STATE OF MISSISSIPPI
AIR POLLUTION CONTROL PERMIT

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

TopShip LLC
13303 Industrial Seaway Road
Gulfport, Mississippi
(Harrison 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: JUN 0 1 2016

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Permit No.: 1020-00107

4867 PER20150001

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SECTION 1. GENERAL CONDITIONS

A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)

2. Any activities not identified in the application are not authorized by this permit. (Ref.: Miss. Code Ann. 49-17-29 1.b)

3. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for operating without a valid permit pursuant to State Law. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)

4. It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(6).)

5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)

6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit, unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)

7. The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).)

8. The permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)

9. The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such

records directly to the Administrator along with a claim of confidentiality. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).)

10. Design and Construction Requirements: The stationary source shall be designed and constructed so as to operate without causing a violation of an Applicable Rules and Regulations, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards, and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A.)

11. Solids Removal: The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits. (Ref.: Miss. Code Ann. 49-17-29)

12. Diversion and Bypass of Air Pollution Controls: The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed except as provided for in 11 Miss. Admin. Code Pt. 2, R. 1.10., "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

13. Fugitive Dust Emissions from Construction Activities: The construction of the stationary source shall be performed in such a manner so as to reduce fugitive dust emissions from construction activities to a minimum. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A(4).)

14. Right of Entry: The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives upon presentation of credentials:

    a) To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and

    b) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emissions. (Ref.: Miss. Code Ann. 49-17-21)

15. Permit Modification or Revocation: After notice and opportunity for a hearing, the Permit Board may modify the permit or revoke it in whole or in part for good cause shown including, but not limited to:

    a) Persistent violation of any of the terms or conditions of this permit;

    b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

c) A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

16. Public Record and Confidential Information: Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality, Office of Pollution Control. (Ref.: Miss. Code Ann. 49-17-39)

17. Permit Transfer: This permit shall not be transferred except upon approval of the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B)

18. Severability: The provisions of this permit are severable. If any provision of the permit, or the application of any provision of the permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref. 11 Miss. Admin. Code Pt. 2, R. 2.1.D(7).)

19. Permit Expiration: The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance or if construction is suspended for eighteen (18) months or more. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1).)

20. Certification of Construction: A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(3).)

21. Beginning Operation: Except as prohibited in Part I, Condition 24 of this permit, after certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by 11 Miss. Admin. Code Pt. 2, R. 2.13.G. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).)

22. Application for a Permit to Operate: Except as otherwise specified in Part I, Condition 24 of this permit, the application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).)

23. Operating Under a Permit to Construct: Except as otherwise specified in Part I, Condition 24 of this permit, upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct

and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).)

24. Application Requirements for a Permit to Operate for Moderate Modifications: For moderate modifications that require contemporaneous enforceable emissions reductions from more than one emission point in order to "net" out of PSD/NSR, the applicable Title V Permit to Operate or State Permit to Operate must be modified prior to beginning operation of the modified facilities. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7).)

25. Compliance Testing: Regarding compliance testing:

    a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.

    b) Compliance testing will be performed at the expense of the permittee.

    c) Each emission sampling and analysis report shall include but not be limited to the following:

        (1) detailed description of testing procedures;

        (2) sample calculation(s);

        (3) results; and

        (4) comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

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

B. GENERAL NOTIFICATION REQUIREMENTS

1. Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).)

2. The permittee must notify DEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).)

3. Upon the completion of construction or installation of an approved stationary source or modification, the applicant shall notify the Permit Board that construction or installation was performed in accordance with the approved plans and specifications on file with the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1).)

4. The Permit Board shall be promptly notified in writing of any change in construction from the previously approved plans and specifications or permit. If the Permit Board determines the changes are substantial, it may require the submission of a new application to construct with "as built" plans and specifications. Notwithstanding any provision herein to the

contrary, the acceptance of an “as built” application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).)

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-001	**Fiberglass Boat and Component Manufacturing Process** - This process utilizes Vacuum Assisted Resin Transfer Molding (VARTM), a closed molding process, in order to create composite material. VOC and HAP emissions occur during the resin infusion process. Furthermore, open-molding composite manufacturing occurs in various activities throughout the facility. This process involves the spraying of hot resin onto wood core sections. VOC and HAPs are emitted during this application.
AA-002	**Abrasive Blasting Operations** - Abrasive blasting is conducted on some metal and composite components produced at the facility. This blasting occurs within the blasting bay. This area has partial openings on all four walls with mesh curtains hung over the openings during blasting operations. The facility uses non-silica based blasting media for both metal and composite blasting. Furthermore, smaller components are blasted within a blasting booth in Bay 9. This booth is equipped with a dust collection system which routes particulate matter to a baghouse. The blasting booth currently uses aluminum oxide based blasting media for its blasting operations. • AA-002a – Torit Dust Collector – closed loop cyclone which deposits dust into drums for disposal; 99% efficiency
AA-003	**Surface Coating Operations** - Surface coating operations are conducted in open air bays and/or outside. Solvents may be used as a degreaser to prepare the surface for painting. Solvent may also be used to clean spray guns and other application equipment. Waste paints and recovered solvents are shipped offsite for recycle.
AA-004 **AA-005**	**Metal Cutting and Burning Operations (steel fabrication) & Welding Operations** – Several bays are used for metalworking (i.e. welding, cutting, grinding, blasting, and painting) and storage of metal and composite raw and finished materials. Welding and cutting also occur at a number of outdoor locations. The cutting of metal is done using approximately 200 natural gas fired torches of various manufacturers and ages. These torches have a combined total heating value of 14.28 MMBtu/hour.
AA-006	**Composite Cutting and Finishing Operations (equipped with dust collectors)** – Composite cutting utilizes two (2) computer assisted 5-axis saws which make precision cuts in the composite products. Each saw is equipped with a dust collection system. The cut products are then finished by hand grinding, sanding, and other machining equipment. These pieces of finishing equipment use two (2) dust collectors to control particulate emissions. • AA-006a – Torit Model 30-15 – Dust Collection System; closed loop cyclone which deposits dust into drums or other container. • AA-006b – Torit Model 30-15 – Dust Collection System; closed loop cyclone which deposits dust into drums or other container. • AA-006c – AGET Model PT40DI – Particulate emission control (baghouse); 99% efficiency, 5,000 acfm inlet flowrate, 2-5 in. H_2O pressure drop • AA-006d – AGET Model PT40DI – Particulate emission control (baghouse); 99% efficiency, 5,000 acfm inlet flowrate, 2-5 in. H2O pressure drop
AA-007	**Emergency Generators and Fire Pumps** – The facility has ten (10) backup generators and two (2) fire pumps. These units are intended for emergency use only. Maximum hourly emissions have been calculated using AP-42 emissions factors for diesel engines. • AA-007a – Caterpillar "Bay 2" – MY 2009; 0.51 MMBtu/hr Max. Heat Input; 402.3 hp/ 300 kW Rated Power; diesel fueled, 4-stroke, compression ignition;

Emission Point	Description
AA-007	constructed in 2009 • AA-007b – Caterpillar "Resin Building" – MY 2009; 0.51 MMBtu/hr Max Heat Input; 402.3 hp/ 300 kW Rated Power; diesel fueled, 4-stroke, compression ignition; constructed in 2009 • AA-007c – Caterpillar "Bay 6" – MY 2009; 0.51 MMBtu/hr Max Heat Input; 201.15 hp/ 150 kW Rated Power; diesel fueled, 4-stroke, compression ignition; constructed in 2009 • AA-007d – Generac "Bay 7" – MY 2007; 0.07 MMBtu/hr Max Heat Input; 26.82 hp/20 kW Rated Power; diesel fueled, 4-stroke, compression ignition; constructed in June 2008 • AA-007e – Olympian "Admin. Generator" – MY 2004; 0.43 MMBtu/hr Max Heat Input; 167.63 hp/ 125 kW Rated Power; diesel fueled, 4-stroke, compression ignition; constructed in 2005 • AA-007f – Olympian "HR Generator" – MY 2004; 0.17 MMBtu/hr Max Heat Input; 67.05 hp/ 50 kW Rated Power; diesel fueled, 4-stroke, compression ignition; constructed in 2005 • AA-007g – Kohler "Bay 5" – MY 2005; 0.34 MMBtu/hr Max Heat Input; 134.1 hp/ 100 kW Rated Power; diesel fueled, 4-stroke, compression ignition; constructed in May 2005 • AA-007h – Kohler "Bay 3 & 4" – MY 2005; 0.34 MMBtu/hr Max Heat Input; 134.1 hp/ 100 kW Rated Power; diesel fueled, 4-stroke, compression ignition; constructed in 2005 • AA-007i – Taylor Power "Bay 3 & 4" – MY 2002; 0.10 MMBtu/hr Max Heat Input; 40.23 hp/ 30 kW Rated Power; diesel fueled, 4-stroke, compression ignition; constructed in September 2003 • AA-007j – Taylor Power "Bay 1" – MY 2002; 0.10 MMBtu/hr Max Heat Input; 40.23 hp/ 30 kW Rated Power; diesel fueled, 4-stroke, compression ignition; constructed in September 2003 • AA-007k – Fire Pump #1 – MY 2005; 0.62 MMBtu/hr Max Heat Input; 244.06 hp/ 182 kW Rated Power; diesel fueled, 4-stroke, compression ignition; constructed in January 2006 • AA-007l – Fire Pump #2 – MY 2004; 0.45 MMBtu/hr Max Heat Input; 175 hp/ 130.5 kW Rated Power; diesel fueled, 4-stroke, compression ignition; constructed in January 2006
AA-008	**Carpentry Shop (equipped with a dust collection system)** – The carpentry shop will be used to cut balsa core to size to make crates for shipping as well as to make supports for the composite process. The carpentry shop uses sanding and other machining processes, and the emissions from this area are controlled using a dust collection system. • AA-008a – Torit Model 30-15 – Dust Collection System; closed loop cyclone which deposits dust into drums or other container.
AA-009	**Boilers** – The facility has two (2) boilers on site. Both boilers are existing, natural gas fired units and have a maximum heat input of 5.00 MMBtu/hr. • AA-009a – "Boiler #1" – Model 500 WG; Max Input 5 MMBtu/hr; 3 hp; natural gas fired, built in 2006 • AA-009b – "Boiler #2" – Model 500 WG; Max Input 5 MMBtu/hr; 3 hp; natural gas fired, built in 2006

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	Construction Permit Issued June 1, 2016 **(PSD Avoidance)**	3.B.1	$PM/PM_{10}/PM_{2.5}$	240.0 tons per year
		3.B.2		Minimization of fugitive particulate matter emissions
		3.B.3	VOC	240.0 tons per year
AA-001	40 CFR 63, Subpart VVVV (§ 63.5683 and 63.5689)	3.B.4	HAP	Applicability
	40 CFR 63, Subpart WWWW (§ 63.5785)	3.B.5		Applicability
	40 CFR 63.5698(a)(1-5) 40 CFR 63.5698(b)	3.B.6		An organic HAP emission limit dependent on each type of open molding operation.
	40 CFR 63.5698(d)(1)	3.B.7		Organic HAP emission limit exemption
	40 CFR 63.5728(a) 40 CFR 63.5731	3.B.8 3.B.9	HAP	HAP's from closed molding, resin and gel coat mixing; resin
	40 CFR 63.5734 40 CFR 63.5737	3.B.10 3.B.11		Standards and compliance for resin and gel coat application equipment cleaning
AA-003	40 CFR 63, Subpart II (§ 63.781)	3.B.12	VOHAP	Applicability
	40 CFR 63.783(a) 40 CFR 63.783(b)	3.B.13		An as-applied VOHAP content limit dependent on the type of coating and operational standards
	40 CFR 63.781(b)	3.B.14		"Low-Usage" coating exemption standard
	11 Miss. Admin. Code Pt. 2, R. 1.3.A(1)-(3), and R. 1.3.B.	3.A.1 3.A.2	Opacity	40% Opacity
AA-007a AA-007b AA-007c AA-007d	40 CFR Part 60, Subpart IIII (§60.4200)	3.B.15	Exhaust Emissions	Applicability

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
AA-007	40 CFR Part 63, Subpart ZZZZ (§63.6585)	3.B.16	Exhaust Emissions	Applicability
AA-007	40 CFR 60.4207(b)	3.B.17	Fuel Requirements	Diesel fuel requirements for stationary CI internal combustion engines
AA-007a AA-007b AA-007c AA-007d	40 CFR 60.4202(a)(1)(i).	3.B.18	Exhaust Emission Standards	Stationary CI internal combustion engine with maximum engine power <50 HP
	40 CFR 60.4209(a)	3.B.19	HAP	Install non-resettable hour meters prior to start-up
	40 CFR 60.4211(f)(1) through (3)	3.B.20		Operate engines according to manufacturer's recommendations; engine operation limits
AA-007e AA-007f AA-007g AA-007h AA-007i AA-007j AA-007k AA-007l	40 CFR 63.6640(f) and 63.6675	3.B.21	HAP	Limit non-emergency engine operation to 100 hours per year
	40 CFR 63.6605	3.B.22		Operate engine in an effort to minimize air emissions
	40 CFR 63.6602, 63.6625(i), and Table 2c of Subpart ZZZZ	3.B.23		Engine maintenance and inspection requirements
	40 CFR 63.6625(e)(2),(f) and (h), 63.6640(a), and Tables 2 and 6 of Subpart ZZZZ	3.B.24		Operate engine according to manufacturer's recommendations; install a non-resettable hour meter; and, minimize time spent idling.
AA-009a AA-009b	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.B.25	PM	0.6 lb/MMBTU
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.B.26	SO_2	4.8 lb/MMBTU
	NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63, Subpart DDDDD §§63.7485, 63.7490, 63.7499(l) §§63.7500(a)(3) and 63.7500(f)	3.B.27	HAP	General Applicability
		3.B.28		Operate boilers in an effort to minimize air emissions

3.B.1 For the entire facility, the permittee shall limit total combined particulate matter (PM/PM_{10}) emissions to no more than 240.0 tons per year for any consecutive 12-month period. (Ref.: Construction Permit Issued June 1, 2016)

3.B.2 For the entire facility, the permittee shall comply with best management practices, as stated in the permittee's site specific dust control plan (dated March 2016; located in Appendix B of the federally enforceable permit herein), for the minimization of fugitive particulate matter emissions. (Ref.: Construction Permit Issued June 1, 2016)

3.B.3 For the entire facility, the permittee shall limit total volatile organic compound (VOC) emissions to no more than 240.0 tons per year for any consecutive 12-month period. (Ref.: Construction Permit Issued June 1, 2016)

3.B.4 For Emission Point AA-001, the fiberglass boat and component manufacturing process is an affected source due to the fact that it is located at an existing major source of HAPs. As such, for Emission Point AA-001, the permittee shall comply with the National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing, 40 CFR Part 63, Subpart VVVV.
(Ref.: 40 CFR Part 63.5683(a) and 63.5689)

3.B.5 For Emission Point AA-001, the reinforced plastic composite production is an affected source, due to the fact that it is located at an existing major source of HAPs. As such, for Emission Point AA-001, the permittee shall comply with the National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production, 40 CFR Part 63, Subpart WWWW.
(Ref. 40 CFR Part 63.5785)

3.B.6 For Emission Point AA-001, for open molding operations, the permittee shall:

(a) Limit organic HAP emissions from the five open molding operations listed in (1) through (5) below to the emission limit specified in paragraph (b).

(1) Production resin.
(2) Pigmented gel coat.
(3) Clear gel coat.
(4) Tooling resin.
(5) Tooling gel coat.

(b) Limit organic HAP emissions from open molding operations to the limit specified below, based on a 12-month rolling average.

$$\text{HAP Limit} = [46(M_R) + 159(M_{PG}) + 291(M_{CG}) + 54(M_{TR}) + 214(M_{TG})]$$

where:

- HAP Limit = total allowable organic HAP that can be emitted from the open molding operations, kilograms.
- M_R = mass of production resin used in the past 12 months, excluding any materials exempt under

Condition 3.B.6, megagrams.

- M_{PG} = mass of pigmented gel coat used in the past 12 months, excluding any materials exempt under Condition 3.B.6, megagrams.
- M_{CG} = mass of clear gel coat used in the past 12 months, excluding any materials exempt under Condition 3.B.6, megagrams.
- M_{TR} = mass of tooling resin used in the past 12 months, excluding any materials exempt under Condition 3.B.6, megagrams.
- M_{TG} = mass of tooling gel coat used in the past 12 months, excluding any materials exempt under Condition 3.B.6, megagrams.

(Ref.: 40 CFR 63.5698(a)(1-5) and (b))

3.B.7 For Emission Point AA-001, the materials listed in (1) through (3) below are exempt from the open molding emission limit specified in Condition 3.B.5(b):

(1) Production resins (including skin coat resins) that must meet specifications for use in military vessels or must be approved by the U.S. Coast Guard for use in the construction of lifeboats, rescue boats, and other life-saving appliances approved under 46 CFR subchapter Q or the construction of small passenger vessels regulated by 46 CFR subchapter T. Production resins for which this exemption is used must be applied with nonatomizing (non-spray) resin application equipment. The permittee must keep a record of the resins for which this exemption is being used.

(2) Pigmented, clear, and tooling gel coat used for part or mold repair and touch up. The total gel coat materials included in this exemption must not exceed 1 percent by weight of all gel coat used at the permitted facility on a 12-month rolling-average basis. The permittee must keep a record of the amount of gel coats used per month for which this exemption is being used and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used.

(3) Pure, 100 percent vinylester resin used for skin coats. This exemption does not apply to blends of vinylester and polyester resins used for skin coats. The total resin materials included in the exemption cannot exceed 5 percent by weight of all resin used at the permitted facility on a 12-month rolling-average basis. The permittee must keep a record of the amount of 100 percent vinylester skin coat resin used per month that is eligible for this exemption and copies of calculations showing that the exempt amount does not exceed 5 percent of all resin used.

(Ref.: 40 CFR 63.5698(d))

3.B.8 For the closed molding resin operations in Emission Point AA-001, the permittee shall comply with standards for closed molding resin operations as outlined in paragraphs (a) through (c) below:

(a) If a resin application operation meets the definition of closed molding specified in §63.5779, there is no requirement to reduce emissions from that operation.

(b) If the resin application operation does not meet the definition of closed molding, then the permittee must comply with the limit for open molding resin operations specified in Condition 3.B.5(b).

(c) Open molding resin operations that precede a closed molding operation must comply with the limit for open molding resin and gel coat operations specified in Condition 3.B.5(b). Examples of these operations include gel coat or skin coat layers that are applied before lamination is performed by closed molding.

(Ref.: 40 CFR 63.5728)

3.B.9 For the resin and gel coat mixing operations in Emission Point AA-001, the permittee shall comply with standards in paragraphs (a) and (b) below:

(a) All resin and gel coat mixing containers with a capacity equal to or greater than 208 liters, including those used for on-site mixing of putties and polyputties, must have a cover with no visible gaps in place at all times.

(b) The work practice standard in paragraph (a) of this section does not apply when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

(Ref.: 40 CFR 63.5731)

3.B.10 For the resin and gel coat application equipment cleaning operations in Emission Point AA-001, the permittee shall comply with the standards in paragraphs (a) and (b) below:

(a) For routine flushing of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushes, rollers, and squeegees), the permittee must use a cleaning solvent that contains no more than 5 percent organic HAP by weight. For removing cured resin or gel coat from application equipment, no organic HAP content limit applies.

(b) The permittee must store organic HAP-containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 7.6 liters, the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Containers that store organic HAP-containing solvents used for removing cured resin or gel coat are exempt from the requirements of 40 CFR part 63, subpart T. Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.

(Ref.: 40 CFR 63.5734)

3.B.11 For Emission Point AA-001, the permittee shall demonstrate compliance with the resin and gel coat application equipment cleaning operations standards by following paragraphs (a) through (c) below:

(a) Determine and record the organic HAP content of the cleaning solvents subject to the standards specified in Condition 3.B.9 using the methods specified in Condition 5.B.5.

(b) If the facility recycles cleaning solvents used on site, the permittee may use documentation from the solvent manufacturer or supplier or a measurement of the organic HAP content of the cleaning solvent as originally obtained from the solvent supplier for demonstrating compliance, subject to the conditions in §63.5758 for demonstrating compliance with organic HAP content limits.

(c) At least once per month, the permittee must visually inspect any containers holding organic HAP-containing solvents used for removing cured resin and gel coat to ensure that the containers have covers with no visible gaps. Keep records of the monthly inspections and any repairs made to the covers.

(Ref.: 40 CFR 63.5737)

3.B.12 For Emission Point AA-003, the marine surface coating operations are affected by and shall comply with the National Emission Standards for Hazardous Air Pollutants for Shipbuilding and Ship Repair (Surface Coating), 40 CFR Part 63, Subpart II. (Ref.: 40 CFR 63.781)

3.B.13 For Emission Point AA-003, the permittee shall not cause or allow the application of any coating to a ship with an **as-applied** VOHAP content exceeding the applicable limit given in Table 2 of Appendix B of Subpart II. The as-applied VOHAP content shall be determined using the procedures described in Condition 5.B.13.

At all times, the permittee shall operate and maintain any affected source in a manner consistent with the safety and good air pollution control practices for minimizing emissions. (Ref.: 40 CFR 63.783(a) and (b)(1))

3.B.14 For Emission Point AA-003, the provisions of Subpart II do not apply to any coating used in a volume less than 52.8 gallons per year provided the total volume of all exempted coatings used at the facility does not exceed 264 gallons per year. Each exempt coating used shall be labeled as “low-usage exempt” and the records concerning the usage of each shall be maintained in accordance with Conditions 5.B.16 and 5.B.17. (Ref.: 40 CFR 63.781(b))

3.B.15 Emission Points AA-007a through AA-007d are subject to and shall comply with all applicable provisions of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart IIII. (Ref.: 40 CFR 60.4200(a)(2))

3.B.16 Emission Points AA-007a through AA-007l are subject to and shall comply with all applicable requirements of the National Emission Standards of Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ.

Emission Points AA-007a through AA-007d are new compression ignition (CI) emergency stationary RICE with a site rating <500 HP located at a major source of HAP emissions. As such, these engines shall meet the requirements of Subpart ZZZZ by complying with the applicable requirements of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart IIII.

Emission Points AA-007e through AA-007l are existing CI emergency stationary RICE with a site rating <500 HP at a major source of HAP emissions and shall comply with the operating limits contained in Conditions 3.B.20 and 3.B.21.

(Ref.: 40 CFR 63.6585, 63.6590(a)(1)(ii), 63.6590(a)(2)(ii), 63.6590(c)(6), and 63.6675)

3.B.17 For Emission Points AA-007a through AA-007d, the permittee shall use diesel fuel that meets the following requirements:

(a) Sulfur content

(1) 15ppm maximum for non-road diesel fuel

(b) Cetane index or aromatic content

(1) A minimum cetane index of 40; or
(2) A maximum aromatic content of 35 volume percent.

(Ref.: 40 CFR 60.4207(b) and 80.510(b)(1) and (2))

3.B.18 Emission Points AA-007a through AA-007d shall comply with the emission standards for new nonroad CI engines in accordance with the following:

(a) Emission Points AA-007a and AA-007b must be certified to meet the Tier 3 standards from 40 CFR 89.112.
(b) Emission Point AA-007c must be certified to meet the Tier 3 standards from 40 CFR 89.112.
(c) Emission Point AA-007d must be certified to meet the Tier 2 standards from 40 CFR 89.112.

Each engine should also be certified to meet the following exhaust opacity limits:

(a) 20 percent during the acceleration mode;
(b) 15 percent during the lugging mode; and,
(c) 50 percent during the peaks in either the acceleration or lugging modes.

The permittee shall operate and maintain each engine such that it achieves the emission standards over the entire life of the engine.

(Ref.: 40 CFR 60.4205(b), 60.4202(a)(1)(i) and (2),60.4206, 89.112, and 89.113)

3.B.19 For Emission Points AA-007a through AA-007d, the permittee shall install a non-resettable hour meter prior to startup of the engine. (Ref.: 40 CFR 60.4209(a))

3.B.20 For Emission Points AA-007a through AA-007d, the permittee shall operate and maintain the engines according to the manufacturer's emission-related written instructions, change only those emission-related settings that are permitted by the manufacturer, and meet the requirements of Condition 3.B.17.

The permittee shall operate each emergency engine according to (a) through (c) below. In order to be considered an emergency stationary engine under Subpart IIII, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year as described in (a) through (c) below is prohibited. If the permittee does not comply with (a) through (c) below for any engine, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

(a) There is no limit on the use of emergency stationary engines in emergency situations.

(b) The permittee may operate an emergency engine for any combination of purposes specified in (1) through (3) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed in (c) counts towards the 100 hours per calendar year allowed in (b).

  (1) The permittee may operate an emergency engine for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. Additional hours for maintenance checks and readiness testing can be granted via petition; however, such a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of engines beyond 100 hours per calendar year.

  (2) Emergency engines may be operated for emergency demand response for periods in which an authorized entity has declared an Energy Emergency Alert Level 2.

  (3) Emergency engines may be operated for periods when there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

(c) Emergency engines may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in (b). The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response or to generate income for the permittee to an electric grid or otherwise supply power as part of a financial arrangement with another entity unless all the conditions in 60.4211(f)(3)(i)(A) through (E) are met.

(Ref.: 40 CFR 60.4211(f)(1) through (3))

3.B.21 Emission Points AA-007e through AA-007l are emergency units and the permittee shall operate each engine according to the requirements in (a) through (c) below:

(a) There is no limit on the use of an engine during emergency situations.

(b) An engine may operate for any combination of the purposes specified in paragraphs (1) - (3) below for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (c) counts as part of the 100 hours per calendar year allowed by this paragraph.

(1) An engine may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engines. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.

(2) An engine may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see § 63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.

(3) An engine may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

(c) An engine may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (b). The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(d) If the emergency engines are not operated according to the requirements in (a) - (c) above, the engines will not be considered an emergency engine under this subpart and will need to meet any applicable requirements for non-emergency engines.

(Ref.: 40 CFR 63.6640(f) and 63.6675)

3.B.22 For Emission Points AA-007e through AA-007l, the permittee shall, at all times, be in compliance with the applicable requirements of Subpart ZZZZ and operate and maintain the engine, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for

minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by Subpart ZZZZ have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the MDEQ which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. (Ref.: 40 CFR 63.6605)

3.B.23 For Emission Points AA-007e through AA-007l, the permittee shall comply with the following requirements:

(a) Change oil and filter every 500 hours of operation or annually, whichever comes first, or perform an oil analysis at the same frequency in order to extend the oil change requirement. If the permittee chooses to use oil analysis in an effort to extend the oil/filter change requirement, the results of the analysis must verify the oil still meets the limits contained in (1)–(3) below. If any of these limits are exceeded, the oil must be changed within two business days of receiving the results of the analysis. If the engine is not in operation when the results are received, the oil must be changed within two business days or before commencing operation, whichever is later. The oil analysis program must be included in the engine's maintenance plan required by Condition 3.B.22;
   (1) Total Base Number is less than 30 percent of the Total Base Number of the oil when new.
   (2) Viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new.
   (3) Percent water content (by volume) is greater than 0.5.

(b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary;

(c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

If an engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practices according to the schedule listed in (a)–(c) above, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated.

(Ref.: 40 CFR 63.6602, 63.6625(i), and Table 2c of Subpart ZZZZ)

3.B.24 For Emission Points AA-007e through AA-007l, the permittee shall comply with the following requirements:

(a) Operate and maintain the engines according to the manufacturer's emission-related written instructions or develop and follow a maintenance plan which provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution practice for minimizing emissions.

(b) Each engine must have a non-resettable hour meter if one is not already installed.

(c) Minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

(Ref.: 40 CFR 63.6625(e)(2),(f) and (h), 63.6640(a), and Tables 2 and 6 of Subpart ZZZZ)

3.B.25 For Emission Points AA-009a and AA-009b, the permittee shall not have particulate emissions from fossil fuel burning installations of less than 10 MMBTU/hr heat input that exceeds 0.6 lb/MMBTU. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).)

3.B.26 For Emission Points AA-009a and AA-009b, the permittee shall not discharge sulfur oxides from any fuel burning installations in which the fuel is burned primarily to produce heat or power by indirect heat transfer in excess of 4.8 lb/MMBTU (measured as sulfur dioxide) heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)

3.B.27 Emission Points AA-009a and AA-009b are subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63 Subpart DDDDD.

Emission Points AA-009a and AA-009b are existing small boilers in the "units designed to burn gas 1 fuel" subcategory as listed in §63.7499(l) and defined in §63.7575. These units do not have any applicable emission standards and only have to comply with the work practice standard in Condition 3.D.2.

(Ref.: 40 CFR 63.7485, 63.7490(a)(1) and (d), 63.7499(l), and 63.7500(a)(1))

3.B.28 The permittee shall operate and maintain Emission Points AA-009a and AA-009b, including any monitoring equipment, in a manner consistent with safe and good air pollution control practices for minimizing emissions. (Ref.: 40 CFR 63.7500(a)(3))

C. Insignificant and Trivial Activity Emission Limitations & Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
Entire Facility	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 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).)

3.C.2 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)

D. Work Practice Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
AA-003	40 CFR 63.783(b)(2) and (3)	3.D.1	VOHAP	Handling and transfer procedures for VOHAP containing coatings, and inspection of equipment.
AA-009a AA-009b	40 CFR 63.7510(e), Subpart DDDDD	3.D.2	HAP	Conduct initial tune-up and one time energy assessment within six months of completion of construction
	40 CFR 63.7500(e), 63.7515(d), 63.7540(a)(10)(i)-(vi), (12), and (13) and Table 3 of Subpart DDDDD	3.D.3		Subsequent Tune-ups

3.D.1 For Emission Point AA-003, the permittee shall ensure that:

(a) All handling and transfer of VOHAP-containing materials to and from containers, tanks, vats, drums, and piping systems is conducted in a manner that minimizes spills.

(b) All containers, tanks, vats, drums, and piping systems are free of cracks, holes,

and other defects and remain closed unless materials are being added to or removed from them. (Ref.: 40 CFR 63.783(b)(2) and (3))

3.D.2 For Emission Points AA-009a and AA-009b, the permittee must complete an initial tune-up by following the procedures described in 40 CFR 63.7540(a)(10)(i) through (vi) and complete the one-time energy assessment specified in Table 3 of 40 CFR 63, Subpart DDDDD, both no later than six months of completion of construction. (Ref.: 40 CFR 63.7510(e), Subpart DDDDD)

3.D.3 For Emission Points AA-009a and AA-009b, the permittee shall complete a tune-up of each boiler every five years beginning from the date of the initial tune-up. Each subsequent tune-up shall be completed no more than 61 months after the previous one. If the unit is not operating on the required date of the tune-up, the tune-up must be conducted within 30 calendar days of startup. The tune-up must be completed in accordance with (a) through (f) below

(a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled or unscheduled unit shutdown not to exceed 72 months from the previous burner inspection). At units where entry into a piece of process equipment is required to complete the tune-up inspections, inspections are required only during planned entries into the process equipment;

(b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;

(c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled or unscheduled unit shutdown).

(d) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_X requirement to which the unit is subject;

(e) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and

(f) Maintain on-site and submit, if requested by MDEQ, a report containing the following information listed in (1) through (3) of this section:

(1) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.

(2) A description of any corrective actions taken as a part of the tune-up of the boiler.

(3) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.

(Ref.: 40 CFR 63.7500(e), 63.7515(d), 63.7540(a)(10)(i)-(vi),(12), and(13), and Table 3 of Subpart DDDDD)

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

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)(c).)

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

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(b)(1).)

5.A.3 Except as otherwise specified herein, 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(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(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(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. (Ref.: Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation. (Ref.: Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

B. Specific Monitoring and Recordkeeping Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/ Parameter Monitored	Monitoring/Recordkeeping Requirement
Entire Facility	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.1	PM/PM_{10}	Monitor and maintain monthly records consistent with determining compliance with Condition 3.B.1 of the federally enforceable permit herein.
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.2	VOC	Monitor and maintain monthly records consistent with determining compliance with Condition 3.B.3 of the federally enforceable permit herein.
AA-001	40 CFR 63.5704(a)(3). 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.B.3	VOC/HAP	Recording the amount of each type of resin used for both closed and open molding operations.
	40 CFR 63.5787(b)	5.B.4	HAP	Demonstration of compliance with the reinforced plastic composite production emission limits and standards.
	40 CFR 63.5701(b) and 63.5704(b)	5.B.5 5.B.6	HAP	Determination of the method of compliance to meet the open molding emission limit specified in 40 CFR 63.5698.
	40 CFR 63.5713	5.B.7	HAP	Demonstration of compliance using compliant materials method.
	40 CFR 63.5731 (c) and (d)	5.B.8	HAP	Demonstration of compliance with the open molding emission limit specified in 40 CFR 63.5698.
	40 CFR 63.5737	5.B.9	HAP	Determination of compliance with the resin and gel coat application equipment cleaning standards.
	40 CFR 63.5767 and 63.5770	5.B.10	HAP	Standard specific recordkeeping requirements.
AA-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.B.11	Particulate Matter	Determination of compliance by recording the amount of abrasive blasting media used.
AA-003	40 CFR 63.785	5.B.12 5.B.13	VOHAP	Determination of VOHAP limit and certification of compliance
	40 CFR 63.786(a), (b), and (c)	5.B.14	VOHAP	Test methods and procedures

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/ Parameter Monitored	Monitoring/Recordkeeping Requirement
AA-003	40 CFR 63.786(d)	5.B.15	VOHAP	Use of forms and procedures
	40 CFR 63.788(a) and (b)	5.B.16	VOHAP	General provisions recordkeeping requirements and standard specific recordkeeping
	40 CFR 63.781(b) and 63.788 (b)(1)	5.B.17	VOHAP	"Low usage exempt" recordkeeping requirements
AA-002 AA-004 AA-005 AA-006 AA-008	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.B.18	Opacity	Weekly observation for presence of any visible emissions.
AA-007a AA-007b AA-007c AA-007d	40 CFR 60.4211(c)	5.B.19	Exhaust Emissions	Compliance requirements for stationary compression ignition internal combustion engines
	40 CFR 60.4214(b)	5.B.20		
AA-007e AA-007f AA-007g AA-007h AA-007i AA-007j AA-007k AA-007l	40 CFR 60.4211(b)	5.B.21	Exhaust Emissions	Compliance requirements for stationary compression ignition internal combustion engines
	40 CFR 63.6655(a), (d), and (e) and 63.6625(i)	5.B.22		
	40 CFR 63.6655(f)	5.B.23		
AA-007	40 CFR 63.6660 and 63.10(b)(1)	5.B.24	Exhaust Emissions	Recordkeeping
AA-009a AA-009b	40 CFR 63.7540(a)(12)	5.B.25	HAP	Continuous Compliance
	40 CFR 63.7555(a)(1), 63.7560, and 63.10(b)(2)	5.B.26	HAP	Recordkeeping
Entire Facility	11 Miss. Admin. Code Pt. 2, R. 1.3.C.; 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).	5.B.27	PM/PM_{10}	Utilization of best management practices for compliance demonstration.

5.B.1 For the entire facility, the permittee shall monitor and maintain monthly records of the mass of total particulate matter emissions, in tons per year, based on a consecutive rolling 12-month period to provide assurance of compliance with Condition 3.B.1 of the federally enforceable permit herein. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

5.B.2 For the entire facility, the permittee shall monitor and maintain monthly records of the mass of total volatile organic compound emissions, in tons per year, based on a consecutive rolling 12-month period to provide assurance of compliance with Condition 3.B.3 of the federally enforceable permit herein. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

5.B.3 For Emission Point AA-001, the permittee shall record the amount of resin used in both closed and open molding operations. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.B.4 For Emission Point AA-001, the permittee shall demonstrate compliance with the emission limitations and standards for plastic composite production found in 40 CFR Part 63, Subpart WWWW by complying with the emission limitations and standards outlined in 40 CFR Part 63, Subpart VVVV. (Ref.: 40 CFR 63.5787(b))

5.B.5 For Emission Point AA-001, the permittee shall demonstrate compliance with the emission limit specified in Condition 3.B.6(b) for the resins and gel coats used in open molding operations by using compliant materials that meet the organic HAP content requirements in Table 2 of Subpart VVVV and using the procedures contained in Condition 5.B.4.

To determine the organic HAP content for each material used in an open molding resin and gel coat operation, the permittee shall rely on documentation from the supplier or manufacturer of the material to identify:

(a) The organic HAP total of each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds.

(b) If the organic HAP content is provided as a range then the permittee shall use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content exceeds the upper limit of the range provided by the material supplier or manufacturer, then the permittee must use the measured organic HAP content to determine compliance.

(c) If the organic HAP content is provided as a single value, the permittee may assume the value is a manufacturing target value and actual organic HAP content may vary from the target value. If a separate measurement of the total organic HAP content is less than 2 percentage points higher than the value provided by the material supplier or manufacturer, then the permittee may use the provided value to demonstrate compliance. If the measured value exceeds the provided value by 2 percentage points or more, then the permittee shall use the measured HAP content value to demonstrate compliance.

(Ref.: 40 CFR 63.5701(b) and 63.5758(a)(5))

5.B.6 For each open molding operation in Emission Point AA-001 using the compliant materials option, the permittee shall demonstrate compliance with the emission limit in Condition 3.B.6(b) by completing the following:

(a) Use the method in Condition 5.B.5 to determine the organic HAP content of resins and gel coats.

(b) Complete the calculation in Condition 5.B.7 to show the weighted-average organic HAP content does not exceed the limit specified in Table 2 of Subpart VVVV.

(c) Keep the following records for each resin and gel coat:
- (1) Hazardous air pollutant content;
- (2) Application method for production resin and tooling resin. This is not required if they are applied with non-atomized technology.
- (3) Amount of each material used per month. This is not required if all materials used for that operation comply with the organic HAP content requirements.
- (4) Calculations performed, if required, to demonstrate compliance based on the weighted-average organic HAP content as described in Condition 5.B.7.

(Ref.: 40 CFR 63.5704(b))

5.B.7 For Emission Point AA-001, the permittee shall demonstrate compliance with the compliant materials method using the information provided in paragraphs (a) through (d) below:

(a) Compliance using the organic HAP content requirements listed in the table from Condition 5.B.5 is based on a 12-month rolling average that is calculated at the end of every month. The first 12-month rolling-average period begins upon startup.

(b) At the end of the twelfth month after the compliance date and at the end of every subsequent month, review the organic HAP contents of the resins and gel coats used in the past 12 months in each operation. If all resins and gel coats used in an operation have organic HAP contents no greater than the applicable organic HAP content limits from Table 2 of Subpart VVVV, then the permittee is in compliance with the emission limit specified in Condition 3.B.6(b) for that 12-month period for that operation. In addition, the permittee does not need to complete the weighted-average organic HAP content calculation contained in paragraph (c) of this section for that operation.

(c) If the permittee has used a resin or gel coat in an operation that does contain a HAP content in excess of the limits in Table 2 of Subpart VVVV, at the end of every month, the permittee must use the equation below to calculate the weighted-average organic HAP content for all resins and gel coats used in each operation in the past 12 months.

$$Weighted\ Average\ HAP\ Content\ (\%) = \frac{\sum_{i=1}^{n}(M_i HAP_i)}{\sum_{i=1}^{n}(M_i)}$$

Where:

- M_i = mass of open molding resin or gel coat i used in the past 12 months in an operation, megagrams.
- HAP_i = Organic HAP content, by weight percent, of open molding resin or gel coat i used in the past 12 months in an operation. Use the methods in §63.5758 to determine organic HAP content.
- n = number of different open molding resins or gel coats used in the past 12 months in an operation.

(d) If the weighted-average organic HAP content does not exceed the applicable organic HAP content limit specified in the table from Condition 5.B.5, then the permittee is in compliance with the emission limit specified in Condition 3.B.6(b).
(Ref.: 40 CFR 63.5713)

5.B.8 For the resin and gel coat mixing operations in Emission Point AA-001, the permittee shall demonstrate compliance Condition 3.B.9 by visually inspecting all mixing containers subject to this requirement at least once per month. The inspection should ensure that all containers have covers with no visible gaps between the cover and the container, or between the cover and equipment passing through the cover. The permittee shall keep records of which mixing containers are subject to the standard and the results of the inspections, including a description of any repairs or corrective actions taken.
(Ref.: 40 CFR 63.5731 (c) and (d))

5.B.9 For the resin and gel coat application equipment cleaning operations in Emission Point AA-001, the permittee shall comply with Condition 3.B.10 as outlined in paragraphs (a) through (c) below:

(a) Determine and record the organic HAP content of the cleaning solvents subject to the standards specified in Condition 3.B.10 using the methods specified in Condition 5.B.5.

(b) If the facility recycles cleaning solvents on site, the permittee may use documentation from the solvent manufacturer or supplier or a measurement of the organic HAP content of the cleaning solvent as originally obtained from the solvent supplier for demonstrating compliance, subject to the conditions in Condition 5.B.3 for demonstrating compliance with organic HAP content limits.

(c) At least once per month, the permittee must visually inspect any containers holding organic HAP-containing solvents used for removing cured resin and gel coat to ensure that the containers have covers with no visible gaps. Keep records of the monthly inspections and any repairs made to the covers.

(Ref.: 40 CFR 63.5737)

5.B.10 For Emission Point AA-001, the permittee shall perform the applicable recordkeeping as outlined in paragraphs (a) through (h) below:

(a) The permittee must keep a copy of each notification and report that was submitted to comply with this subpart.

(b) The permittee must keep all documentation supporting any notification or report that was submitted.

(c) If the facility is not controlled by an add-on control device (i.e., complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), the permittee must keep the records of the total amounts of open molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP contents for each operation, expressed as weight-percent. For open molding production resin and tooling resin, the permittee must also record the amounts of each applied by atomized and nonatomized methods.

(d) Records must be readily available and in a form so they can be easily inspected and reviewed.

(e) The permittee must keep each record for 5 years following the date that each record is generated.

(f) The permittee must keep each record on site for at least 2 years after the date that each record is generated. The permittee can keep the records offsite for the remaining 3 years.

(g) The permittee can keep the records on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.

(Ref.: 40 CFR 63.5767 and 40 CFR 63.5770)

5.B.11 For Emission Point AA-002, the permittee shall record the amount of abrasive blasting media used in blasting operations occurring in blasting booths and outdoors. This information will be used in conjunction with the appropriate emission factors to calculate the amount of particulate matter produced from abrasive blasting operations. Emission factors shall come from AP-42, Section 13.2.6. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.B.12 For each batch of coating received *for use in Emission Point AA-003*, the permittee shall:

(a) Determine the coating category and applicable VOHAP limit as specified in Condition 3.B.13; and

(b) Certify the **as-supplied** VOC content of the batch of coating, using a certification supplied by the manufacturer or by performing certification testing personally.

(Ref.: 40 CFR 63.785(a)(1) and (2))

5.B.13 For Emission Point AA-003, as an alternative to testing each batch of coating, **as applied**, the permittee may determine compliance with the applicable limits determined in Condition 5.B.12(a) using any combination of the following procedures. The procedure used for each coating shall be determined and documented prior to application.

(a) For coatings to which thinning solvent (or any other material) will not be added under any circumstance or to which only water is added, the permittee shall:

(1) Certify the **as-applied** VOC content of each batch of coating.

(2) Notify the persons responsible for applying the coating that no thinning solvent may be added to the coating by affixing a label to each container of coating in the batch or through another means described in the implementation plan required in 40 CFR 63.787(b).

(3) If the certified as-applied VOC content of each batch of coating used during a calendar month is less than or equal to the VOHAP limit in Condition 5.B.12(a), then compliance is demonstrated for that calendar month, unless a violation is revealed using Method 24 or Appendix A to 40 CFR Part 60.

(b) For a coating to which thinning solvent is routinely or sometimes added, the permittee shall:

(1) Prior to the first application of each batch, designate a single thinner for the coating and calculate the maximum allowable thinning ratio (or ratios) using the equation and procedures specified in 40 CFR 63.785(c)(2)(i).

(2) Prior to the first application of each batch, notify painters and other persons, as necessary, of the designated thinner and maximum allowable thinning ratio(s) for each batch of the coating by affixing a label to each container of coating or through another means described in the implementation plan required in Condition 5.C.4.

(3) By the 15th day of each calendar month, determine the volume of each batch of the coating used, **as-supplied** during the previous month.

(4) By the 15th day of each calendar month, determine the total allowable volume of thinner for the coating used during the previous month using the Equation 3 specified in 40 CFR 63.785(c)(2)(iv).

(5) By the 15th day of each calendar month, determine the volume of thinner actually used with the coating during the previous month.

(c) For coatings to which the same thinning solvent (or other material) is routinely or sometimes added, the permittee shall:

(1) Designate a single thinner to be added to each coating during the month and "group" coatings according to their designated thinner.

(2) Prior to the first application of each batch, calculate the maximum allowable thinning ratio for each batch of coating in the group using the equations in 40 CFR 63.785 (c)(2)(i).

(3) Prior to the first application of each "batch," notify painters and other persons, as necessary, of the designated thinner and maximum allowable thinning ratio(s) for each batch in the group by affixing a label to each container of coating or through another means described in the implementation plan required in Condition 5.C.4.

(4) By the 15th day of each calendar month, determine the volume of each batch of the group used, **as-supplied**, during the previous month.

(5) By the 15th day of each calendar month, determine the total allowable volume of thinner for the group for the previous month using the Equation 3 specified in 40 CFR 63.785(c)(2)(iv).

(6) By the 15th day of each calendar month, determine the volume of thinner actually used with the group during the previous month.

(d) For demonstrating compliance through alternative test methods, the permittee shall follow the requirements of 40 CFR 63.785(c)(4).

(Ref.: 40 CFR 63.785(b) and (c)(1) through (4))

5.B.14 For Emission Point AA-003, the permittee shall use the following test methods and procedures as applicable:

(a) When using the compliance procedures described in Conditions 5.B.13(a) through 5.B.13(c), the permittee shall use Method 24 of 40 CFR 60, Appendix A to determine the VOC content of coatings as-supplied or as-applied.

(b) When using the compliance procedure described in Condition 5.B.13(d), the permittee shall use a MDEQ approved test method that meets the specified accuracy limits in 40 CFR 63.786(b).

(c) The permittee may use batch formulation data as a test method in lieu of Method 24 to certify the as-supplied VOC content of a coating if it has been determined that the batch formulation data have a consistent and quantitatively known relationship to Method 24 results.

(Ref.: 40 CFR 63.786(a),(b), and (c))

5.B.15 For Emission Point AA-003, the permittee shall use the forms and procedures in Appendix A of Subpart II to determine the values for the thinner and coating parameters to be used in Equations 1 and 2 of 40 CFR 63.785(c). (Ref.: 40 CFR 63.786(d))

5.B.16 For Emission Point AA-003, the permittee shall keep the following records on a monthly basis and retain them in accordance with Condition 5.A.3:

(a) A copy of the approved implementation plan;
(b) The volume of each low-usage exempt coating applied;
(c) Identification of the coatings used, their appropriate coating categories, and the applicable VOHAP limit;
(d) Certification of the as-supplied VOC content of each batch coating;
(e) A determination of whether the containers are free of cracks, holes, and other defects and remain closed unless materials are being added or removed from them; and
(f) The results of any Method 24 or approved VOHAP measurement test conducted on individual containers of coating, as-applied.

In addition to the records in (a) through (f) above, the permittee shall also include the additional records required in 40 CFR 63.788(b)(3)(i), (ii), (iii), or (iv) that corresponds to the chosen compliance procedure(s) from Condition 5.B.12 that were followed.

(Ref.: 40 CFR 63.788(a) and (b)(2) and (3))

5.B.17 For Emission Point AA-003, if the permittee determines a coating has been used that exceeds a limit established in Condition 3.B.13, the permittee shall keep additional records for the rest of the reporting period that contain the following:

(a) A summary of the number and duration of deviations during the reporting period and a reason for each deviation;

(b) A summary of the number and total duration of incidents that the monitoring protocol failed to perform in accordance with the design of the protocol or data that did not meet minimum data accuracy and precision requirements and a reason for each;

(c) Identification of the compliance status as of the last day of the reporting period and whether compliance was continuous or intermittent during the reporting period; and

(d) Each deviation shall also include records identifying the magnitude of each deviation, reason for each deviation, a description of the corrective action taken (including each action taken to minimize the deviation and what action was taken to prevent a recurrence), and what quality assurance activities were done on any element of the monitoring protocol.

(Ref.: 40 CFR 63.788(a) and (b)(4))

5.B.18 For Emission Points AA-002, AA-004, AA-005, AA-006, and AA-008, the permittee shall perform a weekly observation for the presence of any visible emissions.

(1) The operator shall conduct an observation/EPA Reference Method 22 test for the presence of visible emissions from all stacks and other emission points of this equipment on a weekly basis. Observations shall be conducted during daylight hours and while the equipment is in operation. If visible emissions (not including condensed water vapor) are observed, the operator shall:

(a) Within 24 hours, take corrective action that eliminates the visible emissions or verify that the unit causing the emissions and any associated air pollution control equipment are operating normally, in accordance with design and standard procedures, and under the same conditions in which compliance was achieved in the past; and

(b) If visible emissions are not eliminated, have a certified visual emissions observer determine compliance with the opacity standard using EPA Reference Method 9 within three business days; and

(c) Report the visible emissions as a potential deviation (or as a violation if demonstrated by EPA Reference Method 9) according to the reporting requirements of this permit.

(2) The operator shall keep records of the following items for a minimum of five years:

(a) Identification of stack or emission point;

(b) Results of all required visual observations;
(c) Description of corrective actions or statement of verification under (1)(a) above and record of testing under (1)(b) above; and

(d) Date and time any visible emissions were abated.

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

5.B.19 For Emission Points AA-007a through AA-007d the permittee shall demonstrate compliance by using an engine certified to meet the emission standards in Condition 3.B.18. The engine must be installed and configured according to the manufacturer's emission-related specifications. (Ref.: 40 CFR 60.4211(c))

5.B.20 For Emission Points AA-007a through AA-007d, the permittee shall keep records of the operation of each engine in emergency and non-emergency service that are recorded through the non-resettable hour meter required in Condition 3.B.19. The permittee shall record the time and reason when any engine is operated. (Ref.: 40 CFR 60.4214(b))

5.B.21 For Emission Points AA-007e through AA-007l, the permittee shall demonstrate compliance according to one of the methods specified in paragraphs (a) through (e) below:

(1) Purchasing an engine certified according to 40 CFR part 89 or 40 CFR part 94, as applicable, for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's specifications.

(2) Keeping records of performance test results for each pollutant for a test conducted on a similar engine. The test must have been conducted using the same methods specified in this subpart and these methods must have been followed correctly.

(3) Keeping records of engine manufacturer data indicating compliance with the standards.

(4) Keeping records of control device vendor data indicating compliance with the standards.

(5) Conducting an initial performance test to demonstrate compliance with the emission standards according to the requirements specified in §60.4212, as applicable.

(Ref.: 40 CFR 60.4211(b))

5.B.22 For Emission Points AA-007e through AA-007l, the permittee shall keep the following records:

(a) A copy of each report submitted to comply with Subpart ZZZZ;

(b) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment);

(c) Records of maintenance conducted on each engine in order to demonstrate the engine is being operated and maintained according to the manufacturer’s emission related operation and maintenance instructions or the permittee’s own maintenance plan as required by Condition 3.B.23;

(d) Records of all required maintenance performed. If using an oil analysis program as described in Condition 3.B.23, records of the results for each required parameter of the oil analysis.

(Ref.: 40 CFR 63.6655(a), (d), and (e) and 63.6625(i))

5.B.23 For Emission Points AA-007e through AA-007l, the permittee shall keep records of the hours of operation of each engine recorded using the non-resettable hour meter required in Condition 3.B.23. These records must indicate how many hours are spent in emergency operation, including what classified the operation as an emergency, and how many hours are spent in non-emergency operation. Records should also include any time spent operating for the purposes identified in Condition 3.B.21(b)(2) and (3) or (c) and should contain an explanation of the emergency situation, date, and start and end time of engine operation for this purpose. (Ref.: 40 CFR 63.6655(f))

5.B.24 The permittee shall keep records required in Conditions 5.B.20 and 5.B.21 in a form suitable and readily available for expeditious review. These records shall be kept in hard copy or electronic form for five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. (Ref.: 40 CFR 63.6660 and 63.10(b)(1))

5.B.25 For Emission Points AA-009a and AA-009b, the permittee shall demonstrate continuous compliance with the applicable work practice standards by conducting a tune-up in accordance with Condition 3.D.3. (Ref.: 40 CFR 63.7540(a)(12))

5.B.26 For Emission Points AA-009a and AA-009b, the permittee shall keep a copy each notification and report submitted to comply with Subpart DDDDD, including all documentation supporting the Notification of Compliance Status or a semiannual compliance report. These records shall be retained for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. The permittee is required to keep the records on site for a period of 2 years after the event and then they may be kept offsite for the remaining 3 years. All records must be readily available for review. (Ref.: 40 CFR 63.7555(a)(1), 63.7560, and 63.10(b)(2))

5.B.27 For the entire facility, the permittee shall utilize best management practices, as stated in the permittee's site specific dust control plan (dated March 2016; located in Appendix B of the federally enforceable permit herein), for demonstrating compliance with Condition 3.B.2 of the federally enforceable permit herein, minimization of fugitive particulate matter emissions. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.C.; 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

C. Specific Reporting Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Reporting Requirement
Entire Facility	Construction Permit Issued June 1, 2016	5.C.1	PM/PM10	Semi-annual reporting of emissions based on a consecutive 12-month total.
			VOC	
AA-001	40 CFR 63.5761	5.C.2	HAP	Standard specific notification requirements.
	40 CFR 63.5764	5.C.3		Standard specific reporting requirements.
AA-003	40 CFR 63.787	5.C.4	VOHAP	General Provisions notification requirements and implementation plan.
	40 CFR 63.788(a) and (c)	5.C.5		General Provisions reporting requirements and standard specific reporting.
AA-002, AA-004, AA-005, AA-006, & AA-008	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.C.6	Opacity	Reporting in accordance with Condition 5.A.4 of the federally enforceable permit herein.
AA-007e AA-007f AA-007g AA-007h AA-007i AA-007j AA-007k AA-007l	40 CFR 63.6640(b)	5.C.7	HAP	Reporting of work practice deviations
AA-009a AA-009b	40 CFR 63.7510(e), Subpart DDDDD	5.C.8	HAP	Reporting results of initial tune-up and one-time energy assessment
	40 CFR 63.7550(a), (b), and (c)(5)(i)-(iii),(xiv), and (xvii) and Table 9 of Subpart DDDDD	5.C.9		Reporting of 5-year tune-ups
	40 CFR 63.7550(h)(3)	5.C.10		Electronic submission requirements
Entire Facility	11 Miss. Admin. Code Pt. 2, R. 1.3.C.; 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).	5.C.11	$PM/PM_{10}/PM_{2.5}$	Semiannual reporting for compliance demonstration

5.C.1 For the entire facility, to demonstrate compliance with Conditions 5.B.1 and 5.B.2 of the federally enforceable permit herein, the permittee shall maintain monthly inventories, which are based on a consecutive 12-month total. A summary of this recordkeeping shall be submitted every six (6) months in accordance with Condition 5.A.4 of the federally enforceable permit herein. (Ref.: Construction Permit Issued June 1, 2016)

5.C.2 For Emission Point AA-001, the permittee shall submit a notification of compliance status with thirty calendar days after the end of the first 12-month averaging period after startup of the facility. (Ref.: 40 CFR 63.5761(a))

5.C.3 For Emission Point AA-001, the permittee shall submit semi-annual compliance reports in accordance with Condition 5.A.4. These reports shall contain at a minimum:

(a) Company name and address
(b) A statement by a responsible official with that official's name, title, and signature certifying the truth, accuracy and completeness of the report.
(c) The date of the report and the beginning and ending dates of the reporting period.
(d) A description of any changes in the manufacturing process since the last compliance report.
(e) A statement, or table showing, for each regulated operation, the applicable organic HAP content limit and application equipment. The statement or table must also show the actual weighted-average organic HAP content for each operation during each of the 12-month averaging periods that end during the reporting period.
(f) If the permittee is in compliance with the emission limits and work practice standards during the reporting period, the report must include such a statement.
(g) If the permittee deviated from an emission limit or work practice standard during the reporting period, the following information should be included in the report:
(1) A description of the operation involved in the deviation.
(2) The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation.
(3) A description of any corrective actions taken to minimize the deviation and actions taken to prevent it from happening again.
(4) A statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period.

(Ref.: 40 CFR 63.5764(b)(5) and (c))

5.C.4 For Emission Point AA-003, the permittee shall develop, submit for approval and maintain an implementation plan that identifies what which compliance procedure(s) the permittee intends to use, identifies the procedures used by the permittee to gather the necessary data and make the required calculations, and the procedures the permittee will use to transfer, handle, and store VOHAP containing materials. (Ref.: 40 CFR 63.787(b)(3))

5.C.5 For Emission Point AA-003, the permittee shall submit a report to the MDEQ in accordance with Condition 5.A.4 containing a summary of the records required to be

kept in Conditions 5.B.15 and 5.B.16. (Ref.: 40 CFR 63.788(c))

5.C.6 For Emission Points AA-002, AA-004, AA-005, AA-006, and AA-008, the permittee shall submit the results of Condition 5.B.15 of the federally enforceable permit herein in accordance with Condition 5.A.4 of the federally enforceable permit herein. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

5.C.7 For Emission Points AA-007e through AA-007l, the permittee shall report each instance in which the work practices listed in 3.B.23 were not met. Such instances are deviations and should be reported within five (5) business days in accordance with Condition 5.A.5. If the management practices were not performed on the required schedule because it posed an unacceptable risk under Federal, State, or local law at the time of the required scheduled maintenance, the report must include the Federal, State, or local law under which the risk was deemed unacceptable. (Ref.: 40 CFR 63.6640(b))

5.C.8 For Emission Points AA-009a and AA-009b, the permittee shall report the results of the initial tune-up and the one-time energy assessment as required by Condition 3.D.2 within five (5) business days of completion of those activities. The report shall include the information outlined in (a) through (e) of Condition 5.C.9 below. (Ref.: 40 CFR 63.7510(e), Subpart DDDDD)

5.C.9 For Emission Points AA-009a and AA-009b, the permittee shall submit the information listed in (a) through (e) in accordance with the next required report per Condition 5.A.4 once the tune-up required in Condition 3.D.3 has been completed.

(a) Company and Facility name and address
(b) Process unit information
(c) Date of report and beginning and ending dates of reporting period
(d) The date of the most recent tune-up for Emission Points AA-009a and AA-009b. Include the date of the most recent burner inspection, if it was not done on a 5-year period and was delayed until the next scheduled or unscheduled shutdown.
(e) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

(Ref.: 40 CFR 63.7550(a), (b), and (c)(5)(i)-(iii),(xiv), and (xvii) and Table 9 of Subpart DDDDD)

5.C.10 For Emission Points AA-009a and AA-009b, the permittee shall submit all reports required by Table 9 of Subpart DDDDD electronically to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX.) The permittee must use the appropriate electronic report in CEDRI for this subpart. Instead of using the electronic report in CEDRI for this subpart, the permittee may submit an alternate electronic file consistent with the XML schema listed on the CEDRI Web site (http://www.epa.gov/ttn/chief/cedri/index.html), once the XML schema is available. If the reporting form specific to this subpart is not available in CEDRI at the time that the

report is due, the permittee must submit the report to the Administrator at the appropriate address listed in §63.13. The permittee must begin submitting reports via CEDRI no later than 90 days after the form becomes available in CEDRI. (Ref.: 40 CFR 63.7550(h)(3))

5.C.11 For the entire facility, the permittee shall submit semiannual reports certifying that the permittee implemented and followed its site specific dust control plan (dated March 2016; located in Appendix B of the federally enforceable permit herein), for the minimization of fugitive particulate matter emissions, for the previous consecutive 12-month period, demonstrating compliance with Conditions 3.B.2 and 5.B.27. The required semiannual reports shall be due in accordance with Condition 5.A.4. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.C.; 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

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

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 Fm 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

SITE SPECIFIC DUST CONTROL PLAN (DATED MARCH 2016)

Topship, L.L.C. Gulfport Operations (Topship)

Site Dust Control Plan for Shipbuilding and Repair

Stormwater and Air Emissions Best Management Practices

Prepared by

Edison Chouest Offshore
Environmental Branch

March 2016

Topship, L.L.C. Gulfport Operations Site Dust Control Plan

This dust control plan will assist in the control and prevention of potential dust pollution in the shipyard environment. These recommendations and guidelines are intended to be interpreted and applied by the shipyard responsible official, environmental personnel and other qualified persons trained in this discipline.

However, it is recommended that individuals use these recommendations and guidelines as a supplement to their environmental program. BMPs help to improve the shipyards overall environmental program. However, the user must recognize all constraints and limitations subject to proper BMP implementation and bear the responsibility for such use.

Responsibility	Responsible Person	Title	Phone Number
Development and Review	Johnie Robertson	General Manager of Environmental Affairs	(985) 601-4238
Implementation of Plan	Site Environmental Coordinator and Responsible Official	Environmental Coordinator	Facility Main Phone Line
Observance and Reporting of Dust	All Employees	-	Facility Main Phone Line
Technical Aspects	Site Environmental Coordinator	Environmental Coordinator	Facility Main Phone Line
Management Overview	Johnie Robertson	General Manager of Environmental Affairs	(985) 601-4238

Definitions

- **BMP –** Best Management Practices.
- **Boatyard –** a facility that builds or repairs boats or ships less than 65 feet in length.
- **Department –** the Department of Environmental Quality.
- **Floating Dry-Dock –** a dock that consists of a platform bottom and vertical sides (wing walls) that is raised with ballast tanks to work on ships above the water level.
- **Fugitive Emissions –** dust, fumes, gases, mist, odorous matter, vapors or any combination thereof that are not easily given to measurement, collection, and treatment by conventional pollution control methods.
- **Graving Dock –** a dock that is generally constructed with concrete sides and bottom and with a gate at the end of the dock next to the water surface.
- **Shipyard –** a facility that builds or repairs boats or ships larger than 65 feet in length.
- **Waters of the State –** lakes, bays, ponds, impounding reservoirs, within the territorial limits of the State of Mississippi, and all other bodies of surface or springs, wells, rivers, streams, creeks, estuaries, marshes, inlets, canals, the Pacific Ocean underground waters, natural or artificial, inland or coastal, fresh or salt, public or private (except those private waters which do not combine or effect a junction with natural surface or underground waters), which are wholly or partially within or bordering the state or within its jurisdiction.

Topship, L.L.C. Gulfport Operations Site Dust Control Plan

1. Location of Potential/Actual Dust Sources

Topship is located at 13303 Industrial Seaway Road, Gulfport, Mississippi 39503. The facility is on the north side of Bernard Bayou. The majority of the facility is covered in concrete. The following dust sources have been evaluated:

1.1. The yard traffic is limited to the required vehicles, forklifts, and cranes. Concrete roads and parking lots are located at the entrance of the facility. During dry weather days, dust may be generated via equipment movement or wind.

1.2. Abrasive blasting will be conducted on some metal and composite components produced at the faiclity. This blasting bay has partial openings on all four walls with mesh curtains hung over these openings during blasting operations. For the majority of blasting operations, the facility uses non-silica based blasting media for both metal and composite blasting. The facility also conducts blasting on small components in an enclosed blast booth located in Bay 9. Emissions from the blast booth are routed to a baghouse equipped with a cyclone where spent media is collected for disposal.

1.3. Spray painting operations are used in the painting of ship components. Operations may produce dust in the form of overspray.

1.4. Metal fabricating, cutting, and welding operations are conducted and may produce dust in the form of grinding dust or welding fumes.

1.5. Composite cutting and finishing operations may produce dust. Each saw is equipped with a dust collection system. Finishing operations include hand-held grinding, sanding, and other equipment which uses two dust collectors to control emissions.

1.6. The facility operates a carpentry shop used to trim metal/wood, to make crates for shipping, and to make mold supports for the composite process. This area may create dust from sanding and machine processing and is controlled by a dust collection system.

2. Peripheral Areas that may be Impacted by Dust

See attached figure for areas within 1 mile radius of the Topship facility.

3. Suppressants Used or Available

3.1. Water is the sole item used to suppress road/yard dust.

4. Contingencies to Control Dust Emissions

4.1. The road/work area will be inspected to determine if the concrete roads are contributing to dust leaving the site.

4.2. Should blast screens become unserviceable around the blasting area, abrasive blasting in this area will cease until the walls or curtains are repaired.

4.3. Should buildings or containments structures become degraded to the point of not containing blast dust or paint overspray, operations will cease until the containment structures are returned to a serviceable condition.

5. Best Management Practices for Controlling Dust Emissions

This section contains different Best Management Practices (BMPs) to be used for control and collection of pollutants in shipyards.

Each BMP data sheet provides a general discussion on the need for the BMP; a description of the BMP; a general discussion about how the BMP functions and why; associated criteria related to proper BMP functioning; and a brief discussion on related concerns which could affect the BMP operation.

5.1 Administrative

5.1.1 Vehicle Speed Limits

General

Topship has a strictly enforced 5 mph speed limit for all traffic.

5.1.2 Training and Education

General

Due to the nature of the shipyard business, BMP structures are in constant need of repair, replacement, inspection and cleanup. Employees must be aware of the purpose of BMP procedures or structures and how they should be implemented or maintained.

BMP Objective

The objective is to have educated and trained employees which are familiar with BMPs for the facility and understand the purpose of BMPs and prevention of pollution.

BMP

Management should provide all employees with regularly scheduled BMP seminars and discussions relating to pollutants and pollution prevention. The training should emphasize procedures, BMP techniques and supervisory responsibility and accountability. Subcontracting firms should be strongly encouraged to participate in the BMP training program. New employees should be made aware of BMPs on the first day of work and be regularly reminded of them.

By, Regulation, the facility must submit an annual certification report to the Mississippi Department of Environmental Quality (MDEQ) with regards to emissions information as it relates to the facility. If a dust/visible emission event occurs, the relevant information will be documented and reported as required by the MDEQ and made available upon request by the agency.

5.2 Facility

5.2.1 Dock Cleanup

General

Cleanup of the dock floor to remove trash, blast abrasive, and other potential pollutants should occur on a regular basis. Boatyard personnel should maintain records of each cleaning occurrence. The materials must be disposed of in the appropriate disposal bins.

BMP

After a vessel has been docked, floor cleanup can be accomplished with the use of the following equipment:

- Front end loaders
- Tractor sweepers
- Mobile sweepers
- Mobile vacuums
- Hand brooms
- Stationary vacuums

If an area is inaccessible to a front end loader or mechanical sweeper, vacuums, shovels, or brooms should be used to complete the cleanup of blast abrasives and other solid pollutants.

5.3 Blasting and Painting Operations

5.3.1 Shrouding

General

Vessel maintenance generally involves some amount of abrasive blasting followed by painting. These operations may be carried out on the ship's interior tanks and compartments or on the exterior hull and upper decks. The use of blast abrasive or paint represents a potential pollutant source, which may be lost to the water surface or off the property during the repair work.

BMP Objective

The use of shrouds will reduce or prevent the loss of abrasive blast grit to the surrounding property. The shroud will also reduce the scattering effects of wind and localize the area of cleanup. To be effective, the shrouding must be properly designed, constructed, positioned, and erected.

BMP

While performing abrasive blasting or painting operations in areas where blast material may reach state waters or leave the property, shroud material should be erected to prevent the loss or scattering of these potential pollutants. Shroud material should be used in dock areas as well, particularly extending from the ship sides to the top of the dock walls. In addition, shrouding should be incorporated with all blasting or painting performed on super structures. Support structures should be used in conjunction with the shroud. To be effective, the shrouding must be properly designed, constructed, positioned, and erected.

5.3.2 Port Screening and Filtering

General

Abrasive blasting, spray painting, water blasting, welding, and numerous other repair and repair-related operations generate pollutants have potential of exiting the dock.

BMP Objective

The objective is to prevent particulate matter from leaving the dock area through the sally ports at any time thus enhancing the removal of various pollutants.

BMP

The screen size should be adequate in size to prevent the potential movement through the sally ports of approximately 80% of the spent abrasive blast material. In some instances, the screens can be welded in place, flush with the wing walls of the dry dock. Otherwise, various shaped molding or hinges can be used to hold the screen in place. The screen and molding can be designed to allow service hoses or piping to pass through the sally port and not interfere with the primary purpose of the BMP. The screen need not cover the entire sally port opening, but the sally port should be covered to the degree necessary to filter any particulates.

5.3.3 Yard Operation and Maintenance

5.3.3.1 Yard Inspection

General

Most boat and shipyards are centers for a variety of repair, cleaning, painting, construction, and fabrication operations because of continually changing maintenance operations, manpower requirements, and repair schedules, yard "good housekeeping", and BMP controls tend to become a low priority among workers.

New employees may not understand or remember to maintain BMP controls or report potential and existing environmental problems.

BMP Objective

The purposes of an inspection include: keeping abreast of changing conditions within the shipyard; observing employees, contractor, and client BMP control and "good housekeeping" performance; identifying potential pollutant source problems; and determining conditions which require resolution through immediate action. Designated cleanup crew should be available to perform cleanup tasks. Action must be taken immediately to correct specific boatyard problems. Follow-up actions should be undertaken to ensure that a specific concern has been properly addressed.

BMP

A shipyard environmental supervisor and all manager(s) should be responsible for routine inspections of all on-site waterfront, pier, and docking facilities. The inspection should include an evaluation of BMP control implementation and effectiveness. The inspections should include, but are not limited to, the direct observation of:

1. Repair activities along the shoreline, bulkheads, wetslips, dry docks, and marine railways;
2. Abrasive blast materials work and storage areas; and
3. Trash and waste container disposal areas.

Frequent surveillance of the shipyard support shops and contractors (i.e. electrical, carpentry, engine, steel fabrication, machine, etc.) should be conducted to inspect for dust sources.

5.3.3.2 General Yard Maintenance

General

The ship/boat yard workplace is constantly changing due to the varied work tasks and fabrication requirements. Employees may shift from one work area to another and the numbers of employed individuals may change dramatically from one month to the next. Therefore, keeping all

employees informed of their responsibility to maintain a clean environment is a continual task. This is accomplished most effectively by ensuring that employee's actions are scrutinized closely by supervisor's inspections and by promotion of company policy to maintain a clean and orderly yard.

BMP Objective

The objective is simply to use commonly accepted practices to maintain a clean yard. Organized, clean yard provides an environment that reduces the potential for pollutants to enter air, groundwater, and surface waters. A cleanup crew should walk through the yard conducting cleanup tasks of a general nature and per instruction of an environmental supervisor to complete specific tasks. Without the presence of a dedicated and educated crew to maintain "good housekeeping", it is unlikely that a yard can maintain the intent of this BMP. Also, through management direction and commitment, the company must continually promote the general concept of "good housekeeping."

BMP

Per an established daily schedule, a cleanup crew should:

1. Remove and properly dispose of general yard refuse, including but not limited to paper, plastics, cans, drink bottles, used welding materials, discarded fabrication, and construction materials.
2. Cleanup spent blast abrasive and placed in appropriate container.
3. Ensure that trash cans and trash bins are in the appropriate yard locations and are emptied when full. Trash bins must be located on piers and on vessels.
4. Remove and dispose of any refuse found on the water surface within the areas adjacent to the piers, bulkheads, dry docks, or shorelines.

Topship, L.L.C. Gulfport Operations
Fugitive Emissions (Dust) Log

Date/Time of Observation	Blasting Ceased Y/N	Wind Direction	Wind Speed MPH	Other Significant Observations

Topship, L.L.C. Gulfport Operations Site Dust Control Plan

Certification by Responsible Official

I certify that I am familiar with the information contained in this dust management plan for Topship, L.L.C. Gulfport Operations, and that, to the best of my knowledge and belief, such information is true, complete, and accurate. As an appropriate representative of Topship, L.L.C., by my hand and signature, I submit this Plan for fulfilling the requirements for a Title V Permit and that, to the best of my ability, will commit the necessary resources and personnel to fulfill the Plan's requirements.

Johnie Robertson	General Manager Environmental Affairs
Printed Name of Responsible Party	**Title**
Signature	**Date**

Contact Information

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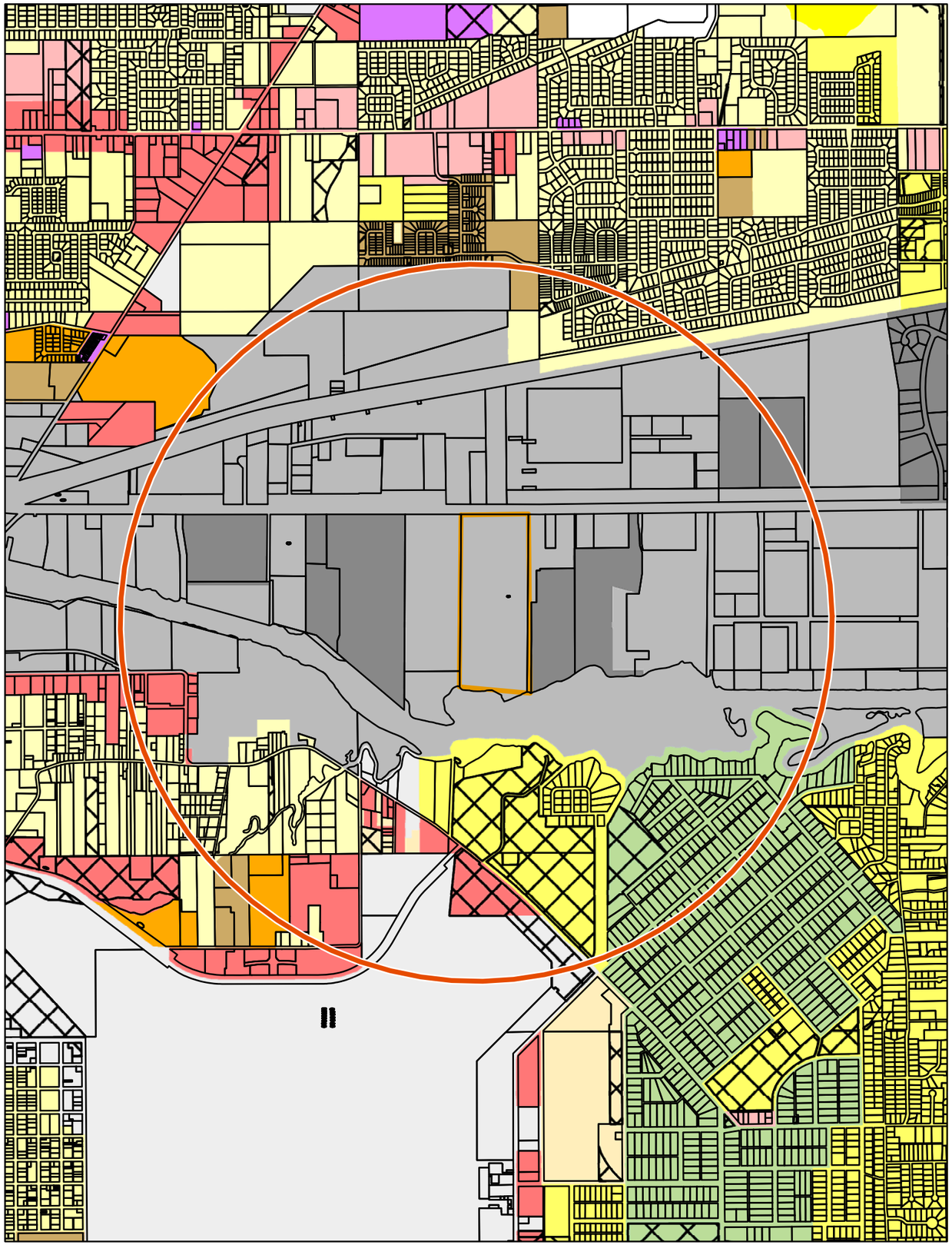

Zoning

- A-1 - Agricultural District
- B-1 - Neighborhood Business District
- B-2 - General Business District
- B-3 - Central Business District
- B-4 - Highway Business District
- E-G - Entertainment - Gaming District
- I-1 - Light Industry District
- I-2 - Heavy Industry District
- I-3 - Planned Industrial District
- R-1-10 - Single Family Residence (Low Density)
- R-1-15 - Single Family Residence District (Low Density)
- R-1-5 - Single Family Residence District (Medium Density)
- R-1-7.5 - Single Family Residence District (Low Density)
- R-2 - Single Family Residence District (Medium Density)
- R-3 - General Residence (High Density)
- R-4 - General Residence (High Density)
- R-O - Residence-Office
- R-B - Residence-Business District
- R-E - Residence-Estate
- R-UE - Residential Urban Estate
- SB - Sand Beach
- WF - Water Front