

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

**TO OPERATE AIR EMISSIONS EQUIPMENT**

**THIS CERTIFIES THAT**

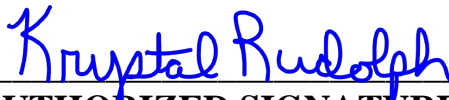
Mississippi Polymers Inc  
2733 South Harper Road  
Corinth, Mississippi  
Alcorn County

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

**Permit Issued: December 29, 2022**

**Effective Date: As specified herein.**

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**



**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Expires: November 30, 2027**

**Permit No.: 0060-00019**

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**APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT**

## SECTION 1. GENERAL CONDITIONS

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

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

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

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

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

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

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

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

- (1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of 3 or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.
- (2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
- (3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.
- (4) The Administrator or the Permit Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

- (b) Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.
- (c) Reopenings shall not be initiated before a notice of such intent is provided to the Title V source by the DEQ at least 30 days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- 1.11 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:
- (a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - (c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
  - (d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

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

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

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

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

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

- 1.14 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source.

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

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

- (a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
- (b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- (c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
- (d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act.

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

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

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

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

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

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

- (a) the changes are not modifications under any provision of Title I of the Act;
- (b) the changes do not exceed the emissions allowable under this permit;
- (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:

- (1) a brief description of the change(s),
  - (2) the date on which the change will occur,
  - (3) any change in emissions, and
  - (4) any permit term or condition that is no longer applicable as a result of the change;
- (d) the permit shield shall not apply to any Section 502(b)(10) change.

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

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

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

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

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



- (1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51, Subpart I, or 40 CFR 51.166; or
- (2) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, or 40 CFR 51.166;
- (e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or
- (f) any change in ownership of the stationary source.

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

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

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

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

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

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

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

- (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.
- (c) Burning must not occur within 500 yards of commercial airport property, private airfields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator.

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

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

- (a) Except as otherwise specified herein, an “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
- (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.
- (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
  - (1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
  - (2) the permitted facility was at the time being properly operated;
  - (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
  - (4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

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

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

- (a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
  - (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:
    - (i) An upset occurred and that the source can identify the cause(s) of the upset;
    - (ii) The source was at the time being properly operated;
    - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
    - (iv) That within 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
    - (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
  - (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
  - (3) This provision is in addition to any upset provision contained in any applicable requirement.

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

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

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

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

**SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES**

<b>Emission Point</b>	<b>Description</b>
<b>MP-000</b>	<b>The Entire Facility</b>
<b>AA-000</b>	<b>Color Weight Operation</b>  Various colors of pigments are blended in the Color Weight Operation
AA-001	Pre-Mix Color Mixers (comprised of three (3) Mixers) and a Large Color Weighed Scale – vents to a single baghouse
AA-002	Color Weight Operation Portion of the Manufacturing Building (includes two (2) Large Color Mixers) – vents to Emission Point AA-001
AA-003	Color Weight Bench – equipped with a baghouse
<b>AB-000</b>	<b>Blending Operation</b>  PVC resins, fillers, stabilizers, plasticizers, additives, and other processing aids are weighed and mixed according to product formulation
AB-001	No. 3 Railcar Resin Unloading System – equipped with a baghouse
AB-002	No. 4 Railcar Resin Unloading System – equipped with a baghouse
AB-003	Resin Storage Silo No. 1 – equipped with a baghouse
AB-004	Resin Storage Silo No. 2 – equipped with a baghouse
AB-005	Resin Storage Silo No. 3 – equipped with a baghouse
AB-006	Filler Storage Silo – equipped with a baghouse
AB-007	Resin and Filler Scale Tanks – equipped with a baghouse
AB-010	Blenders 5 and 6 Holding Tank – equipped with a baghouse
AB-011	Blenders 7, 8, & 9 Holding Tank – equipped with a baghouse
AB-012	Blenders 1, 2, 3, & 4 – equipped with a baghouse (includes emissions from four (4) blenders and Calenders No. 1 & No. 2 Banbury Mixers)
AB-013	Blenders 5 & 6 – equipped with a baghouse
AB-014	Blenders 7, 8, & 9 – equipped with a baghouse
AB-015	Blending Operation Portion of Manufacturing Plant (all vent inside the building) – Includes:  Blenders 1& 2 Holding Tank – equipped with a baghouse  Blenders 3 & 4 Holding Tank – equipped with a baghouse

Emission Point	Description
	Calender No. 3's TiO <sub>2</sub> Scale Tank – equipped with a baghouse Calender No. 4's TiO <sub>2</sub> Scale Tank – equipped with a baghouse Calender No. 3 & No. 4 TiO <sub>2</sub> Super Sack Loading Areas – equipped with a baghouse
<b>AC-000</b>	<p style="text-align: center;"><b>Calender Operation</b></p> Pre-mix from blenders is pressed into rolled (continuous sheet) vinyl ready for shipment or further processing
AC-010	Calender No. 1 – comprised of a calender holding tank, scale tank, two (2) banbury mixers, roll mill and extruder. Process emissions, except from banbury mixers, are vented through a baghouse and building exhaust. Emissions from the two (2) banbury mixers are vented to Emission Point AB-012.
AC-020	Calender No. 2 – comprised of a holding tank, scale tank, two (2) banbury mixers, roll mill and a extruder. Process emissions, except from banbury mixers, are vented through a baghouse and building exhaust. Emissions from the two (2) banbury mixers are vented to Emission Point AB-012.
AC-030	Calender No. 3 – comprised of a calender, roll mill and extruder. Process emissions are vented through building exhaust.
AC-040	Calender No. 4 – comprised of a calender, roll mill and extruder. Process emissions are vented through building exhaust.
AC-050	Calender No. 5 – comprised of a calender, four (4) holding tanks, scale tank, high speed mixer, continuous mixer, two (2) banbury mixers, roll mill, and extruder. Process emissions are vented through a holding tank baghouse and building exhaust.
<b>AE-000</b>	<p style="text-align: center;"><b>Printing Operation</b></p>
AE-003	Rotogravure Printer No. 6 and Dryer – Process emissions are vented through building exhaust.
<b>AF-000</b>	<p style="text-align: center;"><b>Laminating Operation</b></p> A polyester non-woven and woven fabric is applied to the back of the vinyl sheeting for support.
AF-001	Laminator No. 1 – Process emissions vented through building exhaust.
AF-002	Laminator No. 2 – Process emissions vented through building exhaust.
AF-004	Laminator No. 4 – Process emissions vented through building exhaust.
AF-005	Laminator No. 5 – Process emissions vented through building exhaust.
<b>AG-000</b>	<p style="text-align: center;"><b>Ink Preparation</b></p> Inks are received and mixed for using in the Printing Operation
AG-001	Ink Preparation Room – Process emissions vented through building exhaust.
<b>AH-000</b>	<p style="text-align: center;"><b>North and South Color Mix Rooms</b></p> Topcoats and adhesives used in the Printing Operation and pigment dispersions used in the Calender

Emission Point	Description
	Operations are prepared depending on the formulation required.
AH-002	Mix Tanks equipped with a single baghouse.
AH-003	Ventilation System (East) – Floor sweep and mix tank exhaust ventilation system used to remove process emissions from the work areas.
<b>AN-000</b>	<b>Fuel Burning Equipment</b>
AN-001	1.02 MMBTU/hr Hot Oil Heater Boiler No. 1 fueled by natural gas only.
AN-002	1.02 MMBTU/hr Hot Oil Heater Boiler No. 2 fueled by natural gas only.
AN-003	8.4 MMBTU/hr Steam Boiler fueled by natural gas only.
AN-005	144 hp Emergency Diesel Fire Pump Engine installed in 2014.
AN-006	22 KW (29.5 hp) Natural Gas-fired emergency light generator installed in 2017.
AN-007	22 KW (29.5 hp) Natural Gas-fired emergency backup lighting generator installed in 2019.

### SECTION 3. EMISSION LIMITATIONS & STANDARDS

#### A. Facility-Wide Emission Limitations & Standards

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

- (a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.
- (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour.

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

3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in 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 For the entire facility, the permittee shall not cause, permit, 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 gasborne material leaving the building or equipment are controlled or removed prior to discharge to the open air.



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

**B. Emission Point Specific Emission Limitations & Standards**

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
MP-000 (Entire Facility)	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.B.1	PM (filterable only)	$E = 4.1(p)^{0.67}$
AA-001 AA-003 AB-001 AB-002 AB-003 AB-004 AB-005 AB-006 AB-007 AB-010 AB-011 AB-012 AB-013 AA-014 AC-010 AC-020 AC-050 AH-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). as established in Title V Operating Permit issued May 21, 2012 and modified in the Title V Operating Permit issued December 29, 2022	3.B.2	PM (filterable only)	Operate baghouses at all times when emissions may be vented
AE-000 AF-000 AG-000 AH-000	40 CFR 63, Subpart KK – National Emission Standards for Hazardous Air Pollutants for the Printing and Publishing Industry  40 CFR 63.820(a)(1) and (2), 63.821(a)(1) and (2)	3.B.3	HAP	Applicability
	40 CFR 63.823(b), Subpart KK	3.B.4		At all times operate and maintain the affected source in a manner consistent with safety and good air pollution control practices for minimizing emissions.
	40 CFR 63.825(b), Subpart KK	3.B.5		Limit organic HAP emissions to no more than 4 percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials on a monthly average “as applied” basis.
AN-001 AN-002 AN-003 AN-005 AN-006 AN-007	11 Miss. Admin. Code Pt. 2, R. 1.4.D(1)(a).	3.B.6	PM (filterable only)	0.6 lbs/MMBTU

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AN-001 AN-002	11 Miss. Admin. Code Pt. 2, R. 1.4.A(3).	3.B.7	SO <sub>2</sub>	2.4 lbs/MMBTU
AN-003	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.B.8	SO <sub>2</sub>	4.8 lbs/MMBTU
AN-001 AN-002 AN-003	40 CFR 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers  40 CFR 63.7485, 63.7490, and 63.7499	3.B.9	HAP	Applicability
	40 CFR 63.7500(a)(3), Subpart DDDDD	3.B.10		Operate in such a manner to minimize emissions using good air pollution control practices.
AN-005 AN-006 AN-007	40 CFR 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines  40 CFR 63. 6580, 63.6585(a) and (b), and 63.6590(a)(2)(ii) and (c)	3.B.11	HAP	Applicability
AN-005	40 CFR 60, Subpart IIII – New Source Performance Standards for Stationary Compression Ignition Combustion Engines  40 CFR 60.4200(a)(2)(ii)	3.B.12	NMOC + NO <sub>x</sub>  PM (filterable only)	Applicability
	40 CFR 60.4205(c) and Table 4, Subpart IIII	3.B.13	NMOC + NO <sub>x</sub>  PM (filterable only)	3.0 g/hp-hr  0.22 g/hp-hr
	40 CFR 60.4206 and 60.4211(a), Subpart IIII	3.B.14	NMOC + NO <sub>x</sub>  PM (filterable only)	Operate and Maintain Stationary CI ICE
AN-005	40 CFR 60.4207(b), Subpart IIII and 40 CFR 1090.305	3.B.15	Fuel Requirement	Maximum diesel sulfur content of 15 ppm  Minimum Cetane index or 40, or maximum aromatic content of 35 volume percent

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AN-005	40 CFR 60.4209(a), Subpart IIII	3.B.16	Hours of Operation	Install a non-resettable hour meter
	40 CFR 60.4211(c), Subpart IIII	3.B.17	Operating Requirements	Certified Engine Requirements
	40 CFR 60.4211(f), Subpart IIII	3.B.18		Operation Restrictions
AN-006 AN-007	40 CFR 60, Subpart JJJJ – New Source Performance Standards for Stationary Spark Ignition Combustion Engines  40 CFR 60.4230(a)(4)(iv)	3.B.19	CO  NO <sub>x</sub>  VOC	Applicability
	40 CFR 60.4233(d) and Table 1, 40.4324, and 60.4236(c), Subpart JJJJ	3.B.20	NO <sub>x</sub> + HC	10 g/hp-hr
			CO	387 g/hp-hr
	40 CFR 60.4237(c), Subpart JJJJ	3.B.21	Hours of Operation	Install a non-resettable hour meter
	40 CFR 60.4243(b)(1), Subpart JJJJ	3.B.22	Operating Requirements	Certified Engine Requirements
	40 CFR 60.4243(d), Subpart JJJJ	3.B.23	Operating Requirements	Operation Restrictions

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

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

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 maybe allowed if no nuisance is created beyond the property boundary where the discharge occurs.

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

3.B.2 For Emission Points AA-001, AA-003, AB-001, AB-002, AB-003, AB-004, AB-005, AB-006, AB-007, AB-010, AB-011, AB-012, AB-013, AB-014, AC-010, AC-020, AC-050 and AH-002, the permittee shall operate the baghouses at all times when emissions are vented. Should the baghouse become nonoperational then the respective process shall

be shut down immediately, but not as to cause damage to equipment or property, or cause further environmental problems. The process shall not startup until such time that the baghouse becomes operational. For each baghouse, the permittee will maintain a baghouse pressure differential consistent with historical operating conditions indicative of good control practices.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). as established in Title V Operating Permit issued May 21, 2012, and modified in the Title V Operating Permit issued December 29, 2022).

- 3.B.3 For Process Areas AE-000, AF-000, AG-000, and AH-000, the permittee is subject to and shall comply with all applicable requirements of National Emission Standards for Hazardous Air Pollutants for the Printing and Publishing Industry (40 CFR 63, Subpart KK) and the General Provisions (40 CFR 63, Subpart A).

(Ref.: 40 CFR 63.820(a)(1) and (2), and 40 CFR 63.821(a)(1) and (2), Subpart KK)

- 3.B.4 For Process Areas AE-000, AF-000, AG-000, and AH-000, the permittee shall at all times operate and maintain that affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the DEQ 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 63.823(b), Subpart KK)

- 3.B.5 For Process Areas AE-000, AF-000, AG-000, and AH-000, the permittee shall limit organic HAP emissions to no more than 4 percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.

(Ref.: 40 CFR 63.825(b), Subpart KK)

- 3.B.6 For Emission Points AN-001, AN-002, AN-003, AN-005, AN-006, and AN-007, the maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input.

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

- 3.B.7 For Emission Points AN-001 and AN-002, the maximum discharge of sulfur dioxide from any modified fuel burning unit whose generation capacity is less than 250 million BTU per hour and in which the fuel is burned primarily to produce heat or power by indirect

heat transfer shall not exceed 2.4 pounds (measured as sulfur dioxide) per million BTU heat input. For the purposes of this limitation, "modification" shall mean any physical change in an Air Contaminant Source which increases the amount of any air pollutant (to which a standard applies) emitted by such source or which results in the emission of any air pollutant (to which a standard applies) not previously emitted.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(3).)

- 3.B.8 For Emission Point AN-003, the maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.

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

- 3.B.9 For Emission Points AN-001, AN-002, and AN-003, the permittee is subject to and shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR 63. Subpart DDDDD) and the General Provisions (40 CFR 63, Subpart A).

(Ref: 40 CFR 63.7485, 63.7490, and 63.7499, Subpart DDDDD)

- 3.B.10 For Emission Points AN-001, AN-002 and AN-003, the permittee shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the MDEQ that 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 63.7500(a)(3), Subpart DDDDD)

- 3.B.11 For Emission Points AN-005, AN-006, and AN-007, the permittee is subject to and shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants from Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) and the General Provisions (40 CFR 63, Subpart A).

Emission Point AN-005 is considered a new 144 hp Emergency Diesel Fired Pump Engine installed in 2014.

Emission Point AN-006 is considered a new 29.5 hp Natural Gas Fired Emergency Generator installed in 2017.

Emission Point AN-007 is considered a new 29.5 hp Natural Gas Fired Emergency Generator installed in 2019.

The permittee shall meet the requirements of 40 CFR 63, Subpart ZZZZ by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under Subpart ZZZZ.

(Ref.: 40 CFR 63.6580, 63.6585(a) and (b), and 63.6590(a)(2)(ii) and (c), Subpart ZZZZ)

- 3.B.12 For Emission Point AN-005, the permittee is subject to and shall comply with all applicable requirements of New Source Performance Standards for Stationary Compression Ignition Combustion Engines (40 CFR 60, Subpart IIII) and the General Provisions (40 CFR 60, Subpart A).

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

- 3.B.13 For Emission Point AN-005, the permittee, for the life of the engine, shall not have emissions of non-methane hydrocarbons and nitrogen oxides (NMHC+NO<sub>x</sub>) combined greater than than 3.0 g/HP-hr and filterable particulate matter (PM) greater than 0.22 g/HP-hr).

(Ref.: 40 CFR 60.4205(c) and Table 4, Subpart IIII)

- 3.B.14 For Emission Point AN-005, the permittee must operate and maintain these engines according to the manufacturer's written instructions or procedures developed by the permittee that are approved by the engine manufacturer over the entire life of the engine. In addition, the permittee may only change those settings that are permitted by the manufacturer.

(Ref.: 40 CFR 60.4206 and 60.4211(a), Subpart IIII)

- 3.B.15 For Emission Point AN-005, the permittee shall use diesel fuel that meets the requirements of 40 CFR 1090.305 for nonroad diesel fuel.

(a) Maximum sulfur content of 15ppm.

(b) Minimum cetane index of 40 or maximum aromatic content of 35 volume percent.

(Ref.: 40 CFR 60.4207(b), Subpart IIII and 40 CFR 1090.305)

- 3.B.16 For Emission Point AN-005, the permittee shall install a non-resettable hour meter prior to startup of the engine.

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

3.B.17 For Emission Point AN-005, the permittee shall comply by purchasing an engine certified to the emission standards in 40 CFR 60.4205(c) for the same model year and maximum (or in the case of fire pumps, NFPA nameplate) engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications.

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

3.B.18 For Emission Point AN-005, the permittee shall operate the emergency stationary RICE according to the following requirements. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per calendar year is prohibited. If the engine(s) is not operated according to these requirements, the engine(s) will not be considered an emergency engine(s) under this subpart and shall meet all requirements for non-emergency engines.

- (a) There is no time limit on the use of emergency stationary RICE in emergency situations.
- (b) The permittee may operate the emergency stationary RICE for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to a maximum of 100 hours per calendar year. The permittee may petition the DEQ 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 permittee may operate the emergency stationary RICE up to 50 hours per calendar year in non-emergency situations, but those 50 hours are counted towards the 100 hours per calendar year for maintenance and testing. 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.

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

3.B.19 For Emission Points AN-006 and AN-007, the permittee is subject to and shall comply with all applicable requirements of the New Source Performance Standards for Stationary Spark Ignition Combustion Engines (40 CFR 60, Subpart JJJJ) and the General Provisions (40 CFR 60, Subpart A).

(Ref.: 60.4230(a)(4)(iv), Subpart JJJJ)

3.B.20 For Emission Point AN-006 and AN-007, the permittee shall, for the life of the engine, have emissions of carbon monoxide (CO) less than 387 g/HP-hr and emissions of nitrogen oxides (NO<sub>x</sub>) and hydrocarbons (HC) combined less than 10 g/HP-hr.

(Ref.: 40 CFR 60.4233(d), 60.4324, 60.4236(c) and Table 1 of 40 CFR 60, Subpart JJJJ)

3.B.21 For Emission Points AN-006 and AN-007, the permittee shall install a non-resettable hour meter upon startup of your emergency engine.

(Ref.: 40 CFR 60.4237(c), Subpart JJJJ)

3.B.22 For Emission Points AN-006 and AN-007, the permittee shall demonstrate compliance with the emission standards specified in 40 CFR 60.4233(d) by purchasing an engine certified according to procedures specified in 40 CFR Subpart JJJJ, for the same model year.

(Ref.: 40 CFR 60.4243(b)(1), Subpart JJJJ)

3.B.23 For Emission Points AN-006 and AN-007, the permittee shall operate the emergency stationary ICE according to the following requirements. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per calendar year is prohibited. If the engine(s) is not operated according to these requirements, the engine(s) will not be considered an emergency engine(s) under this subpart and shall meet all requirements for non-emergency engines.

- (a) There is no time limit on the use of emergency stationary ICE in emergency situations.
- (b) The permittee may operate the emergency stationary ICE for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to a maximum of 100 hours per calendar year. The permittee may petition the DEQ 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 ICE beyond 100 hours per calendar year.
- (c) The permittee may operate the emergency stationary ICE up to 50 hours per calendar year in non-emergency situations, but those 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing. Except as provided in 60.4243(d)(3)(i), 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.

(Ref.: 40 CFR 60.4243(d), Subpart JJJJ)

C. Insignificant and Trivial Activity Emission Limitations & Standards

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

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

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

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

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

D. Work Practice Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AN-001 AN-002	40 CFR 63.7500(a)(1), and Table 3, Subpart DDDDD	3.D.1	HAP	Conduct Tune-up every 5 years
AN-003				Conduct Tune-up Biennially
AN-003	40 CFR 63.7540(a)(10), Subpart DDDDD	3.D.2		Tune up Requirements

3.D.1 For Emission Points AN-001, AN-002, and AN-003, the permittee shall complete a tune-up on the following frequencies.

For Emission Points AN-001 and AN-002, the permittee shall complete a tune-up of the boilers every 5 years beginning from the date of the initial tune-up. Each subsequent tune-up shall be completed no more than 61 months after the previous one.

For Emission Point AN-003, the permittee shall complete a biennial tune-up of the boiler beginning from the date of the initial tune-up. Each subsequent tune-up shall be completed no more than 25 months after the previous one.

(Ref.: 40 CFR 63.7500(a) and Table 3, Subpart DDDDD)

3.D.2 For Emission Points AN-001, AN-002, and AN-003, each tune-up shall consist of the following:

- (a) As applicable, inspect the burner, and clean or replace any components of the burner, as necessary (the burner inspection may be completed any time prior to the tune-up or can be delayed until the next scheduled unit shutdown).
- (b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
- (c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (inspection may be delayed until the next scheduled unit shutdown).
- (d) Optimize total emission of Carbon Monoxide (CO). This optimization should be consistent with the manufacturer's specifications, if available, and with any NO<sub>x</sub> requirement to which the unit is subject.
- (e) Measure the concentrations from the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.
- (f) Maintain on-site and submit, if requested by DEQ, a report containing the information in (1) and (2) below:
  - (1) The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater.
  - (2) A description of any corrective actions taken as part of the tune-up.

(Ref.: 40 CFR 63.7540(a)(10), Subpart DDDDD)

## SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. If the permit was reissued or modified during the course of the preceding calendar year, the 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), & (d).)

## SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

### A. General Monitoring, Recordkeeping and Reporting Requirements

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

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

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

- (a) the date, place as defined in the permit, and time of sampling or measurements;
- (b) the date(s) analyses were performed;
- (c) the company or entity that performed the analyses;
- (d) the analytical techniques or methods used;
- (e) the results of such analyses; and
- (f) the operating conditions existing at the time of sampling or measurement.

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

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

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

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

30th, July 31st, October 31st, and January 31st), and any required annual reports shall be submitted by January 31st following each calendar year.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1), 40 CFR 60.19(c), 61.10(g), and 63.10(a)(5))

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

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

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

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

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

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

**B. Specific Monitoring and Recordkeeping Requirements**

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
AA-001 AA-003 AB-001 AB-002 AB-003 AB-004 AB-005 AB-006 AB-007 AB-010 AB-011 AB-012 AB-013 AA-014 AC-010 AC-020 AC-050 AH-002	11 Miss. Admin. Code Pt. 2, R. 6.3A(3)(a)(2).	5.B.1	Opacity	Weekly Visible Emissions Observations
		5.B.2	Maintenance	Weekly inspections and/or maintenance
AN-001 AN-002 AN-006 AN-007	11 Miss. Admin. Code Pt. 2, R. 6.3A(3)(a)(2).	5.B.3	Fuel	Monthly Fuel Usage Records
AE-000 AF-000 AG-000 AH-000	40 CFR 63.825(b)(2), Subpart KK	5.B.4	HAP	Monthly Usage Monitoring
	40 CFR 63.827(b)(2), Subpart KK	5.B.5		Performance Testing
	40 CFR 63.829, Subpart KK	5.B.6		Monthly Recordkeeping
AN-001 AN-002 AN-003	40 CFR 63.7505(a), Subpart DDDDD	5.B.7	HAP	Compliance Demonstration
	40 CFR 63.7555(a)(1) and (h), and 63.7560, Subpart DDDDD	5.B.8		Recordkeeping
AN-005	40 CFR 60.4214(b), Subpart IIII	5.B.9	Hours of Operation	Recordkeeping
AN-006 AN-007	40 CFR 60.4243(b)(1), Subpart JJJJ	5.B.10	Certified Engine	Comply by Purchasing a Certified Engine or Conducting a Performance Test
	40 CFR 60.4245(a), Subpart JJJJ	5.B.11	CO NO <sub>x</sub> VOC	Recordkeeping
	60 CFR 60.4245(b), Subpart JJJJ	5.B.12	Hours of Operation	Recordkeeping

- 5.B.1 For Emission Points AA-001, AA-003, AB-001, AB-002, AB-003, AB-004, AB-005, AB-006, AB-007, AB-010, AB-011, AB-012, AB-013, AB-014, AC-010, AC-020, AC-030, AC-040, AC-050, and AH-002, the permittee shall conduct visual observations for visible emissions from all exhaust stacks on a weekly basis and whenever there is a public complaint of visible emissions. Each visual observation shall be conducted for a minimum of six (6) consecutive minutes. Visual observations shall be conducted during daylight hours and during conditions representative of normal operation. If any visible emissions (not including condensed water vapor) are observed, the permittee shall:
- (a) Take corrective action that eliminates the visible emissions within 24 hours;
  - (b) Verify that the air emissions equipment and/or any associated air pollution equipment is operating normally, in accordance with design and standard procedures, and under the same conditions in which compliance was achieved in the past; and
  - (c) Perform an additional visual observation of six consecutive minutes within three (3) business days.

If the corrective action does not result in “no visible emissions” being observed from the emission point, the permittee shall notify DEQ in writing within five (5) business days and shall have a certified visual emissions observer perform a visible emissions observation using EPA Reference Method 9 within five (5) business days.

The permittee shall record and maintain records documenting the following:

- (a) Identification of stack and/or Emission Point;
- (b) Results of all required visual observations, including Method 9 testing results when applicable;
- (c) Description of corrective action taken and a statement of verification that the emission unit and the associated pollution control device are operating normally; and
- (d) Date and time any visible emissions were abated.

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

- 5.B.2 For Emission Points AA-001, AA-003, AB-001, AB-002, AB-003, AB-004, AB-005, AB-006, AB-007, AB-010, AB-011, AB-012, AB-013, AB-014, AC-010, AC-020, AC-050, and AH-002, the permittee shall perform regular inspections and/or maintenance each week, or more often if necessary, to maintain proper operation of the pollution control equipment. The permittee shall maintain on hand at all times sufficient equipment as is necessary to repair and/or replace the pollution control equipment.

The permittee shall maintain and perform quality assurance/quality control measures in accordance with the manufacture's specifications. The permittee shall measure and monitor the pressure drop weekly across each baghouse control system and ensure the pressure differential is consistent with the pressure drop ranges established and documented, and updated as necessary to reflect current operating conditions.

A log of the Emission Point, date and time of the weekly maintenance inspection and pressure drop reading, and the documented pressure drop range shall be maintained at the facility. Records of the inspections and pressure drop readings shall be kept in log form and maintained in accordance with Condition 5.A.3 and shall be made available upon request by DEQ personnel.

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

- 5.B.3 For Emission Points AN-001, AN-002, AN-003, AN-006, and AN-007, the permittee shall maintain monthly usage records. The records shall contain information on the quantity of natural gas combusted maintained for a facility-wide total.

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

- 5.B.4 For Process Areas AE-000, AF-000, AG-000, and AH-000, the permittee shall comply with the organic HAP emission standard in Condition 3.B.5 by demonstrating that each ink, coating, varnish, adhesive, primer, solvent, diluent, reducer, thinner, and other material applied during the month contains no more than 0.04 weight-fraction organic HAP, on a monthly average as-applied basis as determined in accordance with 40 CFR 63.825(b)(2)(i) and (ii).

(Ref.: 40 CFR 63.825(b)(2), Subpart KK)

- 5.B.5 For Process Areas AE-000, AF-000, AG-000, and AH-000, the permittee shall determine the organic HAP weight fraction of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, diluents, and other materials applied by following the procedures in 40 CFR 63.827(b)(2)(iii).

(Ref.: 40 CFR 63.827(b)(2), Subpart KK)

- 5.B.6 For Process Areas AE-000, AF-000, AG-000, and AH-000, the permittee shall maintain records specified in 40 CFR 63.10(b)(2) of all measurements needed to demonstrate compliance with the emission standard in Condition 3.B.5, records of the occurrence and duration of each malfunction of operation, and records of actions taken during periods of malfunction to minimize emissions, on a monthly basis in accordance with the requirements of 40 CFR 63.10(b).

(Ref.: 40 CFR 63.829, Subpart KK)



5.B.7 For Emission Points AN-001, AN-002, and AN-003, the permittee shall be in compliance with the work practice standards at all times when each unit is operating.

(Ref.: 40 CFR 63.7505(a), Subpart DDDDD)

5.B.8 For Emission Points AN-001, AN-002, and AN-003, the permittee must keep all records readily available for review. The permittee shall keep a copy each notification and report submitted to comply with Subpart DDDDD, including all documentation supporting the Notification of Compliance Status or compliance report. These records shall be retained for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. The permittee is required to keep the records on site for a period of 2 years after the event and then they may be kept offsite for the remaining three years.

(Ref.: 40 CFR 63.7555(a)(1) and (h), 63.7560, and 63.10(b)(2), Subpart DDDDD)

5.B.9 For Emission Point AN-005, the permittee shall keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The permittee shall record the time of operation of the engine and the reason the engine was in operation during that time.

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

5.B.10 For Emission Points AN-006 and AN-007, if the permittee operates and maintains the certified engine according to the manufacturer's emission-related written instructions, compliance may be demonstrated by keeping records of conducted maintenance, and no performance testing is required. The permittee shall also meet the requirements as specified in [40 CFR 1068, subparts A through D](#), as applicable. If the permittee adjusts engine settings according to and consistent with the manufacturer's instructions, the stationary SI internal combustion engine will not be considered out of compliance. If the permittee does not operate and maintain the certified engine and control device according to the manufacturer's emission-related written instructions, the engine will be considered a non-certified engine, and the permittee must demonstrate compliance according to 60.4243(a)(2)(i).

(Ref.: 40 CFR 60.4243(b)(1), Subpart JJJJ)

5.B.11 For Emission Points AN-006 and AN-007, the permittee shall keep records of the following:

- (a) All notifications submitted to comply with Subpart JJJJ and all documentation supporting any notification.
- (b) Maintenance conducted on the engine.

- (c) Maintain documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR parts 90, 1048, 1054, and 1060, as applicable.
- (d) If the engine is operated in a non-certified manner, documentation that the engine meets the emission standards.

(Ref.: 40 CFR 60.4245(a), Subpart JJJJ)

- 5.B.12 For Emission Points AN-006 and AN-007, the permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. 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 60.4245(b), Subpart JJJJ)

C. Specific Reporting Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Reporting Requirement
AA-001 AA-003 AB-001 AB-002 AB-003 AB-004 AB-005 AB-006 AB-007 AB-010 AB-011 AB-012 AB-013 AA-014 AC-010 AC-020 AC-050 AH-002	11 Miss. Admin. Code Pt. 2, R. 6.3.C(1).	5.C.1	Opacity	Visible Emissions Observations Records
			PM	Inspections and/or Maintenance Records
AE-000 AF-000 AG-000 AH-000	40 CFR 63.830, Subpart KK	5.C.2	HAP	Usage Reporting
AN-001 AN-002 AN-003	40 CFR 63.7545(f), Subpart DDDDD	5.C.3	HAP	Other Fuel Notification
	40 CFR 63.7545(h), Subpart DDDDD	5.C.4		Change Notification
	40 CFR 63.7540(b), 63.7550(a), (b)(5), (c)(1), and (5), (d), (h)(3), and Table 9 of Subpart DDDDD	5.C.5		Compliance Reports
AN-005 AN-006 AN-007	11 Miss. Admin. Code Pt. 2, R. 6.3.C(1)..	5.C.6	HAP	Hours of Operation

5.C.1 The permittee shall submit a report summarizing the required recordkeeping and monitoring specified in Conditions 5.B.1 and 5.B.2, in accordance with Condition 5.A.4. The report shall include, at a minimum, any visible emissions detected, any corrective action undertaken, results of any Method 9 opacity observations, any weekly inspections that were not performed, and any pressure drop readings not within the established pressure drop range.

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

- 5.C.2 For Process Areas AE-000, AF-000, AG-000, and AH-000, the permittee shall submit the reports specified in 40 CFR Part 63 Subpart A and 40 CFR 63.830(b)(2)(3), (4) and(6). All notifications and reports shall be submitted semi-annually in accordance with 5.A.4, unless otherwise specified in 40 CFR Part 63 Subpart A or 40 CFR 63.830.

(Ref.: 40 CFR 63.830, Subpart KK)

- 5.C.3 For Emission Points AN-001, AN-002, and AN-003, if the permittee operates a unit designed to burn natural gas, refinery gas, or other gas 1 fuels that is subject to this subpart, and intends to use a fuel other than natural gas, refinery gas, gaseous fuel subject to another subpart of part 60, 61, 63, or 65, or other gas 1 fuel to fire the affected unit during a period of natural gas curtailment or supply interruption, as defined in 40 CFR 63.7575, the permittee shall submit a notification of alternative fuel use within 48 hours of the declaration of each period of natural gas curtailment or supply interruption, as defined in 40 CFR 63.7575. The notification must include the information specified in 40 CFR 63.7545(f)(1) through (5).

(Ref.: 40 CFR 63.7545(f), Subpart DDDDD)

- 5.C.4 For Emission Points AN-001, AN-002, and AN-003, if the permittee has switched fuels or made a physical change to the boiler or process heater and the fuel switch or physical change resulted in the applicability of a different subcategory, the permittee shall provide notice of the date upon which you switched fuels or made the physical change within 30 days of the switch/change. The notification must identify:

- (a) The name of the owner or operator of the affected source, as defined in 40CFR 63.7490, the location of the source, the boiler(s) and process heater(s) that have switched fuels, were physically changed, and the date of the notice.
- (b) The currently applicable subcategory under this subpart.
- (c) The date upon which the fuel switch or physical change occurred.

(Ref.: 40 CFR 63.7545(h), Subpart DDDDD)

- 5.C.5 For Emission Points AN-001, AN-002, and AN-003, the permittee shall submit a compliance report biennially, or every 5 years as applicable. This reporting period corresponds with the requirement to conduct a tune-up on each boiler. The compliance report shall contain the following:

- (a) Company and Facility name and address.
- (b) Process unit information, emissions limitations, and operating parameter limitations.
- (c) Date of report and beginning and ending dates of the reporting period.
- (d) Include the date of the most recent tune-up for each unit subject to only the

requirement to conduct a tune-up. Include the date of the most recent burner inspection if it was not done during the tune-up time period and was delayed until the next scheduled or unscheduled unit shutdown.

- (e) A statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

In addition to the information required above, if there are no deviations from the operating limits or work practice standards for periods of startup and shutdown from Table 3 of Subpart DDDDD, the report shall also include a statement that there were no deviations from the standards during the reporting period. If there is a deviation from an operating limit or work practice standard for periods of startup and shutdown, the report must also contain the following information:

- (a) A description of the deviation and which emission limit, operating limit, or work practice standard from which you deviated.
- (b) Information on the number, duration, and cause of deviations (including unknown cause), as applicable, and the corrective action taken.

The permittee must submit all reports required by Table 9 of Subpart DDDDD electronically to the EPA via the CEDRI (CEDRI can be accessed through the EPA's CDX.) You must use the appropriate electronic report in CEDRI for this subpart. Instead of using the electronic report in CEDRI for this subpart, you may submit an alternate electronic file consistent with the XML schema listed on the CEDRI Web site (<http://www.epa.gov/ttn/chief/cedri/index.html>), once the XML schema is available. If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, you must submit the report to the MDEQ. You must begin submitting reports via CEDRI no later than 90 days after the form becomes available in CEDRI.

(Ref.: 40 CFR 63.7540(b), 63.7550(a), (b)(5), (c)(1) and (5), (d), (h)(3), and Table 9 of Subpart DDDDD)

- 5.C.6 For Emission Points AN-005, AN-006, and AN-007, the permittee shall submit records of the hours of operation recorded by the non-resettable hour meter, in accordance with Condition 5.A.4.

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

## SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

## SECTION 7. TITLE VI REQUIREMENTS

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

- 7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A – Production and Consumption Controls.
- 7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.
- 7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E – The Labeling of Products Using Ozone-Depleting Substances, for the following containers and products:
  - (a) All containers in which a class I or class II substance is stored or transported;
  - (b) All products containing a class I substance; and
  - (c) All products directly manufactured with a process that uses a class I substance, unless otherwise exempted by this subpart or, unless EPA determines for a particular product that there are no substitute products or manufacturing processes for such product that do not rely on the use of a class I substance, that reduce overall risk to human health and the environment, and that are currently or potentially available. If the EPA makes such a determination for a particular product, then the requirements of this subpart are effective for such product no later than January 1, 2015.
- 7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F – Recycling and Emissions Reduction:
  - (a) Servicing, maintaining, or repairing appliances containing class I, class II or non-exempt substitute refrigerants;
  - (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

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
NMVOC	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
PM <sub>2.5</sub>	Particulate Matter less than 2.5 µm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOHAP	Volatile Organic Hazardous Air Pollutant
VOC	Volatile Organic Compound