

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

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

**THIS CERTIFIES THAT**

Taylor Group Inc, The, Taylor Machine Works Inc, Philadelphia Operations  
109 Industrial Park Road  
Philadelphia, Neshoba, Mississippi

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with 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**

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**AUTHORIZED SIGNATURE  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Issued: XXXXX**

**Permit No.: 1920-00039**

**Expires: [Five years from the issuance of this permit]**

## **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. 2.1.D [11 Miss. Admin. Code Pt. 2, R. 2.1.D.]
3. Any activities not identified in the application are not authorized by this permit. [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. [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. [11 Miss. Admin. Code Pt. 2, R.2.2.B(15)(a).]
7. 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).]
8. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).]
9. 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).]

10. The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may 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]

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]

11. 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 [11 Miss. Admin. Code Pt. 2, R. 2.2.C.]
12. 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. [Miss. Code Ann. 49-17-39]
13. Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).]
14. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board. [11 Miss. Admin. Code Pt. 2, R. 2.16.B.]
15. 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. [11 Miss. Admin. Code Pt. 2, R. 2.1.D(7).]

16. The permittee shall furnish to MDEQ within a reasonable time any information MDEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to MDEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to MDEQ along with a claim of confidentiality. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).]
17. This permit does not authorize a modification as defined in Regulation 11 Miss. Admin. Code Pt. 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 and "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:
    - (a) 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
    - (b) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40CFR 51.66;
  - e. an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or

f. any change in ownership of the stationary source.”

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

**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. [11 Miss. Admin. Code Pt. 2, R.2.10.]
2. 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. [11 Miss. Admin. Code Pt. 2, R.2.2.B(10).]
3. The permittee shall retain all required records, monitoring data, supported information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to MDEQ as required by Applicable Rules and Regulations or this permit upon request. [11 Miss. Admin. Code Pt. 2, R.2.9.]
4. The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed except as provided for in 11 Miss. Admin. Code Pt. 2, R. 1.10., "Air Emission Regulations for the Prevention and Control of Air Contaminants." [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. GENERAL SUBMITTAL REQUIREMENTS**

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. [11 Miss. Admin. Code Pt. 2, R. 2.8.]

**SECTION 2**  
**EMISSION POINT DESCRIPTION**

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

<b>Emission Point</b>	<b>Description</b>
AB-001	Facility Wide Surface Coating Operations
AB-002	Facility Wide Metal Working Operations – Consists of metal cutting, drilling, grinding, and welding
AB-003	Facility Wide Fuel Burning Equipment – Consists of natural gas fired space heaters
AB-004	Facility Wide Tank Storage – Consists of diesel fuel, hydraulic fluid, unleaded gasoline, and used oil storage tanks
AB-005	Generator Load Test Banks – Consists of diesel (900 HP max), liquefied petroleum (1300 HP max), and natural gas (1300 HP max) engines
AB-006	Forklift Engine Testing – Consists of liquefied petroleum and diesel engines

### 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.	3.1	Opacity	Opacity from any point source shall not exceed 40% unless otherwise specified
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2		Visual obscuration caused by uncombined water droplets does not apply to the 40% Opacity limitation.
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.3	PM	0.6 lbs/MMBTU
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.4		$E = 4.1 * p^{0.67}$
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.5	SO <sub>2</sub>	4.8 lbs/MMBTU
	11 Miss. Admin Code Pt. 2, R. 2.2.B(10).	3.6	NO <sub>x</sub>	99.0 tons per year
		3.7	CO	
		3.8	VOC	
		3.9	HAPs	9.90 tons per year of any individual HAP 24.90 tons per year of all combined HAPs
AB-001 AB-002	40 CFR 63, Subpart XXXXXX (§63.11514(a), (b)(2-4), and (c))	3.10	MFHAP	Applicability

- 3.1 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.)



- 3.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Condition 3.1. This shall not apply to vision obscuration caused by uncombined water droplets.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)
- 3.3 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).)
- 3.4 For the entire facility, the permittee shall limit the emissions of Particulate Matter (PM) to no more than the rate determined by the following relationship:  
$$E = 4.1 \cdot p^{0.67}$$
where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour. Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).)
- 3.5 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)
- 3.6 For the entire facility, the permittee shall limit the emissions of nitrogen oxides (NO<sub>x</sub>) to no more than 99.0 tons per year for each consecutive 12-month period on a rolling basis. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 3.7 For the entire facility, the permittee shall limit the emissions of carbon monoxide (CO) to no more than 99.0 tons per year for each consecutive 12-month period on a rolling basis. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 3.8 For the entire facility, the permittee shall limit the emissions of volatile organic compounds (VOCs) to no more than 99.0 tons per year for each consecutive 12-month period on a rolling basis. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 3.9 For the entire facility, the permittee shall limit the emissions of hazardous air pollutants (HAPs) to no more than 9.90 tons per year for any individual HAP and 24.90 tons per year for all combined HAPs for each consecutive 12-month period on a rolling basis. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 3.10 Emission Points AB-001 and AB-002 are subject to and shall comply with all applicable requirements of 40 CFR Part 63, Subpart XXXXXX: National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories. (Ref. 40 CFR 63.11514(a), (b)(2-4), and (c))

## SECTION 4 WORK PRACTICES

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
AB-001	40 CFR 63, Subpart XXXXXX (§63.11516(d)(1)(i)-(iv))	4.1	MFHAP	Standards for spray painting for MFHAP control
	40 CFR 63, Subpart XXXXXX (§63.11516(d)(2))	4.2		Standards for spray painting application equipment of all objects painted for MFHAP control
	40 CFR 63, Subpart XXXXXX (§63.11516(d)(4))	4.3		Standards for spray gun cleaning
	40 CFR 63, Subpart XXXXXX (§63.11516(d)(5))	4.4		Standards for spray painting worker certification
	40 CFR 63, Subpart XXXXXX (§63.11516(d)(6)(i-iii), (8)(ii), and (9))	4.5		<ul style="list-style-type: none"> <li>• Spray painting training program content</li> <li>• Spray painting training dates</li> <li>• Duration of training validity</li> </ul>
AB-002	40 CFR 63, Subpart XXXXXX (§63.11516(b)(1-2))	4.6		Standards for machining
	40 CFR 63, Subpart XXXXXX (§63.11516(c)(1-2))	4.7		Standards for dry grinding and dry polishing with machines
	40 CFR 63, Subpart XXXXXX (§63.11516(f)(1-2))	4.8		Standards for welding

4.1 For Emission Point AB-001, all spray-applied painting of objects must meet the requirements of paragraphs (a) through (d) of this section. These requirements do not apply to affected sources that spray paint objects greater than 15 feet (4.57 meters), that are not spray painted in spray booths or spray rooms.

- (a) Spray booths or spray rooms must have a full roof, at least two complete walls, and one or two complete side curtains or other barrier material so that all four sides are covered. The spray booths or spray rooms must be ventilated so that air is drawn into the booth and leaves only through the filter. The roof may contain narrow slots for connecting fabricated products to overhead cranes, and/or for cords or cables.
- (b) All spray booths or spray rooms must be fitted with a type of filter technology that is demonstrated to achieve at least 98 percent capture of MFHAP. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate

Matter, June 4, 1992” (incorporated by reference, see §63.14). The test coating for measuring filter efficiency shall be a high-solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-High Volume Low Pressure) air-atomized spray gun operating at 40 psi air pressure; the air flow rate across the filter shall be 150 feet per minute. The permittee may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement.

- (c) The permittee must perform regular inspection and replacement of the filters in all spray booths or spray rooms according to manufacturer's instructions and maintain documentation of these activities, as detailed in Condition 5.8.
- (d) As an alternative compliance requirement, spray booths or spray rooms equipped with a water curtain, called “waterwash” or “waterspray” booths or spray rooms that are operated and maintained according to the manufacturer's specifications and that achieve at least 98 percent control of MFHAP, may be used in lieu of the spray booths or spray rooms requirements of paragraphs (a) through (c) above.

(Ref.: 40 CFR 63.11516(d)(1)(i)-(iv))

- 4.2 For Emission Point AB-001, all paints applied via spray-applied painting must be applied with a high-volume, low-pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated to achieve transfer efficiency comparable to one of these spray gun technologies for a comparable operation and for which written approval has been obtained from the Administrator. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's “Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989” and “Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002”, Revision 0 (incorporated by reference, see §63.14). (Ref.: 40 CFR 63.11516(d)(2))
- 4.3 For Emission Point AB-001, all cleaning of paint spray guns must be done with either non-HAP gun cleaning solvents or in such a manner that an atomized mist of spray of gun cleaning solvent and paint residue is not created outside of a container that collects the used gun cleaning solvent. Spray gun cleaning may be done, for example, by hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of these non-atomizing methods may also be used. (Ref.: 40 CFR 63.11516(d)(4))
- 4.4 For Emission Point AB-001, all workers performing painting must be certified that they have completed training in the proper spray application of paints and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in Condition 4.5. The spray application of paint is prohibited by persons who are not certified as having completed the training described in Condition 4.5. The requirements of this paragraph do not apply to the students of an accredited painting training program who are under the direct supervision of an instructor who meets the requirements of this paragraph. The requirements of this paragraph do not

apply to operators of robotic or automated painting operations. (Ref.: 40 CFR 63.11516(d)(5))

- 4.5 For Emission Point AB-001, the permittee must ensure and certify that all new and existing personnel, including contract personnel, who spray apply paints are trained in the proper application of paints as required by Condition 4.4. The training program must include, at a minimum, the items listed in paragraphs (a) through (c) below.
- (a) A list of all current personnel by name and job description who are required to be trained;
  - (b) Hands-on, or in-house or external classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in paragraphs (i) through (iv) below.
    - (i) Spray gun equipment selection, set up, and operation, including measuring paint viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.
    - (ii) Spray technique for different types of paints to improve transfer efficiency and minimize paint usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.
    - (iii) Routine spray booth and filter maintenance, including filter selection and installation.
    - (iv) Environmental compliance with the requirements of this subpart.
  - (c) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Alternatively, if the permittee can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in paragraph (b), then the permittee is not required to provide the initial training required by that paragraph to these painters.

As required by Condition 4.4, all new and existing personnel at an affected spray painting affected source, including contract personnel, who spray apply paints must be trained by the dates specified in paragraph (d) below.

- (d) All personnel must be trained and certified no later than 180 days after hiring. Worker training that was completed within 5 years prior to the required training date and that meets the requirements specified in paragraph (b) above satisfies this requirement and is valid for a period not to exceed 5 years after the date the training is completed.

Training and certification will be valid for a period not to exceed 5 years after the date the training is completed. All personnel must receive refresher training that meets the

requirements of this section and be re-certified every 5 years. (Ref.: 40 CFR 63.11516(d)(6)(i-iii), (8)(ii), and (9))

- 4.6 For Emission Point AB-002, the permittee must implement management practices to minimize emissions of MFHAP as specified in paragraphs (a) and (b) below for each machining operation that uses materials that contain MFHAP or has the potential to emit MFHAP. These requirements do not apply when machining operations are being performed that do not use any materials containing MFHAP and do not have the potential to emit MFHAP.
- (a) The permittee must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and
  - (b) The permittee must operate all equipment associated with machining according to manufacturer's instructions.

(Ref.: 40 CFR 63.11516(b)(1-2))

- 4.7 For Emission Point AB-002, the permittee must comply with the requirements of paragraphs (a) and (b) below for each dry grinding and dry polishing with machines operation that uses materials that contain MFHAP or has the potential to emit MFHAP. These requirements do not apply when dry grinding and dry polishing operations are being performed that do not use any materials containing MFHAP and do not have the potential to emit MFHAP.
- (a) The permittee must capture emissions and vent them to a filtration control device. The permittee must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices, as required by Condition 5.12.
  - (b) The permittee must implement management practices to minimize emissions of MFHAP as specified in paragraphs (i) and (ii) below.
    - (i) The permittee must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable;
    - (ii) The permittee must operate all equipment associated with the operation of dry grinding and dry polishing with machines, including the filtration control device, according to manufacturer's instructions.

(Ref.: 40 CFR 63.11516(c)(1-2))

- 4.8 For Emission Point AB-002, the permittee must comply with the requirements in paragraphs (a) and (b) of this section for each welding operation that uses materials that contain MFHAP or has the potential to emit MFHAP. These welding standards do not apply when welding operations are being performed that do not use any materials containing MFHAP or do not have the potential to emit MFHAP.
- (a) The permittee must operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions. The permittee must demonstrate compliance with this requirement by maintaining a record of

the manufacturer's specifications for the capture and control devices, as specified by Condition 5.13.

- (b) You must implement one or more of the management practices specified in paragraphs (i) through (v) below to minimize emissions of MFHAP, as practicable, while maintaining the required welding quality through the application of sound engineering judgment.
  - (i) Use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW)—also called metal inert gas welding (MIG));
  - (ii) Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates;
  - (iii) Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation;
  - (iv) Optimize welding process variables (e.g., electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated; and
  - (v) Use a welding fume capture and control system, operated according to the manufacturer's specifications.

(Ref.: 40 CFR 63.11516(f)(1-2))

## SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
Entire Facility	11 Miss. Admin Code Pt. 2, R. 2.2.B(11).	5.1	VOC HAP	Coating VOC/HAP monitoring
		5.2		Coating VOC/HAP recordkeeping
		5.3	NO <sub>x</sub> CO	Fuel usage monitoring
		5.4		Fuel usage recordkeeping
AB-001 AB-002	40 CFR 63, Subpart XXXXXX (§63.11519(c)(1)(i) and (ii))	5.5	MFHAP	General compliance and applicability recordkeeping
	40 CFR 63, Subpart XXXXXX (§63.11519(c)(15))	5.6		General recordkeeping
	40 CFR 63, Subpart XXXXXX (§63.11519(c)(13))	5.7		Maintain a copy of manufacturer's instructions
AB-001	40 CFR 63, Subpart XXXXXX (§63.11516(d)(1)(iii) and §63.11519(c)(5))	5.8		Spray paint booth filter records
	40 CFR 63, Subpart XXXXXX (§63.11519(c)(6))	5.9		Waterspray booth or water curtain efficiency tests
	40 CFR 63, Subpart XXXXXX (§63.11516(d)(3) and §63.11519(c)(7))	5.10		Spray system recordkeeping
	40 CFR 63, Subpart XXXXXX (§63.11516(d)(7) and §63.11519(c)(8))	5.11		Records of spray painting training
AB-002	40 CFR 63, Subpart XXXXXX (§63.11516(c)(1) and §63.11519(c)(4))	5.12		Records of manufacturer's specifications for control devices
	40 CFR 63, Subpart XXXXXX (§63.11516(f)(1) and §63.11519(c)(4))	5.13		
	40 CFR 63, Subpart XXXXXX (§63.11519(c)(14))	5.14		Records of welding rod usage
AB-005 AB-006	11 Miss. Admin Code Pt. 2, R. 2.2.B(11).	5.15	Exhaust Emissions	Engine testing monitoring
		5.16		Engine testing recordkeeping

5.1 For the entire facility, the permittee shall determine the following for each coating, adhesive, solvent, or other VOC or HAP containing material used:

- (a) quantity used (gal);
- (b) the percentage of VOC by weight;
- (c) the percentage of HAP by weight; and
- (d) the density (lb/gal).

The permittee may utilize data supplied by the manufacturer, or analysis of VOC and HAP content by EPA Test Method 311, 40 CFR Part 63, Appendix A, respectively. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.2 For the entire facility, the permittee shall maintain sufficient records to document:

- (a) The identification of each coating, adhesive, solvent or other VOC or HAP containing material used, and the total gallons of each coating and each solvent used on a monthly basis and in any consecutive 12-month period;
- (b) the VOC and HAP content(s) of each coating, adhesive, solvent or other VOC or HAP containing material used. A description of the method used to determine the VOC and HAP content shall accompany this data; and
- (c) the density of each coating, adhesive, solvent or other VOC or HAP containing material.

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

5.3 For the entire facility, the permittee shall monitor, on a monthly basis, the amount of fuel used for determining NO<sub>x</sub> and CO emissions. The permittee may utilize data supplied by the manufacturer, or analysis of NO<sub>x</sub> and CO emissions by EPA Test Methods 7 and 10, 40 CFR 60 Appendix A, and/or an alternate EPA approved test method(s). (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.4 For the entire facility, the permittee shall maintain sufficient records, on a monthly basis and for each consecutive 12-month period, of the amount of fuel used for determining NO<sub>x</sub> and CO emissions. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.5 For Emission Points AB-001 and AB-002, the permittee shall maintain each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report. The permittee must also maintain the records of the applicability determinations as in 40 CFR Part 63.11514(b)(1) through (5), listing equipment included in its affected source, as well as any changes to that and on what date they occurred. These records shall be maintained for 5 years and be made available for inspector review at any time. (Ref.: 40 CFR 63.11519(c)(1)(i) and (ii))

5.6 For Emission Points AB-001 and AB-002, all records must be maintained according to the requirements in paragraphs (a) through (c) below.

- (a) Records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1), "General Provisions." Where appropriate, the records may be maintained as electronic spreadsheets or as a database.



- (b) As specified in §63.10(b)(1), “General Provisions,” the permittee must keep each record for 5 years following the date of each occurrence, measurement, corrective action, report, or record.
- (c) The permittee must keep each record on-site for at least 2 years after the date of each occurrence, measurement, corrective action, report, or record according to §63.10(b)(1), “General Provisions.” The permittee may keep the records off-site for the remaining 3 years.

(Ref.: 40 CFR 63.11519(c)(15))

- 5.7 For Emission Points AB-001 and AB-002, if the permittee complies with the applicable standards of Subpart XXXXXX by operating any equipment according to manufacturer's instruction, the permittee must keep these instructions readily available for inspector review. (Ref.: 40 CFR 63.11519(c)(13))
- 5.8 For Emission Point AB-001, the permittee shall maintain a record of the filter efficiency demonstrations and spray paint booth filter maintenance activities, performed in accordance with Condition 4.1. (Ref.: 40 CFR 63.11516(d)(1)(iii) and §63.11519(c)(5))
- 5.9 For Emission Point AB-001, the permittee shall maintain a record of the water curtain efficiency demonstrations performed in accordance with Condition 4.1. (Ref.: 40 CFR 63.11519(c)(6))
- 5.10 For Emission Point AB-001, the permittee shall maintain documentation of HVLP or other high transfer efficiency spray paint delivery systems. This documentation must include the manufacturer's specifications for the equipment and any manufacturer's operation instructions. If the permittee has obtained written approval for an alternative spray application system in accordance with Condition 4.2, the permittee must maintain a record of that approval along with documentation of the demonstration of equivalency. (Ref.: 40 CFR 63.11516(d)(3) and §63.11519(c)(7))
- 5.11 For Emission Point AB-001, the permittee shall maintain certification that each worker performing spray painting operations has completed the training specified in Conditions 4.4 and 4.5 with the date the initial training and the most recent refresher training was completed. (Ref.: 40 CFR 63.11516(d)(7) and §63.11519(c)(8))
- 5.12 For Emission Point AB-002, in order to demonstrate compliance with Condition 4.7(b)(i), the permittee shall maintain a record of the manufacturer's specifications for the control devices used to control emissions from dry grinding and dry polishing with machines operations that use materials that contain MFHAP or have the potential to emit MFHAP. (Ref.: 40 CFR 63.11516(c)(1) and §63.11519(c)(4))
- 5.13 For Emission Point AB-002, in order to demonstrate compliance with Condition 4.8(a), the permittee shall maintain a record of the manufacturer's specifications for the control devices used to control emissions from welding operations that use materials that contain MFHAP or have the potential to emit MFHAP. (Ref.: 40 CFR 63.11516(f)(1) and §63.11519(c)(4))

- 5.14 For Emission Point AB-002, in order to demonstrate that compliance with requirements §63.11516(f)(3) through (8) is not required, the permittee must maintain records demonstrating the welding rod usage on a rolling 12-month basis is below 2,000 pounds per year. (Ref.: 40 CFR 63.11519(c)(14))
- 5.15 For Emission Points AB-005 and AB-006, the permittee shall determine the following for each generator and fork lift tested:
- (a) size (HP);
  - (b) fuel type;
  - (c) hours of operation;
  - (d) amount of fuel used.
- (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 5.16 For Emission Points AB-005 and AB-006, the permittee shall maintain sufficient records to document:
- (a) the size and hours of operation of each generator and fork lift tested on a monthly basis and in any consecutive 12-month period;
  - (b) the amount of fuel used each month during testing on a monthly basis and in any consecutive 12-month period.
- (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

## SECTION 6 REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
Entire Facility	11 Miss. Admin Code Pt. 2, R. 2.2.B(11).	6.1	Annual VOC/HAP report
		6.2	Annual NO <sub>x</sub> /CO report
AB-001 AB-002	40 CFR 63, Subpart XXXXXX (§63.11519(b)(1), (2), and (4))	6.3	Annual certification and compliance reports
AB-005 AB-006	11 Miss. Admin Code Pt. 2, R. 2.2.B(11).	6.4	Annual engine testing report

6.1 For the entire facility, the permittee shall submit a monitoring report due annually by the 31st of January for the preceding calendar year. This report shall provide the following:

- (a) identification of each coating, adhesive, solvent or other VOC or HAP containing material used;
- (b) the VOC and HAP content(s) of each coating, adhesive, solvent, or other VOC or HAP containing material used;
- (c) the total gallons of each coating, adhesive, solvent or other VOC or HAP containing material used in any consecutive 12-month period; and
- (d) the total VOC emission rate, the emission rate of each individual HAP and the total HAP emission rate in tons per year based on a consecutive 12-month period.

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

6.2 For the entire facility, the permittee shall submit a monitoring report due annually by the 31st of January for the preceding calendar year. This report shall provide the following:

- (a) The amount of fuel used for determining NO<sub>x</sub> and CO emissions;
- (b) The amount of fuel usage on a monthly basis and in each consecutive 12-month period;
- (c) The total NO<sub>x</sub> and CO emission rates in tons per month and tons per year for each consecutive 12-month period.

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

6.3 For Emission Points AB-001 and AB-002, the permittee must prepare and submit annual certification and compliance reports for each affected source. The annual certification and compliance report must cover the subsequent semiannual reporting period from January 1 through December 31. Each annual certification and compliance report must be prepared and submitted no later than January 31 and kept in a readily-accessible location for inspector review. If an exceedance has occurred during the year, each annual certification and compliance report must be submitted along with the exceedance reports, and postmarked or delivered no later than January 31.

The annual certification and compliance report must contain the information specified in paragraphs (a) through (c) below.

- (a) Company name and address;
- (b) 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; and
- (c) Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31. Note that the information reported for the 12 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(Ref.: 40 CFR 63.11519(b)(1), (2), and (4))

6.4 For Emission Points AB-005 and AB-006, the permittee shall submit an annual engine testing report by the 31<sup>st</sup> of January for the preceding calendar year. This report shall provide the following:

- (a) the size and hours of operation of each generator and fork lift tested;
- (b) the amount of fuel used each month of a consecutive 12-month period on a rolling basis.

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