

**STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
TITLE V PERMIT**

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Metal Coaters
951 Prisock Road
Jackson, Mississippi
(Hinds County)

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

Permit Issued: July 9, 2015

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: June 30, 2020

Permit No.: 1080-00068

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APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT

**APPENDIX B 40 CFR PART 60, SUBPART TT – NEW SOURCE PERFORMANCE
STANDARDS FOR METAL COIL SURFACE COATING**

**APPENDIX C 40 CFR PART 63, SUBPART SSSS – NATIONAL EMISSION
STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR METAL
COIL SURFACE COATING**

SECTION 1. GENERAL CONDITIONS

- 1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(a).)
- 1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(b).)
- 1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(c).)
- 1.4
 - (a) This permit shall be reopened and revised under any of the following circumstances:
 - (1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of 3 or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.
 - (2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
 - (3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.
 - (4) The Administrator or the Permit Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
 - (b) Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.
 - (c) Reopenings shall not be initiated before a notice of such intent is provided to the Title V source by the DEQ at least 30 days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case

of an emergency.

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

- 1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(e).)
- 1.6 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(d).)
- 1.7 The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(5).)
- 1.8 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.)
 - (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).)
 - (b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted

allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D(2).)

- (c) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.)

If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.C.)

- 1.9 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(8).)
- 1.10 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)
- 1.11 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:
 - (a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

- (d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(2).)
- 1.12 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(1).)
- 1.13 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(2).)
- 1.14 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(1).)
- 1.15 Nothing in this permit shall alter or affect the following:
 - (a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
 - (b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - (c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
 - (d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(2).)
- 1.16 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.H.)
- 1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional

information identified as being needed to process the application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C(2)., R. 6.4.B., and R. 6.2.A(1)(c).)

- 1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:
- (a) the changes are not modifications under any provision of Title I of the Act;
 - (b) the changes do not exceed the emissions allowable under this permit;
 - (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:
 - (1) a brief description of the change(s),
 - (2) the date on which the change will occur,
 - (3) any change in emissions, and
 - (4) any permit term or condition that is no longer applicable as a result of the change;
 - (d) the permit shield shall not apply to any Section 502(b)(10) change. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F(1).)
- 1.19 Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in 11 Miss. Admin. Code Pt. 2, Ch. 3., "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)
- 1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 11 Miss. Admin. Code Pt. 2, Ch. 2., "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations 11 Miss. Admin. Code Pt. 2, Ch. 6., "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

- (a) routine maintenance, repair, and replacement;
 - (b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
 - (c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
 - (d) use of an alternative fuel or raw material by a stationary source which:
 - (1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or
 - (2) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166;
 - (e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or
 - (f) any change in ownership of the stationary source."
- 1.21 Any change in ownership or operational control must be approved by the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.D(4).)
- 1.22 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.B(1).)
- 1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.

- (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.
- (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.
- (c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.G.)

1.24 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies.

- (a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
- (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.
- (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
 - (1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - (2) the permitted facility was at the time being properly operated;
 - (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - (4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.G.)
- 1.25 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, shutdowns and maintenance.
- (a) Upsets (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.KK.)
 - (1) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
 - (i) an upset occurred and that the permittee can identify the cause(s) of the upset;
 - (ii) the source was at the time being properly operated;
 - (iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;
 - (iv) the permittee submitted notice of the upset to the DEQ within 5 working days of the time the upset began; and
 - (v) the notice of the upset shall contain a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.
 - (2) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.
 - (3) This provision is in addition to any upset provision contained in any applicable requirement.
 - (b) Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.HH. & R. 1.2.CC.)
 - (1) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns

except as follows:

- (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above;
 - (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or
 - (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.
- (2) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.
- (3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply.

(c) Maintenance.

- (1) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following:
- (i) the permittee can identify the need for the maintenance;
 - (ii) the source was at the time being properly operated;
 - (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;
 - (iv) the permittee submitted notice of the maintenance to the DEQ within 5 working days of the time the maintenance began or such other times as allowed by DEQ; and

- (v) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.
 - (2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.
 - (3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)
- 1.26 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation 11 Miss Admin. Code Pt. 2, R. 1.8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-001	Surface Coating Operation (Including, but not limited to: cleaning; treating; coating. Equipped with a 46 MMBTU/hr natural gas-fired thermal oxidizer.)
AA-002	10,000 Gallon Virgin Solvent Storage Tank

SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. Facility-Wide Emission Limitations & Standards

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

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

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

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

B. Emission Point Specific Emission Limitations & Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
Entire Facility	11 Miss. Admin. Code Pt. 2, R. 6.3.A(1).	3.B.1	VOC	134.96 lbs/hr and 249.90 tons/yr (TPY)
AA-001	40 CFR Part 60, Subpart TT – NSPS for Metal Coil Surface Coating (specifically 60.460)	3.B.2		Applicability
	40 CFR 60.462(a)(2) and (3); 11 Miss. Admin. Code Pt. 2, R. 6.3.A(1).	3.B.3		0.14 kg VOC/liter of coating solids applied for each calendar month or 10% of the VOCs applied (90% emission reduction) for each calendar month.
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(1).	3.B.4	Temperature	Average three (3) hour temperature at or greater than 1500 °F.
	11 Miss. Admin. Code Pt. 2, R. 1.3.H(1).	3.B.5	PM/PM ₁₀ /PM _{2.5}	0.2 grains/dry ft ³ calculated to 12% CO ₂ by volume.
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.B.6	PM	$E = 0.8808 * I^{-0.1667}$
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.C.2	SO ₂	4.8 lbs/MMBTU
	40 CFR Part 63, Subpart SSSS, NESHAP for Metal Coil Surface Coating (specifically 63.5090)	3.B.7	HAP	Applicability
	40 CFR 63.5120(a)(1) and/or (a)(3), respectively, and (b)	3.B.8		No more than 2% of the Organic HAP applied for each month during each 12-month compliance period (98% Reduction) and/or Outlet Organic HAP Concentration no greater than 20 ppmv (dry basis) and 100% Efficiency of Capture System.
	40 CFR 63.5121(a) and (b)	3.B.9	Operating Limits	Establish Operating Limits

- 3.B.1 For the entire facility, the permittee shall limit volatile organic compound (VOC) emissions to no more than 134.96 lbs/hr and 249.90 tons per year for each consecutive 12-month period. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(1).)
- 3.B.2 For the entire facility, the permittee is subject to and shall comply with 40 CFR Part 60, Subpart TT – New Source Performance Standards for Metal Coil Surface Coating. (Ref.: 40 CFR 60.460)
- 3.B.3 For Emission Point AA-001, the permittee shall limit VOC emissions to no more than 14 kg VOC of coating solids applied for each calendar month, or 10 percent of the VOC's applied for each calendar month (90 percent emission reduction), continuously utilizing the thermal oxidizer operated at the most recently demonstrated overall efficiency. (Ref.: 40 CFR 60.462(a)(2) and (a)(3); 11 Miss. Admin. Code Pt. 2, R. 6.3.A(1).)
- 3.B.4 For Emission Point AA-001, the permittee shall maintain a three hour average temperature in the combustion chamber during operation at or greater than 1500°F. (Ref. 11 Miss. Admin. Code Pt. 2, R. 6.3.A(1).)
- 3.B.5 For Emission Point AA-001, the permittee shall limit total particulate matter emissions to no more than 0.2 grains per standard dry cubic foot of flue gas calculated to (12%) carbon dioxide by volume for products of combustion. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.H(1).)
- 3.B.6 The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations equal to or greater than 10 million BTU per hour heat input but less than 10,000 million BTU per hour heat input shall not exceed an emission rate determined by the equation $E = 0.8808 * I^{-0.1667}$, where E is the emission rate in pounds per million BTU per hour input and I is the heat input in millions of BTU per hour. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).)
- 3.B.7 For Emission Point AA-001, the permittee is subject to and shall comply with 40 CFR Part 63, Subpart SSSS, National Emission Standards for Hazardous Air Pollutants for Metal Coil Surface Coating. (Ref.: 40 CFR 63.5090)
- 3.B.8 For Emission Point AA-001, the permittee shall limit organic HAP emissions to no more than 2 percent of the organic HAP applied for each month during each 12-month compliance period (98 percent reduction) and/or no more than 20 parts per million by volume (ppmv) on a dry basis of organic HAPs exiting the thermal oxidizer and the capture system efficiency is 100 percent. The permittee shall demonstrate compliance with one of these standards by following the applicable procedures in Condition 5.B.13 of the federally enforceable permit herein (40 CFR 63.5170). (Ref.: 40 CFR 5120(a)(1) and/or (a)(3), and (b))
- 3.B.9 For Emission Point AA-001, the permittee shall meet the following operating limits, after establishing the operating limits during applicable performance testing according to

the requirements in Condition 5.B.9 of the federally enforceable permit herein (40 CFR 63.5160(d)(3)):

- (1) For the thermal oxidizer, the average combustion temperature in any 3-hour shall not fall below the combustion temperature limit established according to Condition 5.B.9 of the federally enforceable permit herein (40 CFR 63.5160(d)(3)(i)).
- (2) For the emission capture system, the permittee shall develop a monitoring plan, when applicable, that identifies operating parameter to be monitored and specifies operating limits according to Condition 5.B.11 of the federally enforceable permit herein (40 CFR 63.5150(a)(4)).

(Ref.: 40 CFR 63.5121(a))

C. Insignificant and Trivial Activity Emission Limitations & Standards

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

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

SECTION 4. COMPLIANCE SCHEDULE

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

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. General Monitoring, Recordkeeping and Reporting Requirements

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

5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the DEQ and the EPA.

5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

B. Specific Monitoring and Recordkeeping Requirements

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
Entire Facility	VOC	Quality and Quantity	5.B.1	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).
AA-001	Capture Efficiency	EPA Reference Method 204	5.B.2	
	Performance Test	Exclusions to 40 CFR 60.8	5.B.3	40 CFR 60.463(a)
		Performed Monthly	5.B.4	40 CFR 60.463(b)
		Determining the Monthly Volume-Weighted Average Emissions	5.B.5	40 CFR 60.463(c)(2)
	VOC	Determining the Average VOC Content of Coatings Used Monthly	5.B.6	40 CFR 60.464(a)
	Continuous Temperature Monitor	Install, Calibrate, Operate, and Maintain	5.B.7	40 CFR 60.464(c)
	Performance Testing Methods	Utilize Reference Methods in Appendix A, Method 24 (formulation data), or Method 25 (RTO Stack Test)	5.B.8	40 CFR 60.466(a) through (d)
	Performance Testing	Capture Efficiency Determination	5.B.9	40 CFR 63.5160(d)(1) through (3)(i), and (e)
	General Requirements	Compliance with General Requirements	5.B.10	40 CFR 63.5140
	AA-001	Thermal Oxidizer	Monitor Operating Parameters	5.B.11
Deviations			5.B.12	40 CFR 63.5150(b)
Initial Performance Test		Demonstration of Compliance	5.B.13	40 CFR 63.5170(c)

5.B.1 For the entire facility, the permittee shall determine for each coating, adhesive, solvent or other VOC containing material used:

- (a) The quantity used (gal or lbs).
- (b) The percentage of VOCs by weight.
- (c) The density (lbs/gal), unless material usages are measured in pounds (lbs).
- (d) The permittee may utilize data supplied by the manufacturer, or analysis of VOC content by EPA Test Method 24, 40 CFR 60, Appendix A.
- (e) The permittee shall calculate the VOC emissions from the use of these materials each month and compare the emissions to those allowed under Condition 3.B.1 of the federally enforceable permit herein using a consecutive 12-month total and/or calculate the VOC emissions from the following equation, using a consecutive 12-month total:

$$E_a = \text{VOC}_u \times [1 - (\text{ORE}/100)]$$

where E_a is the actual VOC mass emission rate in tons per year (consecutive 12-month average), VOC_u is the actual VOC emission usage rate in tons per year (consecutive 12-month average), and ORE is the most recently demonstrated overall VOC reduction efficiency, %.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

- 5.B.2 For Emission Point AA-001, the permittee shall demonstrate the capture efficiency (mass of total VOC captured and sent to the oxidizer) in accordance with EPA Reference Method 204 – Criteria for and Verification of a Permanent or Temporary Total Enclosure, 40 CFR 51, Appendix M and shall comply with the specific recordkeeping as described in Condition 5.C.5 of the federally enforceable permit herein during each shift. (Ref.: APC-S-6, Section III.A.3)
- 5.B.3 For Emission Point AA-001, 40 CFR 60.8(d) and (f) do not apply to the performance test. (Ref.: 40 CFR 60.463(a))
- 5.B.4 For Emission Point AA-001, the permittee shall conduct a performance test for each calendar month for each affected facility according to the procedures in 40 CFR 60.8 and Conditions 5.B.5 of the federally enforceable permit herein. (Ref.: 40 CFR 60.463(b))
- 5.B.5 For Emission Point AA-001, the permittee shall use the following procedures for determining monthly volume-weighted average emissions of VOCs in kg of coating solids applied.
 - (1) Determine the overall reduction efficiency (R) for the capture system and control device.
 - (a) For the initial performance test, the overall reduction efficiency (R) shall be determined as prescribed in paragraphs (A), (B), and (C) of this section. In subsequent months, the permittee may use the most recently determined

overall reduction efficiency (R) for the performance test, providing control device and capture system operating conditions have not changed. The procedure in paragraphs (A), (B), and (C) of this section, shall be repeated when directed by the MDEQ or when the permittee elects to operate the control device or capture system at conditions different from the initial performance test.

- (A) Determine the fraction (F) of total VOC's emitted by the permittee that enters the control device using the following equation:

$$F = \frac{\sum_{i=1}^l C_{bi}Q_{bi}}{\sum_{i=1}^l C_{bi}Q_{bi} + \sum_{i=1}^p C_{fi}Q_{fi}}$$

Equation 5

Where:

l is the number of gas streams entering the control device, and

p is the number of gas streams emitted directly to the atmosphere.

- (B) Determine the destruction efficiency of the control device (E) using values of the volumetric flow rate of each of the gas streams and the VOC content (as carbon) of each of the gas streams in and out of the device by the following equation:

$$E = \frac{\sum_{i=1}^n Q_{bi}C_{bi} - \sum_{i=1}^m Q_{aj}C_{aj}}{\sum_{i=1}^n Q_{bi}C_{bi}}$$

Equation 6

Where:

n is the number of gas streams entering the control device, and

m is the number of gas streams leaving the control device and entering the atmosphere.

The permittee shall construct the VOC emission reduction system so that all volumetric flow rates and total VOC emissions can be accurately determined by

the applicable test methods and procedures specified in Condition 5.B.8 of the federally enforceable permit herein (40 CFR 60.466). The permittee shall construct a temporary enclosure around the coating applicator and flashoff area during the performance test for the purpose of evaluating the capture efficiency of the system. The enclosure must be maintained at a negative pressure to ensure that all VOC emissions are measurable. If a permanent enclosure exists prior to the performance test and the MDEQ is satisfied that the enclosure is adequately containing VOC emissions, no additional enclosure is required for the performance test.

- (C) Determine overall reduction efficiency (R) using the following equation:

$$R = EF \quad \text{Equation 7}$$

If the overall reduction efficiency (R) is equal to or greater than 0.90, the permittee is in compliance and no further computations are necessary. If the overall reduction efficiency (R) is less than 0.90, the average total VOC emissions to the atmosphere per unit volume of coating solids applied (N) shall be computed as follows.

- (2) Calculate the volume-weighted average of the total mass of VOCs per unit volume of coating solids applied (G) during each calendar month for each affected facility using equations in paragraphs (c)(1)(i) (A), (B), and (C) of this section.

- (3) Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during each calendar month by the following equation:

$$N = G(1 - R) \quad \text{Equation 8}$$

- (4) If the volume-weighted average mass of VOCs emitted to the atmosphere for each calendar month (N) is less than or equal to 0.14 kg of coating solids applied, the permittee is in compliance. Each monthly calculation is a performance test.

(Ref.: 40 CFR 60.463(c)(2)).

- 5.B.6 For Emission Point AA-001, the permittee shall compute and record the average VOC content of coatings applied during each calendar month, according to the equations provided in Condition 5.B.5 of the federally enforceable permit herein (40 CFR 60.463(b)) for determining compliance with the numerical limit specified in Condition 3.B.3 of the federally enforceable permit herein (40 CFR 60.462(a)(2)). (40 CFR 60.464(a))

- 5.B.7 For Emission Point AA-001, the permittee shall install, calibrate, operate, and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with Condition 3.B.3 of the federally enforceable permit herein (40 CFR 60.462(a)(2) and (a)(3)). This device shall have an accuracy of ± 2.5 °C or ± 0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater. The permittee shall also record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in any

thermal incinerator used to control emissions from an affected facility remains more than 28 °C (50 °F) below the temperature at which compliance with Condition 3.B.3 of the federally enforceable permit herein (40 CFR 60.462(a)(2) and (a)(3)) was demonstrated during the most recent measurement of incinerator efficiency required by 40 CFR 60.8. The records required by 40 CFR 60.7 shall identify each such occurrence and its duration. (40 CFR 60.464(c))

5.B.8 For Emission Point AA-001, the permittee shall comply with the following for determining compliance with Condition 3.B.3 of the federally enforceable permit herein (40 CFR 60.462).

- (a) Utilize the Reference Methods in Appendix A of 40 CFR 60, except as provided under 40 CFR 60.8(b) as follows:
 - (1) Method 24, or data provided by the formulator of the coating, shall be used for determining the VOC content of each coating as applied to the surface of the metal coil. In the event of a dispute, Method 24 shall be the reference method. When VOC content of waterborne coatings, determined by Method 24, is used to determine compliance of affected facilities, the results of the Method 24 analysis shall be adjusted as described in Section 12.6 of Method 24;
 - (2) Method 25, both for measuring the VOC concentration in each gas stream entering and leaving the control device on each stack equipped with an emission control device and for measuring the VOC concentration in each gas stream emitted directly to the atmosphere;
 - (3) Method 1 for sample and velocity traverses;
 - (4) Method 2 for velocity and volumetric flow rate;
 - (5) Method 3 for gas analysis; and
 - (6) Method 4 for stack gas moisture.
- (b) For Method 24, the coating sample must be at least a 1-liter sample taken at a point where the sample will be representative of the coating as applied to the surface of the metal coil.
- (c) For Method 25, the sampling time for each of three runs is to be at least 60 minutes, and the minimum sampling volume is to be at least 0.003 dscm (0.11 dscf); however, shorter sampling times or smaller volumes, when necessitated by process variables or other factors, may be approved by the MDEQ.
- (d) The DEQ will approve testing of representative stacks on a case-by-case basis if the permittee can demonstrate to the satisfaction of the MDEQ that testing of representative stacks yields results comparable to those that would be obtained by testing all stacks.

(40 CFR 60.466(a) through (d))

5.B.9 For Emission Point AA-001, the permittee shall conduct a performance test to establish the destruction or removal efficiency of the oxidizer or the outlet HAP concentration achieved by the oxidizer, according to the methods and procedures in paragraphs (1) and (2) of this section. During the performance test, the permittee shall establish the operating limits required by Condition 3.B.9 of the federally enforceable permit herein (40 CFR 63.5121) according to paragraph (3) of this section.

- (1) An initial performance test to establish the destruction or removal efficiency of the oxidizer shall be conducted such that control device inlet and outlet testing is conducted simultaneously. To establish the outlet organic HAP concentration achieved by the oxidizer, only oxidizer outlet testing must be conducted. The data must be reduced in accordance with the test methods and procedures in paragraphs (i) through (ix).
 - (i) Method 1 or 1A of 40 CFR Part 60, appendix A, is used for sample and velocity traverses to determine sampling locations.
 - (ii) Method 2, 2A, 2C, 2D, 2F, or 2G of 40 CFR Part 60, appendix A, is used to determine gas volumetric flow rate.
 - (iii) Method 3, 3A, or 3B of 40 CFR Part 60, appendix A, used for gas analysis to determine dry molecular weight. The permittee may also use as an alternative to Method 3B, the manual method for measuring the oxygen, carbon dioxide, and carbon monoxide content of exhaust gas, ANSI/ASME PTC 19.10–1981, “Flue and Exhaust Gas Analyses” (incorporated by reference, see 40 CFR 63.14).
 - (iv) Method 4 of 40 CFR Part 60, appendix A, is used to determine stack gas moisture.
 - (v) Methods for determining gas volumetric flow rate, dry molecular weight, and stack gas moisture must be performed, as applicable, during each test run, as specified in paragraph (d)(1)(vii) of this section.
 - (vi) Method 25 or 25A of 40 CFR Part 60, appendix A, is used to determine total gaseous non-methane organic matter concentration. Use the same test method for both the inlet and outlet measurements, which must be conducted simultaneously. The permittee shall submit notification of the intended test method to the MDEQ for approval along with notification of the performance test required under 40 CFR 63.7 (b). The permittee shall use Method 25A if any of the conditions described in paragraphs (1)(vi)(A) through (C) of this section apply to the control device.
 - (A) The control exhaust gas volatile organic matter concentration of 50 ppmv or less is required to comply with the standards in Condition 3.B.8 (40 CFR 63.5120); or

- (B) The volatile organic matter concentration at the inlet to the control system and the required level of control are such that they result in exhaust gas volatile organic matter concentrations of 50 ppmv or less; or
 - (C) Due to the high efficiency of the control device, the anticipated volatile organic matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.
- (vii) Each performance test must consist of three separate runs, except as provided by 40 CFR 63.7(e)(3); each run must be conducted for at least 1 hour under the conditions that exist when the affected source is operating under normal operating conditions. For the purpose of determining volatile organic matter concentrations and mass flow rates, the average of the results of all runs will apply. If the permittee is demonstrating initial compliance with the outlet organic HAP concentration limit in Condition 3.B.9 of the federally enforceable permit herein (40 CFR 63.5120(a)(3)), only the average outlet volatile organic matter concentration must be determined.
- (viii) If the permittee is determining the control device destruction or removal efficiency, for each run, determine the volatile organic matter mass flow rates using Equation 1 of this section:

$$M_f = Q_{sd} C_c (12)(0.0416) (10^{-6}) \quad (Eq. 1)$$

Where:

M_f =total organic volatile matter mass flow rate, kg/per hour (h).

C_c =concentration of organic compounds as carbon in the vent gas, as determined by Method 25 or Method 25A, ppmv, dry basis.

Q_{sd} =volumetric flow rate of gases entering or exiting the control device, as determined by Method 2, 2A, 2C, 2D, 2F, or 2G, dry standard cubic meters (dscm)/h.

0.0416=conversion factor for molar volume, kg-moles per cubic meter (mol/m^3) (@ 293 Kelvin (K) and 760 millimeters of mercury (mmHg)).

- (ix) For each run, determine the control device destruction or removal efficiency, DRE, using Equation 2 of this section:

$$DRE = \frac{M_{in} - M_{out}}{M_{in}} \times 100 \quad (Eq. 2)$$

Where:

DRE=organic emissions destruction or removal efficiency of the add-on control device, percent.

M_{fi} =organic volatile matter mass flow rate at the inlet to the control device, kg/h.

M_{fo} =organic volatile matter mass flow rate at the outlet of the control device, kg/h.

- (x) The control device destruction or removal efficiency is determined as the average of the efficiencies determined in the three test runs and calculated in Equation 2 of this section.
- (2) The permittee shall record such process information as may be necessary to determine the conditions in existence at the time of the performance test. Operations during periods of start-up, shutdown, and malfunction will not constitute representative conditions for the purpose of a performance test.
- (3) The permittee shall establish the applicable operating limits required by Condition 3.B.9 of the federally enforceable permit herein (40 CFR 63.5121) which apply to the oxidizer. The permittee shall establish the operating limits during the performance test according to the following requirements.
 - (A) During the performance test, the permittee shall monitor and record the combustion temperature at least once every 15 minutes during each of the three test runs. The permittee shall monitor the temperature in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs.
 - (B) Use the data collected during the performance test to calculate and record the average combustion temperature maintained during the performance test. This average combustion temperature is the minimum operating limit for the thermal oxidizer.
- (4) If the permittee is required to determine capture efficiency to meet the requirements of Condition 5.B.13 of the federally enforceable permit herein (40 CFR 63.5170(e)(2), (f)(1) through (2), (h)(2) through (4), or (i)(2) through (3)), the permittee shall determine capture efficiency using the procedures in (i), (ii), or (iii) of this section, as applicable.
 - (i) For an enclosure that meets the criteria for a PTE, the permittee may assume it achieves 100 percent capture efficiency. The permittee shall confirm that the capture system is a PTE by demonstrating that it meets the requirements of Section 6 of EPA Method 204 of 40 CFR Part 51, Appendix M (or an EPA approved alternative method), and that all exhaust gases from the enclosure are delivered to a control device.
 - (ii) The permittee may determine capture efficiency, CE, according to the protocols for testing with temporary total enclosures that are specified in

Method 204A through F of 40 CFR Part 51, Appendix M. The permittee may exclude never-controlled work stations from such capture efficiency determinations.

- (iii) As an alternative to the procedures specified in paragraphs (1) and (2) of this section, if the permittee is required to conduct a capture efficiency test, the permittee may use any capture efficiency protocol and test methods that satisfy the criteria of either the Data Quality Objective or the Lower Confidence Limit approach as described in appendix A of Subpart KK in 40 CFR Part 63. The permittee may exclude never-controlled work stations from such capture efficiency determinations.

(Ref.: 40 CFR 63.5160(d)(1), (d)(2), and (d)(3)(i), and (e))

5.B.10 For Emission Point AA-001, the permittee shall be in compliance with the standards in this subpart at all times, except during periods of start-up, shutdown, and malfunction of the oxidizer used to comply with this subpart. Table 2 of this subpart provides cross references to Subpart A of this part, indicating the applicability of the General Provisions requirements to this subpart. (Ref.: 40 CFR 63.5140)

5.B.11 For Emission Point AA-001, the permittee shall monitor and inspect the oxidizer required to comply with Condition 3.B.8 of the federally enforceable permit herein (40 CFR 63.5120) following the date on which the initial performance test of the capture system and control device is completed. The permittee shall install and operate the monitoring equipment as specified in the following.

- (1) If the permittee is complying with the requirements of the standards in Condition 3.B.8 of the federally enforceable permit herein (40 CFR 63.5120) through the use of an oxidizer and demonstrating continuous compliance through monitoring of an oxidizer operating parameter, the permittee shall comply with paragraphs (1)(i) through (ii) of this section.
 - (i) Install, calibrate, maintain, and operate temperature monitoring equipment according to manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months; or the chart recorder, data logger, or temperature indicator must be replaced. The permittee shall replace the equipment either if the permittee chooses not to perform the calibration, or if the equipment cannot be calibrated properly. Each temperature monitoring device must be equipped with a continuous recorder. The device must have an accuracy of ± 1 percent of the temperature being monitored in degrees Celsius, or ± 1 °Celsius, whichever is greater.
 - (ii) To demonstrate continuous compliance with the operating limit established according to Condition 5.B.9 of the federally enforceable permit herein (40 CFR 63.5160(d)(3)(i)), the permittee shall install the thermocouple or

temperature sensor in the combustion chamber at a location in the combustion zone.

- (2) If the permittee is complying with the requirements of the standards in Condition 3.B.8 of the federally enforceable permit herein (40 CFR 63.5120) through the use of a capture system and control device, the permittee shall develop a capture system monitoring plan containing the information specified in paragraphs (2)(i) and (ii) of this section. The permittee shall monitor the capture system in accordance with paragraph (2)(iii) of this section. The permittee shall make the monitoring plan available for inspection by the MDEQ upon request.
 - (i) The monitoring plan shall identify the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained, explain why this parameter is appropriate for demonstrating ongoing compliance, and identify the specific monitoring procedures.
 - (ii) The plan also shall specify operating limits at the capture system operating parameter value, or range of values, that demonstrates compliance with the standards in Condition 3.B.8 of the federally enforceable permit herein (40 CFR 63.5120). The operating limits must represent the conditions indicative of proper operation and maintenance of the capture system.
 - (iii) The permittee shall conduct monitoring in accordance with the plan.

(Ref.: 40 CFR 40 CFR 63.5150(a)(3) and (a)(4))

- 5.B.12 For Emission Point AA-001, any deviation from the required operating parameters which are monitored in accordance with Condition 5.B.11 of the federally enforceable permit herein (40 CFR 63.5150(a)(3) and (a)(4), unless otherwise excused, will be considered a deviation from the operating limit. (Ref.: 40 CFR 63.5150(b))
- 5.B.13 For Emission Point AA-001, the permittee shall include all coating materials (as defined in 40 CFR 63.5110) used when determining compliance with the applicable emission limit in Condition 3.B.8 of the federally enforceable permit herein (40 CFR 63.5120). To make this determination, the permittee shall use at least one of the four compliance options listed in Table 1 of 40 CFR 63.5170(c). The permitted shall apply any of the compliance options to an individual coil coating line, or to multiple lines as a group, or to the entire affected source. The permittee may use different compliance options for different coil coating lines, or at different times on the same line. However, the permittee may not use different compliance options at the same time on the same coil coating line. If the permittee switches between compliance options for any coil coating line or group of lines, the permittee shall document this switch as required by 5.C.6 of the federally enforceable permit herein (40 CFR 63.5190(a)), and the permittee shall report it in the next semiannual compliance report required in Condition 5.C.7 of the federally enforceable permit herein (40 CFR 63.5180).

- (1) If the permittee uses one or more capture systems and one or more control devices and demonstrates an average overall organic HAP control efficiency of at least 98 percent for each month to comply with Condition 3.B.8 of the federally enforceable permit herein (40 CFR 63.5120(a)(1)); or operates a capture system and oxidizer so that the capture efficiency is 100 percent and the oxidizer outlet HAP concentration is no greater than 20 ppmv on a dry basis to comply with Condition 3.B.8 of the federally enforceable permit herein (40 CFR 63.5120(a)(3)), the permittee shall follow one of the procedures in paragraphs (1)(i) through (iii) of this section. Alternatively, the permittee may demonstrate compliance for an individual coil coating line by operating its capture system and control device and continuous parameter monitoring system according to the procedures in paragraph (A) of this section.
 - (i) If the permittee uses one compliance procedure to limit organic HAP emissions to the level specified in Condition 3.B.8 of the federally enforceable permit herein (40 CFR 63.5120(a)(1) or (2)) and has only always-controlled work stations, then the permittee shall demonstrate compliance with the provisions of 40 CFR 63.5170(e) when emissions from the affected source are controlled by one or more solvent recovery devices.
 - (ii) If the permittee operates both solvent recovery and oxidizer control devices, one or more never-controlled work stations, or one or more intermittently-controllable work stations, or uses more than one compliance procedure, then the permittee shall demonstrate compliance with the provisions of 40 CFR 63.5170(g).
 - (iii) The method of limiting organic HAP emissions to the level specified in Condition 3.B.8 of the federally enforceable permit herein (40 CFR 63.5120(a)(3)) is the installation and operation of a PTE around each work station and associated curing oven in the coating line and the ventilation of all organic HAP emissions from each PTE to an oxidizer with an outlet organic HAP concentration of no greater than 20 ppmv on a dry basis. An enclosure that meets the requirements in Condition 5.B.9 of the federally enforceable permit herein (40 CFR 63.5160(e)(1)) is considered a PTE. Initial compliance of the oxidizer with the outlet organic HAP concentration limit is demonstrated either through continuous emission monitoring according to paragraph (2)(ii) of this section or through performance tests using the procedure in Condition 5.B.9 of the federally enforceable permit herein (40 CFR 63.5160(d)). If this method is selected, the permittee shall meet the requirements of paragraph (1)(iii)(A) of this section to demonstrate continuing achievement of 100 percent capture of organic HAP emissions and either paragraph (1)(iii)(B) or paragraph (1)(iii)(C) of this section, respectively, to demonstrate continuous compliance with the oxidizer outlet organic HAP concentration limit through continuous emission monitoring or continuous operating parameter monitoring:

- (A) Whenever a work station is operated, continuously monitor the capture system operating parameter established in accordance with Condition 5.B.11 of the federally enforceable permit herein (40 CFR 63.5150(a)(4)).
- (B) To demonstrate that the value of the exhaust gas organic HAP concentration at the outlet of the oxidizer is no greater than 20 ppmv, on a dry basis, install, calibrate, operate, and maintain CEMS according to the requirements of 40 CFR 63.5150(a)(2).
- (C) To demonstrate continuous compliance with operating limits established in accordance with Condition 5.B.11 of the federally enforceable permit herein (63.5150(a)(3)(i-ii) and (a)(4)(i-iii)), whenever a work station is operated, continuously monitor the applicable oxidizer operating parameter.

(Ref.: 40 CFR 63.5170(c))

C. Specific Reporting Requirements

Emission Point(s)	Pollutant/Parameter Monitored	Recordkeeping/Reporting Requirement	Condition Number	Applicable Requirement
Entire Facility	VOC	Monthly Recordkeeping and Semi-Annual Reports	5.C.1	Miss. Admin. Code Pt. 2, R. 6.3.A(3).
AA-001		Record and Report Volume Weighted Average	5.C.2	40 CFR 60.465(c)
	Temperature	Report Incinerator Temperature Drops	5.C.3	40 CFR 60.465(d)
	VOC	Maintain Records (Data and Calculations)	5.C.4	40 CFR 60.465(e)
	Capture Efficiency	EPA Reference Method 204 Recordkeeping	5.C.5	Miss. Admin. Code Pt. 2, R. 6.3.A(3).
	Recordkeeping	Compliance Option Used	5.C.6	40 CFR 63.5190(a)(1)
		Control Efficiency Determination		40 CFR 63.5190(a)(2)(v)
In accordance with 40 CFR 63.10(b)(3)		40 CFR 63.5190 (a)(3)		

Emission Point(s)	Pollutant/Parameter Monitored	Recordkeeping/Reporting Requirement	Condition Number	Applicable Requirement
	Reporting	Performance Testing, Compliance Status, Startup, Shutdown, and Malfunction, Semi-Annual Compliance, and Deviations	5.C.7	40 CFR 63.5180(c), (d), (e), (f), (g), and (h)

5.C.1 For the entire facility, the permittee shall record the following in accordance with Condition 5.B.1 of the federally enforceable permit herein and submit a report summarizing the results within thirty (30) days of the semi-annual periods ending on June 30 and December 31.

- (a) The quantity used (gal or lbs).
- (b) The percentage of VOCs by weight.
- (c) The density (lbs/gal), unless material usages are measured in pounds (lbs).
- (d) If the permittee utilized any data supplied by the manufacturer, or analysis of VOC content by EPA Test Method 24, 40 CFR 60, Appendix A.
- (e) The permittee shall calculate the VOC emissions from the use of these materials each month and compare the emissions to those allowed under Condition 3.B.1 of the federally enforceable permit herein using a consecutive 12-month total and/or calculate the VOC emissions from the following equation and compare the emission to those allowed under Conditions 3.B.1 of the federally enforceable permit herein using a consecutive 12-month total:

$$E_a = \text{VOC}_u \times [1 - (\text{ORE}/100)]$$

where E_a is the actual VOC mass emission rate in tons per year (consecutive 12-month average), VOC_u is the actual VOC emission usage rate in tons per year (consecutive 12-month average), and ORE is the most recently demonstrated overall VOC reduction efficiency, %.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

5.C.2 For Emission Point AA-001, the permittee shall identify, record, and submit a written report to the MDEQ every calendar quarter of each instance in which the volume-weighted average of the local mass of VOCs emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under Condition 3.B.3 of the federally enforceable permit herein (40 CFR 60.462). If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the MDEQ semiannually. (40 CFR 60.465(c))

- 5.C.3 For Emission Point AA-001, the permittee shall also submit reports at the frequency specified in 40 CFR 60.7(c) when the incinerator temperature drops as defined under Condition 5.B.7 of the federally enforceable permit herein (40 CFR 60.464(c)). If no such periods occur, the permittee shall state this in the report. (40 CFR 60.465(d))
- 5.C.4 For Emission Point AA-001, the permittee shall maintain at the facility, for a period of at least two (2) years, records of all data and calculations used to determine monthly VOC emissions and to determine the monthly emission limit, where applicable. In addition, the permittee shall maintain, at the source, daily records of the incinerator combustion temperature. (40 CFR 60.465(e))
- 5.C.5 For Emission Point AA-001, the permittee shall demonstrate the capture efficiency (mass of total VOC captured and sent to the oxidizer) in accordance with EPA Reference Method 204 – Criteria for and Verification of a Permanent or Temporary Total Enclosure, 40 CFR 51, Appendix M. The permittee shall record, during each shift, an “operator certification” that all operation was performed with no openings in the capture system except those allowed by Method 204. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)
- 5.C.6 For Emission Point AA-001, the permittee shall maintain the following records in accordance with 40 CFR 63.10(b)(1)):
- (1) Records of the coating lines on which the permittee used each compliance option and the time periods (beginning and ending dates and times) the permittee used each option;
 - (2) Records specified in 40 CFR 63.10(b)(2) of all measurements needed to demonstrate compliance with this subpart, including: Overall control efficiency determination or alternative outlet HAP concentration using capture efficiency tests and control device destruction or removal efficiency tests in accordance with Condition 5.B.9 of the federally enforceable permit herein (40 CFR 63.5160(d) and (e));
 - (3) Records specified in 40 CFR 63.10(b)(3);
- (Ref.: 40 CFR 63.5190(a)(1)), (a)(2)(v), (a)(3))
- 5.C.7 For Emission Point AA-001, the permittee shall submit the following reports in accordance with 40 CFR 63.5180.
- (1) If the permittee is complying with the emission standard using a control device, then the permittee shall submit a Notification of Performance Test as specified in 40 CFR 63.7 and 63.9(e). This notification and the site-specific test plan required under 40 CFR 63.7(c)(2) must identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is

maintained. The permittee may consider the operating parameter identified in the site-specific test plan to be approved unless explicitly disapproved, or unless comments received from the MDEQ require monitoring of an alternate parameter.

- (2) The permittee shall have submitted a Notification of Compliance Status as specified in 40 CFR 63.9(h). (40 CFR 63.5130).
- (3) The permittee shall submit performance test reports as specified in 40 CFR 63.10(d)(2) if the permittee is using a control device to comply with the emission standards and the permittee has not obtained a waiver from the performance test requirement.
- (4) The permittee shall submit start-up, shutdown, and malfunction reports as specified in 40 CFR 63.10(d)(5) if a control device is used to comply with this subpart.
 - (i) If the permittee's actions during a start-up, shutdown, or malfunction (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the start-up, shutdown, and malfunction plan specified in 40 CFR 63.6(e)(3), the permittee shall state such information in the report. The start-up, shutdown, or malfunction report will consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy, that will be submitted to the MDEQ.
 - (ii) Separate start-up, shutdown, or malfunction reports are not required if the information is included in the report specified in paragraph (5) of this section.
- (5) The permittee shall submit semi-annual compliance reports containing the information specified in paragraphs (i) and (ii) of this section.
 - (i) Compliance report dates.
 - (A) The first semiannual reporting period began 1 day after the end of the initial compliance period (40 CFR 63.5130(d)) that applies to the permittee's affected source and ended 6 months later.
 - (B) The first semiannual compliance report shall have covered the first semiannual reporting period and shall have been postmarked or delivered no later than 30 days after the reporting period ended.
 - (C) Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

- pursuant to
reports
established
(5)(i)(A) through
- (D) 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.
 - (E) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or part 71, and the permitting authority has established dates for submitting semiannual reports 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), the permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (D) of this section.
- (ii) The semi-annual compliance report must contain the following information:
 - (A) Company name and address.
 - (B) Statement by a responsible official with that official's name, title, and signature, certifying the accuracy of the content of the report.
 - (C) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
 - (D) Identification of the compliance option or options specified in Table 1 to Condition 5.B.13 of the federally enforceable permit herein (40 CFR 63.5170) that the permittee used on each coating operation during the reporting period. If the permittee switched between compliance options during the reporting period, the permittee shall report the beginning dates the permittee used each option.
 - (E) A statement that there were no deviations from the standards during the reporting period, and that no CEMS were inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.
- (6) The permittee shall submit, for each deviation occurring where the permittee is not using CEMS to comply with the standards in this subpart, the semiannual compliance report containing the information in paragraphs (5)(ii)(A) through (D) of this section and the information in paragraphs (i) through (iii) of this section:
 - (i) The total operating time of each affected source during the reporting period.

- (ii) Information on the number, duration, and cause of deviations (including unknown cause, if applicable) as applicable, and the corrective action taken.
- (iii) Information on the number, duration, and cause for monitor downtime incidents (including unknown cause other than downtime associated with zero and span and other daily calibration checks, if applicable).

(Ref.: 40 CFR 63.5180(c), (d), (e), (f), (g), and (h))

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

SECTION 7. TITLE VI REQUIREMENTS

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

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

selling class I or class II refrigerants or offering class I or class II refrigerants for sale,
and persons purchasing class I or class II refrigerants.

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

APPENDIX A

List of Abbreviations Used In this Permit

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

APPENDIX B

40 CFR PART 60, SUBPART TT

**NEW SOURCE PERFORMANCE STANDARDS, SUBPART TT – STANDARDS OF
PERFORMANCE FOR METAL COIL SURFACE COATING**

APPENDIX C

40 CFR PART 63, SUBPART SSSS

**NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR
SURFACE COATING OF METAL COIL**