State of Mississippi

FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL PERMIT

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

THIS CERTIFIES

Howard Industries, Ellisville Manufacturing Facility
1520 Highway 11 North
Ellisville, MS
Jones 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. set., 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

Mississippi Department of Environmental Quality

Issued/Modified: JUN 0 6 2014

Expires: MAY 3 1 2019

Permit No. 1360-00133

Agency Interest # 17987

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Other Relevant Documents:

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Howard Industries, Ellisville Manufacturing Facility
Subject Item Inventory
Permit Number:1360-00133
Activity ID No.: PER20130002

Subject Item Inventory:

ID	Designation	Description
AI17987	Facility-Wide	Manufacturer of Transformer Substations
AREA1	AA-004	Metal Working Operations (Including but not limited to: cutting, welding, sanding, and shotblasting.
AREA5	AA-100	Surface Coating Operations (Including but not limited to: Tank Shop Small Paint Booth; Tank Shop Large Paint Booth; Final Assembly Small Paint Booth; Final Assembly Topcoat Booth; Resin Dip Tank; Dry Paint Booth)
AREA6	AA-200	Fuel Burning Equipment (Including but not limited to: One (1) 0.70 MMBTU/hr natural gas fired Burn- Off Oven; One (1) 1.60 MMBTU/hr natural gas fired Process Oven; One (1) 1.89 MMBTU/hr natural gas fired Coil SizingOven; One (1) 2.50 MMBTU/hr natural gas fired Process Oven)

Receiving Stream Relationships:

Subject Item	Relationship	Receiving Stream
AI 17987 Manufacturer of Transformer Substations	Discharges Into	Ellisville POTW MS0025178

KEY

ACT = Activity
AI = Agency Interest
AREA = Area
CAFO = Concentrated Animal Feeding Operation
CONT = Control Device
EQPT = Equipment
IA = Insignificant Activity
IMPD = Impoundment
MAFO = Animal Feeding Operation
PCS = PCS
RPNT = Release Point
TRMT = Treatment

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Howard Industries, Ellisville Manufacturing Facility

Subject Item Inventory

Permit Number:1360-00133

Activity ID No.: PER20130002

KEY

WDPT = Withdrawal Point

AI0000017987 (Facility-Wide) Manufacturer of Transformer Substations:

Limitation Requirements:

Condition No.	Parameter	Condition
L-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, 40 CFR 60, Appendix A. [11 Miss. Admin. Code Pt. 2, Ch. 1. 3.A(1)]
L-2		For the entire facility, 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. [11 Miss. Admin. Code Pt. 2, Ch. 1. 3.D(1)(a)]
L-3		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. [11 Miss. Admin. Code Pt. 2, Ch. 1. 4.A(1)]
L-4		For the entire facility, the permitte 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.). [11 Miss. Admin. Code Pt. 2, Ch. 1. 3.F(1)]
L-5		Facility-Wide Emission Limitations The permittee shall limit volatile organic compound (VOC) emissions to no more than 99.0 tons/year (TPY) as determined for each consecutive 12-month period. [11 Miss. Admin. Code Pt. 2, R.2.2.B(10).]
L-6		Facility-Wide Emission Limitations The permittee shall limit hazardous air pollutant (HAP) emissions to no more than 9.90 tons/year (TPY) of any single HAP and no more than 24.90 TPY of total combined HAPs as determined for each consecutive 12-month period. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).]

AI0000017987 (continued):

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		The permittee shall perform regular maintenance on the control equipment according to the manufacturer design and recommendations. This maintenance shall be kept in log form and made available to MDEQ during inspections. [11 Miss. Admin. Code Pt. 2, Ch. 2. 2.B(11)]
M-2		Monitoring Requirements For the entire facility, the permittee shall determine for each coating, adhesive, solvent or other VOC or HAP containing material used: (a) The quantity used (gallons); (b) The percentage of VOCs by weight; (c) The percentage of each individual HAP and total HAP by weight; (d) The density (lbs/gal); The permittee may utilize data supplied by the manufacturer, or analysis of VOC and HAP content by EPA Test Method 24, 40 CFR 60, Appendix A and/or EPA Test Method 311, 40 CFR 63, Appendix A, and/or an alternate EPA approved test method. [11 Miss. Admin. Code Pt. 2, R.2.2.B(11).]

Record-Keeping Requirements:

Condition No.	Condition
R-1	Recordkeeping Requirements 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 and the total gallons of each coating, adhesive, solvent or other VOC or HAP containing material used on a monthly basis and in each 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; (c) The density of each coating, adhesive, solvent or other VOC or HAP containing material used; (d) The total VOC emission rate, the emission rate of each individual HAP, and the total HAP emission rate in tons/yr for each consecutive 12-month period. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).]

AI0000017987 (continued):

Record-Keeping Requirements:

Condition No.	Condition
R-2	Recordkeeping Requirements The permittee shall maintain copies of all records and reports on site for at least five (5) years and shall make them available upon request by Mississippi Department of Environmental Quality (MDEQ) personnel. [11 Miss. Admin. Code Pt. 2, R.2.2.B(10).]

Submittal/Action Requirements:

Condition No.	Condition
S-1	General Condition: 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).]
S-2	Except as otherwise specified herein, the permittee shall Submit a certified annual synthetic minor monitoring report: Due annually, by the 31st of January for preceding calendar year. This report shall address any required monitoring specified in the permit. [11 Miss. Admin.Code Pt. 2, R.2.2.B(11).]
S-3	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 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 each 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 per month and TPY for each consecutive 12-month period. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).]

AI0000017987 (continued):

Narrative Requirements:

Condition No.	Condition
T-1	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49-17-29 1.b]
T-2	General Condition: The permittee shall at all times maintain in good working order and operate as efficiently as possible all air pollution control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit. [11 Miss. Admin. Code Pt. 2, R. 2.5.A.]
T-3	General Condition: 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. [Miss. Code Ann. 49-17-29 1.a(i and ii)]
T-4	General Condition: 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", [11 Miss. Admin.Code Pt. 2, R.1.10.]
T-5	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.10.]
T-6	General Condition: 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. [Miss. Code Ann. 49-17-21]
T-7	General Condition: 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) 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 any condition that required either a temporary or permanent reduction or elimination of authorized air emissions. [11 Miss. Admin.Code Pt. 2, R. 2.2.C.]

AI0000017987 (continued):

Narrative Requirements:

Condition No.	Condition
T-8	General Condition: This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for this 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 condition of the permit. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(b).]
T-9	General Condition: 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]
T-10	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(15)(c).]
T-11	General Condition: 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).]
T-12	General Condition: 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.]
T-13	General Condition: This permit is for air pollution control purposes only. [11 Miss. Admin.Code Pt. 2, R. 2.1.D(1).]
T-14	General Condition: 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 [11 Miss. Admin.Code Pt. 2, R. 2.4.D.]
T-15	General Condition: 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).]

AI0000017987 (continued):

Narrative Requirements:

Condition No.	Condition
T-16	General Condition: 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).]
T-17	General Condition: This permit does not authorize a modification as defined in 11 Miss. Admin. Code Pt. 2, Ch. 2 "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment". Modification is defined as "Any physical change in or change in the method of operation of a facility which increases actual emissions or 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: (i) 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 (ii) the source is approved to use under any permit issued under 40 CFR 52.51 or under regulations approved pursuant to 40 CFR 51.166; (e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.51, or under regulations approved pursuant to 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).]
T-18	General Condition: 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).]
T-19	General Condition: 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.]

AI0000017987 (continued):

Narrative Requirements:

Condition No.	Condition
T-20	General Condition: 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).]
T-21	General Condition: Emergencies (a) Except as otherwise specified herein, an emergency means any situation arising from sudden and reasonably unforseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error. (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met. (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence as follows: (i) an emergency occurred and that the permittee can identify the cause(s) of the emergency; (ii) the permitted facility was at the time being properly operated; (iii) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and (iv) the permittee submitted notice of the emergency to MDEQ within two (2) working days of the time when emission limitations were exceeded due to the emergency which contained a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of any emergency has the burden of proof. (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein [11 Miss. Admin.Code Pt. 2, R.2.2.B(10).]
T-22	General Condition: Upsets (a) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows: (i) an upset occurred and that the permittee can identify the cause(s) of the upset; (ii) the source was at the time being properly operated; (iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (iv) the permittee submitted notice of the upset to the DEQ within five (5) working days of the time the upset began which contained a description of the upset, any steps taken to mitigate emissions, and corrective actions taken. (b) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof. (c) This provision is in addition to any upset provision contained in any applicable requirement. [11 Miss. Admin.Code Pt. 2, R.1.10.]

AI0000017987 (continued):

Narrative Requirements:

Condition No.	Condition
T-23	General Condition: Startups and Shutdowns (a) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows: (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above; (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit. (b) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof. (c) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply. [11 Miss. Admin.Code Pt. 2, R.1.10.]
T-24	General Condition: Maintenance (a) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following: (i) the permittee can identify the need for the maintenance; (ii) the source was at the time being properly operated; (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (iv) the permittee submitted notice of the maintenance to MDEQ within five (5) working days of the time the maintenance began or such other times as allowed by MDEQ, which contained a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken. (b) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof. (c) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. [11 Miss. Admin.Code Pt. 2, R.1.10.]
T-25	General Condition: 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.]

GENERAL INFORMATION

Howard Industries, Ellisville Manufacturing Facility
1520 Highway 11 North
Ellisville, MS
Jones County

Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
17987	Howard Industries, Ellisville Manufacturing Facility	Official Site Name	5/15/2003	
MSR102592	Howard Industries, Ellisville Manufacturing Facility	GP-Construction	8/20/2003	3/27/2005
MSP092017	Howard Industries, Ellisville Manufacturing Facility	Water - Pretreatment	10/1/2003	9/30/2008
136000133	Howard Industries, Ellisville Manufacturing Facility	Air-Construction	10/1/2003	
136000133	Howard Industries, Ellisville Manufacturing Facility	Air-Synthetic Minor Operating	10/1/2003	9/30/2008
2806700133	Howard Industries, Ellisville Mfg Facil	Air-AIRS AFS	10/1/2003	
20396	Howard Industries, Computer Facility	Official Site Name	2/17/2005	2/17/2005
MSR103517	Howard Industries	GP-Construction	3/7/2005	3/27/2005
24087	Howard Industries Substation Division	Official Site Name	2/22/2006	2/22/2006
MSR000102962	Howard Industries - Substation Division	Hazardous Waste-EPA ID	2/22/2006	
MSP092017	Howard Industries, Ellisville Manufacturing Facility	Water - Pretreatment	4/10/2009	3/31/2014
MSR001766	Howard Industries, Ellisville Manufacturing Facility	GP-Baseline	4/16/2009	12/6/2010
136000133	Howard Industries, Ellisville Manufacturing Facility	Air-Synthetic Minor Operating	5/26/2009	4/30/2014
17987	Howard Industries, Ellisville Manufacturing Facility	No Exposure Certification	6/23/2009	6/24/2009
MSR001766	Howard Industries, Ellisville Manufacturing Facility	GP-Baseline	12/6/2010	9/28/2015
MSP092017	Howard Industries, Ellisville Manufacturing Facility	Water - Pretreatment	4/7/2014	3/31/2019
136000133	Howard Industries, Ellisville Manufacturing Facility	Air-Synthetic Minor Operating	6/6/2014	5/31/2019

Basin: Pascagoula River Basin

GENERAL INFORMATION

Location Description: PG- Plant Entrance (General). Data collected by J. Dewayne Headrick on 10/25/2005. South of Ellisville on Highway 11.