

STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

PG Technologies LLC
135 Technology Boulevard
Ellisville, Mississippi
Jones County

has been granted permission to construct air emissions equipment to comply with the emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: January 3, 2017

Permit No.: 1360-00158

SECTION 1

A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
2. Any activities not identified in the application are not authorized by this permit. (Ref.: Miss. Code Ann. 49-17-29 1.b)
3. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for operating without a valid permit pursuant to State Law. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
4. It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(6).)
5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit, unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)
7. The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).)
8. The permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)
9. The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).)

10. Design and Construction Requirements: The stationary source shall be designed and constructed so as to operate without causing a violation of an Applicable Rules and Regulations, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards, and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A.)
11. Solids Removal: The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits. (Ref.: Miss. Code Ann. 49-17-29)
12. Diversion and Bypass of Air Pollution Controls: The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed except as provided for in 11 Miss. Admin. Code Pt. 2, R. 1.10., "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants." (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)
13. Fugitive Dust Emissions from Construction Activities: The construction of the stationary source shall be performed in such a manner so as to reduce fugitive dust emissions from construction activities to a minimum. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A(4).)
14. Right of Entry: The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives upon presentation of credentials:
 - a) To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and
 - b) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emissions. (Ref.: Miss. Code Ann. 49-17-21)
15. Permit Modification or Revocation: After notice and opportunity for a hearing, the Permit Board may modify the permit or revoke it in whole or in part for good cause shown including, but not limited to:
 - a) Persistent violation of any of the terms or conditions of this permit;
 - b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
 - c) A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

16. Public Record and Confidential Information: Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality, Office of Pollution Control. (Ref.: Miss. Code Ann. 49-17-39)
17. Permit Transfer: This permit shall not be transferred except upon approval of the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B)
18. Severability: The provisions of this permit are severable. If any provision of the permit, or the application of any provision of the permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref. 11 Miss. Admin. Code Pt. 2, R. 2.1.D(7).)
19. Permit Expiration: The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance or if construction is suspended for eighteen (18) months or more. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1).)
20. Certification of Construction: A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(3).)
21. Beginning Operation: Except as prohibited in Section 1, Condition 24 of this permit, after certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by 11 Miss. Admin. Code Pt. 2, R. 2.13.G. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).)
22. Application for a Permit to Operate: Except as otherwise specified in Section 1, Condition 24 of this permit, the application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).)
23. Operating Under a Permit to Construct: Except as otherwise specified in Section 1, Condition 24 of this permit, upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).)
24. Application Requirements for a Permit to Operate for Moderate Modifications: For moderate modifications that require contemporaneous enforceable emissions reductions from more than

one emission point in order to “net” out of PSD/NSR, the applicable Title V Permit to Operate or State Permit to Operate must be modified prior to beginning operation of the modified facilities. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7).)

25. General Duty: All air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

26. Deviation Reporting: Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

27. Compliance Testing: Regarding compliance testing:

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

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

B. GENERAL NOTIFICATION REQUIREMENTS

- 1. Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).)
- 2. The permittee must notify DEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).)
- 3. Upon the completion of construction or installation of an approved stationary source or modification, and prior to commencing operation, the applicant shall notify the Permit Board

that construction or installation was performed in accordance with the approved plans and specifications on file with the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).)

4. The Permit Board shall be promptly notified in writing of any change in construction from the previously approved plans and specifications or permit. If the Permit Board determines the changes are substantial, it may require the submission of a new application to construct with “as built” plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an “as built” application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).)

SECTION 2 EMISSION POINT DESCRIPTION

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

Emission Point	Description
AA-001	<u>Grit Blasters (“GB-01” – “GB-25”)</u> – This emission point consists of twenty-five (25) proposed abrasive blasting units which shall be used to prepare the surface of parts to undergo various coating operations. Varying abrasive blasting media may be used. This emission point has the potential to emit PM, PM ₁₀ , and PM _{2.5} . The particulate emissions from each individual grit blaster will be controlled by a corresponding dust collector equipped with a MERV 16 or higher filter cartridge and a voluntary secondary high-efficiency particulate air (HEPA) filter (“DC-1” – “DC-25”).
AA-002	<u>Coating Operation #1 (“HV001” – “HV003”)</u> – This emission point consists of three (3) proposed coating stations which apply a powder based coating onto parts via thermal spraying. This emission point has the potential to emit PM, PM ₁₀ , PM _{2.5} , and HAPs (specifically Chromium, Nickel, and Cobalt). Emissions from each individual coating station will be controlled by a corresponding dust collector equipped with a voluntary HEPA filter (“DC-26” – “DC-28”).
AA-003	<u>Coating Operation #2 (“EC005” – “EC007”)</u> – This emission point consists of three (3) proposed coaters. This emission point has the potential to emit PM, PM ₁₀ , and PM _{2.5} . The particulate matter emissions from each individual coater will be controlled by a corresponding dust collector equipped with a MERV 16 or higher filter cartridge and a voluntary secondary HEPA filter (“DC-38” – “DC-40”).
AA-004	<u>Coating Operation #3 (“SS001” – “SS004”)</u> – This emission point consists of four (4) proposed coating booths which deposit a slurry mixture onto the parts’ surface. This emission point has the potential to emit PM, PM ₁₀ , PM _{2.5} and VOCs. The emissions from SS001 and SS004 will each be controlled by a corresponding dust collector. Emissions from SS002 and SS003 will both be controlled by a shared dust collector. All three (3) dust collectors will be equipped with a MERV 16 or higher filter cartridge and a voluntary secondary HEPA filter.
AA-005	<u>Coating Operation #4 (“VF001” – “VF009”)</u> – This emission point consists of nine (9) proposed coating stations in which a metal containing coating is deposited onto parts. This emission point has the potential to emit PM, PM ₁₀ , PM _{2.5} and HAPs (specifically Chromium, Cobalt, and HF).
AA-006	<u>Coating Operation #5 (“PA001” and “PA002”)</u> – This emission point consists of two (2) proposed coating stations which will pre-coat metal parts using a series of rinse tanks and metal containing salt tanks. This emission point has the potential to emit PM, PM ₁₀ , and PM _{2.5} .
AA-007	<u>Coating Operation #6 (“N001”)</u> – This emission point consists of one (1) proposed coating station in which a masking agent is applied to metal parts to prevent certain areas from being coated. This emission point has the potential to emit VOCs and HAPs (specifically Methanol).
AA-008	<u>Coating Operation #7 (“P001” – “P003”)</u> – This emission point consists of three (3) proposed coating stations which apply a powder based coating onto parts via thermal spraying. This emission point has the potential to emit PM, PM ₁₀ , PM _{2.5} , and HAPs (specifically Chromium, Nickel, and Cobalt). Emissions from each individual coating station will be controlled by a voluntary corresponding HEPA filter (“DC-29” – “DC-31”).
AA-009	<u>Coating Operation #8 (“HY001” and “HY002”)</u> – This emission point consists of two (2) proposed coating stations which apply a powder based coating onto parts via thermal spraying. This emission point has the potential to emit PM, PM ₁₀ , PM _{2.5} , and HAPs (specifically Chromium, Nickel, and Cobalt). Emissions from each individual coating station will be controlled by a voluntary corresponding HEPA filter (“DC-35” and “DC-36”).
AA-010	<u>Coating Operation #9 (“S001” – “S003”)</u> – This emission point consists of three (3) proposed coating stations which will apply a wet, powder based coating onto parts. Electric ovens are then used to cure the coated parts. This emission point has the potential to emit PM, PM ₁₀ , PM _{2.5} , and HAPs (specifically Chromium, Nickel, and Cobalt). Emissions from each individual coating station will be controlled by a corresponding HEPA filter OR a charcoal filter (“DC-32” – “DC-34”). The emissions from the electric curing ovens are assumed to be negligible.

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Emission Point	Description
AA-011	<u>Surface Finishing</u> (“SF-1” and “SF-2”) – This emission point consists of two (2) proposed surface finishing systems which will be used to prepare parts before and after various coating operations. This emission point has the potential to emit PM, PM ₁₀ , and PM _{2.5} . The emissions from each surface finishing system will be controlled by a corresponding dust collector equipped with a MERV 16 or higher filter cartridge and a voluntary secondary high-efficiency particulate air (HEPA) filter.
AA-012	<u>Stripping Operation #1</u> (“A-1”) – This emission point consists of one (1) proposed dip tank used to remove the coatings from defective parts. This emission point has the potential to emit HAPs (specifically HF).
AA-013	<u>Degreasing Operations</u> (“D001” – “D005”) – This emission point consists of five (5) proposed degreasing units which will remove fluids and oils from parts prior to coating. This emission point has the potential to emit VOCs and HAPs (specifically Toluene).
AA-014a	<u>Emergency Generator #1</u> – This emission point consists of one (1) 603 HP (450 kW) diesel-fired, compression ignition reciprocating internal combustion engine (CI RICE). The generator was manufactured in October 2012 and installed in 2013. The displacement is <10 L/cyl.
AA-014b	<u>Emergency Generator #2</u> - This emission point consists of one (1) proposed 603 HP (450 kW) diesel-fired, compression ignition reciprocating internal combustion engine (CI RICE). The generator was manufactured in XXXXX and installed in XXXXX. The displacement is <10 L/cyl.
AA-015	<p><u>Natural Gas Fired Equipment</u> – This emissions point consists of the following groups of natural gas fired units:</p> <ul style="list-style-type: none"> • Sixteen (16) Rooftop Air Handling Units, each with an individual rated heat capacity of less than 1 MMBtu/hr. These units are currently operating on-site. • One (1) Gas Heater, with a rated heat input capacity of less than 0.5 MMBtu/hr. This unit is currently operating on-site. • Two (2) Air Handling Units, each with an individual rated heat input capacity of less than 1 MMBtu/hr. These units are currently operating on-site. • Five (5) proposed Air Handling Units, each with an individual rated heat capacity of less than 2.5 MMBtu/hr. • Six (6) proposed Air Handling Units, each with an individual rated heat input capacity of less than 1 MMBtu/hr. • One (1) proposed Gas Heater, with a rated heat input capacity of less than 0.5 MMBtu/hr.
AA-016	<p><u>Insignificant Activities</u> – This emission point contains all units which produce negligible emissions and may be considered insignificant as specified in 11 Miss. Admin. Code Pt. 2, R. 6.7. These units are listed below:</p> <ul style="list-style-type: none"> • Wet Blast Cleaning Operations • Vacuum Furnaces • Met Lab • Maintenance Welding • Maintenance Metal Working • Paved Road Emissions

SECTION 3 EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
Entire Facility	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity	Facility-wide opacity limitations
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2		
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.3	PM (filterable only)	Particulate emissions shall not exceed the emission rate given by the following relationship: $E = 4.1 \cdot p^{0.67}$
	Construction Permit Issued January 3, 2017	3.4	HAP	<ul style="list-style-type: none"> • 9 tons per year of any individual HAP • 24 tons per year of all combined HAPs
AA-001 AA-003 AA-004 AA-011	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.5	PM (filterable only)	Dust collectors shall always be in operation whenever their associated emission points are active
AA-002 AA-008 AA-009	40 CFR 63, Subpart WWWW (§63.11504(a)(iv); §63.11505(a)(2) and (c); §63.11506(c); and §63.11508(b)) 40 CFR Part 63, Subpart A (§63.1)	3.6	HAP	Applicability
	40 CFR 63, Subpart WWWW (§63.11507(f)(2)(i) and (ii))	3.7		Operating standard for emission management
AA-010	40 CFR 63, Subpart HHHHHH (§63.11169(c); §63.11170(a)(3); and §63.11171(c)(1))	3.8	HAP	Applicability
AA-014a AA-014b	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.9	PM (filterable only)	0.6 lbs/MMBTU/hr or as otherwise limited by facility modification restrictions
	40 CFR 60, Subpart IIII (§60.4200(a)(2)(i)) 40 CFR 60, Subpart A (§60.1)	3.10	HAP	Applicability
	40 CFR 60, Subpart IIII (§60.4211(f)(1-3))	3.11	Operating Requirements	Emergency RICE Requirements <i>The permittee may operate the emergency engines in a non-emergency capacity for up to 100 hours per calendar year</i>

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
AA-014a AA-014b	40 CFR 60, Subpart IIII (§60.4205(b); §60.4202(a)(2); §89.112(a); and §60.4206)	3.12	NMHC+NO _x CO PM (filterable only)	<ul style="list-style-type: none"> • 4.0 g/kW-hr • 3.5 g/kW-hr • 0.2 g/kW-hr
	40 CFR 60, Subpart IIII (§60.4207(b) and §80.510(c))	3.13	Fuel Requirements	Sulfur content: <ul style="list-style-type: none"> • 15 ppm maximum for non-road diesel fuel. Cetane index or aromatic content: <ul style="list-style-type: none"> • A minimum cetane index of 40; OR • A maximum aromatic content of 35 volume percent.
	40 CFR 63, Subpart ZZZZ (§63.6580; §63.6585(a) and (c); §63.6590(a)(2)(iii) and (c)(1)) 40 CFR 63, Subpart A (§63.1)	3.14	HAPs	Applicability
AA-015	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.15	PM (filterable only)	0.6 lbs/MMBTU/hr or as otherwise limited by facility modification restrictions
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.16	SO ₂	4.8 lbs/MMBTU or as otherwise limited by facility modification restrictions.

3.1 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. 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.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.A.)

3.2 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 Condition 3.1. This shall not apply to vision obscuration caused by uncombined water droplets.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)

3.3 For the entire facility, the permittee shall limit the filterable only emissions of Particulate Matter (PM), Particulate Matter with a diameter of 10 microns or less (PM₁₀) to no more than the emission rate given by the following relationship:

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

where "E" is the emission rate in pounds per hour and "p" is the weight of all parts which are introduced into the coating process, in tons per hour. The value for "p" does not include the weight of recycled process materials which are counted at initial introduction into emission source operations.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.F(1). and 11 Miss. Admin. Code Pt. 2, R. 1.2.Z.)

- 3.4 For the entire facility, the permittee shall limit the emissions of any individual Hazardous Air Pollutant (HAP) to no more than 9 tons per year for any consecutive 12-month period on a rolling basis. The permittee shall also limit the emissions of all combined HAPs to no more than 24 tons per year for each consecutive 12-month period on a rolling basis.
(Ref.: Construction Permit Issued January 3, 2017)
- 3.5 For Emission Points AA-001, AA-003, AA-004, and AA-011, in order to minimize the potential for particulate emissions, the permittee shall operate the emission capture and control systems (i.e. dust collectors) associated with each emission point at all times during operation. Furthermore, these emission capture and control systems shall be operated and maintained according to the manufacturers' specifications and instructions.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 3.6 Emission Points AA-002, AA-008, and AA-009 are new thermal spraying units which apply coatings containing chromium and nickel at an area source of HAPs. As such, these emission points are subject to and shall comply with all applicable requirements of 40 CFR Part 63, Subpart WWWW – National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations as well as the applicable requirements for 40 CFR Part 63, Subpart A – General Provisions.

The permittee shall be in compliance with all applicable provisions of Subpart WWWW and Subpart A upon initial startup and shall comply with all applicable, required management practices and equipment standards at all times.
(Ref.: 40 CFR 63.11504(a)(iv); §63.11505(a)(2) and (c); §63.11506(c); §63.11508(b); and §63.1)
- 3.7 For Emission Points AA-002, AA-008, and AA-009, the permittee must operate a capture system that collects PM emissions from the thermal spraying process and transports the emissions to a cartridge filter.
(Ref.: 40 CFR 63.11507(f)(2) and §63.11507(f)(3)(i) and (ii))
- 3.8 Emission Point AA-010 is subject to and shall comply with all applicable requirements of 40 CFR Part 63, Subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources since it is a new spray coating operation located at an area source of HAPs which applies coatings which containing target HAPs (specifically Chromium and Nickel).
(Ref.: 40 CFR 63.11169(c); §63.11170(a)(3); and §63.11171(c)(1))
- 3.9 For Emission Points AA-014a and AA-014b, 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).)
- 3.10 Emission Points AA-014a and AA-014b are compression ignition (CI) emergency stationary RICEs of which construction commenced after July 11, 2005 and were manufactured after April 1, 2006 with a site rating of >500 HP located at an area source of HAP emissions. As such, these engines are subject to and shall comply with all applicable requirements of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart IIII as well as the applicable requirements for 40 CFR Part 60, Subpart A – General Provisions.

(Ref.: 40 CFR 60.4200(a)(2)(i) and §60.1)

- 3.11 For Emission Points AA-014a and AA-014b, the permittee shall operate each emergency stationary RICE according to the requirements below. In order for the engines to be considered an emergency stationary RICE under Subpart IIII, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations, as described below, is prohibited. If the permittee does not operate the engines according to these requirements, the engines will not be considered emergency engines under Subpart IIII and must meet all requirements for non-emergency engines.
- (a) There is no time limit on the use of an engine in emergency situations.
 - (b) The permittee may operate an engine for any combination of the purposes specified as follows for a maximum of 100 hours per calendar year 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. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of an engine for more than 100 hours per calendar year.
 - (c) The 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 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.

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

- 3.12 For Emission Points AA-014a and AA-014b, the permittee shall certify that the engines do not exceed the following emission standards:
- (a) Non-Methane Hydrocarbons and Nitrogen Oxides (NMHC+NO_x): 4.0 g/kW-hr
 - (b) Carbon Monoxide (CO): 3.5 g/kW-hr
 - (c) Particulate Matter (PM): 0.20 g/kW-hr

The permittee shall operate and maintain the engines such that they meet these emission standards for the entire life of each engine.

(Ref.: 40 CFR 60.4205(b); §60.4202(a)(2); §60.4206; and §89.112(a))

- 3.13 For Emission Points AA-014a and AA-014b, the permittee shall only use diesel fuel which complies with the fuel requirements outlined below:
- (a) Sulfur content:
 - (i) 15 ppm maximum for non-road diesel fuel.
 - (b) Cetane index or aromatic content, as follows:
 - (i) A minimum cetane index of 40; or

- (ii) A maximum aromatic content of 35 volume percent.

(Ref.: 40 CFR 60.4207(b) and §80.510(b))

- 3.14 Emission Points AA-014a and AA-014b are subject to and shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ, as well as the applicable requirements for 40 CFR Part 63, Subpart A – General Provisions.

For the purposes of this subpart, Emission Points AA-014a and AA-014b are considered new (constructed after June 12, 2006) compression ignition (CI) emergency stationary RICEs with a site rating of >500 HP located at an area source of HAP emissions. As such, the 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.

(Ref.: 40 CFR 63.6580; §63.6585(a) and (c); and §63.6590(a)(2)(iii) and (c)(1))

- 3.15 For Emission Point AA-015, 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).)

- 3.16 For Emission Point AA-015, the permittee shall limit the emissions of sulfur oxides from all combined fossil fuel burning equipment to no more than 4.8 pounds (measured as sulfur dioxide) per million BTU of total heat input.

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

SECTION 4 WORK PRACTICES

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Work Practice
AA-001 AA-003 AA-004 AA-011	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	4.1	Operating Requirement	Prepare, maintain, and implement a Preventative Maintenance Plan
		4.2		<ul style="list-style-type: none"> Initial filtration using only filter cartridges with a MERV rating of 16 or higher Run emissions through a voluntary secondary HEPA filter immediately after initial filtration
		4.3		Maintain the pressure drop across the dust collectors within the range of 0.2 to 5.0 inches of H ₂ O
AA-002 AA-008 AA-009	40 CFR 63, Subpart WWWWWW (§63.11507(g)(6), (9), and (12))	4.4	HAP	Emission management practices
AA-010	40 CFR 63, Subpart HHHHHH (§63.11173(e)(1); §63.11173(f)(1)-(3); and §63.11173(g)(1) and (3))	4.5	Operating Requirements	Spray coating training and certification program requirements
	40 CFR 63, Subpart HHHHHH (§63.11173(e)(2)(i) and (iii))	4.6		Spray coating booth requirements
	40 CFR 63, Subpart HHHHHH (§63.11173(e)(3))	4.7		Spray gun specification requirements
	40 CFR 63, Subpart HHHHHH (§63.11173(e)(4))	4.8		Spray gun cleaning requirements
	40 CFR 63, Subpart HHHHHH (§63.11173(e)(5))	4.9		Alternate emission standards
AA-014a AA-014b	40 CFR 60, Subpart IIII (§60.4211(a)(1)-(3) and (c))	4.10	Exhaust Emissions	Operate according to manufacturer's recommendations

- 4.1 For Emission Point AA-001, AA-003, AA-004, and AA-011, the permittee shall prepare and submit a Preventative Maintenance Plan (PMP) to the MDEQ no later than ninety (90) days following the submittal of the Certification of Construction notification. The PMP shall include the following information
- Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - A description of the items or conditions that will be inspected and the inspection schedule for these items and conditions; and
 - Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If the PMP cannot be prepared and implemented within the allotted ninety (90) day timeframe, the permittee may submit a written request for a ninety (90) day extension from the MDEQ.

The PMP shall be subject to review and approval by the MDEQ. The permittee may be required to revise the PMP following MDEQ review. Furthermore, the MDEQ may require the permittee to revise the PMP whenever a lack of proper maintenance causes or is the primary contributor to an exceedance of any emission limitation. Upon completion of construction, the permittee shall implement and maintain the PMP at the facility.

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

- 4.2 For Emission Point AA-001, AA-003, AA-004, and AA-011, in order to ensure that adequate PM, PM₁₀, and HAP emission control is achieved, the permittee shall accomplish initial filtration through the use of filter cartridges in the dust collectors which have a certified Minimum Efficiency Reporting Value (MERV) of at least 16 or higher. Furthermore, the emissions may be passed through a voluntary secondary HEPA filter immediately following the initial filtration.

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

- 4.3 For Emission Points AA-001, AA-003, AA-004, and AA-011, in order to insure adequate PM, PM₁₀, and HAP collection is achieved, the permittee shall maintain the pressure drop across the dust collectors within the range of 0.2 and 5.0 inches of H₂O at all times. This pressure drop range shall be included in the final, approved PMP. In the event that the measured pressure drop is outside of the specified range, the permittee shall implement corrective actions to restore the control unit to proper operating status.

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

- 4.4 For Emission Points AA-002, AA-008, and AA-009, the permittee shall perform regular repair, maintenance, and preventative maintenance of all equipment associated with the affected sources; perform good housekeeping practices, such as regular sweeping or vacuuming, if needed, and periodic wash-downs, as practicable; and perform regular inspections to identify leaks and other opportunities for pollution prevention.

(Ref.: 40 CFR 63.11507(g)(6),(9), and (12))

- 4.5 For Emission Point AA-010, all new and existing painters, including contract personnel, must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The minimum requirements for a training and certification program are described in paragraphs (a) through (c) below:

- (a) A list of all current personnel by name and job description who are required to be trained;
- (b) Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed below:
 - (i) Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.

- (ii) Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.
 - (iii) Routine spray booth and filter maintenance, including filter selection and installation.
 - (iv) Environmental compliance with the requirements of Subpart HHHHHH.
- (c) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. If the permittee can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in paragraph (b) above the permittee is not required to provide the initial training required by that paragraph to these painters.

All new and existing painters, including contract personnel, must be trained and certified no later than 180 days after hiring. Painter training that was completed within five years prior to the date training is required, and that meets the training and certification program requirements, specified above, satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed. Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of this section and be re-certified every five years.

The spray application of surface coatings is prohibited by persons who are not certified as having completed the training described in paragraphs (a) through (c) above. The requirements of this condition do not apply to the students of an accredited surface coating training program who are under the direct supervision of an instructor who meets the requirements of this paragraph.

(Ref.: 40 CFR 63.11173(e)(1); §63.11173(f)(1)-(3); and §63.11173(g)(1) and (3))

- 4.6 For Emission Point AA-010, all spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the requirements of paragraphs (a) and (b) of this condition:
- (a) All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992" (incorporated by reference, see §63.14). The test coating for measuring filter efficiency shall be a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-HVLP) air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure; the air flow rate across the filter shall be 150 feet per minute. The permittee may use published filter efficiency data provided by filter vendors to

demonstrate compliance with this requirement and are not required to perform this measurement. The requirements of this paragraph do not apply to water-wash spray booths that are operated and maintained according to the manufacturer's specifications.

- (b) Spray booths and preparation stations must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process.

(Ref.: 40 CFR 63.11173(e)(2)(i) and (iii))

- 4.7 For Emission Point AA-010, all spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the MDEQ. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002" (incorporated by reference, see §63.14).

(Ref.: 40 CFR 63.11173(e)(3))

- 4.8 For Emission Point AA-010, all paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used.

(Ref.: 40 CFR 63.11173(e)(4))

- 4.9 For Emission Point AA-010, the permittee may request to use an alternative emission standard than the ones specified in Conditions 4.6 and 4.7. The permittee must submit the request to the EPA according to the conditions found in §63.6(g)(2).

(Ref.: 40 CFR 63.11173(e)(5))

- 4.10 For Emission Points AA-014a and AA-014b, 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 applicable emission standards.

The permittee shall comply with the required emission standards by purchasing a certified engine. The engine shall be installed and configured according to the manufacturer's emission-related specifications. If the manufacturer's specifications are not followed, the permittee shall demonstrate compliance using the procedures detailed in 40 CFR 60.4211(g)(3).

(Ref.: 40 CFR 60.4211(a)(1)-(3) and (c))

SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
Entire Facility	11 Miss. Admin. Code Pt. 2, R. 6.3.A(b)(2).	5.1	Recordkeeping	Records Retention
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2		
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.3	PM (filterable only)	Keep monthly records of the facility-wide emissions of particulate matter.
		5.4	HAP	Prepare, maintain, and implement a HAP monitoring plan.
AA-001 AA-003 AA-004 AA-011	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.5	PM (filterable only)	Install, calibrate, and maintain a pressure gauge to measure the pressure drop across each dust collector.
		5.6		Keep records of all maintenance and calibration of pressure gauges for each dust collector.
		5.7		<ul style="list-style-type: none"> Keep daily records of the measured pressure drop across each dust collector. Keep records for each deviation from the required pressure drop range, why the deviation occurred, and what corrective actions were taken.
AA-002 AA-008 AA-009	40 CFR 63, Subpart WWWWWW (§63.11508(c)(10))	5.8	HAP	Demonstration of initial compliance
	40 CFR 63, Subpart WWWWWW (§63.11508(d)(1), (2), and (4)(i) through (v))	5.9		Demonstration of continuous compliance
	40 CFR 63, Subpart WWWWWW (§63.11509(c)(2) and (7))	5.10		Annual certification of compliance report
	40 CFR 63, Subpart WWWWWW (§63.11509(e)(1)-(3))	5.11		Recordkeeping requirements
	40 CFR 63, Subpart WWWWWW (§63.11509(f) and §63.10(b)(1))	5.12		
AA-010	40 CFR 63, Subpart HHHHHH (§63.11177(a)-(d) and (g)-(h); and §63.11178(a))	5.13	HAP	Recordkeeping requirements
AA-014a AA-014b	40 CFR 60, Subpart IIII (§60.4209(a))	5.14	HAP	Install a non-resettable hour meter

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
AA-014a AA-014b	40 CFR 60, Subpart IIII (§60.4214(b))	5.15	HAP	Maintain records of engine use
AA-015	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.16	SO ₂	Keep monthly records of the SO ₂ emissions

- 5.1 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).)
- 5.2 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).)
- 5.3 For the entire facility, the permittee shall keep monthly records of the amount of PM, in tons, which has been emitted by the facility's operations. These records shall include all accompanying calculations and other information which have been used to calculate the particulate emissions from the facility. This recordkeeping shall serve as the demonstration of compliance for the process weight PM limitation. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 5.4 For the entire facility, in order to demonstrate compliance with the HAP limitations, the permittee shall prepare and submit a HAP monitoring plan to the MDEQ no later than ninety (90) days following the submittal of the Certification of Construction notice for each HAP emitting unit. This plan shall include how the HAP emissions from each emission point are estimated and how the facility will maintain records of the HAP emissions which occur at each emission point. If the HAP monitoring plan cannot be prepared and implemented within the allotted ninety (90) day timeframe, the permittee may submit a written request for a ninety (90) day extension from the MDEQ.
- The HAP monitoring plan shall be subject to review and approval by the MDEQ. The permittee may be required to revise the HAP monitoring plan following MDEQ review. Furthermore, in the event of an exceedance of the permitted HAP limitations, the MDEQ may require the permittee to revise the HAP monitoring plan to ensure that future exceedances are avoided.
- The permittee shall implement and maintain the HAP monitoring plan upon completion of construction. The permittee shall keep the monitoring plan on-site such that it is easily accessible for facility operators. The permittee shall also keep all HAP records required in the monitoring plan on-site and readily available for review during inspections. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 5.5 For Emission Points AA-001, AA-003, AA-004, and AA-011, the permittee shall install, calibrate, and maintain, according to the manufacturer's specifications, a pressure gauge scaled to read inches of H₂O to measure the pressure drop across each dust collector. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

- 5.6 For Emission Points AA-001, AA-003, AA-004, and AA-011, the permittee shall calibrate the pressure gauges for each dust collector to ensure that the accurate pressure drop is being monitored. The permittee shall keep records verifying that the calibrations were done according to manufacturer's specifications and shall record any maintenance done to the pressure gauges.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 5.7 For Emission Points AA-001, AA-003, AA-004, and AA-011, the permittee shall check the pressure drop across each dust collector once per day. The permittee shall keep a daily record of the monitored pressure drop. In the event that the pressure drop deviates from the required range, the permittee shall document the time period that the deviation occurred, explain why it happened, and provide details on the corrective actions that were taken to restore the pressure drop to the appropriate operating range. For the purposes of this permit, a deviation shall be defined as any time the monitored pressure drop falls outside the required pressure range.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 5.8 For Emission Points AA-002, AA-008, and AA-009, the permittee shall demonstrate initial compliance by complying with the following paragraphs:
- (a) The permittee shall install and operate the required emission control system.
 - (b) The permittee shall state in the Notification of Compliance Status that the control system has been installed and is being operated according to manufacturer's specifications and instructions.
 - (c) The permittee shall keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.
- (Ref.: 40 CFR 63.11508(c)(10))
- 5.9 For Emission Points AA-002, AA-008, and AA-009, the permittee shall demonstrate continuous compliance by complying with the following paragraphs:
- (a) The permittee shall always operate and maintain the affected source, including air pollution control equipment.
 - (b) The permittee shall prepare an annual compliance certification according to the requirements found in Section 6. This annual compliance certification shall be kept in a readily accessible location for inspector review.
 - (c) The permittee shall operate and maintain the required emission control systems according to the manufacturers' specifications and instructions.
 - (d) Following any malfunction or failure of the required capture or control devices to operate properly, the permittee must take immediate corrective action to return the equipment to normal operation according to the manufacturers' specifications and operating instructions.
 - (e) The permittee shall state in the annual certification that the control system has been operated and maintained in accordance with the manufacturer's specifications and instructions.
 - (f) The permittee shall record the results of all control systems inspections, deviations from proper operation, and any corrective action(s) taken.
 - (g) The permittee shall keep the manufacturers' operating instructions at the facility at all times in a location where they may be easily accessed by the operators.
- (Ref.: 40 CFR 63.11508(d)(1), (2), and (4)(i) through (v))

5.10 For Emission Points AA-002, AA-008, and AA-009, the permittee shall prepare by no later than January 31 of the year following the reporting period, an annual certification of compliance report that includes a statement certifying that the control system has been operated and maintained in accordance with the manufacturer's specifications and instructions. The report shall be kept readily available for review and does not need to be submitted unless a deviation has occurred during the reporting year. A deviation, as defined by §63.11511, means any instance in which an affected source or an owner or operator of such an affected source:

- (a) Fails to meet any requirement or obligation established by this rule including, but not limited to, any equipment standard (including emissions and operating limits), management practice, or operation and maintenance requirement;
- (b) Fails to meet any term or condition that is adopted to implement an applicable requirement in this rule and that is included in the operating permit for any affected facility required to obtain such a permit; or
- (c) Fails to meet any equipment standard (including emission and operating limits), management standard, or operation and maintenance requirement in this rule during startup, shutdown, or malfunction.

If a deviation does occur, the permittee shall submit the required information in accordance with Section 6 of this permit.

(Ref.: 40 CFR 63.11509(c)(2)(iii) and (7) and §63.11511)

5.11 For Emission Points AA-002, AA-008, and AA-009, the permittee shall keep the following records:

- (a) A copy of the Notification of Compliance Status and all documentation supporting this notification.
- (b) The permittee shall maintain records of the occurrence and duration of each startup or shutdown when the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards; the occurrence and duration of each malfunction of process equipment or the required air pollution control and monitoring equipment; and all required maintenance performed on the air pollution control and monitoring equipment; and all documentation supporting notifications of compliance status.
- (c) The records required to show continuous compliance with management practices and equipment standards that have been specified in Sections 3 and 4 of this permit.

(Ref.: 40 CFR 63.11509(e)(1)-(3))

5.12 For Emission Points AA-002, AA-008, and AA-009, the permittee shall keep all required records for a minimum of five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The records shall be kept on-site for at least two (2) years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. After this time, the records may be kept off-site for the remaining three (3) years.

(Ref.: 40 CFR 63.11509(f) and 63.10(b)(1))

5.13 For Emission Point AA-010, the permittee shall keep the records specified in paragraphs (a) through (f) below:

- (a) Certification that each painter has completed the training requirements specified in Section 4 with the date the initial training and the most recent refresher training was completed.
- (b) Documentation of the filter efficiency of any spray booth exhaust filter material to demonstrate compliance with the spray booth requirements specified in Section 4.
- (c) Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the MDEQ to achieve a transfer efficiency equivalent to that of an HVLP spray gun, according to the procedure in Condition 4.7.
- (d) Copies of any notification and any report submitted as required by Conditions 6.5 and 6.6.
- (e) Records of any deviation (as defined in §63.11180) from the requirements in Sections 4 and 6. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.
- (f) Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report.

The permittee must maintain copies of the records, specified above, for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period.

(Ref.: 40 CFR 63.11177(a)-(d) and (g)-(h); §63.11178(a))

- 5.14 For Emission Points AA-014a and AA-014b, the permittee shall install a non-resettable hour meter prior to the startup of the affected units.

(Ref.: 40 CFR 60.4209(a))

- 5.15 For Emission Points AA-014a and AA-014b, the permittee shall keep records of the operation of each engine in emergency and non-emergency service that are recorded through the required non-resettable hour meter. The permittee must record the time of operation of the engines and the reason the engines were in operation during that time.

(Ref.: 40 CFR 60.4214(b))

- 5.16 For Emission Point AA-015, in order to demonstrate compliance with the sulfur dioxide limitations in Section 3, the permittee shall keep monthly records of the amount of sulfur dioxide emissions expressed in pounds per million BTU (lb/MMBtu).

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

SECTION 6 REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
Entire Facility	11 Miss. Admin. Code Pt. 2, R. 6.3.A(c)(2).	6.1	Reporting of permit deviations
	Construction Permit issued January 3, 2017 11 Miss. Admin. Code Pt. 2, R. 6.3.A(c)(1).	6.2	Semi-annual reporting of emissions
AA-002 AA-008 AA-009	40 CFR 63, Subpart WWWWWW (§63.11508(a) and §63.11509(b)(1)-(3))	6.3	Notification of Compliance Status for affected sources
	40 CFR 63, Subpart WWWWWW (§63.11509(c)(7) and (d))	6.4	Annual certification of compliance report
AA-010	40 CFR 63, Subpart HHHHHH (§63.11175(a))	6.5	Initial Notification of Compliance
	40 CFR 63, Subpart HHHHHH (§63.11176(a))	6.6	Annual Notification of Changes Report requirements
AA-014a AA-014b	Construction Permit issued January 3, 2017 11 Miss. Admin. Code Pt. 2, R. 6.3.A(c)(1).	6.7	Semi-annual reporting of emissions
AA-015	Construction Permit issued January 3, 2017 11 Miss. Admin. Code Pt. 2, R. 6.3.A(c)(1).	6.8	Semi-annual reporting of emissions

6.1 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. A deviation is defined as any instance in which the permittee:

- (1) Fails to meet any requirement or obligation established by this permit including, but not limited to, any equipment standard (including emissions and operating limits), management practice, or operation and maintenance requirement; or
- (2) Fails to meet any equipment standard (including emission and operating limits), management standard, or operation and maintenance requirement in this permit during startup, shutdown, or malfunction.

Any deviation reports shall be included along with the required semi-annual report.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(c)(2).)

6.2 For the entire facility, in order to demonstrate compliance with the facility-wide PM, PM₁₀, and HAP limitations, the permittee shall submit a summary of all required monitoring and recordkeeping every six (6) months. These reports shall be submitted by January 31 and July 31 for the preceding six-month period. All instances of deviations from this permit's requirements shall be clearly identified in these reports and shall be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 6.2.E.
(Ref.: Construction Permit Issued January 3, 2017 and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(c)(1).)

- 6.3 For Emission Points AA-002, AA-008, and AA-009, the permittee shall submit a Notification of Compliance Status to the MDEQ before the close of business on the initial start-up day for each affected unit. This notification shall include the following:
- (a) A list of the affected sources and the plating and polishing metal HAPs used in, or emitted by, each unit.
 - (b) The methods used to comply with the applicable management practices and equipment standards.
 - (c) A description of the capture and emission control system used to comply with the applicable equipment standards
 - (d) A statement certifying whether the source is in compliance with the applicable standards or other requirements.

If the permittee makes a change to items (1), (2), or (3) above that does not result in a deviation, an amended Notification of Compliance Status shall be submitted to the MDEQ within thirty (30) days of the change.

(Ref.: 40 CFR 63.11508(a) and 63.11509(b)(1)-(3))

- 6.4 For Emission Points AA-002, AA-008, and AA-009, the permittee shall submit a report to the MDEQ in accordance with Condition 1.A.26 in the event that there are any deviations from the applicable compliance requirements of Subpart WWWWWW. This report shall provide details regarding the deviation and information regarding the corrective actions taken.

The permittee shall also submit the required annual certification of compliance by January 31 of the year following the reporting period in which a deviation has occurred.

(Ref.: 40 CFR 63.11509(c)(7) and (d))

- 6.5 For Emission Point AA-010, the permittee must submit the Initial Notification no later than 180 days after initial startup. The initial notification must provide the information specified in paragraphs (a) through (g) below:
- (a) The company name, if applicable.
 - (b) The name, title, street address, telephone number, e-mail address (if available), and signature of the responsible official;
 - (c) The street address (physical location) of the affected source and the street address where compliance records are maintained, if different;
 - (d) An identification of the relevant standard (i.e., 40 CFR Part 63, Subpart HHHHHH);
 - (e) A brief description of the miscellaneous surface coating operation, and include the number of spray booths and preparation stations, and the number of painters usually employed at the operation.
 - (f) A statement of whether the source is already in compliance with each of the relevant requirements of Subpart HHHHHH. For surface coating operations, the relevant requirements are specified in Section 4 of this permit.
 - (g) The permittee must certify in the initial notification whether the source is in compliance with all applicable requirements of Subpart HHHHHH. If the permittee is certifying in the initial notification that the source is in compliance with the relevant requirements of Subpart HHHHHH, then include also a statement by a responsible official with that official's name, title, phone number, e-mail address (if

available) and signature, certifying the truth, accuracy, and completeness of the notification, a statement that the source has complied with all the relevant standards of Subpart HHHHHH, and that this initial notification also serves as the notification of compliance status.

(Ref.: 40 CFR 63.11175(a))

- 6.6 For Emission Point AA-010, the permittee shall submit a report in each calendar year in which information previously submitted in either the initial notification required by Condition 6.5, or a previous annual notification of changes report submitted under this paragraph, has changed. Deviations from the relevant requirements in Section 4 on the date of the report will be deemed to be a change. The annual notification of changes report must be submitted prior to March 1 of any year following a calendar year when reportable changes have occurred and must include the information specified in paragraphs (a) and (b) below:
- (a) The company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.
 - (b) The name, title, address, telephone, e-mail address (if available) and signature of the responsible official, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the permittee has complied with all the relevant standards and other requirements of Subpart HHHHHH or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance.

(Ref.: 40 CFR 63.11176(a))

- 6.7 For Emission Points AA-014a and AA-014b, in order to demonstrate compliance with the particulate matter limitations from Section 3, the permittee shall submit a summary of all required monitoring and recordkeeping every six (6) months. These reports shall be submitted by January 31 and July 31 for the preceding six-month period. All instances of deviations from this permit's requirements shall be clearly identified in these reports and shall be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 6.2.E.

(Ref.: Construction Permit Issued January 3, 2017 and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(c)(1).)

- 6.8 For Emission Point AA-015, in order to demonstrate compliance with the particulate matter and sulfur dioxide limitations from Section 3, the permittee shall submit a summary of all required monitoring and recordkeeping every six (6) months. These reports shall be submitted by January 31 and July 31 for the preceding six-month period. All instances of deviations from this permit's requirements shall be clearly identified in these reports and shall be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 6.2.E.

(Ref.: Construction Permit Issued January 3, 2017 and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(c)(1).)