

# STATE OF MISSISSIPPI AND FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL

## PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT AT A  
SYNTHETIC MINOR SOURCE

### THIS CERTIFIES THAT

AC Polymers Inc  
103 Lowry Drive  
Byhalia, Mississippi  
Marshall 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: June 23, 2021**

**Modified: November 7, 2024**

**Permit No.: 1780-00054**

**Effective Date: As specified herein.**

**Expires: May 31, 2026**

## 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-001         | 2,000 gallon Reactor #1, 2,000 gallon Reactor #2, 2,000 gallon Reactor #3, 2,000 gallon Reactor #4, 1,000 gallon Reactor #5, 2,463 gallon Reactor #6, and 2,463 gallon Reactor #7<br>Production Vent Controlled by Carbon Adsorption System (Except for Reactor #5) |
| AA-006         | Product Recovery Dryer with Cyclone and Baghouse  |
| AB-001         | 15,000 gallon Horizontal Styrene Storage Tank   |
| AB-002         | 15,000 gallon Horizontal Styrene Storage Tank   |
| AB-003         | 8,500 gallon Horizontal Styrene Storage Tank  |
| AB-004         | 5,000 gallon Vertical Fixed Roof Divinylbenzene Monomer Storage Tank  |
| AB-005         | 5,000 gallon Vertical Fixed Roof Divinylbenzene Monomer Storage Tank  |
| AB-006         | 4,500 gallon Vertical Fixed Roof Divinylbenzene Monomer Storage Tank  |
| AB-007         | 4,500 gallon Vertical Fixed Roof Divinylbenzene Monomer Storage Tank  |
| AB-008         | Batch Dump Tank   |
| AC-001         | Fugitives Emissions from Equipment Leaks  |
| AD-001         | 4.185 MMBtu/hr Natural gas-fired Boiler<br>Construction Date: 2014  |
| AD-002         | 180 kW (241 hp) Natural gas-fired Emergency Generator<br>Spark Ignition, 4-Stroke, Rich Burn<br>Manufactured/Construction Date: Before 2006   |
| AD-003         | 5.25 MMBtu/hr Natural gas-fired Boiler<br>Construction Date: 2018   |
| AD-004         | 160 kW (215 hp) Diesel Fired Emergency Generator<br>Compression Ignition, 4-Stroke<br>Manufactured/Construction Date: 2020  |



### SECTION 3. EMISSION LIMITATIONS AND STANDARDS

| Emission Point             | Applicable Requirement   | Condition Number(s) | Pollutant/Parameter     | Limitation/Standard   |
|----------------------------|--|---------------------|-------------------------|---|
| Facility-Wide              | 11 Miss. Admin. Code Pt. 2, R. 1.3.A and B.  | 3.1                 | Smoke                   | Opacity shall not exceed 40%                                    |
|                            | 11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).   | 3.2                 | PM<br>(filterable only) | $E = 4.1p^{0.67}$   |
|                            | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).  | 3.3                 | Individual HAP          | Emissions shall not exceed 9.0 tpy                              |
|                            |  |                     | Total HAP               | Emissions shall not exceed 24.0 tpy                             |
| AC-001                     | 40 CFR 60, Subpart DDD<br><br>Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry<br><br>40 CFR 60.560(a), Subpart DDD  | 3.4                 | VOC                     | General Applicability   |
|                            | 40 CFR 60.562-2, Subpart DDD<br>40 CFR 60, Subpart VV<br><br>Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006<br><br>40 CFR 60.482-1 through 60.482-10 | 3.5                 | VOC                     | Comply with Subpart DDD by meeting the standards of Subpart VV. |
| AD-001<br>AD-003           | 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).   | 3.6                 | SO <sub>2</sub>         | 4.8 lb/MMBTU  |
| AD-001<br>AD-002<br>AD-003 | 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).  | 3.7                 | PM<br>(filterable only) | 0.6 lb/MMBTU  |
| AD-002<br>AD-004           | 40 CFR 63, Subpart ZZZZ<br><br>National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines<br><br>40 CFR 63.6580, 40 CFR 63.6585(a), (c), and (d), 40 CFR 63.6590(a)(1)(iii), 40 CFR 63.6590(a)(2)(iii) and (c)(1)  | 3.8                 | HAP                     | General Applicability   |

| Emission Point                  | Applicable Requirement  | Condition Number(s)    | Pollutant/Parameter     | Limitation/Standard  |
|---------------------------------|---|------------------------|-------------------------|--|
| AD-002                          | 40 CFR 63.6595(a)(1), 40 CFR 63.6603(a), and Item 4 of Table 2d, Subpart ZZZZ   | 3.9                    | HAP                     | Change oil and filter every 500 hours of operation or annually, whichever comes first.<br><br>Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.<br><br>Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. |
|                                 | 40 CFR 63.6605, Subpart ZZZZ  | 3.10                   |                         | Good Air Pollution Control Practices   |
|                                 | 40 CFR 63.6625(e)(3), Subpart ZZZZ  | 3.11                   |                         | Operate and Maintain Maintenance Plan  |
|                                 | 40 CFR 63.6625(f) and (h), Subpart ZZZZ   | 3.12                   |                         | Non-resettable Hour Meter<br><br>Minimize Engine Idle Time   |
|                                 | 40 CFR 63.6640(f)(1), (2), and (4), Subpart ZZZZ                                | 3.13                   |                         | Emergency Engine Requirements  |
| AD-004                          | 40 CFR 60.4200(a)(2)(i), Subpart IIII   | 3.14                   | NMHC<br>NOx<br>CO<br>PM | General Applicability  |
|                                 | 40 CFR 60.4202(a)(2), 40 CFR 60.4205(b), Subpart IIII<br>40 CFR 1039 Appendix I | 3.15                   |                         | Emission Standards   |
|                                 | 40 CFR 60.4211(c), Subpart IIII   | 3.16                   |                         | Operate and maintain according to manufacturer's written instructions  |
|                                 | 40 CFR 60.4207(b), Subpart IIII, and 40 CFR 1090.305                            | 3.17                   | Fuel Requirement        | Diesel fuel standards:<br><br>a) Max sulfur content of 15 ppm, and<br><br>b) Minimum cetane index of 40 or a maximum aromatic content of 35 volume percent   |
|                                 | 40 CFR 60.4209(a), Subpart IIII   | 3.18                   | Hours of operation      | Install a non-resettable hour meter  |
| 40 CFR 60.4211(f), Subpart IIII | 3.19  | Operating Requirements |                         |  |

3.1 For the entire facility, the permittee shall not cause, permit, or allow emissions of smoke from any 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) and (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% 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 and B.)

3.2 For the entire facility, no person shall cause, permit, or allow the emission of particulate matter in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship

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

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

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

3.3 For the entire facility, the permittee shall limit individual Hazardous Air Pollutant (HAP) emissions to no more than 9.0 tpy and total HAP emissions to 24.0 tpy. The permittee shall determine individual and total HAP emissions on a monthly basis for each consecutive 12-month period on a rolling basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

3.4 For Emission Point AC-001, the permittee is subject to and shall comply with all applicable requirements of the Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry (40 CFR 60, Subpart DDD) and General Provisions (40 CFR 60, Subpart A).

(Ref.: 40 CFR 60.560(a), Subpart DDD)

3.5 For Emission Point AC-001, the permittee is subject to the provisions of 40 CFR 60, Subpart DDD and shall comply with the requirements of the Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006 (40 CFR 60, Subpart VV) as soon as practicable, except that indications for liquids dripping from bleed ports in existing pumps in light liquid service are not considered to be a leak as defined in Condition 5.5. The permittee shall comply with requirements specified in 40 CFR 60.482-1 through 60.482-10, Subpart VV.

(Ref.: 40 CFR 60.562-2(a), Subpart DDD)

3.6 For Emission Points AD-001 and AD-003, the maximum discharge of sulfur oxides from any fuel burning installation in which fuel is burned primary 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).)

3.7 For Emission Points AD-001, AD-002, and AD-003, the maximum permissible emission of ash and/or particulate matter for fossil fuel burning installations of less than 10 million BTU per 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).)

3.8 For Emission Points AD-002 and AD-004, the permittee is subject to and shall comply with all applicable requirements of the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) and General Provisions (40 CFR 63, Subpart A).

Emission Point AD-004 is a new RICE located at an area source of HAPs. Therefore, compliance with 40 CFR Part 63, Subpart ZZZZ shall be achieved by meeting all applicable requirements of 40 CFR Part 60, Subpart IIII. No further requirements apply for Emission Point AD-004 under NESHAP Subpart ZZZZ.

(Ref.: 40 CFR 63.6580, 40 CFR 63.6585(a), (c), and (d), 40 CFR 63.6590(a)(1)(iii), 40 CFR 63.6590(a)(2)(iii) and (c)(1), Subpart ZZZZ)

3.9 For Emission Point AD-002, the permittee shall comply with the following requirements:

- (a) Change oil and filter every 500 hours of operation or annually, whichever comes first.
- (b) Inspect air cleaner every 1,000 hours of operation or annual, whichever comes first, and replace as necessary.
- (c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replaces as necessary.

If the emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required above, the management practice can be delayed until the emergency is over. The management practice should be performed as soon as practicable after the emergency has ended. Sources must report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.

(Ref.: 40 CFR 63.6595(a)(1), 40 CFR 63.6603(a), and Item 4 of Table 2d, Subpart ZZZZ)

- 3.10 For Emission Point AD-002, the permittee shall be in compliance with all applicable emission limitations, operating limitations, and other requirements of 40 CFR 63, Subpart ZZZZ at all times.

The permittee shall at all times operate and maintain the emergency engine, 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 the permittee to make any further efforts to reduce emissions if levels required by 40 CFR 63, Subpart ZZZZ have been achieved. 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 63.6605, Subpart ZZZZ)

- 3.11 For Emission Point AD-002, the permittee shall operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or the permittee may develop a maintenance plan which shall provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

(Ref.: 40 CFR 63.6625(e)(3), Subpart ZZZZ)

- 3.12 For Emission Point AD-002, the permittee shall install and maintain a non-resettable hour meter if one is not already installed.

The permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

(Ref.: 40 CFR 63.6625(f) and (h), Subpart ZZZZ)

- 3.13 For Emission Point AD-002, the permittee shall operate the emergency stationary RICE according to the requirements below. In order for the engine to be considered an emergency stationary RICE under 40 CFR 63, Subpart ZZZZ, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year is prohibited.

- (a) There is no time limit on the use of emergency stationary RICE in emergency situations.
- (b) The permittee shall operate the emergency stationary RICE for any combination of the purposes specified below for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (c) counts as part of the 100 hours per calendar year allowed. Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the 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) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response. 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 an

electric grid or otherwise supply power as part of a financial arrangement with another entity.

(Ref.: 40 CFR 63.6640(f)(1), (2), and (4), Subpart ZZZZ)

- 3.14 For Emission Point AD-004, the permittee is subject to and shall comply with all applicable conditions of Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart III. Emission Point AD-004 is a new, emergency, Compression Ignition (CI), stationary, Internal Combustion Engines (ICE) located at an area source of Hazardous Air Pollutants (HAPs).

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

- 3.15 For Emission Point AD-004, the permittee shall comply with the following emissions standards for new, non-road CI engines, for all pollutants, for the same model year and maximum engine power:

- (a) NMHC + NO<sub>x</sub> – 6.6g/kg-hr
- (b) CO – 3.5g/kw-hr
- (c) PM – 0.20g/kw-hr

(Ref.: 40 CFR 60.4202(a)(2), 40 CFR 60.4205(b), Subpart III and 40 CFR 1039 Appendix I)

- 3.16 For Emission Point AD-004, the engine shall be certified to the emission standards in Condition 3.15 and shall be installed and configured according to the manufacturer's emission-related specifications.

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

- 3.17 For Emission Point AD-004, the permittee shall use only diesel fuel that meets the following requirements for non-road diesel fuel:

- (a) A maximum sulfur content of 15 ppm, and
- (b) A minimum cetane index of 40 or a maximum aromatic content of 35 volume percent

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

- 3.18 For Emission Point AD-004, the permittee shall install a non-resettable hour meter if one is not already installed.

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

- 3.19 For Emission Point AD-004, the permittee shall operate the emergency stationary ICE according to the requirements in (a) through (c) below. In order for the engine to be

considered an emergency stationary ICE under 40 CFR Subpart IIII, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per calendar year, as described below, the engine will not be considered an emergency engine and must meet all requirements for non-emergency engines.

- (a) There is no time limit on the use of emergency stationary ICE in emergency situations.
- (b) Emergency stationary ICE may be operated for maintenance checks and readiness testing for a maximum of 100 hours per calendar year, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.
- (c) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility 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)



## SECTION 4. WORK PRACTICES

| Emission Point | Applicable Requirement       | Condition Number(s) | Pollutant/Parameter | Limitation/Standard         |
|----------------|------------------------------|---------------------|---------------------|-----------------------------|
| AC-001         | 40 CFR 60.486(b), Subpart VV | 4.1                 | VOC                 | Leak Detection Requirements |

- 4.1 For Emission Point AC-001, upon the detection of a leak, the permittee shall perform the following work practices:
- (a) A weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment.
  - (b) The identification on a valve may be removed after it has been monitored for 2 successive months as specified in Condition 5.8(c) and no leak has been detected during those 2 months.
  - (c) The identification on equipment except on a valve, may be removed after it has been repaired.

(Ref.: 40 CFR 60.486(b), Subpart VV)

## SECTION 5. MONITORING AND RECORDKEEPING REQUIREMENTS

| Emission Point | Applicable Requirement                       | Condition Number(s) | Pollutant/Parameter | Monitoring/Recordkeeping Requirement   |
|----------------|--|---------------------|---------------------|--|
| Facility-Wide  | 11 Miss. Admin. Code Pt. 2, R. 2.9.          | 5.1                 | Recordkeeping       | Maintain records for a minimum of 5 years.   |
|                | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).    | 5.2                 | HAP                 | Performance Testing Requirement  |
|                |  | 5.3                 |                     | Monitoring and Recordkeeping Requirement   |
| AC-001         | 40 CFR 60.562-2(d), Subpart DDD              | 5.4                 | VOC                 | Comply with the Test Methods and Procedures of 40 CFR 60, Subpart VV                     |
|                | 40 CFR 60.482-1(f), Subpart VV               | 5.5                 |                     | Leak Detection Monitoring Schedule   |
|                | 40 CFR 60.482-2(a) through (c), Subpart VV   | 5.6                 |                     | Monitor Light Liquid Service for Leaks on a Quarterly Basis.                             |
|                | 40 CFR 60.482-4(a), (b), and (d), Subpart VV | 5.7                 |                     | Pressure Relief Device Monitoring Requirement  |
|                | 40 CFR 60.482-6(a), (b), and (e), Subpart VV | 5.8                 |                     | Open-Ended Valve Requirements  |
|                | 40 CFR 60.482-7(a) through (e), Subpart VV   | 5.9                 |                     | Monitor Valves in Light Liquid Service   |
|                | 40 CFR 60.482-8(a)(2), Subpart VV            | 5.10                |                     | Repair Leaks Detected at Pumps and Valves  |
|                | 40 CFR 60.482-9, Subpart VV                  | 5.11                |                     | Delay of Repair Requirements   |
|                | 40 CFR 60.562-2(b), Subpart DDD              | 5.12                |                     | Alternative Leak Detection Monitoring Standards  |
|                | 40 CFR 60.483-2, Subpart VV                  |                     |                     |  |
|                | 40 CFR 60.562-2, Subpart DDD                 | 5.13                |                     | Comply with the Recordkeeping Requirements of 40 CFR 60, Subpart VV                      |
|                | 40 CFR 60.486(c), Subpart VV                 | 5.14                |                     | Leak Detection Log Requirements  |
|                | 40 CFR 60.486(e)(1) through (5), Subpart VV  | 5.16                |                     | Leak Monitoring Requirement  |
|                | 40 CFR 60.486(g), Subpart VV                 | 5.17                |                     | Recordkeeping Requirement  |
| AD-002         | 40 CFR 63.6655(a), Subpart ZZZZ              | 5.18                | HAP                 | Notification, Malfunction, Maintenance, and Corrective Actions Recordkeeping Requirement |
|                | 40 CFR 63.6655(d) and (e), Subpart ZZZZ      | 5.19                |                     | Maintenance Recordkeeping Requirement  |
|                | 40 CFR 63.6655(f)(1), Subpart ZZZZ           | 5.20                |                     | Emergency Engine Recordkeeping Requirement   |

| <b>Emission Point</b> | <b>Applicable Requirement</b>   | <b>Condition Number(s)</b> | <b>Pollutant/Parameter</b> | <b>Monitoring/Recordkeeping Requirement</b>                          |
|-----------------------|---------------------------------|----------------------------|----------------------------|--|
| AD-002                | 40 CFR 63.6660, Subpart ZZZZ    | 5.21                       | HAP                        | Method and Duration of Keeping Records                               |
| AD-004                | 40 CFR 60.4214(b), Subpart IIII | 5.22                       | Recordkeeping              | Maintain records of hours of operation                               |
|                       | 40 CFR 60.4211(a), Subpart IIII | 5.23                       | Compliance                 | Operate and maintain according to manufacturer's written instruction |

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 DEQ 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 the entire facility, the permittee shall conduct a biennial performance test within 25 months of the previous test to determine the emissions of individual HAP from reactor venting. The permittee may only test one of the 2,000-gallon reactors (Reactors No. 1-4 and Reactors No. 6-7) and assume emissions are consistent for all reactors at the facility. The performance test shall be conducted in accordance with 40 CFR 63.1325(c), Subpart JJJ, as applicable, and shall measure the VOC concentration (as styrene) venting from the reactor for the entire duration of the batch emissions episode. The styrene emissions in lb/episode shall be determined. The amount of styrene-divinylbenzene copolymer produced during the episode shall be recorded to determine an emission factor in lb of styrene/lb of product.

The permittee shall conduct subsequent performance tests on at least one reactor within 24 months of the previous test and shall update the emission factor to reflect the results of the most current test. The permittee shall test a different reactor each performance test.

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

5.3 For the entire facility, the permittee shall demonstrate compliance with Condition 3.3 by calculating and recording the individual and total HAP emissions for each calendar month for each consecutive 12-month period in tons per year on a rolling basis. All emission sources of individual HAP emissions shall be accounted for and calculated as follows:

- (a) Styrene Storage Tanks: The permittee shall use the actual monthly throughput to determine individual HAP emissions from each tank.
- (b) Fugitive Emissions from Equipment Leaks: The permittee may use one or more of the following three methods for calculating fugitive emissions associated with equipment leaks from EPA's Protocol for Equipment Leak Emission Estimates

(EPA-453/R-95-017). The method(s) used must be documented and all calculations maintained on file at the facility.

- (1) For monitored equipment, use the Screening Value Correlations available in Section 2.3.3 and Table 2-9 of EPA's Protocol for Equipment Leak Emission Estimates and results from the most recent monitoring event.
  - (2) For monitored equipment, use the Screening Range Emission Factors available in Section 2.3.2 and Table 2-5 of EPA's Protocol for Equipment Leak Emission Estimates and results from the most recent monitoring event.
  - (3) For both monitored and unmonitored equipment, use the SOCFI Average Emission Factors available in Table 2-1 of EPA's Protocol for Equipment Leak Emission Estimates. The control efficiencies in Table 5-1 may be applied based on equipment design. The control efficiencies for "quarterly monitoring, 10,000 ppmv leak definition" in Table 5-2 may be applied to the monitored equipment components. If connectors are monitored in a manner equivalent to valves in light liquid service, the corresponding control efficiency may be used.
- (c) Reactor Venting: The permittee shall use the most recent reactor test for individual HAP emissions to develop an emission factor in units of lb of individual HAP emissions/lb of product. The amount of styrene-divinylbenzene copolymer produced each calendar month shall be used to determine the individual HAP emissions for each month.
- (d) Fuel Burning Equipment: The permittee shall use the most recent, applicable, EPA AP-42 guidance for determining individual and total HAP emissions.

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

5.4 For Emission Point AC-001, the permittee shall comply with all applicable provisions specified in 40 CFR 60.485, Subpart VV for test methods and procedures.

(Ref.: 40 CFR 60.562-2(d), Subpart DDD)

5.5 For Emission Point AC-001, the permittee is subject to the following leak detection monitoring schedule:

- (a) If a dedicated batch process unit operates less than 365 days during a year, an owner or operator may monitor to detect leaks from pumps and valves at the frequency specified in the following table instead of monitoring as specified in Conditions 5.6, 5.9, and 5.12:

| Operating time (percent of hours during year) | Equivalent monitoring frequency time in use |                |              |
|---|---|----------------|--------------|
|   | Monthly                                     | Quarterly      | Semiannually |
| 0 to <25                                      | Quarterly                                   | Annually       | Annually     |
| 25 to <50                                     | Quarterly                                   | Semiannually   | Annually     |
| 50 to <75                                     | Bimonthly                                   | Three Quarters | Semiannually |
| 75 to 100                                     | Monthly                                     | Quarterly      | Semiannually |

- (b) Pumps and valves that are shared among two or more batch process units that are subject to Subpart VV may be monitored at the frequencies specified in paragraph (a) above, provided the operating time of all such process units is considered.
- (c) The monitoring frequencies specified in paragraph (a) are not requirements for monitoring at specific intervals and can be adjusted to accommodate process operations. A permittee may monitor at any time during the specified monitoring period (e.g., month, quarter, year), provided the monitoring is conducted at a reasonable interval after completion of the last monitoring campaign. Reasonable intervals are defined in paragraphs (c)(1) through (4) below.
- (1) When monitoring is conducted quarterly, monitoring events must be separated by at least 30 calendar days.
  - (2) When monitoring is conducted semiannually (*i.e.*, once every 2 quarters), monitoring events must be separated by at least 60 calendar days.
  - (3) When monitoring is conducted in 3 quarters per year, monitoring events must be separated by at least 90 calendar days.
  - (4) When monitoring is conducted annually, monitoring events must be separated by at least 120 calendar days.

(Ref.: 40 CFR 60.482-1(f), Subpart VV)

5.6 For Emission Point AC-001, the permittee shall monitor each pump in light liquid service for leaks on a monthly basis as determined by the methods specified in 40 CFR 60.485(b), Subpart VV. Each pump in light liquid service shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal,

unless the facility is inoperable during the period. A leak is defined as greater than or equal to 10,000 parts per million (ppm). If a leak is detected, the first attempt at repair will be made within 5 days and the leak will be repaired within 15 days. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected. First attempts at repair include, but are not limited to, the following practices, where practicable.

- (a) Tightening the packing gland nuts;
- (b) Ensuring that the seal flush is operating at design pressure and temperature.

(Ref.: 40 CFR 60.482-2(a) through (c), Subpart VV)

5.7 For Emission Point AC-001, except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as determined by the methods specified in 40 CFR 60.485(c), Subpart VV.

After each pressure release the permittee shall perform the following:

- (a) The pressure relief device shall be returned to a condition of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as soon as practicable, but no later than 5 calendar days after the pressure release, except as provided in Condition 5.11. No later than 5 calendar days after the pressure release, the pressure relief device shall be monitored to confirm the conditions of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, by the methods specified in 40 CFR 60.485(c), Subpart VV.
- (b) Any pressure relief device that is equipped with a rupture disk upstream of the pressure relief device is exempt from the requirements of paragraphs (a) and (b), provided the permittee installs a new rupture disk upstream of the pressure relief device as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in Condition 5.11.

(Ref.: 40 CFR 60.482-4(a), (b), and (d), Subpart VV)

5.8 For Emission Point AC-001, the permittee shall comply with the following:

- (a) Each open open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in 40 CFR 60.482-1(c), Subpart VV, and (c) and (d) below. The cap, blind flange, plug, or second valve shall seal the

open end at all times except during operations requiring process fluid flow through the open-ended valve or line.

- (b) Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.
- (c) Open-ended valves or lines in an emergency shutdown system which are designed to open automatically in the event of a process upset are exempt from the requirements of paragraphs (a) and (b).
- (d) Open-ended valves or lines containing materials which would autocatalytically polymerize or would present an explosion, serious overpressure, or other safety hazard if capped as specified in paragraphs (a) and (b) are exempt from the requirements of paragraphs (a) and (b).

(Ref.: 40 CFR 60.482-6(a), (b), and (e), Subpart VV)

5.9 For Emission Point AC-001, the permittee shall comply with the following:

- (a) Each valve shall be monitored monthly to detect leaks by the methods specified in 40 CFR 60.485(b), Subpart VV and shall comply with paragraphs (b) through (e), except as provided in 40 CFR 60.482-1(c) and (f), Subpart VV.
- (b) If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.
- (c) Any valve for which a leak is not detected for 2 successive months may be monitored the first month of every quarter, beginning with the next quarter, until a leak is detected. As an alternative to monitoring all of the valves in the first month of a quarter, a permittee may elect to subdivide the process unit into 2 or 3 subgroups of valves and monitor each subgroup in a different month during the quarter, provided each subgroup is monitored every 3 months. The permittee must keep records of the valves assigned to each subgroup.

If a leak is detected, the valve shall be monitored monthly until a leak is not detected for 2 successive months.

- (d) When a leak is detected, it shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in Condition 5.11.

A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.



- (e) First attempts at repair include, but are not limited to, the following best practices where practicable:
  - (1) Tightening of bonnet bolts;
  - (2) Replacement of bonnet bolts;
  - (3) Tightening of packing gland nuts;
  - (4) Injection of lubricant into lubricated packing.

(Ref.: 40 CFR 60.482-7(a) through (e), Subpart VV)

- 5.10 For Emission Point AC-001, if evidence of a potential leak is found by visual, audible, olfactory, or any other detection method at pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and connectors, the permittee shall eliminate the visual, audible, olfactory, or other indication of a potential leak within 5 calendar days of detection.

(Ref.: 40 CFR 60.482-8(a)(2), Subpart VV)

- 5.11 For Emission Point AC-001, the permittee shall comply with the following delay of repair requirements:
  - (a) Delay of repair of equipment for which leaks have been detected will be allowed if repair within 15 days is technically infeasible without a process unit shutdown. Repair of this equipment shall occur before the end of the next process unit shutdown. Monitoring to verify repair must occur within 15 days after startup of the process unit.
  - (b) Delay of repair of equipment will be allowed for equipment which is isolated from the process and which does not remain in VOC service.
  - (c) Delay of repair for valves will be allowed if the permittee demonstrate that emissions of purged material resulting from immediate repair are greater than the fugitive emissions likely to result from delay of repair.
  - (d) Delay of repair for pumps will be allowed if:
    - (1) Repair requires the use of a dual mechanical seal system that includes a barrier fluid system, and
    - (2) Repair is completed as soon as practicable, but not later than 6 months after the leak was detected.

- (e) Delay of repair beyond a process unit shutdown will be allowed for a valve, if valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the next process unit shutdown will not be allowed unless the next process unit shutdown occurs sooner than 6 months after the first process unit shutdown.
- (f) When delay of repair is allowed for a leaking pump or valve that remains in service, the pump or valve may be considered to be repaired and no longer subject to delay of repair requirements if two consecutive monthly monitoring instrument readings are below the leak definition.

(Ref.: 40 CFR 60.482-9, Subpart VV)

5.12 For Emission Point AC-001, the permittee may elect to comply with the following alternatives standards for valves:

- (a) The permittee may elect to comply with one of the alternative work practices specified in paragraphs (b)(2) and (b)(3). The permittee must notify the DEQ before implementing one of the alternative work practices, as specified in Condition 6.7.
- (b) The permittee shall comply with the following applicable monitoring procedures:
  - (1) The permittee shall comply initially with the requirements for valves in gas/vapor service and valves in light liquid service, as described in Condition 5.9.
  - (2) After 2 consecutive quarterly leak detection periods with the percent of valves leaking equal to or less than 2.0, an owner or operator may begin to skip 1 of the quarterly leak detection periods for the valves in gas/vapor and light liquid service.
  - (3) After 5 consecutive quarterly leak detection periods with the percent of valves leaking equal to or less than 2.0, an owner or operator may begin to skip 3 of the quarterly leak detection periods for the valves in gas/vapor and light liquid service.
  - (4) If the percent of valves leaking is greater than 2.0, the permittee shall comply with the requirements as described in Condition 5.9 but can again elect to use this section.

- (5) The percent of valves leaking shall be determined as described in 40 CFR 60.485(h), Subpart VV.
- (6) The permittee must keep a record of the percent of valves found leaking during each leak detection period.
- (7) A valve that begins operation in gas/vapor service or light liquid service after the initial startup date for a process unit following one of the alternative standards in this section must be monitored in accordance with 40 CFR 60.482-7(a)(2)(i) or (ii) before the provisions of this section can be applied to that valve.

(Ref.: 40 CFR 60.483-2, Subpart VV)

- 5.13 For Emission Point AC-001, the permittee shall comply with all applicable recordkeeping requirements of 40 CFR 60.486, Subpart VV.

(Ref.: 40 CFR 60.562-2, Subpart DDD)

- 5.14 For Emission Point AC-001, upon detection of a leak, the following information shall be recorded in a log and shall be kept for 2 years in a readily accessible location:

- (a) The instrument and operator identification numbers and the equipment identification number.
- (b) The date the leak was detected and the dates of each attempt to repair the leak.
- (c) Repair methods applied in each attempt to repair the leak.
- (d) "Above 10,000" if the maximum instrument reading measured by the methods specified in 40 CFR 60.485(a), Subpart VV after each repair attempt is equal to or greater than 10,000 ppm.
- (e) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak.
- (f) The signature of the owner or operator (or designate) whose decision it was that repair could not be effected without a process shutdown.
- (g) The expected date of successful repair of the leak if a leak is not repaired within 15 days.
- (h) Dates of process unit shutdowns that occur while the equipment is unrepaired.
- (i) The date of successful repair of the leak.

(Ref.: 40 CFR 60.486(c), Subpart VV)

- 5.15 For Emission Point AC-001, the permittee shall perform the following recordkeeping requirements:
- (a) A list of identification numbers for equipment subject to the requirements of 40 CFR 60, Subpart VV.
  - (b) A list of equipment identification numbers for equipment that is designated for no detectable emissions under 40 CFR 60.482-2(e), 60.482-3(i), and 60.782-7(f), Subpart VV.
  - (c) A list of equipment identification numbers for pressure relief devices required to comply with Condition 5.7 including the background level measured during each test and the maximum instrument reading measured during the compliance test for each piece of equipment.
  - (d) The dates of each compliance test as required by 40 CFR 60.482-2(e), 60.482-3(i), 60.482-4 and 60.782-7(f), Subpart VV.
  - (e) A list of identification numbers for equipment in vacuum service.  
(Ref.: 40 CFR 60.486(e)(1) through (5), Subpart VV)
- 5.16 For Emission Point AC-001, the permittee shall demonstrate compliance with Condition 5.12 by performing the following recordkeeping requirements:
- (a) A schedule of monitoring.
  - (b) The percent of valves found leaking during each monitoring period.  
(Ref.: 40 CFR 60.486(g), Subpart VV)
- 5.17 For Emission Point AC-001, information and data used to demonstrate that a piece of equipment is not in VOC service shall be recorded in a log that is kept in a readily accessible location.  
(Ref.: 40 CFR 60.486(j), Subpart VV)
- 5.18 For Emission Point AD-001, the permittee shall keep the following records:
- (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 submitted, according to the requirement in 40 CFR 63.10(b)(2)(xiv).
  - (b) Records of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment) or the air pollution control and monitoring equipment.

- (c) Records of performance tests and performance evaluations as required in 40 CFR 63.10(b)(2)(viii).
- (d) Records of all required maintenance performed on the air pollution control and monitoring equipment.
- (e) Records of actions taken during periods of malfunction to minimize emissions in accordance with Condition 3.10, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

(Ref.: 40 CFR 63.6655(a), Subpart ZZZZ)

- 5.19 For Emission Point AD-002, the permittee shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to the manufacturer's operation and maintenance instructions or the maintenance plan developed by the permittee.

(Ref.: 40 CFR 63.6655(d) and (e), Subpart ZZZZ)

- 5.20 For Emission Point AD-002, the permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee shall 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. If the engine is used for the purposes specified in Condition 3.13(b) or Condition 3.13(c), the permittee shall keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes.

(Ref.: 40 CFR 63.6655(f)(1), Subpart ZZZZ)

- 5.21 For Emission Point AD-002, the permittee shall maintain records according to the following:

- (a) Records shall be in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1), Subpart A.
- (b) Each record shall be kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
- (c) The permittee shall keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement,

maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1), Subpart A.

(Ref.: 40 CFR 63.6660, Subpart ZZZZ)

- 5.22 For Emission Point AD-004, 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 as required by Condition 3.18. 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)

- 5.23 For Emission Point AD-004, the permittee shall comply with the following:

- (a) Operate and maintain the stationary CI ICE and control device according to the manufacturer's emission-related written instructions; and
- (b) Change only those emission-related settings that are permitted by the manufacturer; and
- (c) Meet the requirements of CFR parts 89, 94, and/or 1068, as they apply.

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

## SECTION 6. REPORTING REQUIREMENTS

| Emission Point   | Applicable Requirement  | Condition Number(s) | Reporting Requirement  |
|------------------|---|---------------------|--|
| Facility-Wide    | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).                               | 6.1                 | Report permit deviations within five (5) working days.                       |
|                  | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).                               | 6.2                 | Submit certified semiannual monitoring report.                               |
|                  | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).                               | 6.3                 | All documents submitted to DEQ shall be certified by a Responsible Official. |
|                  | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).                               | 6.4                 | Submit Performance Test Protocol and Results                                 |
| AC-001           | 40 CFR 60.562-2(e), Subpart DDD   | 6.5                 | Comply with Notification and Submittal Requirements of 40 CFR 60, Subpart VV |
|                  | 40 CFR 60.487(c), Subpart VV  | 6.6                 | Semiannual Leak Detection Reporting Requirement                              |
|                  | 40 CFR 60.487(d), Subpart VV  | 6.7                 | Alternative Standards Notification Requirement                               |
|                  | 40 CFR 60.487(e), Subpart VV  | 6.8                 | Performance Testing Reporting Requirement                                    |
| AD-002           | 40 CFR Part 63.6640(b) and 63.6650(a) through (d) and (f), Subpart ZZZZ | 6.9                 | Deviation Reporting Requirement  |
| AD-002<br>AD-004 | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).                               | 6.10                | Semiannual Hours of Operation 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 semiannual monitoring report postmarked no later than 31st of January or the 31<sup>st</sup> of July for the preceding semiannual reporting period. This report shall address any required monitoring specified in 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 DEQ 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 the entire facility, a written test protocol must be submitted at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the DEQ. If the permittee is proposing an alternative test method not previously approved by EPA, a cover letter indicating such must be attached and submitted with the test protocol.

The DEQ shall be notified ten (10) days prior to the scheduled date(s) so that an observer may be afforded the opportunity to witness the test(s).

The performance test results shall be submitted to DEQ within Sixty (60) days following the completion of the test

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



6.5 For Emission Point AC-001, the permittee shall comply with all applicable requirements of 40 CFR 60.487, Subpart VV.

(Ref.: 40 CFR 60.562-2(e), Subpart DDD)

6.6 For Emission Point AC-001, the permittee shall submit semiannual reports in accordance with Condition 6.2 which include the following information, summarized from the information in 40 CFR 60.486, Subpart VV:

- (a) Process unit identification
- (b) For each month during the semiannual reporting
  - (1) Number of valves for which leaks were detected as described in Condition 5.9(b) or Condition 5.12,
  - (2) Number of valves for which leaks were not repaired as required in Condition 5.9(d),
  - (3) Number of pumps for which leaks were detected as described in Condition 5.6,
  - (4) Number of pumps for which leaks were not repaired as required in Condition 5.6,
  - (5) The facts that explain each delay of repair and, where appropriate, why a process unit shutdown was technically infeasible.
- (c) Dates of process unit shutdowns which occurred within the semiannual reporting period.
- (d) Revisions to items reported according to 40 CFR 60.487(b), Subpart VV if changes have occurred since the initial report or subsequent revisions to the initial report.

(Ref.: 40 CFR 60.487(c), Subpart VV)

6.7 For Emission Point AC-001, the permittee shall notify the DEQ within 90 days before electing to implement either of the alternative standards in 40 CFR 60.483-1 or 40 CFR 60.483-2.

(Ref.: 40 CFR 60.487(d), Subpart VV)

- 6.8 For Emission Point AC-001, the permittee shall report the results of all performance tests in accordance with 40 CFR 60.8 of the General Provisions. The provisions of 40 CFR 60.8(d) do not apply to affected facilities subject to the provisions of this subpart except that the permittee must notify the DEQ of the schedule for the initial performance tests at least 30 days before the initial performance tests.

(Ref.: 40 CFR 60.487(e), Subpart VV)

- 6.9 For Emission Point AD-002, the permittee shall report each instance in which each applicable operating limitation in Condition 3.9 was not met in accordance with Condition 6.2. These deviations shall be reported according to the following requirements:

- (a) If there were no deviations from any applicable emission limitations or operating limitations, a statement shall be included that there were no deviations from the emission limitations or operating limitations during the reporting period; or
- (b) If there was a deviation from any emission limitation or operating limitation during the reporting period, then the compliance report shall contain the following information:
  - (1) Company name and address.
  - (2) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.
  - (3) Date of report and beginning and ending dates of the reporting period.
  - (4) The total operating time of the stationary RICE at which the deviation occurred during the reporting period.
  - (5) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
- (c) If there was a malfunction during the reporting period, the compliance report shall include the number, duration, and a brief description for each type of malfunction

which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report shall also include a description of actions taken by the permittee during a malfunction of an affected source to minimize emissions, including actions taken to correct a malfunction.

(Ref.: 40 CFR Part 63.6640(b) and 63.6650(a) through (d) and (f), Subpart ZZZZ)

- 6.10 For Emission Points AD-002 and AD-004, the permittee shall submit semiannual reports in accordance with Condition 6.2 summarizing the hours of operation of the engine in the calendar year. This report shall also include what hours were for emergency use and what constituted the emergency and what hours were for non-emergency use.

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