# STATE OF MISSISSIPPI
# AND FEDERALLY ENFORCEABLE
# AIR POLLUTION CONTROL
# PERMIT

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

**THIS CERTIFIES THAT**

Alter Trading Corporation - Sardis
690 Belmont Road
Sardis, Mississippi
Panola 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 the Federal Clean Air Act and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), the regulations and standards adopted and promulgated thereunder, and the State Implementation Plan for operating permits for synthetic minor sources.

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

Becky Simonson

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

**Issued: July 22, 2024** **Permit No.: 2100-00034**

**Effective Date: As specified herein.**

**Expires: June 30, 2029**

## Section 1.

## A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only.

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

2. This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.4.D.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.4.D.)

3. Any activities not identified in the application are not authorized by this permit.

   (Ref.: Miss. Code Ann. 49-17-29 1.b)

4. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit.

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

5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)

6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.

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

7. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

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

8. The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:

a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and

b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission.

(Ref.: Miss. Code Ann. 49-17-21)

9. Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control.

(Ref.: Miss. Code Ann. 49-17-39)

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(7).)

11. This permit does not authorize a modification as defined in Regulation 11 Miss. Admin. Code Pt. 2, Ch.2., "Permit Regulations for the Construction and/or Operation of Air Emission Equipment." A modification may require a Permit to Construct and a modification of this permit. Modification is defined as "Any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

a. Routine maintenance, repair, and replacement;

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

c. Use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;

d. Use of an alternative fuel or raw material by a stationary source which:

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

(2) The source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, or 40 CFR 51.166;

e. An increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I or 40 CFR 51.166; or

f. Any change in ownership of the stationary source.

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

## B. GENERAL OPERATIONAL CONDITIONS

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

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.10.)

2. Any diversion from or bypass of collection and control facilities is prohibited, except as provided for in 11 Miss. Admin. Code Pt. 2, R. 1.10., "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants."

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

3. Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits.

   (Ref.: Miss. Code Ann. 49-17-29 1.a(i and ii))

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

   a. Upsets

(1) For an upset defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:

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

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

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

(iv) That within 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 by 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.)

5. Compliance Testing: Regarding compliance testing:

a. The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations 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).)

## C. PERMIT RENEWAL / MODIFICATION / TRANSFER / TERMINATION

1. For renewal of this permit, the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board. If the applicant submits a timely and complete application pursuant to this paragraph and the Permit Board, through no fault of the applicant, fails to act on the application on or before the expiration date of the existing permit, the applicant shall continue to operate the stationary source under the terms and conditions of the expired permit, which shall remain in effect until final action on the application is taken by the Permit Board. Permit expiration terminates the

source's ability to operate unless a timely and complete renewal application has been submitted.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.8.)

2. The permittee shall furnish to the 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 permit or, for information claimed to be confidential, the permittee shall furnish such records to the 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. 2.2.B(15)(d).)

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

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

4. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:

   a. Persistent violation of any terms or conditions of this permit.

   b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

   c. A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

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

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

## SECTION 2
## EMISSION POINT DESCRIPTION

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

| Emission Point | Description |
|---|---|
| AA-000 | Facility-Wide (Alter Trading Corporation – Sardis) |
| AA-001 | 1480 HP (1104 kW) Non-Emergency Natural Gas-Fired Spark Ignition (SI) Engine with Nonselective Catalytic Reduction (NSCR) (Auto Shredder Hammermill Engine West) |
| AA-002 | 1480 HP (1104 kW) Non-Emergency Natural Gas-Fired Spark Ignition (SI) Engine with NSCR (Auto Shredder Hammermill Engine East) |
| AA-003 | Auto Shredder Hammermill [equipped with water spray for PM control] |
| AA-004 | Non-Ferrous Separation System [series of conveyors and devices that use eddy current to magnetically separate non-ferrous metal] |
| AA-005 | Torch Cutting |

## SECTION 3
## EMISSION LIMITATIONS AND STANDARDS

| Emission Point | Applicable Requirement | Condition Number(s) | Pollutant/ Parameter | Limitation/Standard |
|---|---|---|---|---|
| AA-000 (Facility-Wide) | 11 Miss. Admin. Code Pt. 2, R. 1.3.A. | 3.1 | Opacity (Smoke) | ≤ 40% (except during start-up) |
| | 11 Miss. Admin. Code Pt. 2, R. 1.3.B. | 3.2 | Opacity | ≤ 40% |
| | 11 Miss. Admin. Code Pt. 2, R. 1.3.F.(1). | 3.3 | PM (filterable) | $E = 4.1(p^{0.67})$ |
| AA-001 AA-002 | 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b). | 3.4 | PM (filterable) | $E = 0.8808(I^{-0.1667})$ |
| | 11 Miss. Admin. Code Pt. 2, R.2.2.B(10). **(Title V Avoidance Limits)** | 3.5 | Operating Hours | 4380.0 Hours / Year (rolling 12-month total; for each engine) |
| | 40 CFR Part 63, Subpart ZZZZ – NESHAP for Stationary Reciprocating Internal Combustion Engines 40 CFR 63.6585(a), (c), 63.6590(a)(1)(iii), and 63.6665; Subpart ZZZZ | 3.6 | HAPs | General Applicability |
| | 40 CFR 63.6603(a), 63.6612(a), 63.6595(a)(1), Table 2d (Item 12) and Table 5 (Item 14); Subpart ZZZZ | 3.7 | HAPs | Install NSCR and Reduce CO by ≥ 75% or Limit CO to ≤ 270 ppmvd at 15% $O_2$ or Reduce THC by ≥ 30% |

3.1 For Emission Point AA-000 (Facility-Wide), except as otherwise specified herein, the permittee shall not cause or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial, or waste disposal process that exceeds forty percent (40%) opacity subject to the following exceptions:

(a) Start-up operations may produce emissions, which exceed 40% opacity for up to fifteen (15) minutes per start-up in any one (1) hour and not to exceed three (3) start-ups per stack in any twenty-four (24) hour period.

(b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed sixty percent (60%) opacity and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one (1) hour.

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

3.2 For Emission Point AA-000 (Facility-Wide), except as otherwise specified or limited herein, the permittee shall not discharge into the ambient air from a point source any contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity. This shall not apply to vision obscuration caused by uncombined water droplets.

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

3.3 For Emission Point AA-000 (Facility-Wide), the permittee shall not 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 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. The 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).)

3.4 For Emission Points AA-001 and AA-002, the emission of PM from any fossil fuel burning installation equal to / greater than ten (10) MMBTU per hour heat input shall not exceed an emission rate as determined by the following relationship:

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

Where "E" is the emission rate in pounds per MMBTU per hour heat input and "I" is the heat input in MMBTU per hour.

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

3.5 For Emission Points AA-001 and AA-002, the permittee shall limit the operation of each engine to no more than four thousand three hundred and eighty (4380.0) hours per year based on a rolling 12-month total.

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

3.6 For Emission Points AA-001 and AA-002, the permittee is subject to and shall comply with the applicable requirements found in 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants (NESHAP) from Stationary Reciprocating Internal Combustion Engines (RICE) and 40 CFR Part 63, Subpart A – General Provisions (as required in Table 8 of Subpart ZZZZ).

For the purpose of this permit, Emission Points AA-001 and AA-002 are existing non-emergency, spark ignition (SI) stationary RICE located at an area source of hazardous air pollutants (HAPs).

(Ref.: 40 CFR 63.6585(a), (c), 63.6590(a)(1)(iii), and 63.6665; Subpart ZZZZ)

3.7 For Emission Points AA-001 and AA-002, the permittee shall install nonselective catalytic reduction (NSCR) on each RICE and show that the average reduction of emissions of carbon monoxide (CO) is seventy-five percent (75%) or more, or the average CO concentration is less than or equal to 270 ppmvd at fifteen percent (15%) oxygen ($O_2$), or the average reduction of emissions of total hydrocarbons (THC) is thirty percent (30%) or more.

(Ref.: 40 CFR 63.6603(a), 63.6612(a), 63.6595(a)(1), Table 2d (Item 12) and Table 5 (Item 14); Subpart ZZZZ)

## SECTION 4
## WORK PRACTICES

| Emission Point | Applicable Requirement | Condition Number(s) | Pollutant/ Parameter | Work Practice |
|---|---|---|---|---|
| AA-001<br>AA-002 | 40 CFR 63.6605(b); Subpart ZZZZ | 4.1 | HAPs | General Duty Clause |
| | 40 CFR 63.6625(h); Subpart ZZZZ | 4.2 | | Minimize Idling Time During Periods of Start-Up |

4.1 For Emission Points AA-001 and AA-002, the permittee shall operate and maintain the units, at all times, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require any further efforts to reduce emissions if levels required by Subpart ZZZZ have been achieved.

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

(Ref.: 40 CFR 63.6605(b); Subpart ZZZZ)

4.2 For Emission Points AA-001 and AA-002, the permittee shall both minimize each engine's time spent at idle during start-up and minimize each engine's start-up time to a period needed for appropriate and safe loading of an engine, not to exceed thirty (30) minutes, after which time the applicable operating standard specified in Condition 3.7 shall apply.

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

## SECTION 5
## MONITORING AND RECORDKEEPING REQUIREMENTS

| Emission Point | Applicable Requirement | Condition Number(s) | Pollutant/ Parameter | Monitoring/Recordkeeping Requirement |
|---|---|---|---|---|
| AA-000 (Facility-Wide) | 11 Miss. Admin. Code Pt. 2, R. 2.9. | 5.1 | Recordkeeping | Maintain Records for a Minimum of 5 Years. |
| AA-001 AA-002 | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 5.2 | Hours of Operation | Monitor the Hours of Operation for Each Engine (Daily) |
| | 40 CFR 63.6595(a)(1), 63.6612(a), 63.6630(e), 63.6640(c), 63.6655(d), and Table 5 (Item 14); Subpart ZZZZ<br>11 Miss. Admin. Code, Pt. 2, R. 2.2.B(11). | 5.3 | CO<br>HAPs | Perform Initial Compliance Demonstration and Annually Thereafter |
| | 40 CFR 63.6595(a)(1), 63.6612(a), and Table 5 (Item 14); Subpart ZZZZ | 5.4 | | Install a CPMS to Monitor the Catalyst Inlet Temperature or<br>Install Equipment that Shuts Down the Engine when Catalyst Inlet temperature is > 1250 °F |
| | 40 CFR 63.6625(b); Subpart ZZZZ<br>11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 5.5 | Catalyst Inlet Temperature | Operate and Maintain a CPMS<br>Maintain a Site-Specific Monitoring Plan |
| | 40 CFR 63.6635; Subpart ZZZZ | 5.6 | Catalyst Inlet Temperature | Monitoring / Data Collection Requirements |
| | 40 CFR 63.6640(a), 63.6655(d), and Table 6 (Item 15); Subpart ZZZZ | 5.7 | CO<br>HAPs | Demonstrate Continuous Compliance |
| | 40 CFR 63.6655(a) – (b); Subpart ZZZZ | 5.8 | | Recordkeeping Requirements |

5.1 The permittee shall retain all required records, monitoring data, supporting information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to MDEQ as required by Applicable Rules and Regulations or this permit upon request.

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

5.2 For Emission Points AA-001 and AA-002, the permittee shall monitor and record the duration (in hours) that each engine operates on a daily basis.

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

5.3 For Emission Points AA-001 and AA-002, the permittee shall demonstrate compliance with Condition 3.7 by conducting the initial compliance demonstration no later than one hundred eighty (180) days after issuance of this permit and annually thereafter in accordance with the following requirements:

(a) The initial compliance demonstration must consist of at least three (3) test runs. Subsequent compliance demonstrations must consist of at least one (1) test run.

(b) Each test run must be of at least fifteen (15) minute duration, except that each test conducted using the method in Appendix A to Subpart ZZZZ must consist of at least one measurement cycle and include at least two (2) minutes of test data phase measurement.

(c) If demonstrating compliance with the CO concentration or CO percent reduction requirement, the permittee must measure CO emissions using one of the CO measurement methods specified in Table 4 of Subpart ZZZZ, or using appendix A to Subpart ZZZZ.

(d) If demonstrating compliance with the THC percent reduction requirement, the permittee must measure THC emissions using Method 25A, reported as propane, of 40 CFR Part 60, Appendix A.

(e) $O_2$ must be measured using one of the $O_2$ measurement methods specified in Table 4 of Subpart ZZZZ. Measurements to determine $O_2$ concentration must be made at the same time as the measurements for CO or THC concentration.

(f) If demonstrating compliance with the CO or THC percent reduction requirement, the permittee must measure CO or THC emissions and $O_2$ emissions simultaneously at the inlet and outlet of the control device.

(g) If the results of the annual compliance demonstration show that the emissions exceed the levels specified in Condition 3.7, the stationary RICE must be shut down as soon as safely possible, and appropriate corrective action must be taken (e.g., repairs, catalyst cleaning, catalyst replacement). The stationary RICE must be retested within seven (7) days of being restarted and the emissions must meet the levels specified in Condition 3.7. If the retest shows that the emissions continue to exceed the specified levels, the stationary RICE must again be shut down as soon as safely possible, and the stationary RICE may not operate, except for purposes of startup and testing, until the owner/operator demonstrates through testing that the emissions do not exceed the levels specified in Condition 3.7.

(Ref.: 40 CFR 63.6595(a)(1), 63.6612(a), 63.6630(e), 63.6640(c), 63.6655(d), and Table 5 (Item 14); Subpart ZZZZ)
(Ref.: 11 Miss. Admin. Code, Pt. 2, R. 2.2.B(11).)

5.4 For Emission Points AA-001 and AA-002, the permittee must demonstrate initial compliance with Condition 3.7 by either:

(a) Installing a continuous parameter monitoring system (CPMS) to continuously monitor catalyst inlet temperature in accordance with Condition 5.5; or

(b) Installing equipment to automatically shut down the engine if the catalyst inlet temperature exceeds 1250 °F.

(Ref.: 40 CFR 63.6595(a)(1), 63.6612(a), and Table 5 (Item 14); Subpart ZZZZ)

5.5 For Emission Points AA-001 and AA-002, if the permittee installs a CPMS that collects the catalyst inlet temperature, the permittee shall install, operate and maintain the CPMS in accordance with a site-specific monitoring plan and the provisions specified in 40 CFR 63.6625(b)(3) – (6), Subpart ZZZZ.

The site-specific monitoring plan shall address the monitoring system design, data collection, and the quality assurance / quality control elements specified in 40 CFR 63.6625(b)(1)(i) – (v), Subpart ZZZZ. Additionally, the permittee shall maintain the plan on-site.

(Ref.: 40 CFR 63.6625(b); Subpart ZZZZ)
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.6 For Emission Points AA-001 and AA-002, if the permittee installs a CPMS that collects the catalyst inlet temperature, the permittee shall monitor and collect the catalyst inlet temperature at all times an engine is operating, except for periods of monitor malfunction, associated repair, required performance evaluation, and required quality assurance / control activities.

For the purpose of this permit, a "monitoring malfunction" is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. However, a monitoring failure that is caused in part by poor maintenance or careless operation is not a malfunction.

The permittee shall not use data recorded during periods of monitoring malfunction, associated repair, and required quality assurance / control activity in data averages and calculations used. For all other periods, the permittee shall use all the valid data collected.

(Ref.: 40 CFR 63.6635; Subpart ZZZZ)

5.7 For Emission Points AA-001 and AA-002, the permittee must demonstrate continuous compliance with Condition 3.7 by either:

(a) Collecting the catalyst inlet temperature data according to Condition 5.5, reducing these data to 4-hour rolling averages; and maintaining the 4-hour rolling averages within the limitation of greater than or equal to 750 °F and less than or equal to 1250 °F for the catalyst inlet temperature; or

(b) Immediately shutting down the engine if the catalyst inlet temperature exceeds 1250 °F.

(Ref.: 40 CFR 63.6640(a), 63.6655(d), and Table 6 (Item 15); Subpart ZZZZ)

5.8 For Emission Points AA-001 and AA-002, the permittee shall maintain documentation that contains the following information:

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

(b) Records on the occurrence and duration of each malfunction of an engine or the associated air pollution control / monitoring equipment;

(c) Records on any required performance tests and/or performance evaluations;

(d) Records on all required maintenance performed on air pollution control / monitoring equipment;

(e) Records on the actions taken during periods of malfunction to minimize emissions in accordance with Condition 4.1, including corrective actions to restore malfunctioning process and air pollution control / monitoring equipment to its normal or usual manner of operation.

(f) For each CPMS, the permittee shall maintain the following information:

(1) Records described in 40 CFR 63.10(b)(2)(vi) – (xi), Subpart A;

(2) Previous (i.e. superseded) versions of the performance evaluation plan as required in 40 CFR 63.8(d)(3), Subpart A; and

(3) Any request for alternatives to the relative accuracy test for a CPMS as required in 40 CFR 63.8(f)(6)(i), Subpart A (if applicable).

(Ref.: 40 CFR 63.6655(a) – (b); Subpart ZZZZ)

## SECTION 6
## REPORTING REQUIREMENTS

| Emission Point | Applicable Requirement | Condition Number(s) | Reporting Requirement |
|---|---|---|---|
| AA-000 (Facility-Wide) | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 6.1 | Report Permit Deviations Within Five (5) Working Days |
| | | 6.2 | Submit a Certified Semi-Annual Monitoring Report. |
| | | 6.3 | All Documents Submitted to the MDEQ Shall Be Certified by a Responsible Official. |
| AA-001 AA-002 | 40 CFR 63.6645(g); Subpart ZZZZ<br>11 Miss. Admin. Code Pt. 2, R. 2.6.B(5). | 6.4 | Submit Notice of Intent for Compliance Demonstration<br>Submit 10-Day Notification of Compliance Demonstration Event |
| | 40 CFR 63.6645(h)(2); Subpart ZZZZ | 6.5 | Submit Performance Test Results |
| | 40 CFR 63.6650(a), (c), (d), (e), and Table 7 (Item 3); Subpart ZZZZ | 6.6 | Submit a Semi-Annual Compliance Report |

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

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

6.2 Except as otherwise specified herein, the permittee shall submit a certified semi-annual monitoring report (SMR) postmarked no later than January 31 and July 31 of each calendar year for the preceding six-month period. Each report shall include the information specified in Conditions 5.2. If the permit was reissued or modified during the course of the preceding six-month period, the SMR shall address each version of the permit. All instances of deviations from permit requirements must be clearly identified in the report. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration.

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

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

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

6.4 For Emission Points AA-001 and AA-002, the permittee shall submit a Notification of Intent to conduct a compliance demonstration required by Condition 5.3 at least sixty (60) days before the compliance demonstration is scheduled to begin. The notification shall detail the procedures and test methods to be implemented during the actual testing.

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

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

(Ref.: 40 CFR 63.6645(g); Subpart ZZZZ)
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B(5).)

6.5 For Emission Points AA-001 and AA-002, the permittee shall submit the results of a compliance demonstration required by Condition 5.3 to the MDEQ no later than sixty (60) days after the date the compliance demonstration was completed.

(Ref.: 40 CFR 63.6645(h)(2); Subpart ZZZZ)

6.6 For Emission Points AA-001 and AA-002, the permittee shall submit a semi-annual compliance report in accordance with Condition 6.2 that contains the following information (as applicable):

(a) The company name and address;

(b) A statement by a Responsible Official, with that official's name, title, and signature, certifying the accuracy of the content of the report;

(c) If there was a malfunction during the reporting period, the report shall include the following information:

(1) The number, duration, and a brief description for each type of malfunction that occurred during the reporting period and which caused / may have caused any applicable emission limitation to be exceeded; and

(2) A description of actions taken during the malfunction to minimize emissions in accordance with Condition 4.1 including actions taken to correct the malfunction.

(d) If there are no deviations from any emission limitations or operating limitations, a statement that there were no deviations from the applicable emission limitations or operating limitations during the reporting period;

(e) If there were no periods during which a CPMS was out-of-control [as specified in 40 CFR 63.8(c)(7), Subpart A], a statement that there were not periods during which the CMS was out-of-control during the reporting period;

(f) For each deviation from an emission or operating limitation that occurs for a stationary RICE where no CPMS is used to comply with the emission or operating limitations of Subpart ZZZZ, the report must contain the information in paragraphs (a) through (c) above and the information below:

(1) The total operating time of the stationary RICE at which the deviation occurred during the reporting period.

(2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

(g) If there was a deviation from an applicable emission standard, an operating limitation, and/or the CPMS was out-of-control during the reporting period, the report shall include paragraphs (a) through (c) above and the information below:

(1) The date and time that each malfunction started and stopped as well as the duration that a CPMS was inoperative [except for zero (low-level) and high-level checks] or out-of-control, including the information specified in 40 CFR 63.8(c)(8), Subpart A;

(2) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of malfunction or during another period;

(3) A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period;

(4) A breakdown of the total duration of the deviations during the reporting period into those that are due to control equipment problems, process problems, other known causes, and other unknown causes;

(5) A summary of the total duration of CPMS downtime during the reporting period and the total duration of CPMS downtime as a percent of the total operating time at which the CPMS downtime occurred during that reporting period;

(6) A brief description of the engine;

(7) A brief description of the CPMS;

(8) The date of the latest CPMS certification or audit; and

(9) A description of any changes in a CPMS, process, or controls since the last reporting period.

(Ref.: 40 CFR 63.6650(a), (c), (d), (e), and Table 7 (Item 3); Subpart ZZZZ)