittee shall comply with the requirements of Subpart ZZZZ for this engine by meeting the requirements of 40 CFR Part 60, Subpart IIII – New Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines. No further requirements apply for AI-004 under Subpart ZZZZ.

(Ref.: 40 CFR 63.6585(a), (b), 63.6590(a)(1)(ii), (2)(ii), 63.6590(c)(6), and Table 8; Subpart ZZZZ)

- 3.B.17 For Emission Points AI-003 and AI-004, the permittee must operate the emergency engines according to the following requirements:

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

- (b) The permittee may operate each engine for maintenance checks and readiness testing for a maximum of 100 hours per calendar year, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.
- (c) The 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 provided in paragraph (b) of this permit condition. Except as provided (for Emission Point AI-004 only) in 40 CFR 60.4211(f)(3)(i), Subpart IIII, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.
- (d) In order for the engines to be considered emergency engines under Subparts ZZZZ and IIII, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in this permit condition, is prohibited. If the permittee does not operate the engines according to the requirements in this permit condition, the engines will not be considered emergency engines under Subparts ZZZZ and/or Subpart IIII and must meet all requirements for non-emergency engines.

(Ref.: 40 CFR 63.6640(f)(1) – (3), Subpart ZZZZ and 40 CFR 60.4211(f); Subpart IIII)

- 3.B.18 For Emission Point AI-004, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines and 40 CFR Part 60, Subpart A – General Provisions (as required in Table 8 of Subpart IIII).

(Ref.: 40 CFR 60.4200(a)(2)(i), 60.4218, and Table 8; Subpart IIII)

- 3.B.19 For Emission Point AI-004, the permittee must install, configure, operate, and maintain the engine according to the manufacturer’s emission-related specifications; change only those emission-related settings that are permitted by the manufacturer; and meet the requirements of 40 CFR Part 1068, as applicable, such that the following emission standards are achieved over the entire life of the engine:

- (a) NO<sub>x</sub> + NMHC: 4.7 grams per kilowatt-hour (g/kW-hr)
- (b) CO: 5.0 g/kW-hr
- (c) PM: 0.40 g/kW-hr

(d) Opacity (as smoke) from the engine shall not exceed the following standards:

- (1) 20% during the acceleration mode.
- (2) 15% during the lugging mode.
- (3) 50% during the peaks in either the acceleration or lugging modes.

(Ref.: 40 CFR 60.4205(b), 60.4202(a)(2), 60.4206, and 60.4211(a), (c), Subpart III)

3.B.20 For Emission Point AI-004, the permittee must use diesel fuel that meets the following requirements:

- (a) Maximum sulfur content of 15 parts per million (ppm).
- (b) Minimum cetane index of 40 or maximum aromatic content of 35 volume percent (vol%).

(Ref.: 40 CFR 60.4207(b); Subpart III)

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 lb/MMBTU
11 Miss. Admin. Code Pt. 2, R. 1.4.A.(1).	3.C.2	SO <sub>2</sub>	4.8 lb/MMBTU

3.C.1 The maximum permissible emission of ash and/or particulate matter (PM) from any fossil fuel burning installation of less than ten (10) MMBTU per hour heat input shall not exceed 0.6 pounds per MMBTU per hour (lb/MMBTU/hr) 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 MMBTU (lb/MMBTU) heat input.

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

**D. WORK PRACTICE STANDARDS**

<b>Emission Point(s)</b>	<b>Applicable Requirement</b>	<b>Condition Number</b>	<b>Pollutant / Parameter</b>	<b>Limit / Standard</b>
AG-003	40 CFR 63.7700(a) – (c); Subpart EEEEE	3.D.1	Organic Contaminants Metal HAPs	Standards and Requirements for the Management of Scrap
AI-003	40 CFR 63.6602, 63.6625(h), (i), and Table 2c (Item 1), Subpart ZZZZ	3.D.2	HAPs	Oil Change and Inspection Requirements

3.D.1 For Emission Point AG-003, the permittee shall comply with one (1) of the following work practice standards for each segregated scrap storage area, bin, or pile. For the purpose of this condition, the permittee may have certain scrap subject to paragraph (a) and other scrap subject to paragraph (b) provided the scrap remains segregated until charge make-up.

- (a) The permittee shall prepare and operate at all times in accordance with a written certification that indicates the permittee purchases and uses only metal ingots, pig iron, slitter, or other materials that do not include post-consumer automotive body scrap, post-consumer engine blocks, post-consumer oil filters, oily turnings, lead components, mercury switches, plastics, or free organic liquids.

For the purpose of this condition, “free organic liquids” is defined as any material that fails the paint filter test specified by EPA Test Method 9095A—“*Paint Filter Liquids Test*” (Revision 1, December 1996)—as published in the EPA publication SW-846 “*Test Methods for Evaluation Solid Waste, Physical/Chemical Methods*” (incorporated by reference, see 40 CFR 63.14).

Any post-consumer engine blocks, post-consumer oil filters, or oily turnings that are processed and/or cleaned to the extent practicable such that the materials do not include lead components, mercury switches, chlorinated plastics, or free organic liquids can be included in this certification.

- (b) The permittee shall prepare and operate at all times in accordance with a written plan that details the selection and inspection of steel scrap to minimize (to the extent practicable) the amount of organics and HAP metals in the charge materials used by the permittee. The “scrap selection and inspection plan” is subject to approval by the MDEQ. The permittee shall keep an up-to-date copy of the plan on-site and readily available to all plant personnel with materials acquisition or inspection duties. Additionally, the permittee shall provide a copy of the material specifications to each of the permittee’s scrap vendors.

Each plan shall include the following information:

- (1) A materials acquisition program that limits organic contaminants, which includes specifications for scrap materials to be depleted (to the extent practicable) of the presence of used oil filters, chlorinated plastic parts, organic liquids;
- (2) A program that ensures scrap materials are drained of free liquids;
- (3) A materials acquisition program that specifies each scrap supplier removes accessible mercury switches from the trunks and hoods of any automotive bodies contained in the scrap and removes accessible lead components (such as batteries and wheel weights).

As part of the materials acquisition program, the permittee shall adhere to one (1) of the following requirements:

- (i) Obtain and maintain on-site a copy of the procedures used by a scrap supplier for either removing accessible mercury switches or for purchasing automobile bodies that have had mercury switches removed (as applicable); or
  - (ii) Document all attempts to obtain a copy of the procedures specified in paragraph (b)(3)(i) of this condition from the scrap supplier(s) servicing the permittee's area.
- (4) Procedures conducted in accordance to the following requirements for the visual inspection of a representative portion [but not less than ten (10) percent] of all incoming scrap shipments to ensure the materials meet the specifications:
- (i) The inspection procedures shall identify the location(s) where inspections are to be performed for each type of shipment. Inspections may be performed at the scrap supplier's facility. However, the selected location(s) must provide a reasonable vantage point (considering worker safety) for visual inspection.
  - (ii) The inspection procedures shall include recordkeeping requirements that document each visual inspection and the corresponding results.
  - (iii) The inspection procedures shall include provisions for rejecting or returning entire or partial scrap shipments that do not meet specifications as well as limiting purchases from vendors whose shipments fail to meet specifications for more than three (3) inspections in one (1) calendar year.
  - (iv) If the inspections are performed at the scrap supplier's facility, the inspection procedures shall include an explanation on how the periodic inspections ensure that not less than ten (10) percent of scrap purchased from each supplier is subject to inspection.

(Ref.: 40 CFR 63.7700(a)–(c); Subpart EEEEE)

3.D.2 For Emission Point AI-003, the permittee must meet the following requirements, except during periods of start-up:

- (a) Change oil and filter every 500 hours of operation or annually, whichever comes first. The permittee has the option of utilizing an oil analysis program in order to extend this oil change requirement, as specified in 40 CFR 63.6625(i).
- (b) Inspect air cleaner every 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.

During periods of startup, the permittee must minimize the engine's time spent at idle and minimize the engine's start-up time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

(Ref.: 40 CFR 63.6602, 63.6625(h), (i), and Table 2c (Item 1), 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 of each year for the preceding calendar year. If the permit was reissued or modified during the course of the preceding calendar year, the compliance certification 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), and (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. Supporting 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 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), 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, the monitoring, testing, recordkeeping, and reporting requirements of Section 5 herein supersede the requirements of any preceding permit to construct and/or operate upon permit issuance.

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

**B. SPECIFIC MONITORING AND RECORDKEEPING REQUIREMENTS**

<b>Emission Point(s)</b>	<b>Applicable Requirement</b>	<b>Condition Number</b>	<b>Pollutant / Parameter Monitored</b>	<b>Monitoring/Recordkeeping Requirement</b>
AA-000	11 Miss. Admin. Code. Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.1	PM / PM <sub>10</sub> / PM <sub>2.5</sub> CO NO <sub>x</sub> VOC SO <sub>2</sub>	Calculate the Total Emission of Each Pollutant (Monthly and Rolling 12-Month Totals)
		5.B.2	PM / PM <sub>10</sub> / PM <sub>2.5</sub> (filterable) Condensable PM CO	Conduct Routine Performance Testing
		5.B.3	Pressure Drop	Monitor the Pressure Drop Across Each Baghouse Daily
		5.B.4	PM / PM <sub>10</sub> / PM <sub>2.5</sub> VOCs	Perform Monthly Inspections on Control Devices Maintain Documentation on Periods of Non-Operation for Control Devices
	40 CFR 63.7731(b) and 63.7732(d); Subpart EEEEE	5.B.5	Opacity	Conduct a VEE Every Six (6) Months
	40 CFR 63.7752(a) and (c) – (e); Subpart EEEEE 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.6	Monitoring Data PM HAPs VOCs	Recordkeeping Requirements
AB-001 AB-002 AB-003 AE-001 AE-002 AF-001 AF-002	11 Miss. Admin. Code. Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.7	Capture Efficiency	Recordkeeping Requirement
5.B.8		Develop and Maintain a Capture System Monitoring Plan		
AB-001 AE-001 AE-002	40 CFR 63.7731(a), 63.7732(b)(1), (2), (4), (c)(1), (2), (4), (h), and 63.7743(a)(1), (5), (12); Subpart EEEEE	5.B.9	PM (or Total Metal HAPs)	Conduct a Performance Test Every Five (5) Years
	40 CFR 63.7740(b), 63.7741(b), and 63.7743(c)(2); Subpart EEEEE	5.B.10	PM Metal HAPs	Install, Operate, and Maintain a Bag Leak Detection System

<b>Emission Point(s)</b>	<b>Applicable Requirement</b>	<b>Condition Number</b>	<b>Pollutant / Parameter Monitored</b>	<b>Monitoring/Recordkeeping Requirement</b>
AB-001 AE-001 AE-002	40 CFR 63.7740(c) and 63.7743(c)(1); Subpart EEEEE	5.B.11	Pressure Drop Operating Equipment	Conduct an Inspection on Each Baghouse
	40 CFR 63.7710(b)(1), (3) – (6), and 63.7745(a)(2) – (5), (b); Subpart EEEEE	5.B.12	PM Metal HAPs	Prepare and Maintain an Operation and Maintenance Plan
	40 CFR 63.7742; Subpart EEEEE	5.B.13		Data Monitoring and Collection Requirements
AG-003	40 CFR 7744(a); Subpart EEEEE	5.B.14	Scrap Management	Recordkeeping Requirements
AB-002 AB-003	40 CFR 64.3(a), (b), and 64.6(c); CAM	5.B.15	Pressure Drop	CAM Requirements: Monitor the Pressure Drop Daily Conduct an Inspection on Each Baghouse Monthly
	40 CFR 64.7(b) and (c); CAM	5.B.16	Operation & Maintenance	Operation and Maintenance Requirements for Monitoring System(s)
	40 CFR 64.7(d); CAM	5.B.17	Corrective Action	Corrective Action Response to an Excursion/Exceedance of a CAM Indicator
	40 CFR 64.8; CAM	5.B.18	QIP	Upon Request by the MDEQ, Develop a Quality Improvement Plan (QIP)
	40 CFR 64.9(b); CAM	5.B.19	CAM Records	Maintain CAM Records as Specified
AI-003	40 CFR 63.6605(b), 63.6625(e)(2), 63.6640(a), 63.6655(e), and Table 6 (Item 9), Subpart ZZZZ	5.B.20	Operation & Maintenance	Follow Manufacturer’s Instruction or Develop a Maintenance Plan Keep Records of Maintenance Conducted
AI-003 AI-004	40 CFR 63.6625(f) and 63.6655(f); Subpart ZZZZ 40 CFR 60.4209(a), 60.4214(b), and Table 5; Subpart IIII 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)	5.B.21	Hours of Operations	Recordkeeping Requirement

5.B.1 For Emission Point AA-000 (Facility-Wide), the permittee shall demonstrate compliance with the limitations specified in Condition 3.B.2 by calculating and recording the total emission of PM (filterable), PM<sub>10</sub> (filterable and condensable), PM<sub>2.5</sub> (filterable and

condensable), CO, NO<sub>x</sub>, VOCs, and SO<sub>2</sub> in tons both on a monthly basis and rolling 12-month total basis.

Unless otherwise specified herein, the permittee shall include all reference data used to validate calculated emissions (e.g., operational data, usage, records, applicable emission factors, manufacturer's specifications, engineering judgement determinations, stack test results, etc.).

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

For Emission Point AA-000 (Facility-Wide), unless otherwise specified herein, the permittee shall evaluate the emission of pollutants from the following sources by conducting performance testing no later than two hundred seventy (270) days after the issuance of this permit. Thereafter, the permittee shall conduct subsequent testing once every five (5) years and not to exceed more than sixty-one (61) months after the previously completed test.

The permittee shall conduct all performance testing in accordance with the following requirements:

- (a) The permittee shall conduct testing at the exhaust point of each specified source or the corresponding control device(s), as applicable, for the specified pollutant(s) in accordance with the following table:

Emission Point	Control Device(s)	PM (filterable)	PM <sub>10</sub> (filterable)	PM <sub>2.5</sub> (filterable)	Condensable PM	CO
AB-001	AA-001a AA-001b	√ <sup>1</sup>	√	√	√	√
AB-002	AA-002	√	√	√	√	√
AB-003	AA-032	√	√	√	√	√
AC-001	AA-003	√	√	√		
AC-002	AA-030	√	√	√		
AE-001	AA-007	√ <sup>1</sup>	√	√	√	√
AE-002	AA-030	√ <sup>1</sup>	√	√	√	√
AF-001	AA-006	√	√	√		
AF-002	AA-029 AA-031	√	√	√	√	√
AF-004 (Prev. AH-004)	AA-003 AA-005	√	√	√		
AH-003	AA-004	√	√	√		
AH-005	AA-034	√	√	√		

Emission Point	Control Device(s)	PM (filterable)	PM <sub>10</sub> (filterable)	PM <sub>2.5</sub> (filterable)	Condensable PM	CO
AH-007	AA-035	✓	✓	✓		

<sup>1</sup> If the permittee demonstrates compliance with the applicable PM emission limitation within 40 CFR Part 63 – Subpart EEEEE, the permittee shall instead follow the testing schedule outlined in Condition 5.B.9.

- (b) Each test shall be conducted in accordance with the applicable EPA Test Method found in Appendix A of 40 CFR Part 60, Appendix M of 40 CFR Part 51, Appendix A of 40 CFR Part 63, or an alternative test method approved by the EPA prior to the testing event.
- (c) The permittee shall conduct a minimum of three (3) separate test runs for a performance test for a duration of at least one (1) hour.
- (d) As applicable, the permittee shall conduct a performance test at representative load/operating conditions. For the purpose of this permit, “*representative load/operating conditions*” is defined as the operation of the applicable unit(s) under a heat input rate and/or material processing rate that will be typical in the future.

The MDEQ may require the permittee to conduct a subsequent performance test if the applicable rate of the unit(s) increase by more than ten percent (10%) of the average rate established during the previously completed test.

- (e) The permittee shall establish an operational range (i.e., a minimum and maximum reading) for each corresponding control device during a performance test by continuously monitoring and recording the appropriate parameter(s) during each test run.
- (g) The permittee shall monitor and record the following operational data during a performance test (as applicable):
  - (1) The quantity of metal melted (in tons) on an hourly basis;
  - (2) The quantity of metal poured (in tons) on an hourly basis;
  - (3) The quantity of sand processed and/or reclaimed on an hourly basis; and
  - (4) The total material heating period (including the start and stop time).

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

5.B.2 For Emission Point AA-000 (Facility-Wide), except as otherwise specified herein, the permittee shall monitor and record the differential pressure drop (in inches of water) across each baghouse on a daily basis during the active operation of the corresponding process unit(s). If a monitored pressure drop is outside of the range established either in

accordance with Condition 5.B.2 or through the manufacturer's recommendations, the permittee shall perform and record corrective measures taken to return the baghouse to the recommended pressure drop range. Additionally, the permittee shall maintain documentation for each applicable baghouse that details the recommended differential pressure drop range specified by the respective manufacturer.

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

- 5.B.3 For Emission Point AA-000 (Facility-Wide), with the exception of Emission Points AB-002 and AB-003, the permittee shall demonstrate compliance with Condition 3.B.3 by conducting monthly inspections to evaluate the performance capability of each control device that corresponds with the associated emission points.

If a problem is noted during an inspection of a control device, the permittee shall perform the necessary maintenance to ensure operation as originally designed. Additionally, the permittee shall maintain on-site (to the best extent practicable) sufficient components as is necessary to repair a control device.

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

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

- 5.B.4 For Emission Point AA-000 (Facility-Wide), the permittee shall demonstrate compliance with the opacity standard specified in Condition 3.B.6 by conducting a visible emissions evaluation (VEE) on each building or structure that contains an applicable steel foundry source no less than once every six (6) months in accordance with the following requirements:

- (a) A VEE shall be conducted under conditions representative of normal operations. However, "normal operating conditions" shall exclude periods of start-up and shutdown. Additionally, the permittee may not conduct a VEE during periods of malfunction. The permittee shall record and maintain the necessary process information to document operating conditions during a VEE and include in such record an explanation to support that such conditions represent normal operation.
- (b) A VEE shall be conducted by a certified observer in accordance with EPA Test Method 9 (found in Appendix A of 40 CFR Part 60) and 40 CFR 63.6(h)(5)(iii), Subpart A. The certified observer may identify a limited number of openings or vents that appear to have the highest opacities and perform opacity observations on the identified openings or vents in lieu of performing observations for each opening or vent from the building or structure.

Alternatively, a single opacity observation for the entire building or structure may be performed if the fugitive release points afford such an observation.

- (c) During any PM-related performance test required by Condition 5.B.9 (as applicable), the permittee shall conduct a VEE in conjunction with the test.
- (d) The permittee shall maintain records of the results of each VEE.

(Ref.: 40 CFR 63.7731(b) and 63.7732(a), (d); Subpart EEEEE)

5.B.5 For Emission Point AA-000 (Facility-Wide), the permittee shall maintain documentation that details the following information:

- (a) Each notification and report submitted to comply with Subpart EEEEE (including all documentation supporting any initial notification or notification of compliance status submitted);
- (b) Records on any required maintenance performed on the air pollution control and monitoring equipment;
- (c) Records on any performance tests and performance evaluations;
- (d) The following information on chemical binders and/or coating materials;
  - (1) Records on the annual quantity of each chemical binder or coating material used to coat or make molds and cores;
  - (2) The Material Data Safety Sheet or other documentation that provides the chemical composition of each component;
  - (3) The annual quantity of HAPs and VOCs emitted from all chemical binders and/or coating materials as calculated from the recorded quantities and chemical compositions (based on Material Data Safety Sheets or other documentation);
- (e) Records as required by Conditions 5.B.5, 5.B.6, and 5.B.9 through 5.B.14 to demonstrate continuous compliance with applicable emissions limitations, work practice standards, and operation and maintenance requirements;
- (f) The following information must be maintained for each failure to meet an applicable emission limit (including an operating limit), work practice standard, or operation and maintenance requirement:
  - (1) The date, start time, and duration of each failure;
  - (2) A list of the source(s) related to each failure, an estimate on the quantity of each regulated pollutant emitted over an applicable emission limit, and a description of the method used to estimate the emissions; and

(3) Any actions taken to minimize emissions in accordance with Condition 3.B.5 and any corrective actions taken to return an affected source to its normal or usual manner of operation.

(g) Any records required to be maintained by Subpart EEEEE that are submitted electronically via the EPA's CEDRI. The ability to maintain an electronic copy of the applicable records does not affect the requirement for the permittee to make records, data, and reports available (upon request) to the MDEQ or the EPA as part of an on-site compliance evaluation.

(Ref.: 40 CFR 63.7752(a) and (c)–(e), Subpart EEEEE; and 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

5.B.6 For Emission Points AB-001, AB-002, AB-003, AE-001, AE-002, AF-001, and AF-002, the permittee shall maintain documentation that certifies the capture efficiency of the emissions capture system associated with each source. At a minimum, the documentation shall include the method(s) utilized to determine the capture efficiency and the results of the corresponding determination.

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

5.B.7 For Emission Points AB-001, AB-002, AB-003, AE-001, AE-002, AF-001, and AF-002, the permittee shall develop and maintain a capture system monitoring plan for each emissions capture system that identifies the following information:

- (a) The operating parameter(s) to be monitored;
- (b) The parametric value (or range of values) that represents the conditions indicative of proper operation of the system for the certified capture efficiency; and
- (c) The specific monitoring procedures.

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

5.B.8 For Emission Points AB-001, AE-001, and AE-002, the permittee shall demonstrate compliance with the applicable PM (or total metal HAP) emission limits specified in Conditions 3.B.7 and 3.B.10 by conducting routine performance testing no less frequently than every five (5) years **and** each time the permittee elects to comply with a different alternative emission limit (i.e., from PM to total metal HAPs or vice versa) in accordance with the following requirements (as applicable):

- (a) A performance test shall be conducted under conditions representative of normal operations. However, “normal operating conditions” shall exclude periods of start-up and shutdown. Additionally, the permittee may not conduct a performance test during periods of malfunction.

The permittee shall record and maintain the necessary process information to document operating conditions during a performance test and include in such record an explanation to support that such conditions represent normal operation.

- (b) For Emission Points AB-001 and AE-001, the permittee shall use the following procedures to determine compliance with the applicable PM (or total metal HAP) emission limit:
  - (1) Determine the concentration of PM or total metal HAPs in accordance with the following EPA Test Methods found in Appendix A of 40 CFR Part 60:
    - (i) Method 1 or 1A to select sampling port locations and the number of traverse points in each stack or duct. Sampling sites must be located at the outlet of the control device prior to any releases to the atmosphere.
    - (ii) Method 2, 2A, 2C, 2D, 2F, or 2G to determine the volumetric flow rate of the stack gas.
    - (iii) Method 3, 3A, or 3B to determine the dry molecular weight of the stack gas.
    - (iv) Method 4 to determine the moisture content of the stack gas.
    - (v) Method 5, 5B, 5D, 5F, or 5I (as applicable) to determine the PM concentration. The PM concentration is determined using only the front-half (probe rinse and filter) of the PM catch.
    - (vi) Method 29 to determine the total metal HAP concentration.
  - (2) Collect a minimum sample volume of 60 dscf of gas during each PM sampling run.
  - (3) A minimum of three (3) valid test runs shall comprise a performance test.
- (c) For Emission Point AB-001, the permittee shall only conduct testing during normal production conditions, which may include (but is not limited to) the following cycles: charging, melting, alloying, refining, slagging, and tapping.
- (d) For Emission Point AE-002, since exhaust from *regulated* emission sources (i.e., the pouring stations subject to a Subpart EEEEE emission limit) is combined with exhaust from other *non-regulated* emission sources, the permittee may determine compliance with the PM (or total metal HAP) emission limit specified in Condition 3.B.10 by using one (1) of the following procedures:
  - (1) Comply with the PM (or total metal HAP) emission limit, in accordance with paragraph (b) of this permit condition, for the final combined exhaust stream.

- (2) Comply with the flow-weighted average emission limit for the *regulated* emission sources included within the combined exhaust stream, calculated using the following procedures:
- (i) Determine the volumetric flow rate of each individual *regulated* exhaust stream for which the PM (or total HAP) emission limit applies.
  - (ii) Calculate the flow-weighted average emissions limit, while only considering the *regulated* exhaust streams, by using Equation 1:

$$C_W = \frac{\sum_{i=1}^n C_i Q_i}{\sum_{i=1}^n Q_i} \quad \text{(Equation 1)}$$

Where:

$C_W$  = the flow-weighted average emission limit for PM or total metal HAPs in the exhaust stream, in grains/dscf;

$C_i$  = the concentration of PM or total metal HAPs in the exhaust stream “*i*”, grains/dscf;

$n$  = the number of exhaust streams sampled; and

$Q_i$  = the volumetric flow rate of effluent gas from the exhaust stream “*i*”, in dry standard cubic feet per minute (dscfm).

- (3) Comply with the PM (or total metal HAP) emission limit based on the PM (or total metal HAP) concentration for the *regulated* emissions source, calculated using the following procedures:
- (i) Determine the PM (or total metal HAP) concentration of each individual *regulated* exhaust stream prior to either the combination with other exhaust streams or the inlet to the control device.
  - (ii) Measure the flow rate and the PM (or total metal HAP) concentration of the combined exhaust stream both before and after the control device and calculate the mass removal efficiency of the control device by using Equation 2:

$$\% \text{ reduction} = \left( \frac{E_i - E_o}{E_i} \right) \times 100 \quad \text{(Equation 2)}$$

Where:

$E_i$  = the mass emission rate of PM or total metal HAPs at the inlet of the control device, in lb/hour; and

$E_o$  = the mass emission rate of PM or total metal HAPs at the outlet of the control device, in lb/hour.

- (iii) Calculate the PM (or total metal HAP) concentration for the *regulated* exhaust stream using Equation 3:

$$C_{released} = C_i \times \left(1 - \frac{\% reduction}{100}\right) \quad \text{(Equation 3)}$$

Where:

$C_{released}$  = the calculated concentration of PM (or total metal HAP) predicted to be released to the atmosphere from the regulated emissions source, in grains/dscf; and

$C_i$  = the concentration of PM (or total metal HAP) in the uncontrolled regulated exhaust stream, in grains/dscf.

(Ref.: 40 CFR 63.7731(a), 63.7732(b)(1), (2), (4), (c)(1), (2), (4), (h), 63.7743(a)(1), (5), (12); Subpart EEEEE)

5.B.9 For Emission Points AB-001, AE-001, and AE-002, the permittee must install, operate, and maintain a bag leak detection system within each associated baghouse in accordance with the following requirements:

- (a) The system must be certified by the manufacturer to be capable of detecting particulate matter (PM) emissions at a concentration of at least ten (10) milligrams per actual cubic meter (or 0.0044 grains per actual cubic foot).
- (b) The system sensor must provide an output of relative PM loadings, and the permittee shall continuously record the output using either electronic means or other means (e.g., using a strip chart recorder or a data logger).
- (c) The system must be equipped with an alarm that will sound when an increase in relative PM loadings is detected over the alarm set point established in accordance with the Operation and Maintenance Plan (as required by Condition 5.B.12), and the alarm must be located such that it can be heard by the appropriate plant personnel.

The permittee shall maintain documentation that details the times in which the system sounded. Additionally, the permittee shall maintain the following information for each valid alarm:

- (1) The time in which the corresponding corrective action was initiated;
- (2) The corrective action(s) taken; and
- (3) The date the corrective action(s) was completed.

- (d) The initial adjustment of the system must (at a minimum) consist of establishing the baseline output by adjusting the sensitivity (i.e., range) and the averaging period of the device as well as establishing the alarm set points and the alarm delay time (if applicable).
- (e) Following the initial adjustment, the permittee shall not adjust the sensitivity or range, the averaging period, the alarm set point, or the alarm delay time without approval from the MDEQ.

As an exception, the permittee may adjust the sensitivity of the system to account for seasonable effects (including temperature and humidity) in accordance with the procedures outlined in the Operation and Maintenance Plan once per quarter.

- (f) For each negative pressure, induced air baghouse or positive pressure baghouse that discharges to the atmosphere through a stack, the bag leak detector sensor must be installed downstream of the baghouse and upstream of any wet scrubber.
- (g) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.

(Ref.: 40 CFR 63.7740(b), 63.7741(b), and 63.7743(c)(2); Subpart EEEEE)

5.B.10 For Emission Points AB-001, AE-001, and AE-002, the permittee shall conduct an inspection of each baghouse in accordance with the following requirements and all information needed to demonstrate conformance with the requirements:

- (a) Monitor the differential pressure drop across each baghouse cell once per day to ensure pressure drop is within the normal operating range as identified in the manual.
- (b) Confirm that dust is being removed from the hopper(s) either through a weekly visual inspection or through other means of ensuring the proper functioning of removal mechanisms.
- (c) Check the compressed air supply for a pulse-jet baghouse once per day.
- (d) Monitor the cleaning cycle(s) to ensure proper operation using an appropriate methodology.
- (e) Check the bag cleaning mechanism(s) for proper functioning either through a monthly visual inspection or through equivalent means.
- (f) Conduct a monthly visual check of bag tension on any reverse air and shaker-type baghouse to ensure that bags are not kinked (i.e., kneed or bent) or lying on their sides. This check is not required for a shaker-type baghouse using self-tensioning (spring-loaded) devices.

- (g) Confirm the physical integrity of the baghouse through a quarterly visual inspection of the baghouse's interior for air leaks.
- (h) Inspect fans for wear, material build-up, and corrosion through either a quarterly visual inspection, the use of vibration detectors, or equivalent means.

(Ref.: 40 CFR 63.7740(c) and 63.7743(c)(1); Subpart EEEEE)

5.B.11 For Emission Points AB-001, AE-001, and AE-002, the permittee shall prepare and operate at all times in accordance with a written Operation and Maintenance Plan subject to approval by the MDEQ. Additionally, the permittee must maintain a current copy of the Operation and Maintenance Plan on-site and make it available for inspection (upon request) until such time that the permittee is no longer subject to the requirements of 40 CFR Part 63, Subpart EEEEE. The Operation and Maintenance Plan must contain the following elements:

- (a) *A monthly inspection of the equipment that is important to the performance of the total capture system (i.e., pressure sensors, dampers, and damper switches):* This inspection must include observations of the physical appearance of the equipment (e.g., presence of holes in the ductwork or hoods, flow constrictions caused by dents or accumulated dust in the ductwork, and fan erosion). The Operation and Maintenance Plan must also include requirements to repair the defect or deficiency as soon as practicable.
- (b) *A preventative maintenance plan for each control device:* The plan must include a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance. The permittee shall maintain all information needed to demonstrate conformance with this requirement.
- (c) *A site-specific monitoring plan for each bag leak detection system:* For each bag leak detection system that operates on the triboelectric effect, the monitoring plan must be consistent with the recommendations contained in the U.S. EPA guidance document "Fabric Filter Bag Leak Detection Guidance" (EPA-454/R-98-015). Additionally, the site-specific monitoring plan must address the following items:
  - (1) The installation of the bag leak detection system;
  - (2) The initial and periodic adjustment of the bag leak detection system including how the alarm set-point will be established;
  - (3) The operation of the bag leak detection system (including any quality assurance procedures);
  - (4) How the bag leak detection system will be maintained (including a routine maintenance schedule and a spare parts inventory list); and
  - (5) How the bag leak detection system output will be recorded and maintained.

The site-specific monitoring plan is subject to approval by the MDEQ. The permittee shall operate and maintain the bag leak detection system in accordance with the site-specific monitoring plan at all times and maintain all information needed to demonstrate conformance with these requirements.

- (d) *A corrective action plan for each baghouse:* The plan must include the requirement that the following actions are performed in the event a bag leak detection system alarm is triggered:
- (1) The permittee must determine the cause of the alarm within one (1) hour of the alarm.
  - (2) The permittee must initiate corrective action(s) to correct the cause of the problem within twenty-four (24) hours of the alarm. Corrective actions taken may include (but are not limited to) the following items:
    - (i) Inspecting the baghouse for air leaks, torn or broken bags (or filter media), or any other condition that may cause an increase in emissions;
    - (ii) Sealing off defective bags or filter media;
    - (iii) Replacing defective bags (or filter media) or otherwise repairing the control device.
    - (iv) Sealing off a defective baghouse compartment.
    - (v) Cleaning the bag leak detection system probe or otherwise repairing the bag leak detection system.
    - (vi) Making process changes.
    - (vii) Shutting down the process producing the PM emissions.
  - (3) The permittee must complete the corrective action(s) as soon as practicable.
  - (4) The permittee shall maintain all information needed to demonstrate conformance with these requirements.
- (e) *For Emission Points AE-001 and AE-002:* The Operation and Maintenance Plan must include the procedures for providing an ignition source to mold vents of sand mold systems in each pouring area/station unless the permittee determines the mold vent gases either are not ignitable, ignite automatically, or cannot be ignited due to accessibility or safety issues.

The determination of ignitibility, accessibility, and safety may encompass multiple casting patterns provided the castings utilize similar sand-to-metal rations, binder formulations, and coating materials. Additionally, the determination of ignitibility must be based on the observation of the mold vents within five (5) minutes of

pouring, and the flame must be present for at least fifteen (15) seconds for the mold vent to be considered ignited.

For the purpose of the determination, the permittee must be aware of the following criteria:

- (1) Mold vents that ignite more than seventy-five (75) percent of the time without the presence of an auxiliary ignition source are considered to ignite automatically; and
- (2) Mold vents that do not ignite automatically and cannot be ignited in the presence of an auxiliary ignition source more than twenty-five (25) percent of the time are considered to be not ignitable.
- (3) The permittee must record and maintain all documentation related to this determination. Additionally, any instance where the permittee fails to follow the procedures for igniting gases from mold vents (as specified in the Operation and Maintenance Plan) is a deviation that must be included in the compliance report required by Condition 5.C.4.

(Ref.: 40 CFR 63.7710(b)(1), (3)–(6), and 63.7745(a)(2)–(5), (b); Subpart EEEEE)

5.B.12 For Emission Point AB-001, AE-001, and AE-002, the permittee shall monitor and collect any data required for demonstrating compliance with 40 CFR Part 63, Subpart EEEEE in accordance with the following requirements:

- (a) With the exception of monitoring malfunctions, associated repairs, and required quality assurance or control activities (including as applicable, calibration checks and required zero and span adjustments), the permittee must continuously monitor data (or collect data at all required intervals) any time an applicable source is operational.
- (b) The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emissions or operating levels or to fulfill a minimum data availability requirement (if applicable). The permittee must use all the data collected during all other periods in assessing compliance.
- (c) For the purpose of this condition, a monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(Ref.: 40 CFR 63.7742; Subpart EEEEE)

5.B.13 For Emission Point AG-003, the permittee shall maintain documentation that demonstrates continuous compliance with either the certification requirement specified in Condition 3.D.1(a) or the procedures in the scrap selection and inspection plan as

specified in Condition 3.D.1(b). The documentation demonstrating compliance with the scrap selection and inspection plan must include a copy (which shall be maintained on-site) of the procedures used by the scrap supplier for either removing accessible mercury switches or for purchasing automobile bodies that have had mercury switches removed (as applicable).

(Ref.: 40 CFR 7744(a); Subpart EEEEE)

- 5.B.14 For Emission Points AB-002 and AB-003, the permittee shall monitor the differential pressure drop across each baghouse on a daily basis and conduct a monthly inspection of each baghouse in accordance with the CAM Plan found in Appendix C of the permit.

(Ref.: 40 CFR 64.3(a), (b), and 64.6(c); CAM)

- 5.B.15 For Emission Points AB-002 and AB-003, the permittee shall comply with the following requirements for the monitoring required by the approved CAM Plan:

- (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); CAM)

- 5.B.16 For Emission Points AB-002 and AB-003, 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); CAM)

- 5.B.17 For Emission Points AB-002 and AB-003, based on the results of a determination made under Condition 5.B.17 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; CAM)

- 5.B.18 Emission Points AB-002 and AB-003, the permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written QIP required pursuant to Condition 5.B.16 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); CAM)

- 5.B.19 For Emission Point AI-003, the permittee shall:

- (a) Operate and maintain the engine according to the manufacturer's emission-related written instructions; or

- (b) Develop a maintenance plan which must provide, to the extent practicable, for the maintenance and operation of the engine, including associated air pollution control equipment and monitoring equipment, in a manner consistent with good air pollution control practice for minimizing emissions; and
- (c) Keep records of the maintenance conducted on the engine in order to demonstrate that the engine was operated and maintained according to the maintenance plan or the manufacturer's instructions.

Determination of whether proper operation and maintenance procedures are being used will be based on information available to the MDEQ which may include (but is not limited to) monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(Ref.: 40 CFR 63.6605(b), 63.6625(e)(2), 63.6640(a), 63.6655(e), and Table 6 (Item 9); Subpart ZZZZ)

- 5.B.20 For Emission Points AI-003 and AI-004, the permittee must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter during each calendar month. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

(Ref.: 40 CFR 63.6625(f), 63.6655(f), Subpart ZZZZ; 40 CFR 60.4209(a), 60.4214(b), and Table 5, Subpart III; 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

**C. SPECIFIC REPORTING REQUIREMENTS**

<b>Emission Point(s)</b>	<b>Applicable Requirement</b>	<b>Condition Number</b>	<b>Pollutant / Parameter Monitored</b>	<b>Reporting Requirement</b>
AA-000	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)	5.C.1	PM (filterable) PM <sub>10</sub> / PM <sub>2.5</sub> (filterable and condensable) CO NO <sub>x</sub> VOCs SO <sub>2</sub> Hours of Operation	Submit a Semi-Annual Monitoring Report
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11) and R. 2.6.B(5).	5.C.2	PM / PM <sub>10</sub> / PM <sub>2.5</sub> (filterable) Condensable PM CO	Submit a Performance Test Protocol Submit 10-Day Notification of Performance Testing Event
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11) and 2.6.B(6). 40 CFR 63.7751(f); Subpart EEEEE	5.C.3	PM / PM <sub>10</sub> / PM <sub>2.5</sub> (filterable) Condensable PM CO Total Metal HAPs	Submit Performance Test Results
	40 CFR 63.7746, 63.7751(a), (b)(1) – (3), (5), (7), (d), (e), (h), and (i); Subpart EEEEE	5.C.4	Deviations	Submit a Semi-Annual Compliance Report
AA-000	40 CFR 63.7732(d); Subpart EEEEE	5.C.5	Opacity	Submit VEE results
AB-001 AE-001 AE-002	40 CFR 63.775(d); Subpart EEEEE	5.C.6	PM (or Total Metal HAPs)	Submit a Performance Test Notice of Intent
	40 CFR 63.7750(a), Subpart EEEEE 40 CFR 63.7(c), Subpart A	5.C.7		Submit the Site-Specific Test Plan (If Requested)
AB-002 AB-003	40 CFR 64.9(a), CAM	5.C.8	CAM Reporting	Submit Semi-Annual Reports
	40 CFR 64.7(e), CAM	5.C.9	CAM Modification	Promptly Notify the MDEQ of Failure to Achieve Limit/Standard (Though no Excursion or Exceedance was Indicated By Approved Monitoring)

5.C.1 For Emission Point AA-000 (Facility-Wide), the permittee shall submit a semi-annual monitoring report to the MDEQ in accordance with Condition 5.A.4 that includes the following information:

- (a) The total respective emission of PM (filterable), PM<sub>10</sub> (filterable and condensable), PM<sub>2.5</sub> (filterable and condensable), CO, NO<sub>x</sub>, VOCs, and SO<sub>2</sub> in tons both on a monthly and rolling 12-month total basis as well as an inclusion of all reference data (e.g., operational data, engineering judgement determinations, performance testing results, emission factors, etc.)
- (b) A summary of any maintenance action(s) performed on each control device and any periods of time (including date and duration) in which an applicable device was non-operational.
- (c) The total hours of operation of the emergency engines during each calendar month, including how many hours are spent for emergency operation, what classified the operation as emergency, and how many hours are spent for non-emergency operation.

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

5.C.2 For Emission Point AA-000 (Facility-Wide), unless otherwise specified herein, the permittee shall submit a written performance test protocol for any testing conducted in accordance with Condition 5.B.2 that details the procedures and test methods to be implemented during the actual testing event no later than thirty (30) days prior to the intended testing date.

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

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

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

5.C.3 For Emission Point AA-000 (Facility-Wide), the permittee shall submit the results from any performance test conducted in accordance with Conditions 5.B.2 and 5.B.9 no later than sixty (60) days after completing each completed test. Additionally, the permittee shall submit the following information with the results:

- (a) A detailed description of testing procedures;
- (b) Sample calculation(s);
- (c) A comparison of results to all Applicable Rules and Regulations and to the applicable emission limitations in this permit;

- (d) The hourly throughput data for all applicable process units.

For Emission Points AB-001, AE-001, and AE-002, the permittee shall submit the results from any performance testing conducted in accordance with Condition 5.B.9 to the EPA through its Electronic Reporting Tool (ERT): <https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert>. Additionally, the permittee shall refer to 40 CFR 63.7751(f), (h), and (i), Subpart EEEEE for additional requirements pertaining to the electronic submittal of the performance test results.

(Ref.: 40 CFR 63.7751(f), Subpart EEEEE; 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11) and R. 2.6.B(6).)

- 5.C.4 For Emission Point AA-000 (Facility-Wide), the permittee must submit a semi-annual compliance report to the MDEQ in accordance with Condition 5.A.4 that contains the following information:

- (a) If there were no deviations from any applicable emissions limitations (including an operating limit, work practice standards, or operation and maintenance requirements), a statement that there were no deviations from the applicable emissions limitations, work practice standards, or operation and maintenance requirements during the reporting period.
- (b) For each affected source or equipment for which there was a deviation from an emissions limitation (including an operating limit, work practice standard, or operation and maintenance requirement) that occurs during the reporting period (including during periods of start-up, shutdown, and malfunction), the compliance report must contain the following information:
- (1) A list of the affected source or equipment and the total operating time of each emissions source during the reporting period.
  - (2) For each deviation from an emissions limitation (including an operating limit, work practice standard, or operation and maintenance requirement), the permittee shall include the following information:
    - (i) The date, start time, duration (in hours), and cause of each deviation (characterized as either a start-up, shutdown, control equipment problem, process problem, other known cause, or unknown cause, as applicable) and the corrective action taken; and
    - (ii) An estimate of the quantity of each regulated pollutant emitted over any emission limit and a description of the method used to estimate the emissions.
  - (3) A summary of the total duration (in hours) of the deviations that occurred during the reporting period by cause (characterized as start-up, shutdown, control equipment problems, process problems, other known causes, and unknown causes) and the cumulative duration of deviations during the

reporting period across all causes both in hours and as a percent of the total source operating time during the reporting period.

The permittee shall submit each semi-annual compliance report to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI) that can be accessed through the CDX (<https://cdx.epa.gov/>). The permittee shall use the appropriate electronic report template on the CEDRI website (<https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri>) for Subpart EEEEE.

The permittee shall refer to 40 CFR 63.7751(e), (h), and (i), Subpart EEEEE for additional requirements pertaining to the electronic submittal of a compliance report.

(Ref.: 40 CFR 63.7746, 63.7751(a), (b)(1) – (3), (5), (7), (d), (e), (h), and (i); Subpart EEEEE)

- 5.C.5 For Emission Point AA-000 (Facility-Wide), the permittee shall submit the results from each VEE conducted in accordance with Condition 5.B.5 no later than thirty (30) days after completing the VEE. However, if a VEE was conducted concurrently with a performance test as required in Condition 5.B.9, the corresponding VEE result shall be submitted along with the results from the associated performance test.

(Ref.: 40 CFR 63.7732(d); Subpart EEEEE)

- 5.C.6 For Emission Point AB-001, AE-001, and AE-002, the permittee shall submit a written notification of the intent to conduct a performance test in accordance Condition 5.B.9 at least sixty (60) calendar days before the performance test is scheduled to begin to allow the MDEQ to review and approve the site-specific test plan required in Condition 5.C.7, if requested by the MDEQ, and to have an observer present during the test.

(Ref.: 40 CFR 63.7750(a), (d), Subpart EEEEE)

- 5.C.7 For Emission Points AB-001, AE-001, and AE-002, before conducting a required performance test, the permittee shall develop and, if requested by the MDEQ, shall submit a site-specific test plan to the Administrator for approval. The test plan shall include a test program summary, the test schedule, data quality objectives, and both an internal and external quality assurance (QA) program. Data quality objectives are the pretest expectations of precision, accuracy, and completeness of data.

If review of the site-specific test plan is requested, the permittee shall submit the site-specific test plan to the MDEQ at least 60 calendar days before the performance test is scheduled to take place, that is, simultaneously with the notification of intention to conduct a performance test required by Condition 5.C.6, or on a mutually agreed upon date. The MDEQ will notify the permittee of approval or intention to deny approval of the site-specific test plan within 30 calendar days after receipt.

The permittee shall refer to 40 CFR 63.7(c) for additional requirements regarding content, submission, and approval of the site-specific test plan.

(Ref.: 40 CFR 63.7750(a), Subpart EEEEE)

- 5.C.8 For Emission Points AB-002 and AB-003, the permittee shall submit a semi-annual monitoring report 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 (if requested) during the reporting period as specified in Condition 5.B.18. 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), CAM)

- 5.C.9 For Emission Points AB-002 and AB-003, 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); CAM)

**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 <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM <sub>10</sub>	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 <sub>2</sub>	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 CAM Plans**

The table below is the CAM Plan for Emission Points AB-002 and AB-003 (Baghouses):

	<b>INDICATOR NO. 1</b>	<b>INDICATOR NO. 2</b>
<b>Indicator</b>	Differential Pressure Drop	Visible Emissions
<b>Measurement Approach</b>	Pressure drop across each baghouse is measured with a differential pressure gauge	Visible emissions are evaluated using EPA Test Method 22 procedures
<b>Monitoring Methods and Location</b>	Pressure taps are located at the baghouse inlet and outlet	Visible observations are made the exhaust of each baghouse
<b>Indicator Range (including the corrective action taken for an excursion)</b>	An excursion is defined as a pressure drop greater than 10.00 and less than 3.00 inches of water  Pressure drop values to be re-assessed and adjusted (if necessary) at each subsequent permit required stack test for PM for this source	If visible emissions are detected, a visible emissions evaluation (VEE) in accordance with EPA Test Method 9 procedures must be performed
<b>QIP Threshold</b>	Six (6) excursions in a 6-month reporting period	N/A
<b>Monitoring Frequency</b>	Pressure drop is monitored daily	A 6-minute Method 22 observation is performed daily
<b>Data Collection Frequency</b>	Pressure drop is manually recorded daily	The results of the visible emission observation is documented by the observer daily
<b>Averaging Period</b>	All pressure drop readings will be assumed to be representative of the preceding 24-hour period	6-minute averaging period pursuant to EPA Test Method 9 (if a VEE is prompted)
<b>Recordkeeping</b>	Pressure drop records and copies of all inspections and calibrations will be kept at the facility for a period of five (5) years	Copies of visible emissions observations (and VEEs) will be kept at the facility for a period of five (5) years
<b>QA / QC</b>	Maintenance inspections and pressure drop gauge calibrations will be performed in accordance with the manufacturer's recommendations	Visible emissions observer trained and certified pursuant to EPA Test Method 9