

STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Baymont Inc, Belmont Facility
111 Duncan Road
Belmont, Mississippi
Tishomingo County

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

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: _____

Permit No.: 2640-00064

Draft/Proposed

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. Any activities not identified in the application are not authorized by this permit. (Ref.: Miss. Code Ann. 49-17-29 1.b)
3. 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 operating without a valid permit pursuant to State Law. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
4. It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(6).)
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 the permit, unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)
7. The 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 permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: 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. Design and Construction Requirements: The stationary source shall be designed and constructed so as to operate without causing a violation of an Applicable Rules and Regulations, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards, and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A.)
11. Solids Removal: 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)
12. Diversion and Bypass of Air Pollution Controls: 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, Abatement, and Control of Air Contaminants." (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)
13. Fugitive Dust Emissions from Construction Activities: The construction of the stationary source shall be performed in such a manner so as to reduce fugitive dust emissions from construction activities to a minimum. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A(4).)
14. Right of Entry: The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives upon 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 emissions. (Ref.: Miss. Code Ann. 49-17-21)
15. Permit Modification or Revocation: After notice and opportunity for a hearing, the Permit Board may modify the permit or revoke it in whole or in part for good cause shown including, but not limited to:
 - a) Persistent violation of any of the terms or conditions of this permit;

- b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts;
or
- c) A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

16. **Public Record and Confidential Information:** Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality, Office of Pollution Control. (Ref.: Miss. Code Ann. 49-17-39)
17. **Permit Transfer:** This permit shall not be transferred except upon approval of the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B)
18. **Severability:** The provisions of this permit are severable. If any provision of the permit, or the application of any provision of the permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref. 11 Miss. Admin. Code Pt. 2, R. 2.1.D(7).)
19. **Permit Expiration:** The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance or if construction is suspended for eighteen (18) months or more. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1).)
20. **Certification of Construction:** A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(3).)
21. **Beginning Operation:** Except as prohibited in Section 1, Condition 24 of this permit, after certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by 11 Miss. Admin. Code Pt. 2, R. 2.13.G. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).)
22. **Application for a Permit to Operate:** Except as otherwise specified in Section 1, Condition 24 of this permit, the application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).)

23. Operating Under a Permit to Construct: Except as otherwise specified in Section 1, Condition 24 of this permit, upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).)
24. Application Requirements for a Permit to Operate for Moderate Modifications: For moderate modifications that require contemporaneous enforceable emissions reductions from more than one emission point in order to “net” out of PSD/NSR, the applicable Title V Permit to Operate or State Permit to Operate must be modified prior to beginning operation of the modified facilities. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7).)
25. General Duty: All air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
26. Deviation Reporting: Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
27. 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).)

B. GENERAL NOTIFICATION REQUIREMENTS

1. Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).)
2. The permittee must notify DEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).)
3. Upon the completion of construction or installation of an approved stationary source or modification, and prior to commencing operation, the applicant shall notify the Permit Board that construction or installation was performed in accordance with the approved plans and specifications on file with the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).)
4. The Permit Board shall be promptly notified in writing of any change in construction from the previously approved plans and specifications or permit. If the Permit Board determines the changes are substantial, it may require the submission of a new application to construct with “as built” plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an “as built” application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).)

SECTION 2
EMISSION POINT DESCRIPTION

The permittee is authorized to construct and operate, upon certification of construction, air emissions equipment, as described in the following table.

Emission Point	Description
AA-001	Open Mold Spray Lay-up Operation – Non-atomized spray gun equipment used to apply gel coat and catalyst to the open molds. Exhaust from this operation is routed through fabric filters before venting to the atmosphere.
AA-002	Finishing Operation – Irregularities are trimmed and sanded before packaging. Cartridge dust collectors are used to control particulate emissions.

**SECTION 3
EMISSION LIMITATIONS AND STANDARDS**

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 1.3.A and B	3.1	Opacity	< 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1)	3.2	PM (filterable only)	$E = 4.1p^{0.67}$
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)	3.3	VOC	< 249 tons/year (12 month rolling total) PSD Avoidance Limit
		3.4	HAP	< 99 tons/year (12 month rolling total) MACT WWWW Controls Avoidance per 40 CFR 63.5805(d)(1)
AA-001	National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW; 40 CFR 63.5785(a) and 63.5795(a)	3.5	HAP	New Source Applicability
	40 CFR 63.5800 and Table 2(4), Subpart WWWW	3.6	HAP	Compliance Date – Upon startup
	40 CFR 63.5805(c), Subpart WWWW	3.7	HAP	Comply with Emission Limits in Table 3 and Work Practice Standards in Table 4
	Table 3(2), (3), and (6), Subpart WWWW	3.8	HAP	Organic HAP Emissions Limits: <u>Open Molding Mechanical Resin Application:</u> (1) Non-CR/HS – 88 lb _{HAP} /ton _{resin} (2) Tooling – 254 lb _{HAP} /ton _{resin} <u>Open Molding Gel Coat:</u> (1) Tooling – 440 lb _{HAP} /ton _{gelcoat} (2) White/off white Pigmented – 267 lb _{HAP} /ton _{gelcoat} (3) Other Pigmented – 377 lb _{HAP} /ton _{gelcoat}
AA-001 AA-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)	3.9	PM	Vent emissions to fabric filters or dust collectors

3.1 For the entire facility, the permittee shall not cause, permit, or allow emissions of smoke from any point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) and (b).

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

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

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

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

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

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

- 3.3 For the entire facility, the permittee shall limit Volatile Organic Compound (VOC) emissions to no more than 249 tons/year as determined for each consecutive 12-month period.

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

- 3.4 For the entire facility, the permittee shall limit total Hazardous Air Pollutant (HAP) emissions to no more than 99 tons/year as determined for each consecutive 12-month period.

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

- 3.5 For Emission Point AA-001, the permittee is subject to and shall comply with all applicable requirements of National Emission Standards for Hazardous Air Pollutants: Reinforced Plastics Composites Production (40 CFR 63, Subpart WWWW) and the General Provisions (40 CFR 63, Subpart A).

The permittee is considered a new affected source because construction commenced after August 2, 2001 and no other reinforced plastic composites production affected source exists at the site. The permittee shall comply with all new source requirements in 40 CFR 63, Subpart WWWW.

(Ref.: 40 CFR 63.5785(a) and 63.5795(a), Subpart WWWW)

- 3.6 For Emission Point AA-001, the permittee shall comply with all applicable requirements of 40 CFR 63, Subpart WWWW upon startup of the facility.

(Ref.: 40 CFR 63.5800 and Table 2(4), Subpart WWWW)

- 3.7 For Emission Point AA-001, the permittee shall meet the organic HAP emissions limits in Table 3 and the work practice standards in Table 4 of Subpart WWWW.

(Ref.: 40 CFR 63.5805(c), Subpart WWWW)

- 3.8 For Emission Point AA-001, the permittee shall comply with the following applicable emission limits:

- (a) For open molding operations using mechanical resin application, the permittee shall limit HAP emissions according to the following types of operation:
 - (1) For non-corrosion-resistant and/or high strength (non-CR/HS) operations, the organic HAP emissions limit is 88 pounds of organic HAP emitted per ton of resin applied, based on a 12-month rolling average and,
 - (2) For tooling operations, the organic HAP emissions limit is 254 pounds of organic HAP emitted per ton of resin applied, based on a 12-month rolling average.
- (b) For open molding gel coating applications, the permittee shall limit HAP emissions according to the following types of operation:
 - (1) For tooling operations, the organic HAP emissions limit is 440 pounds of organic HAP emitted per ton of gelcoat applied, on a 12-month rolling average,
 - (2) For white/off white pigmented gel coatings, the organic HAP emissions limit is 267 pounds of organic HAP emitted per ton of gelcoat applied, on a 12-month rolling average, and
 - (3) For all other pigmented gel coatings, the organic HAP emissions limit is 377 pounds of organic HAP emitted per ton of gelcoat applied, on a 12-month rolling average.

(Ref.: Table 3(2), (3), and (6), Subpart WWWW)

- 3.9 For Emissions Points AA-001 and AA-002, the permittee shall vent emissions from the spray lay-up operations through fabric filters and vent emissions from the finishing operations to dust collectors for control of particulate matter.

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

**SECTION 4
WORK PRACTICES**

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Work Practice
AA-001	40 CFR 63.5805(c) and Table 4(2) and (3), Subpart WWWW	4.1	HAP	Cleaning Operations and HAP-containing Materials Storage Operation

4.1 The permittee shall comply with the following work practice standards:

- (a) 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.
- (b) The permittee shall 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.

(Ref.: 40 CFR 63.5805(c) and Table 4(2) and (3), Subpart WWWW)

**SECTION 5
MONITORING AND RECORDKEEPING REQUIREMENTS**

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)	5.1	VOC/HAP	Usage Recordkeeping
		5.2		Monthly Recordkeeping
AA-001	40 CFR 63.5796, Subpart WWWW	5.3	HAP	HAP Emission Factors Calculation
	40 CFR 63.5797, Subpart WWWW	5.4		Determine HAP Content
	40 CFR 63.5810(a), Subpart WWWW	5.5		Options for Meeting Standards
	40 CFR 63.5835(a) and (c), Subpart WWWW	5.6		General Compliance Requirements
	40 CFR 63.5840, Subpart WWWW	5.7		Initial Compliance Requirements
	40 CFR 63.5860(a), Subpart WWWW	5.8		Demonstrate Initial Compliance
	Table 8(1), Subpart WWWW	5.9		
	Table 9(2) and (3), Subpart WWWW	5.10		Demonstrate Continuous Compliance
	40 CFR 63.5895(c) and (d), Subpart WWWW	5.11		
	40 CFR 63.5900(a)(2) and (4), Subpart WWWW	5.12		
	40 CFR 5900(c), Subpart WWWW	5.13		
	40 CFR 63.5915(a), (c), and (d), Subpart WWWW	5.14		Recordkeeping
40 CFR 63.5920, Subpart WWWW	5.15			
AA-001 AA-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)	5.16	PM/PM ₁₀	Recordkeeping
		5.17		Inspections and Maintenance

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

- (a) Identification of the coating(s), catalyst(s), 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 the coating(s), catalyst(s), 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.
- (c) The density of the coating(s), catalyst(s), or other VOC or HAP containing material.

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

- 5.2 For Emission Point AA-001, the permittee shall maintain monthly records for each resin, gelcoat, and catalyst usage. VOC/HAP emissions from the usages are determined from equations listed in Table 1 of 40 CFR 63, Subpart WWWW or the Unified Emission Factors for Open Molding of Composites Table. A material balance can be utilized for calculating VOC/HAP from catalysts. VOC/HAP emissions are determined on a monthly and 12-month rolling total basis.

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

- 5.3 For Emission Point AA-001, emissions factors are used in 40 CFR 63, Subpart WWWW to determine compliance with certain organic HAP emissions limits in Condition 3.8 (Table 3 of Subpart WWWW). The permittee may use the equations in Table 1 of Subpart WWWW to calculate the emissions factors. Equations are available for each open molding operation and have units of pounds of organic HAP emitted per ton (lb/ton) of resin or gel coat applied. These equations are intended to provide a method to demonstrate compliance without the need to conduct a HAP emissions test. In lieu of these equations, the permittee can elect to use site-specific organic HAP emissions factors to demonstrate compliance provided the site-specific organic HAP emissions factors are incorporated in the facility's air emissions permit and are based on actual facility HAP emissions test data. The permittee may also use the organic HAP emissions factors calculated using the equations in Table 1, combined with resin and gel coat use data, to calculate the organic HAP emissions.

(Ref.: 40 CFR 63.5796, Subpart WWWW)

- 5.4 For Emission Point AA-001, in order to determine the organic HAP content of resins and gel coats, the permittee may rely on information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), using the procedures specified in 40 CFR 63.5797(a) through (c), as applicable.

(Ref.: 40 CFR 63.5797, Subpart WWWW)

5.5 For Emission Point AA-001, the permittee shall use the method in 40 CFR 63.5810(a) to meet the standards for open molding operations in Table 3 of Subpart WWWW. The permittee may use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to non-atomized 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 listed in Table 3 of Subpart WWWW. The necessary calculations shall be completed within 30 days after the end of each month.

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

5.6 For Emission Point AA-001, the permittee shall comply with the following:

- (a) The permittee shall be in compliance at all times with the work practice standards in Table 4 of Subpart WWWW, as well as the organic HAP emissions limits in Table 3 of Subpart WWWW.
- (b) The permittee shall always operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in 40 CFR 63.6(e)(1)(i), Subpart A.

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

5.7 For Emission Point AA-001, the permittee shall conduct performance tests, performance evaluations, design evaluations, capture efficiency testing, and other initial compliance demonstrations upon startup, with the following exception: 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.

(Ref.: 40 CFR 63.5840, Subpart WWWW)

5.8 For Emission Point AA-001, the permittee shall demonstrate initial compliance with the organic HAP emissions standard in 40 CFR 63.5805(c) by using the procedures shown in Tables 8 and 9 of Subpart WWWW.

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

5.9 For Emission Point AA-001, to demonstrate initial compliance, the permittee shall demonstrate the following:

- (a) permittee has met the appropriate organic HAP emissions limits for these operations 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
- (b) permittee has demonstrated that any individual resins or gel coats not included in (a) above, as applied, meet their applicable emission limits, or

- (c) the permittee has demonstrated using the appropriate values in Table 7 of Subpart WWWW to this subpart that the weighted average of all resins and gel coats for each resin type and application method meet the appropriate organic HAP contents.

(Ref.: Table 8(1), Subpart WWWW)

5.10 For Emission Point AA-001, the permittee shall demonstrate initial compliance with the work practice standards by complying with the following:

- (a) New cleaning operation -- The permittee shall submit 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.
- (b) New HAP-containing materials storage operation -- The permittee shall submit 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.

(Ref.: Table 9(2) and (3), Subpart WWWW)

5.11 For Emission Point AA-001, the permittee shall comply with the following to demonstrate continuous compliance:

- (a) The permittee shall collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used. Resin use records may be based on purchase records if the permittee 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.
- (b) 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 the facility has initially demonstrated 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 the facility changes the application method or controls, then the permittee again shall 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 Table 3 of Subpart WWWW, 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(c) and (d), Subpart WWWW)

5.12 For Emission Point AA-001, the permittee shall demonstrate continuous compliance with the standard in 40 CFR 63.5805(c) according to the methods specified below:

- (a) 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 Condition 3.8 (Table 3 of Subpart WWWW), 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).
- (b) Compliance with the work practice standards in Table 4 of Subpart WWWW is demonstrated by performing the work practice required for the operation.

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

5.13 For Emission Point AA-001, during periods of startup, shutdown or malfunction, the permittee shall meet the organic HAP emissions limits and work practice standards that apply.

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

5.14 For Emission Point AA-001, the permittee shall comply with the following:

- (a) Keep the following records:
 - (1) A copy of each notification and report that was submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv).
 - (2) The records in 40 CFR 63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.
 - (3) Records of performance tests, design, and performance evaluations as required in 40 CFR 63.10(b)(2).
- (b) Keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents.

- (c) Keep a certified statement that you are in compliance with the work practice requirements in Table 4 of Subpart WWWW.

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

5.15 For Emission Point AA-001, the permittee shall comply with the following:

- (a) 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).
- (b) As specified in 40 CFR 63.10(b)(1), the permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
- (c) Keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. You can keep the records offsite for the remaining 3 years.
- (d) 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)

5.16 For Emission Points AA-001 and AA-002, the permittee shall maintain sufficient records to document the emission units are vented to fabric filters or dust collectors, as applicable, when operating. These records shall be maintained in log form and kept onsite for a period of at least five (5) years.

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

5.17 For Emission Point AA-001 and AA-002, the permittee shall perform regular inspections and maintenance as needed each week or more often if necessary to maintain proper operation of all fabric filters and dust collectors for achieving the desired PM control efficiency. Records of this maintenance shall be kept in log form onsite for a period of at least five (5) years.

The permittee shall maintain on hand at all times sufficient equipment as is necessary to repair, replace, and/or overhaul the pollution control equipment.

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

**SECTION 6
REPORTING REQUIREMENTS**

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)	6.1	Usage Reporting
AA-001	40 CFR 63.5900(b), Subpart WWWW	6.2	Deviations
	40 CFR 63.5905, Subpart WWWW	6.3	Notifications in Table 13
	40 CFR 63.5910(a), (b), (c), (d), (h), and (i), Subpart WWWW	6.4	Reporting
AA-001 AA-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)	6.5	Semi-annual Reporting

- 6.1 For the entire facility, the permittee shall submit semi-annual reports providing:
- (a) Identification of the coating(s), catalyst(s), or other VOC or HAP containing material used.
 - (b) The VOC and HAP content(s) of coating(s), catalyst(s), or other VOC or HAP containing material used.
 - (c) The total gallons of the coating(s) or other VOC or HAP containing material used in any consecutive 12-month period.
 - (d) The total VOC emission rate, the emission rate of each individual HAP and the total HAP emission rate in tons/year for each consecutive 12-month period.

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

- 6.2 For Emission Point AA-001, the permittee shall report each deviation from the standard in 40 CFR 63.5805(c). The deviations must be reported according to the requirements in 40 CFR 63.5910.

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

- 6.3 For Emission Point AA-001, the permittee shall comply with the following:
- (a) Submit all the notifications in Table 13 of Subpart WWWW that apply by the dates specified in Table 13. The notifications are described more fully in 40 CFR part 63, subpart A, referenced in Table 13 of Subpart WWWW.

- (b) If the permittee changes 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)

6.4 For Emission Point AA-001, the permittee shall comply with the following reporting requirements:

- (a) Submit each report in Table 14 of Subpart WWWW that applies.
- (b) Submit each report by the date specified in Table 14 of Subpart WWWW and according to following paragraphs:
 - (1) The first compliance report shall cover the period beginning on the compliance date that is specified for your affected source in 40 CFR 63.5800 (Upon Startup) and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date.
 - (2) The first compliance report shall be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date.
 - (3) Each subsequent compliance report shall cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
 - (4) Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
- (c) The compliance report shall contain the information in 40 CFR 63.5910(c)(1) through (6).
- (d) 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 or work practice standards, the compliance report shall 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.
- (e) Submit compliance reports and startup, shutdown, and malfunction reports based on the requirements in table 14 of Subpart WWWW, and not based on the requirements in 40 CFR 63.999.

- (f) Where multiple compliance options are available, the permittee shall state in the next compliance report if there was a change in compliance options since the last compliance report.

(Ref.: 40 CFR 63.5910(a), (b), (c), (d), (h), and (i), Subpart WWWW)

- 6.5 For Emission Points AA-001 and AA-002, the permittee shall submit semi-annual reports, due on July 31 and January 31 for the proceeding six-month period, containing the required documentation in Conditions 5.16 and 5.17. This report shall also contain the VOC and HAP emission rates for each reporting period.

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