

STATE OF MISSISSIPPI AIR POLLUTION CONTROL TITLE V PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

B&D Plastics LLC
5500 Allen Road
Gautier, Mississippi
Jackson County

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

Permit Issued: _____

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: [Date not to exceed 5 yrs from issuance]

Permit No.: 1280-00145

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APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT

OTHER IMPORTANT DOCUMENTS:

**40 CFR 63, SUBPART WWWW – NATIONAL EMISSION STANDARDS FOR
HAZARDOUS AIR POLLUTANTS FOR REINFORCED PLASTIC COMPOSITES
PRODUCTION**

**40 CFR 63, SUBPART A – NATIONAL EMISSION STANDARDS FOR HAZARDOUS
AIR POLLUTANTS: GENERAL PROVISIONS**

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SECTION 1. GENERAL CONDITIONS

- 1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(a).)
- 1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(b).)
- 1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(c).)
- 1.4 (a) This permit shall be reopened and revised under any of the following circumstances:
 - (1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of 3 or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.
 - (2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
 - (3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.
 - (4) The Administrator or the Permit Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- (b) Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.

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- (c) Reopenings shall not be initiated before a notice of such intent is provided to the Title V source by the DEQ at least 30 days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

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

- 1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(e).)
- 1.6 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(d).)
- 1.7 The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(5).)
- 1.8 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.)
 - (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgments where such

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judgments are derived from process and/or emission data which supports the estimates of maximum actual emission. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).)

- (b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D(2).)
 - (c) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.)
 - (d) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.C.)
- 1.9 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(8).)
- 1.10 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)
- 1.11 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:
- (a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of

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this permit;

- (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(2).)

1.12 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(1).)

1.13 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(2).)

1.14 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(1).)

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

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

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

- 1.16 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.H.)
- 1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C(2)., R. 6.4.B., and R. 6.2.A(1)(c).)
- 1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:
- (a) the changes are not modifications under any provision of Title I of the Act;
 - (b) the changes do not exceed the emissions allowable under this permit;
 - (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:
 - (1) a brief description of the change(s),
 - (2) the date on which the change will occur,
 - (3) any change in emissions, and
 - (4) any permit term or condition that is no longer applicable as a result of the change;
 - (d) the permit shield shall not apply to any Section 502(b)(10) change. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F(1).)
- 1.19 Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in

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the absence of an approved schedule, with the appropriate requirements specified in 11 Miss. Admin. Code Pt. 2, Ch. 3., "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)

- 1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 11 Miss. Admin. Code Pt. 2, Ch. 2., "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations 11 Miss. Admin. Code Pt. 2, Ch. 6., "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:
- (a) routine maintenance, repair, and replacement;
 - (b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
 - (c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
 - (d) use of an alternative fuel or raw material by a stationary source which:
 - (1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; 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 51.166;
 - (e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or

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- (f) any change in ownership of the stationary source."
- 1.21 Any change in ownership or operational control must be approved by the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.D(4).)
- 1.22 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.B(1).)
- 1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.
- (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.
 - (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.
 - (c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.G.)
- 1.24 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies.
- (a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or

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improper operation, or operator error.

- (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.
- (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
 - (1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - (2) the permitted facility was at the time being properly operated;
 - (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - (4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.G.)

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

- (a) Upsets (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.KK.)
 - (1) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:

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- (i) an upset occurred and that the permittee can identify the cause(s) of the upset;
 - (ii) the source was at the time being properly operated;
 - (iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;
 - (iv) the permittee submitted notice of the upset to the DEQ within 5 working days of the time the upset began; and
 - (v) the notice of the upset shall contain a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.
 - (2) In any enforcement proceeding, the permittee 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.
- (b) Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.HH. & R. 1.2.CC.)
- (1) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows:
 - (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above;
 - (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or
 - (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.
 - (2) In any enforcement proceeding, the permittee seeking to establish the

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applicability of any exception during a startup or shutdown has the burden of proof.

- (3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply.

(c) Maintenance.

- (1) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following:
 - (i) the permittee can identify the need for the maintenance;
 - (ii) the source was at the time being properly operated;
 - (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;
 - (iv) the permittee submitted notice of the maintenance to the DEQ within 5 working days of the time the maintenance began or such other times as allowed by DEQ; and
 - (v) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.
- (2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.
- (3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

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

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required to obtain a modification of this permit in order to perform the referenced activities.

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SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-000	<p>Facility Wide manufacturing of large custom fiberglass reinforced plastic (FRP) components.</p> <p>Buildings 1, 2, and 3 – Manufacturing operations involving application and curing of resins</p> <p>Building 4 – Purchased thermoplastic sheet used in production of dual-laminate components is cut and shaped and otherwise prepared for use</p> <p>Building 5 – Storage of flammable materials, including new and used acetone, and hydraulic and lubricating oils</p> <p>Building 6 – Storage of production materials, consisting primarily of rolls of glass fiber roving and cloth, and premade plastic sheets</p> <p>Building 7 – Storage of resins received in drums</p> <p>Building 8 – Maintenance shop</p>
AT-001 AT-002	Two 8,000 gallon bulk resin storage tanks located within secondary containment outside of Building 3

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SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. Facility-Wide Emission Limitations & Standards

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

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

(b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.A.)

3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Paragraph 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)

B. Emission Point Specific Emission Limitations & Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
AA-000	11 Miss. Admin. Code Pt. 2, R. 1.3.B	3.B.1	Opacity	40%
AA-000	40 CFR 63.5785(a), Subpart WWW – National Emission Standard for Hazardous Air Pollutants from Reinforced Plastic Composites Production	3.B.2	HAP	Applicability

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Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-000	40 CFR 63.5805(b), and Table 3(1), (3), and (6), Subpart WWW	3.B.3	HAP	<p><u>Open Molding</u> – corrosion-resistant and/or high strength (CR/HS)</p> <p>A. Mechanical Resin Application – 113 lb/ton</p> <p>B. Filament application – 171 lb/ton</p> <p>C. Manual resin application – 123 lb/ton</p> <p><u>Open Molding</u> – Tooling</p> <p>A. Mechanical Resin Application – 254 lb/ton</p> <p>B. Manual Resin Application – 157 lb/ton</p> <p><u>Open Molding</u> – Gel Coat</p> <p>A. Tooling Gel Coating – 440 lb/ton</p> <p>B. White/off White Pigmented Gel Coating – 267 lb/ton</p> <p>C. All Other Pigmented Gel Coating – 377 lb/ton</p> <p>D. CR/HS or High Performance Gel Coat – 605 lb/ton</p> <p>E. Fire Retardant Gel Coat – 854 lb/ton</p> <p>F. Clear Production Gel Coat – 522 lb/ton</p>
	40 CFR 63.5810, Subpart WWW	3.B.4		Compliance Options
	40 CFR 63.5810(a), Subpart WWW	3.B.5		For Open Molding: Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 or Table 5
	40 CFR 63.5810(b), Subpart WWW	3.B.6		Demonstrate that, on average, you meet the individual organic HAP emission limits for each combination of operation type and resin application method or gel coat type.

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Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
	40 CFR 63.5810(c), Subpart WWWW	3.B.7		Demonstrate compliance with a weighted average emissions limit.
	40 CFR 63.5810(d), Subpart WWWW	3.B.8		Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type.
AA-000	40 CFR 63, Subpart WWWW Table 7(2), (7), and (8)	3.B.9	HAP	<p>When using the same resin(s) for multiple resin application methods, the permittee may use any resin(s) with organic HAP content less than or equal to:</p> <p>CR/HS Resins, nonatomized mechanical</p> <p>A. Filament application – 46.4%</p> <p>B. Manual application – 46.4%</p> <p>Tooling Resins, nonatomized mechanical</p> <p>A. Manual application – 91.4%</p> <p>Tooling Resins, manual</p> <p>A. Atomized Mechanical – 45.9%</p>
	40 CFR 63.5835(a), Subpart WWWW	3.B.10		General Compliance Requirements
AA-000	Title V Operating Permit issued XXXXX, and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)	3.B.11	Total HAP	159 tpy (12-month rolling total)
		3.B.12	Total VOC	131 tpy (12-month rolling total)

3.B.1 The permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Paragraph 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets.

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

3.B.2 For Emission Point AA-000, the permittee is subject to and shall comply with all applicable requirements of National Emission Standards for Hazardous Air Pollutants from Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW) and the General Provisions (40 CFR 63, Subpart A).

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(Ref.: 40 CFR 63.5785(a), Subpart WWWW)

- 3.B.4 For Emission Point AA-000, the permittee shall meet the requirements of 40 CFR 63.5805(b). Compliance with the HAP emission limits may be demonstrated as appropriate using one or more of the compliance options listed in Conditions 3.B.5 through 3.B.8.

Operation Type	And Using	Organic HAP Emission Limit
Open Molding – CR/HS	Mechanical Resin Application	113 lb/ton
	Filament Application	171 lb/ton
	Manual Resin Application	123 lb/ton
Open Molding – Tooling	Mechanical Resin Application	254 lb/ton
	Manual Resin Application	157 lb/ton
Open Molding – Gel Coat	Tooling Gel Coating	440 lb/ton
	White/off White Pigmented Gel Coating	267 lb/ton
	All Other Pigmented Gel Coating	377 lb/ton
	CR/HS or High Performance Gel Coat	605 lb/ton
	Fire Retardant Gel Coat	854 lb/ton
	Clear Production Gel Coat	522 lb/ton

(Ref.: 40 CFR 63.5805(b) and Table 3(1), (3), and (6), Subpart WWWW)

- 3.B.4 For Emission Point AA-000, for open molding, the permittee shall use one of the methods in 40 CFR 63.5810(a) through (d) to meet the standards. The permittee shall use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to nonatomized mechanical application, using covered curing techniques, and routing part or all of the emissions to an add-on control. The permittee may use different compliance options for the different operations. The necessary calculations must be completed within 30 days after the end of each month. The permittee may switch between the compliance options in 40 CFR 63.5810(a) through (d). When

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changing to an option based on a 12-month rolling average, the permittee shall base the average on the previous 12 months of data calculated using the compliance option that is changed to, unless the previously used option did not require the maintenance of records of resin and gel coat use. In this case, the permittee shall immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

(Ref.: 40 CFR 63.5810, Subpart WWWW)

3.B.5 For Emission Point AA-000, the permittee may comply with the following: *Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in 40 CFR 63, Subpart WWWW Table 3.*

- (1) Calculate the actual organic HAP emissions factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique, or the control technique. The permittee shall calculate organic HAP emissions factors for each different process stream by using the appropriate equations in 40 CFR 63, Subpart WWWW Table 1 for open molding or site-specific organic HAP emissions factors discussed in 40 CFR 63.5796. The emission factor calculation should include any and all emission reduction techniques used including any add-on controls.
- (2) If the calculated emission factor is less than or equal to the appropriate emission limit in Table 3, the permittee has demonstrated that this process stream complies with the emission limit in 40 CFR 63, Subpart WWWW Table 3. It is not necessary that all your process streams, considered individually, demonstrate compliance to use this option for some process streams. However, for any individual resin or gel coat used, if any of the process streams that include that resin or gel coat are to be used in any averaging calculations described in 40 CFR 63.5810(b) through (d), then all process streams using that individual resin or gel coat must be included in the averaging calculations.

(Ref.: 40 CFR 63.5810(a), Subpart WWWW)

3.B.6 For Emission Point AA-000, the permittee may comply with the following: *Demonstrate that, on average, you meet the individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type.* Demonstrate that on average you meet the individual organic HAP emissions limits for each unique combination of operation type and resin application method or gel coat type shown in 40 CFR 63, Subpart WWWW Table 3 that applies to you.

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- (1) (i) Group the process streams described in 40 CFR 63.5810(a) by operation type and resin application method or gel coat type listed in 40 CFR 63, Subpart WWW Table 3 and then calculate a weighted average emission factor based on the amounts of each individual resin or gel coat used for the last 12 months. To do this, sum the product of each individual organic HAP emissions factor calculated in 40 CFR 63.5810(a)(1) and the amount of neat resin plus and neat gel coat plus usage that corresponds to the individual factors and divide the numerator by the total amount of neat resin plus and neat gel coat plus used in that operation type as shown in Equation 2 in 40 CFR 63.5810(b)(1), seen below.

$$\text{Average organic HAP Emissions Factor} = \frac{\sum_{i=1}^n (\text{Actual Process Stream EF}_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Eq. 2})$$

Where:

Actual Process Stream EF_i = actual organic HAP emissions factor for process stream i, lbs/ton;

Material_i = neat resin plus or neat gel coat plus used during the last 12 calendar months for process stream i, tons;

n = number of process streams where you calculated an organic HAP emissions factor.

- (ii) The permittee shall, but are not required to, include process streams where you have demonstrated compliance as described in 40 CFR 63.5810(a), subject to the limitations described in 40 CFR 63.5810(a)(2), and the permittee is not required to and should not include process streams for which you will demonstrate compliance using the procedures in 40 CFR 63.5810(d).
- (2) Compare each organic HAP emissions factor calculated in 40 CFR 63.5810(b)(1) with its corresponding organic HAP emissions limit in 40 CFR 63, Subpart WWW Table 3. If all emissions factors are equal to or less than their corresponding emission limits, then the permittee is in compliance.

(Ref.: 40 CFR 63.5810(b), Subpart WWW)

- 3.B.7 For Emission Point AA-000, the permittee may comply with the following: *Demonstrate compliance with a weighted average emission limit.* Demonstrate each month that the permittee meets each weighted average of the organic HAP emissions limits in 40 CFR 63, Subpart Table 3. When using this option, the permittee shall demonstrate compliance with

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the weighted average organic HAP emissions limit for all open molding operations.

- (1) Each month calculate the weighted average organic HAP emissions limit for all open molding operations for the last 12-month period to determine the organic HAP emissions limit that applies. To do this, multiply the individual organic HAP emissions limits in 40 CFR 63, Subpart WWWW Table 3 for each open molding operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding over the last 12 months as shown in Equation 3 in 40 CFR 63.5810(c)(1), seen below.

$$\text{Weighted Average Emission Limit} = \frac{\sum_{i=1}^n (EL_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Eq. 3})$$

Where:

EL_i = organic HAP emissions limit for operation type i, lbs/ton from Tables 3 of Subpart WWWW;

Material_i = neat resin plus or neat gel coat plus used during the last 12-month period for operation type i, tons;

n = number of operations.

- (2) Each month calculate the weighted average organic HAP emissions factor for open molding and centrifugal casting. To do this, multiply the actual open molding operation organic HAP emissions factors calculated in 40 CFR 63.5810(b)(1) and the amount of neat resin plus and neat gel coat plus used in each open molding operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding operations as shown in Equation 4 of this section.

$$\begin{array}{l} \text{Actual Weighted} \\ \text{Average organic} \\ \text{HAP Emissions} \\ \text{Factor} \end{array} = \frac{\sum_{i=1}^n (\text{Actual Operation } EF_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Eq. 4})$$

Where:

Actual Individual EF_i = Actual organic HAP emissions factor for operation type i,

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lbs/ton;

Material_i = neat resin plus or neat gel coat plus used during the last 12 calendar months for operation type i, tons;

n=number of operations.

- (3) Compare the values calculated in (1) and (2). If each 12-month rolling average organic HAP emissions factor is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit, then the permittee is in compliance.

(Ref.: 40 CFR 63.5810(c), Subpart WWWW)

3.B.8 For Emission Point AA-000, the permittee may comply with the following: *Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type.* This option is limited to resins of the same type. The resin types for which this option may be used are noncorrosion-resistant, corrosion-resistant and/or high strength, and tooling.

- (1) For any combination of manual resin application, mechanical resin application, or filament application, the permittee may elect to meet the organic HAP emissions limit for any one of these application methods and use the same resin in all of the resin application methods listed. Table 7 of 40 CFR 63, Subpart WWWW presents the possible combinations based on a facility selecting the application process that results in the highest allowable organic HAP content resin. If the resin organic HAP content is below the applicable value shown in Table 7, the resin is in compliance.
- (2) The permittee may also use a weighted average organic HAP content for each application method described in 40 CFR 63.5810(d)(1). Calculate the weighted average organic HAP content monthly. Use Equation 2 in 40 CFR 63.5810(b)(1) except substitute organic HAP content for organic HAP emissions factor. The permittee is in compliance if the weighted average organic HAP content based on the last 12 months of resin use is less than or equal to the applicable organic HAP contents in 40 CFR 63, Subpart WWWW Table 7.
- (3) The permittee may simultaneously use the averaging provisions in 40 CFR 63.5810(b) or (c) to demonstrate compliance for any operations and/or resins not included in the compliance demonstrations in (1) and (2) above. However, any resins for which is claimed compliance under the option in (1) and (2) above may not be included in any of the averaging calculations described in 40 CFR 63.5810(b) or (c).
- (4) The permittee does not have to keep records of resin use for any of the individual resins where compliance was demonstrated under the option in (1) above unless

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the permittee elects to include that resin in the averaging calculations described in 40 CFR 63.5810(d)(2).

(Ref.: 40 CFR 63.5810(d), Subpart WWWW)

- 3.B.9 For Emission Point AA-000, the permittee shall comply with the following when electing to use the same resin(s) for multiple resin application methods. The permittee shall use resin(s) with organic HAP content less than or equal to the following:

Resin Type	Application Method	Organic HAP Content
CR/HS Resins, nonatomized mechanical	Filament Application	46.4%
	Manual Application	46.4%
Tooling Resins, nonatomized mechanical	Manual Application	91.4%
Tooling Resins, Manual	Atomized Mechanical	45.9%

(Ref.: 40 CFR 63.5810(d) and Table 7(2), (7), and (8), Subpart WWWW)

- 3.B.10 For Emission Point AA-000, the permittee shall be in compliance at all times with the work practice standards in 40 CFR 63, Subpart WWWW Table 4, as well as the organic HAP emissions limits in 40 CFR 63, Subpart WWWW, Tables 3, or the organic HAP content limits in 40 CFR 63, Subpart WWWW, Table 7, as applicable, that is being met without the use of add-on controls.

(Ref.: 40 CFR 63.5835(a), Subpart WWWW)

- 3.B.11 For Emission Point AA-000, the permittee shall not exceed 159 tons per year of Total HAP based on a 12-month rolling total.

(Ref.: Title V Operating Permit issued XXXXX and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10))

- 3.B.12 For Emission Point AA-000, the permittee shall not exceed 131 tons per year of Total VOC based on a 12-month rolling total.

(Ref.: Title V Operating Permit issued XXXXX and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10))

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C. Insignificant and Trivial Activity Emission Limitations & Standards

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

- 3.C.1 The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).)
- 3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)

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D. Work Practice Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
AA-000	40 CFR 63, Subpart WWWW, Table 4(2)	3.D.1	HAP	Cleaning operation
	40 CFR 63, Subpart WWWW, Table 4(3)	3.D.2		HAP-containing materials storage operation
	40 CFR 63, Subpart WWWW, Table 4(6)	3.D.3		Mixing operations
	40 CFR 63, Subpart WWWW, Table 4(7)	3.D.4		
	40 CFR 63, Subpart WWWW, Table 4(8)	3.D.5		

3.D.1 For Emission Point AA-000, for each cleaning operation, the permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.

(Ref.: 40 CFR 63, Subpart WWWW, Table 4(2))

3.D.2 For Emission Point AA-000, for each HAP-containing materials storage operation, the permittee shall keep containers that store HAP-containing materials (like methylene chloride) closed or covered except during the addition or removal of materials. Storage tanks may be vented as necessary for safety.

(Ref.: 40 CFR 63, Subpart WWWW, Table 4(3))

3.D.3 For Emission Point AA-000, for each mixing operation, the permittee shall use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.

(Ref.: 40 CFR 63, Subpart WWWW, Table 4(6))

3.D.4 For Emission Point AA-000, for each mixing operation, the permittee shall close any mixer vents when actual mixing is occurring, except that venting is allowed during

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addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement.

(Ref.: 40 CFR 63, Subpart WWWW, Table 4(7))

- 3.D.5 For Emission Point AA-000, for each mixing operation, the permittee shall keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

(Ref.: 40 CFR 63, Subpart WWWW, Table 4(8))

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SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:
- (a) the identification of each term or condition of the permit that is the basis of the certification;
 - (b) the compliance status;
 - (c) whether compliance was continuous or intermittent;
 - (d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
 - (e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(5)(a), (c), & (d).)

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SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. General Monitoring, Recordkeeping and Reporting Requirements

- 5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.
- 5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:
- (a) the date, place as defined in the permit, and time of sampling or measurements;
 - (b) the date(s) analyses were performed;
 - (c) the company or entity that performed the analyses;
 - (d) the analytical techniques or methods used;
 - (e) the results of such analyses; and
 - (f) the operating conditions existing at the time of sampling or measurement. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(1).)
- 5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(2).)
- 5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 6.2.E. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)
- 5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such

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deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) days of the time the deviation began. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(2).)

- 5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the DEQ and the EPA.
- 5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

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B. Specific Monitoring and Recordkeeping Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
AA-000	40 CFR 63.5840, Subpart WWWW	5.B.1	HAP	Initial Compliance Demonstration
	40 CFR 63.5860(a), Subpart WWWW	5.B.2		
	40 CFR 63, Subpart WWWW, Table 8(1)	5.B.3		
	40 CFR 63, Subpart WWWW, Table 9(2), (3), (6), (7), and (8)	5.B.4		
	40 CFR 63.5895(c), Subpart WWWW	5.B.5		Demonstrate Continuous Compliance
	40 CFR 63.5895(d), Subpart WWWW	5.B.6		
	40 CFR 63.5900(a)(2), (3), and (4), Subpart WWWW	5.B.7		Deviations
	40 CFR 63.5900(b), Subpart WWWW	5.B.8		
	40 CFR 63.5915(a), Subpart WWWW	5.B.9		Recordkeeping
	40 CFR 63.5915(c), Subpart WWWW	5.B.10		Recordkeeping for Organic HAP Emission Factors
	40 CFR 63.5915(d), Subpart WWWW	5.B.11		Recordkeeping for Work Practice Standards
	40 CFR 63.5920, Subpart WWWW	5.B.12		Records Retention
AA-000	11 Miss. Code Admin. Code Pt. 2, R. 2.2(B)(10)	5.B.13	PM	Good Housekeeping Practices
AA-000	11 Miss. Code Admin. Code Pt. 2, R. 2.2(B)(10)	5.B.14	Total HAP and Total VOC	Recordkeeping for 12-month rolling total

5.B.1 For Emission Point AA-000, the permittee shall conduct performance tests, performance evaluations, design evaluations, capture efficiency testing, and other initial compliance demonstrations by the compliance date. Open molding operations that elect to meet an organic HAP emissions limit on a 12-month rolling average must initiate collection of the required data on the compliance date, and demonstrate compliance 1 year after the compliance date.

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(Ref.: 40 CFR 63.5840, Subpart WWWW)

- 5.B.2 For Emission Point AA-000, the permittee shall demonstrate initial compliance with each organic HAP emissions standard in 40 CFR 63.5808(a) through (h) by using the procedures shown in 40 CFR 63, Subpart WWWW, Tables 8 and 9.

(Ref.: 40 CFR 63.5860(a), Subpart WWWW)

- 5.B.3 For Emission Point AA-000, the permittee shall meet the organic HAP emissions limit shown in 40 CFR 63, Subpart WWWW Table 3 or the organic HAP content limits shown in 40 CFR 63, Subpart WWWW Table 7. To determine initial compliance, the permittee shall comply with the following:

- (1) Met the appropriate organic HAP emissions limits as calculated using the procedures in 40 CFR 63.5810 on a 12-month rolling average 1 year after the appropriate compliance date, and/or
- (2) Demonstrate that any individual resins or gel coats meet their applicable emission limits, or
- (3) Demonstrate using the appropriate values in 40 CFR 63, Subpart WWWW Table 7 that the weighted average of all resins and gel coats for each resin type and application method meet the appropriate organic HAP contents.

(Ref.: 40 CFR 63.5860(a) and Table 8(1), Subpart WWWW)

- 5.B.4 For Emission Point AA-000, the permittee shall comply with the following:

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Operation Type	Meeting the following standards:	Permittee has demonstrated initial compliance if:
Cleaning Operation	Not use cleaning solvents that contain HAP, except that styrene may be used in closed systems, and organic HAP containing materials may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin between storage and applying resin to the mold or reinforcement.	The permittee submits a certified statement in the notice of compliance status that all cleaning materials, except styrene contained in closed systems, or materials used to clean cured resin from application equipment, contain no HAP.
HAP-containing materials storage operation	Keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.	The permittee submits a certified statement in the notice of compliance status that all HAP-containing storage containers are kept closed or covered except when adding or removing materials, and that any bulk storage tanks are vented only as necessary for safety.
Mixing Operation	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.	The permittee submits a certified statement in the notice of compliance status that mixer covers are closed during mixing except when adding materials to mixers, and that gaps around mixer shafts are required instrumentation are less than 1 inch.
	Not actively vent mixers to the atmosphere while the mixing agitator is turning, except that venting is allowed during addition of materials, or as necessary prior to adding materials for safety.	The permittee submits a certified statement in the notice of compliance status that mixers are not actively vented to the atmosphere when the agitator is turning except when adding materials or as necessary for safety.
	Keep the mixer covers closed during mixing except when adding materials to the mixing vessels.	The permittee submits a certified statement in the notice of compliance status that mixers closed except when adding materials to the mixing vessels.

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(Ref.: 40 CFR 63.5860(a) and Table 9, Subpart WWWW)

- 5.B.5 For Emission Point AA-000, the permittee shall collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if you are meeting any organic HAP emissions limits based on an organic HAP emissions limit in 40 CFR 63, Subpart WWWW, Table 3. The permittee shall collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if you are meeting any organic HAP content limits in 40 CFR 63, Subpart WWWW, Table 7 if averaging organic HAP contents. Resin use records may be based on purchase records if you can reasonably estimate how the resin is applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier.

(Ref.: 40 CFR 63.5895(c), Subpart WWWW)

- 5.B.6 For Emission Point AA-000, resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission as defined in 40 CFR 63.5810(a). However, the permittee shall retain the records of resin and gel coat organic HAP content, and shall include the list of these resins and gel coats and identify their application methods in the semiannual compliance reports. If after initially demonstrating that a specific combination of an individual resin or gel coat, application method, and controls meets its applicable emission limit, and the resin or gel coat changes or the organic HAP content increases, or changing the application method, then the permittee shall again demonstrate that the individual resin or gel coat meets its emission limit as specified in 40 CFR 63.5810(a). If any of the previously mentioned changes results in a situation where an individual resin or gel coat now exceeds its applicable emission limit in 40 CFR 63, Subpart WWWW, Table 3, the permittee shall begin collecting resin and gel coat use records and calculate compliance using one of the averaging options on a 12-month rolling average.

(Ref.: 40 CFR 63.5895(d), Subpart WWWW)

- 5.B.7 For Emission Point AA-000, the permittee shall demonstrate continuous compliance with each standard in 40 CFR 63.5805 that applies according to the methods specified below.
- (1) Compliance with organic HAP emissions limits is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in 40 CFR 63, Subpart WWWW, Table 3, on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as discussed in 40 CFR 63.5895(d).
 - (2) Compliance with organic HAP content limits in 40 CFR 63, Subpart WWWW, Table 7 is demonstrated by maintaining an average organic HAP content value less

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than or equal to the appropriate organic HAP contents listed in Table 7, on a 12-month rolling average, and/or by including in each compliance report a statement that resins and gel coats individually meet the appropriate organic HAP content limits in Table 7, as discussed in 40 CFR 63.5895(d).

- (3) Compliance with the work practice standards in 40 CFR 63, Subpart WWWW, Table 4 is demonstrated by performing the work practice required for the operation.

(Ref.: 40 CFR 63.5900(a)(2), (3), and (4), Subpart WWWW)

- 5.B.8 For Emission Point AA-000, the permittee shall report each deviation from each standard in 40 CFR 63.5805 that applies. The deviations must be reported according to the requirements in 40 CFR 63.5910 (See Section 5.C.).

(Ref.: 40 CFR 63.5900(b), Subpart WWWW)

- 5.B.9 For Emission Point AA-000, the permittee shall maintain a copy of each notification and report that was submitted to comply with 40 CFR 63, Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv).

(Ref.: 40 CFR 63.5915(a), Subpart WWWW)

- 5.B.10 For Emission Point AA-000, the permittee shall keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in 40 CFR 63, Subpart WWWW, Tables 3, and 7.

(Ref.: 40 CFR 63.5915(c), Subpart WWWW)

- 5.B.11 For Emission Point AA-000, the permittee shall keep a certified statement that you are in compliance with the work practice requirements in 40 CFR 63, Subpart WWWW, Table 4, as applicable.

(Ref.: 40 CFR 63.5915(d), Subpart WWWW)

- 5.B.12 For Emission Point AA-000, the permittee shall comply with the following:

- (1) Maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to 40 CFR 63.10(b)(1).
- (2) As specified in 40 CFR 63.10(b)(1), Keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
- (3) Keep each record onsite for at least 2 years after the date of each occurrence,

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measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). Records can be kept offsite for the remaining 3 years.

- (4) Keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

(Ref.: 40 CFR 63.5920, Subpart WWWW)

5.B.13 For Emission Point AA-000, the permittee shall perform good housekeeping practices (i.e., sweeping of floors).

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

5.B.14 For Emission Point AA-000, the permittee shall maintain records of the monthly usage of all VOC and HAP containing materials, including the type of material, amount used, and the percent VOC and HAP content of each material.

The VOC and HAP emissions shall be calculated for each month and for each consecutive 12-month period.

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

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C. Specific Reporting Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Reporting Requirement
AA-000	40 CFR 63.5905(a), Subpart WWWW	5.C.1	HAP	Notifications
	40 CFR 63, Subpart WWWW, Table 13	5.C.2		
	40 CFR 63.5910(a) and Table 14, Subpart WWWW	5.C.3		Reporting
	40 CFR 63.5910(b), Subpart WWWW	5.C.4		
	40 CFR 63.5910(c), Subpart WWWW	5.C.5		Compliance Report
	40 CFR 63.5910(d), Subpart WWWW	5.C.6		Deviations
	40 CFR 63.5910(g), Subpart WWWW	5.C.7		
	40 CFR 63.5910(i), Subpart WWWW	5.C.8		Compliance Options
AA-000	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)	5.C.9	Total HAP and Total VOC	Reporting

5.C.1 For Emission Point AA-000, the permittee shall comply with the following:

- (1) Submit all of the notifications in 40 CFR 63, Subpart WWWW, Table 13 (See Condition 5.C.2) that apply by the dates specified in Table 13. The notifications are described more fully in 40 CFR 63, Subpart A, referenced in Table 13.
- (2) If you change any information submitted in any notification, the permittee shall submit the changes in writing to the MDEQ within 15 calendar days after the change.

(Ref.: 40 CFR 63.5905, Subpart WWWW)

5.C.2 For Emission Point AA-000, as required in 40 CFR 63.5905(a), the permittee shall determine the applicable notifications and submit them by the dates shown in the following table:

If your facility . . .	You must submit . . .	By this date . . .
1. Is an existing source subject to this subpart	An Initial Notification containing the information specified in 40 CFR 63.9(b)(2)	No later than the dates specified in 40 CFR 63.9(b)(2).

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2. Is a new source subject to this subpart	The notifications specified in 40 CFR 63.9(b)(4) and (5)	No later than the dates specified 40 CFR 63.9(b)(4) and (5).
3. Qualifies for a compliance extension as specified in 40 CFR 63.9(c)	A request for a compliance extension as specified in 40 CFR 63.9(c)	No later than the dates specified in 40 CFR 63.6(i).
4. Is complying with organic HAP emissions limit averaging provisions	A Notification of Compliance Status as specified in 40 CFR 63.9(h)	No later than 1 year plus 30 days after your facility's compliance date.
5. Is complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging	A Notification of Compliance Status as specified in 40 CFR 63.9(h)	No later than 30 calendar days after your facility's compliance date.

(Ref.: 40 CFR 63, Subpart WWWW, Table 13)

- 5.C.3 For Emission Point AA-000, the permittee shall submit each report listed in 40 CFR 63, Subpart WWWW, Table 14. As required in 40 CFR 63.5910(a), (b), (g), and (h), the permittee shall submit reports on the schedule shown in the following table:

You must submit a(n)	The report must contain . . .	You must submit the report . . .
Compliance report	a. A statement that there were no deviations during that reporting period if there were no deviations from any emission limitations (emission limit, operating limit, opacity limit, and visible emission limit) that apply to you and there were no deviations from the requirements for work practice standards in 40 CFR Subpart WWWW, Table 4 that apply. If there were no periods during which the CMS, including CEMS, and operating parameter monitoring systems, was out of control as specified in 40 CFR 63.8(c)(7), the report must also contain a statement that there were no periods during which the CMS was out of control during the reporting period	Semiannually according to the requirements in 40 CFR 63.5910(b).

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You must submit a(n)	The report must contain . . .	You must submit the report . . .
	b. The information in 40 CFR 63.5910(d) if you have a deviation from any emission limitation (emission limit, operating limit, or work practice standard) during the reporting period. If there were periods during which the CMS, including CEMS, and operating parameter monitoring systems, was out of control, as specified in 40 CFR 63.8(c)(7), the report must contain the information in 40 CFR 63.5910(e)	Semiannually according to the requirements in 40 CFR 63.5910(b).
	c. The information in 40 CFR 63.10(d)(5)(i) if you had a startup, shutdown or malfunction during the reporting period, and actions consistent with your startup, shutdown, and malfunction plan	Semiannually according to the requirements in 40 CFR 63.5910(b).
An immediate startup, shutdown, and malfunction report if you had a startup, shutdown, or malfunction during the reporting period that is not consistent with your startup, shutdown, and malfunction plan	a. Actions taken for the event	By fax or telephone within 2 working days after starting actions inconsistent with the plan.
	b. The information in 40 CFR 63.10(d)(5)(ii)	By letter within 7 working days after the end of the event unless you have made alternative arrangements with the permitting authority. (40 CFR 63.10(d)(5)(ii)).

(Ref.: 40 CFR 63.5910(a) and Table 14, Subpart WWWW)

- 5.C.4 For Emission Point AA-000, the permittee shall submit each report by the date specified in 40 CFR 63, Subpart WWWW, Table 14 and the permittee shall submit the first and subsequent compliance reports in accordance with Condition 5.A.4.

(Ref.: 40 CFR 63.5910(b)(5), Subpart WWWW)

- 5.C.5 For Emission Point AA-000, the compliance report must contain following information:

- (1) Company name and address.

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- (2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
- (3) Date of the report and beginning and ending dates of the reporting period.
- (4) If you had a startup, shutdown, or malfunction during the reporting period and you took actions consistent with your startup, shutdown, and malfunction plan, the compliance report must include the information in 40 CFR 63.10(d)(5)(i).
- (5) If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to you, and there are no deviations from the requirements for work practice standards in 40 CFR 63, Subpart WWWW, Table 4, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period.

(Ref.: 40 CFR 63.5910(c), Subpart WWWW)

5.C.6 For Emission Point AA-000, for each deviation from an organic HAP emissions limitation (*i.e.*, emissions limit and operating limit) and for each deviation from the requirements for work practice standards that occurs at an affected source where you are not using a CMS to comply with the organic HAP emissions limitations or work practice standards in Section 3.D., the compliance report must contain the information in 40 CFR 63.5910(c)(1) through (4) and in 40 CFR 63.5910(d)(1) and (2). This includes periods of startup, shutdown, and malfunction.

- (1) The total operating time of each affected source 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.

(Ref.: 40 CFR 63.5910(d), Subpart WWWW)

5.C.7 For Emission Point AA-000, the permittee shall report all deviations as defined in this subpart in the semiannual monitoring report required by Condition 5.A.4. If an affected source submits a compliance report pursuant to 40 CFR 63, Subpart WWWW, Table 14 along with, or as part of, the semiannual monitoring report required by Condition 5.A.4, and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

(Ref.: 40 CFR 63.5910(g), Subpart WWWW)

5.C.8 For Emission Point AA-000, where multiple compliance options are available, the

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permittee shall state in your next compliance report if you have changed compliance options since your last compliance report.

(Ref.: 40 CFR 63.5910(i), Subpart WWW)

- 5.C.9 For Emission Point AA-000, the permittee shall submit records of the 12-month rolling total of Total HAP and Total VOC in accordance with Condition 5.A.4.

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

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

- 6.1 None permitted.

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SECTION 7. TITLE VI REQUIREMENTS

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

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

operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, persons selling class I or class II refrigerants or offering class I or class II refrigerants for sale, and persons purchasing class I or class II refrigerants.

- 7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any acceptable alternative that is listed in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR Part 82, Subpart G – Significant New Alternatives Policy Program. The permittee shall also comply with any use conditions for the acceptable alternative substance.
- 7.6 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart H – Halon Emissions Reduction:
- (a) Any person testing, servicing, maintaining, repairing, or disposing of equipment that contains halons or using such equipment during technician training;
 - (b) Any person disposing of halons;
 - (c) Manufacturers of halon blends; or
 - (d) Organizations that employ technicians who service halon-containing equipment.

APPENDIX A

List of Abbreviations Used In this Permit

11 Miss. Admin. Code Pt. 2, Ch. 1.	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
11 Miss. Admin. Code Pt. 2, Ch. 2.	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
11 Miss. Admin. Code Pt. 2, Ch. 3.	Regulations for the Prevention of Air Pollution Emergency Episodes
11 Miss. Admin. Code Pt. 2, Ch. 4.	Ambient Air Quality Standards
11 Miss. Admin. Code Pt. 2, Ch. 5.	Regulations for the Prevention of Significant Deterioration of Air Quality
11 Miss. Admin. Code Pt. 2, Ch. 6.	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
11 Miss. Admin. Code Pt. 2, Ch. 7.	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lbs/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards For Hazardous Air Pollutants, 40 CFR 61
	or
	National Emission Standards For Hazardous Air Pollutants for Source Categories, 40 CFR 63
NM VOC	Non-Methane Volatile Organic Compounds
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM ₁₀	Particulate Matter less than 10 µm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound

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