STATE OF MISSISSIPPI AND FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL

PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT AT A SYNTHETIC MINOR SOURCE

THIS CERTIFIES THAT

Caterpillar Remanufactured Components Group
100 Caterpillar Drive
Booneville, Mississippi
Prentiss County

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with the Federal Clean Air Act and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), the regulations and standards adopted and promulgated thereunder, and the State Implementation Plan for operating permits for synthetic minor sources.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

QUALITY
2240 00040
: 2340-00048

Page 2 of 18 Permit No.: 2340-00048

Section 1.

A. GENERAL CONDITIONS

- 1. This permit is for air pollution control purposes only. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
- 2. This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.4.D. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.4.D.)
- 3. Any activities not identified in the application are not authorized by this permit. (Ref.: Miss. Code Ann. 49-17-29 1.b)
- 4. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
- 5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
- 6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)
- 7. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)
- 8. The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:
 - a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and
 - b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission.

Page 3 of 18

Permit No.: 2340-00048

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

- 9. Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control. (Ref.: Miss. Code Ann. 49-17-39)
- 10. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
- 11. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(7).)
- 12. This permit does not authorize a modification as defined in Regulation 11 Miss. Admin. Code Pt. 2, Ch.2., "Permit Regulations for the Construction and/or Operation of Air Emission Equipment." A modification may require a Permit to Construct and a modification of this permit. Modification is defined as "Any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:
 - a. Routine maintenance, repair, and replacement;
 - b. Use of an alternative fuel or raw material by reason of an order under Sections 2(a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
 - c. Use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act:
 - d. Use of an alternative fuel or raw material by a stationary source which:
 - (1) The source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or

Page 4 of 18 Permit No.: 2340-00048

- (2) 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.

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

B. GENERAL OPERATIONAL CONDITIONS

- 1. Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in Regulation, 11 Miss. Admin. Code Pt. 2, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.10.)
- 2. Any diversion from or bypass of collection and control facilities is prohibited, except as provided for in 11 Miss. Admin. Code Pt. 2, R. 1.10., "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants." (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)
- 3. Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits. (Ref.: Miss. Code Ann. 49-17-29 1.a(i and ii))
- 4. Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.
 - a. Upsets
 - (1) For an upset defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:

Page 5 of 18 Permit No.: 2340-00048

- (i) An upset occurred and that the source can identify the cause(s) of the upset;
- (ii) The source was at the time being properly operated;
- (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
- (iv) That within 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
- (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
- (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
- (3) This provision is in addition to any upset provision contained in any applicable requirement.
- (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third-party enforcement actions.
- b. Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.)
 - (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
 - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).

Page 6 of 18 Permit No.: 2340-00048

(3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

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

- 5. Compliance Testing: Regarding compliance testing:
 - a. The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.
 - b. Compliance testing will be performed at the expense of the permittee.
 - c. Each emission sampling and analysis report shall include but not be limited to the following:
 - (1) Detailed description of testing procedures;
 - (2) Sample calculation(s);
 - (3) Results; and
 - (4) Comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B(3), (4), and (6).)

C. PERMIT RENEWAL / MODIFICATION / TRANSFER / TERMINATION

- 1. For renewal of this permit, the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board. If the applicant submits a timely and complete application pursuant to this paragraph and the Permit Board, through no fault of the applicant, fails to act on the application on or before the expiration date of the existing permit, the applicant shall continue to operate the stationary source under the terms and conditions of the expired permit, which shall remain in effect until final action on the application is taken by the Permit Board. Permit expiration terminates the source's ability to operate unless a timely and complete renewal application has been submitted. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.8.)
- 2. The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee

Page 7 of 18 Permit No.: 2340-00048

- may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).)
- 3. The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).)
- 4. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:
 - a. Persistent violation of any terms or conditions of this permit.
 - b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
 - c. A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

5. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B.)

Page 8 of 18 Permit No.: 2340-00048

SECTION 2 EMISSION POINT DESCRIPTION

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

Emission Point	Description					
AA-100	Facility-wide Surface Coating Operations including, but not limited to spray applications (arc wire; robotic weld; flame; rust preventative, part dunker tanks.					
AB-100	Facility-wide Metal Working Operations, including, but not limited to blasting (ceramic bead; metal shot; slurry); grinding; polishing; detailing; welding; machining; equipped with controls.					
AC-101	Rod Final Wash including, but not limited to one (1) 490-gallon tank; one (1) 420-gallon tank.					
AC-102	Rod Rough Wash including, but not limited to one (1) 625-gallon tank; two (2) 325-gallon tanks.					
AC-103	New Parts Dunker - Groups 1 & 2 including, but not limited to four (4) 500-gallon tanks.					
AC-104	Water/Oil Pump Final Wash including, but not limited to one (1) 560-gallon tank; one (1) 1400-gallon tank.					
AC-105	Fuel System Final Wash including, but not limited to one (1) 305-gallon tank; four (4) 220-gallon tanks.					
AC-106	Fuel System Rough Wash including, but not limited to five (5) 330-gallon tanks.					
AC-107	Five (5) Stage Oil Cooler Cleaning including, but not limited to two (2) 350-gallon tanks; two (2) 200-gallon tanks.					
AC-108	Cam Shaft Tarp Wash including, but not limited to one (1) 350-gallon tank.					
AC-109	Typhoon Fuel System Wash including, but not limited to one (1) 130-gallon tank.					
AC-110	Rod Belt Wash including, but not limited to one (1) 200-gallon tank.					
AC-111	Rocker Arm Wash including, but not limited to one (1) 190-gallon tank; one (1) 175-gallon tank; and three (3) stage washers consisting of three (3) 300-gallon tanks.					
AC-112	Aluminum Parts Wash including, but not limited to one (1) 1252-gallon tank.					
AC-113	Pin Wash including, but not limited to one (1) 300-gallon tank.					
AC-114	Piston Wash including, but not limited to one (1) 275-gallon tank; three (3) stage washer consisting of one (1) 400-gallon tank and two (2) 275-gallon tanks.					
AC-115	Flywheel Operation					
AC-116	Crown Rough Wash including, but not limited to one (1) 190-gallon tank; one (1) 175-gallon tank.					
AC-117	Crown Final Wash including, but not limited to one (1) 175-gallon tank.					

Emission Point	Description			
AC-118	Red Parts Washers			
AD-101	One (1) 0.8 MMBTU/hr Natural Gas-fired Burner			
AD-102	Two (2) 0.2 MMBTU/hr Natural Gas-fired Burners			
AD-103	Two (2) 1.5 MMBTU/hr Natural Gas-fired Burners			
AD-104	One (1) 3.0 MMBTU/hr Natural Gas-fired Burner			
AD-105	Two (2) 1.0 MMBTU/hr Natural Gas-fired Burners			
AD-106	Natural Gas-fired Rooftop Air Makeup and Conditioning Units including, but not limited to a total capacity of 5.703 MMBTU/hr.			
AD-107	One (1) 0.92 MMBTU/hr (361 HP) Diesel-fired Backup Generator			
AD-108	Two (2) 0.25 MMBTU/hr Natural Gas-fired Ovens			
AD-109	One (1) 0.7 MMBTU/hr Natural Gas-fired Burner			
AE-100	Facility-wide Miscellaneous Operations including, but not limited to fuel system assembly and testing; battery charge; induction heat cam shaft gears; disassembly; assembly and packaging; oil and chemical use (miscellaneous; maintenance; machining); component flush station.			

Page 10 of 18 Permit No.: 2340-00048

SECTION 3 EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limitation/Standard
Facility- wide	EPA Test Method 9, 40 CFR 60, Appendix A. 11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.1	Opacity	Opacity Limitations
Facility- wide	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.2	PM	Emissions Limitations for Ash and PM from fossil fuel burning
Facility- wide	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.3	Total PM	PM Emissions Limitations Manufacturing Processes.
Facility- wide	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.4	SO_2	SO ₂ Discharge Limitations for fuel burning .
Facility- wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.5	VOC	Annual VOC Emissions Limitations
Facility- wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.6	Individual HAP/Total HAP's	Annual HAP Emissions Limitations
Facility- wide	11 Miss. Admin. Code Pt.2, R. 2.2.B(10)	3.7	PM/PM ₁₀ /PM _{2.5}	Annual PM/PM ₁₀ /PM _{2.5}
Facility- wide	40 CFR 63.6585(c) and 63.6590(a)(1)(iii)	3.8	HAP's	The permittee is subject to and shall comply with 40 CFR Part 63, Subpart ZZZZ

- 3.1 For the entire facility, 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 to obscure an observer's view to a degree in excess of 40%, as determined by EPA Test Method 9, 40CFR 60, Appendix A. [11 Miss. Admin Code Pt. 2, R. 1.3. B]
- 3.2 For the entire facility, the maximum possible emission of ash and/or particulate matter from the 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 [11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).].
- 3.3 For the entire facility, the permittee shall not 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 $E = (4.1)*(p^{0.67})$, 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. Additionally, $E = (4.1)*(p^{0.67})$ should not exceed 89.0 TPY, as determined for each consecutive 12-month period [11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).].

- 3.4 For the entire facility, 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 (4.8 lbs/MMBTU) [11 Miss. Admin. Code Pt. 2, R. 1.4.A(1)].
- 3.5 For the entire facility, the permittee shall limit volatile organic compound (VOC) emissions to no more than 89.0 tons per year as determined for each consecutive 12-month period [11 Miss. Admin. Code Pt2, R. 2.2. B(10).].
- 3.6 For the entire facility, the permittee shall limit hazardous air pollutant (HAP) emissions to no more than 9.60 tons per year of any single HAP and no more than 22.60 tons per year of total combined HAP's as determined for each consecutive 12-month period [11 Miss. Admin. Code Pt2, R. 2.2. B(10).].
- 3.7 For the entire facility, the permittee shall limit total particulate matter (PM/PM₁₀/PM_{2.5}) emissions to no more than 89.0 tons per year as determined for each consecutive 12-month period [11 Miss. Admin. Code Pt2, R. 2.2. B(10).].
- 3.8 For the entire facility, the permittee is subject to and shall comply with 40 CFR Part 63, Subpart ZZZZ National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (RICE) in accordance with 63.6585(c) and 63.6590(a)(1)(iii). [40CFR 63.6585(c) and 63.6590(a)(1)(iii).]

Page 12 of 18 Permit No.: 2340-00048

SECTION 4 WORK PRACTICES

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Work Practice
AD-107	40CFR 63.6603(a) and Table 2d National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)	4.1	HAP's	Inspection and Maintenance

- 4.1 For Emission Point AD-107, the permittee shall comply with the following requirements:
 - (a) change oil and filter every 500 hours of operation or annually, whichever comes first;
 - (b) inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and.
 - (c) inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary

(Ref.: 40CFR 63.6603(a) and Table 2d National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE))

Page 13 of 18 Permit No.: 2340-00048

SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Monitoring/Recordkeeping Requirement
Facility- Wide	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1		Maintain records for a minimum of 5 years.
Facility- wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2	VOC HAP	Monitoring for each and all coatings, adhesives and solvents
Facility- wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	5.3	PM/PM10/PM2.5	Monitoring for PM/PM10/PM2.5
Facility- wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	5.4	VOC/HAP	Maintain records for any and all coatings, adhesives, solvents, VOC and HAP containing materials
Facility- wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	5.5	PM/PM10/PM2.5	Maintain PM/PM10/PM2.5 records for usage on a monthly basis and in any consecutive 12-month period
AD-107	40 CFR 63.6625(e), (f), (h) and (i)	5.6		Monitoring maintenance for emissions
	40 CFR 63.6605, 40 CFR 63.6640(a), (b), (e) and (f)	5.7		Monitoring continuous compliance requirements
	40 CFR 63.10(b)(2)(xiv); 63.10(b)(2)(viii); 63.6605(b); 40 CFR 63.6605 and 63.6640; 40 CFR 63.6655(a), (d), (e) and (f)	5.8		Maintain records for stationary RICE generators
	40 CFR 63.10(b)(1); [40 CFR 63.6660]	5.9		Maintain records for a minimum of 5 years

5.1 The permittee shall retain all required records, monitoring data, supporting information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to MDEQ as required by Applicable Rules and Regulations or this permit upon request. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.9.)

Page 14 of 18 Permit No.: 2340-00048

- 5.2 For the entire facility, the permittee shall determine and maintain sufficient records of the following for each coating, adhesive, solvent, or other VOC or HAP containing material used:
 - (a) identification of each coating, adhesive, solvent or other VOC or HAP containing material used:
 - (b) quantity used (gal);
 - (c) the percentage of VOC by weight;
 - (d) the percentage of HAP by weight;
 - (e) the density (lb/gal); and
 - (f) the total VOC emissions rate, the emissions rate of each individual HAP and the total HAP emissions rate in tons per year based on a consecutive 12-month period.

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

- 5.3 For the entire facility, the permittee shall determine and maintain sufficient records of the following:
 - (a) the quantity of PM/PM10/PM2.5 producing materials which may include, but is not limited to, abrasive blasting medium, welding wire, electrodes consumed/used, etc. used on a monthly basis and in any consecutive 12-month period.
 - (b) the total particulate emissions in tons per year for any consecutive 12-month period.

The permittee may utilize data supplied by the manufacturer, or analysis of PM/PM10/PM2.5 emissions by EPA Test Methods 1-5, 40 CFR 60 Appendix A, and/or an alternate EPA approved test method(s). 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).

- 5.6 For Emission Point AD-107, the permittee shall comply with the following monitoring requirements:
 - (a) operate and maintain according to the manufacturer's emission-related written instructions or develop a maintenance plan which shall provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions;
 - (b) install a non-resettable hour meter;
 - (c) minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not

to exceed 30 minutes, after which time the non-startup emission limitations apply; and

- (d) the permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement.
 - 1) The oil analysis shall be performed at the same frequency specified for changing the oil.
 - 2) The analysis program shall at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows:
 - a) Total Base Number is less than 30 percent of the Total Base Number of the oil when new;
 - b) viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or
 - c) percent water content (by volume) is greater than 0.5.

If all of these condemning limits are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the permittee shall change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee shall change the oil within 2 days or before commencing operation, whichever is later. The permittee shall keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR 63.6625(e), (f), (h) and (i)]

- 5.7 For Emission Point AD-107, the permittee shall comply with the following continuous compliance requirements:
 - (a) work or management practices by operating and maintaining according to the manufacturer's emission-related operation and maintenance instructions or by developing and following a maintenance plan which shall provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions;
 - (b) report each instance in which an emission or operating limitation (that applies) was not met according to 40 CFR 63.6650;
 - (c) report each instance in which a general provisions requirement (that applies) was not met:
 - (d) operate in accordance with the following:

Page 16 of 18 Permit No.: 2340-00048

- (1) there is no time limit on the use of emergency stationary RICE in emergency situations.
- (2) for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. The permittee may petition for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year. [40 CFR 63.6605, 40 CFR 63.6640(a), (b), (e) and (f)]
- 5.8 For Emission Point AD-107, the permittee shall comply with the following recordkeeping requirements:
 - (a) a copy of each notification and report submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status submitted, according to the requirement in 63.10(b)(2)(xiv);
 - (b) records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment;
 - (c) records of performance tests and performance evaluations as required in 63.10(b)(2)(viii);
 - (d) records of all required maintenance performed on the air pollution control and monitoring equipment; and
 - (e) records of actions taken during periods of malfunction to minimize emissions in accordance with 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation;
 - (f) keep the records required in Table 6 of this subpart (as stated in 40 CFR 63.6605 and 63.6640) to show continuous compliance with each emission or operating limitation that applies;
 - (g) keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to the maintenance plan; and
 - (h) keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee shall document how many hours are spent for emergency operation (including what classified the operation as emergency). [40 CFR 63.6655(a), (d), (e) and (f)
- 5.9 For Emission Point AD-107, the permittee shall comply with the following recordkeeping requirements:
 - (a) records shall be in a form suitable and readily available for expeditious review according to 63.10(b)(1);

Page 17 of 18 Permit No.: 2340-00048

- (b) as specified in 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; and
- (c) keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 63.10(b)(1). [40 CFR 63.6660]

SECTION 6 REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
Facility- Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	Report permit deviations within five (5) working days.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.2	Submit certified annual monitoring report.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.3	All documents submitted to MDEQ shall be certified by a Responsible Official.
	Miss. Admin. Code Pt. 2, R. 2.2.B(11)	6.4	Submit annual report for each coating, adhesive, solvent, or other VOC or HAP containing material
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.5	Submit annual report for PM/PM10/PM2.5

- 6.1 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 6.2 Except as otherwise specified herein, the permittee shall submit a certified annual synthetic minor monitoring report postmarked no later than 31st of January for the preceding calendar year. This report shall address any required monitoring specified in the permit. All instances of deviations from permit requirements must be clearly identified in the report. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

Page 18 of 18 Permit No.: 2340-00048

- 6.3 Any document required by this permit to be submitted to the MDEQ shall contain a certification signed by a responsible official stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 6.4 For 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. [11Miss. Admin. Code Pt. 2, R. 2.2.B(11).]
- 6.5 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 quantity of PM/PM10/PM2.5 producing materials which may include, but is not limited to, abrasive blasting medium, welding wire, electrodes, etc. consumed/used: and
 - (c) the total particulate emission rate in tons per year based on a consecutive 12-month period. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).]
- 6.6 For Emission Point AD-107, the permittee shall comply with the reporting requirement: if an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required by Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, State or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State or local law has abated. The permittee shall report any failure to perform the management practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable (40CFR 63_Subpart ZZZZ., Table 2d (Footnote2)