

**STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
PERMIT**

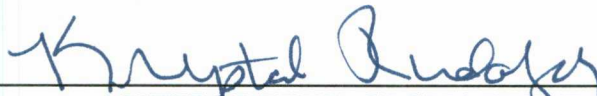
TO CONSTRUCT AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

BPI Coatings Solutions LLC
10136 Magnolia Drive
Olive Branch, Mississippi
Desoto 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: March 2, 2016

Modified: NOV 14 2018

Permit No.: 0680-00015

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
FUEL BURNING EQUIPMENT	
AA-001	8.369 MMBTU/hr Natural Gas-Fired Boiler
AA-002	10.461 MMBTU/hr Natural Gas-Fired Boiler
AA-003	Natural Gas-Fired Space Heaters
AA-005	150 kW Natural Gas-Fired Emergency Generator. Installed in 2015. Subject to NSPS JJJJ.
PAINT MANUFACTURING EQUIPMENT	
AA-006	Mixing Operations – Various amount of raw materials will be pumped to one of several mixing tanks that will range from 100 gallons to 10,000 gallons to produce different industrial and commercial products.
AA-007	30,000 gallon Fixed Roof Toluene Storage Tank
AA-008	30,000 gallon Fixed Roof Xylene Storage Tank
AA-009	30,000 gallon Fixed Roof Butyl Acetate Storage Tank
AA-010	12,000 gallon Fixed Roof Ethyl 3-Ethoxypropionate Storage Tank
AA-011	20,000 gallon Fixed Roof Methyl Amyl Ketone Storage Tank
AA-012	30,000 gallon Fixed Roof Methyl Ethyl Ketone Storage Tank
AA-013	30,000 gallon Fixed Roof Aromatic 100 Fluid Storage Tank
AA-014	20,000 gallon Fixed Room Hexamethylene Diisocyanate Prepolymer Storage Tank
AA-015	20,000 gallon Fixed Room Hexamethylene Diisocyanate Prepolymer Storage Tank
AA-016	20,000 gallon Fixed Room Hexamethylene Diisocyanate Prepolymer Storage Tank
AA-017	20,000 gallon Fixed Room Hexamethylene Diisocyanate Prepolymer Storage Tank
AA-018	20,000 gallon Fixed Roof Parachlorobenzotrifluoride Storage Tank
AA-019	30,000 gallon Fixed Roof Acetone Storage Tank
AA-020	30,000 gallon Fixed Roof Acetone Storage Tank

Emission Point	Description
AA-021	20,000 gallon Fixed Roof Methyl Isobutyl Ketone Storage Tank
AA-022	30,000 gallon Fixed Roof Methanol Storage Tank
AA-023	30,000 gallon Fixed Roof Methanol Storage Tank
AA-024	20,000 gallon Fixed Roof Butyl Alcohol Storage Tank
AA-025	30,000 gallon Fixed Roof Solvent Storage Tank
AA-026	30,000 gallon Fixed Roof Mineral Spirits Storage Tank
AA-027	20,000 gallon Fixed Roof n-Propyl Acetate Storage Tank
AA-028	20,000 gallon Fixed Roof PM Acetate Storage Tank
AA-029	20,000 gallon Fixed Roof Methylene Chloride Storage Tank
AA-030	Fugitive Emissions from Mixing Operations – includes emissions from piping and equipment necessary for mixing operations
BONDO OPERATIONS	
AA-031	15,000 gallon Fixed Roof Promoted Body Resin Storage Tank
AA-032	15,000 gallon Fixed Roof Promoted Body Resin Storage Tank
AA-033	15,000 gallon Fixed Roof Promoted Body Resin Storage Tank
AA-034	15,000 gallon Fixed Roof Stain-Free Resin Storage Tank
AA-035	15,000 gallon Fixed Roof DCPD Resin Storage Tank
AA-036	15,000 gallon Fixed Roof Styrene Monomer Storage Tank
AA-037	5,000 gallon Fixed Roof Kit Resin Storage Tank
AA-038	Mixing Operations – Various amounts of liquid and solid raw materials will be pumped to one of several mixing tanks to produce various blends of Bondo controlled by three (3) Tank Scrubbers with carbon adsorption.

**SECTION 3
EMISSION LIMITATIONS AND STANDARDS**

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 1.3.A. and 1.3.B.	3.1	Opacity	< 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.2	PM (filterable only)	$E = 4.1p^{0.67}$
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.3	VOC	< 99.9 tons/year
		3.4	Individual HAP	< 9.9 tons/year
			Total HAP	< 24.9 tons/year
AA-001 AA-002 AA-003 AA-005	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.5	Fuel	Natural gas only
AA-001 AA-003	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.6	PM (filterable only)	0.6 lb/MMBTU
AA-002	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.7		$E = 0.8808 * I^{-0.1667}$
AA-001 AA-002 AA-003	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.8	SO ₂	4.8 lb/MMBTU
AA-002	40 CFR 60, Subpart Dc – Standards of Performance for Industrial, Commercial, and Institutional Steam Generating Units 40 CFR 60.40c(a)	3.9	PM/SO ₂	Applicability
AA-005	40 CFR 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants: Reciprocating Internal Combustion Engines (RICE) 40 CFR 63.6585(a) and (c)	3.10	HAP	Applicability
AA-005	40 CFR 63.6590(c), Subpart ZZZZ	3.11	HAP	Compliance with 40 CFR 63, Subpart ZZZZ by complying with 40 CFR 60, Subpart JJJJ
	40 CFR 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition (SI)	3.12		Comply with emission standards in 40 CFR 60.4231(c), Subpart JJJJ

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
	Internal Combustion Engines 40 CFR 60.4230(a)(4)(iv)			
	40 CFR 60.4233(c), and 60.4231(c), Subpart JJJJ	3.13		Certification for new non-road SI engines
	40 CFR 60.4237(b), Subpart JJJJ	3.14	Hours of Operation	Install a non-resettable hour meter
	40 CFR 60.4243(d), Subpart JJJJ	3.15	Operating Time	No limit on use during emergency situations.
AA-006 AA-007 AA-008 AA-009 AA-010 AA-011 AA-012 AA-013 AA-014 AA-015 AA-016 AA-017 AA-018 AA-019 AA-020 AA-021 AA-022 AA-023 AA-024 AA-025 AA-026 AA-027 AA-028 AA-029 AA-030	40 CFR 63. Subpart CCCCCC – National Emission Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing 40 CFR 63.11599(a) and (b)(2), Subpart CCCCCC	3.16	HAP/PM	Applicability
	40 CFR 63.11601(a), Subpart CCCCCC	3.17		Particulate Matter (PM) Requirements
	40 CFR 63.11601(b), Subpart CCCCCC	3.18		HAP Requirements

3.1 For the Entire Facility, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity. This shall not apply to vision obscuration caused by uncombined water droplets.

- (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 and 1.3.B.)

- 3.2 For the Entire Facility, no person shall cause, permit, or allow the emission of particulate matter in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship

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

where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour.

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

- 3.3 For the Entire Facility, the permittee shall limit Volatile Organic Compound (VOC) emissions to no more than 99.0 tons/year as determined for each consecutive 12-month period on a monthly rolling basis.

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

- 3.4 For the Entire Facility, the permittee shall limit Individual Hazardous Air Pollutant (HAP) emissions to no more than 9.9 tons/year as determined for each consecutive 12-month period on a monthly rolling basis.

The permittee shall limit Total Hazardous Air Pollutant (HAP) emissions to no more than 24.9 tons/year as determined for each consecutive 12-month period on a monthly rolling basis.

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

- 3.5 For Emission Points AA-001, AA-002, AA-003 and AA-005, the permittee shall combust natural gas only.

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

- 3.6 For Emission Points AA-001 and AA-003, the maximum permissible emissions of ash and/or particulate matter from fossil fuel burning installations 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).)

- 3.7 For Emission Point AA-002, the maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations shall not exceed an emission rate as determined by the relationship

$$E = 0.8806 * I^{0.1667}$$

where E is the emission rate in pounds per million BTU per hour heat input and I is the heat input in millions of BTU per hour.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).)

- 3.8 For Emission Points AA-001, AA-002, and AA-003, 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).)

- 3.9 For Emission Point AA-002, the permittee is subject to and shall comply with all applicable requirements of Standards of Performance for Industrial, Commercial, and Institutional Steam Generating Units (40 CFR 60, Subpart Dc) and the General Provisions (Subpart A).

(Ref.: 40 CFR 60.40c(a), Subpart Dc)

- 3.10 For Emission Point AA-005, the permittee is subject to and shall comply with all applicable requirements of National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) and the General Provisions (40 CFR 63, Subpart A).

(Ref.: 40 CFR 63.6585(a) and (c), Subpart ZZZZ)

- 3.11 For Emission Point AA-005, the permittee shall meet the requirements of 40 CFR 63, Subpart ZZZZ by meeting the requirements in 40 CFR 60, Subpart JJJJ. No further requirements apply under Subpart ZZZZ.

(Ref.: 40 CFR 63.6590(c), Subpart ZZZZ)

- 3.12 For Emission Point AA-005, the permittee is subject to and shall comply with all applicable requirements of Standards of Performance for Stationary Spark Ignition (SI) Internal Combustion Engines (40 CFR 60, Subpart JJJJ) and the General Provisions (Subpart A).

(Ref.: 40 CFR 60.4230(a)(4)(iv), Subpart JJJJ)

3.13 For Emission Point AA-005, the permittee shall certify their stationary SI ICE to the certification emission standards and other requirements for new nonroad SI engines in 40 CFR part 1048.

(Ref.: 40 CFR 60.4231(c), Subpart JJJJ)

3.14 For Emission Point AA-005, the permittee shall install a non-resettable hour meter.

(Ref.: 40 CFR 60.4237(b), Subpart JJJJ)

3.15 For Emission Point AA-005, the permittee shall operate the emergency stationary ICE according to the requirements in paragraphs 40 CFR 60.4243(d)(1) through (3). In order for the engine to be considered an emergency stationary ICE under this subpart, 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), is prohibited. If the engine is not operated according to the requirements in (a) through (c), 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 time limit on the use of emergency stationary ICE in emergency situations.
- (b) The permittee shall operate the emergency stationary ICE for any combination of the purposes specified in 40 CFR 63.4243(d)(2)(i) through (iii) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by (c) counts as part of the 100 hours per calendar year allowed.
- (c) Emergency stationary ICE 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).

(Ref.: 40 CFR 60.4243(d), Subpart JJJJ)

3.16 For Emission Points AA-006 through AA-030, the permittee is subject to and shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing (40 CFR 63, Subpart CCCCCC) and the General Provisions (Subpart A).

(Ref.: 40 CFR 63.11599(a) and (b)(2), Subpart CCCCCC)

3.17 For Emission Points AA-006 through AA-030, the permittee shall comply with the requirements in 40 CFR 63.11601(a)(1) through (5). These requirements apply at all times.

- (a) Add the dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel and operate a capture system that minimizes fugitive particulate

emissions during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling process.

- (b) Capture particulate emissions and route them to a particulate control device meeting the requirements of (e) during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel. This requirement does not apply to pigments and other solids that are in paste, slurry, or liquid form.
- (c) The permittee shall comply with the following:
 - (1) Capture particulate emissions and route them to a particulate control device meeting the requirements of (e) of this condition during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to the grinding and milling process; or
 - (2) Add pigments and other solids that contain compounds of cadmium, chromium, lead, or nickel to the grinding and milling process only in paste, slurry, or liquid form.
- (d) The permittee shall comply with the following:
 - (1) Capture particulate emissions and route them to a particulate control device meeting the requirements of (e) of this condition during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel; or
 - (2) Fully enclose the grinding and milling equipment during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel; or
 - (3) Ensure that the pigments and solids are in the solution during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel.
- (e) The visible emissions from the particulate control device exhaust must not exceed 10-percent opacity for particulate control devices that vent to the atmosphere. This requirement does not apply to particulate control devices that do not vent to the atmosphere.

(Ref.: 40 CFR 63.11601(a), Subpart CCCCCC)

- 3.18 For Emission Points AA-006 through AA-030, the permittee shall comply with the requirements in 40 CFR 63.11601(b)(1) through (5).

- (a) Process and storage vessels that store or process materials containing benzene or methylene chloride, except for process vessels which are mixing vessels, must be equipped with covers or lids meeting the requirements of (1) through (3).
 - (1) The covers or lids can be of solid or flexible construction, provided they do not warp or move around during the manufacturing process.
 - (2) The covers or lids must maintain contact along at least 90-percent of the vessel rim. The 90-percent contact requirement is calculated by subtracting the length of any visible gaps from the circumference of the process vessel, and dividing this number by the circumference of the process vessel. The resulting ratio must not exceed 90-percent.
 - (3) The covers or lids must be maintained in good condition.
- (b) Mixing vessels that store or process materials containing benzene or methylene chloride must be equipped with covers that completely cover the vessel, except as necessary to allow for safe clearance of the mixer shaft.
- (c) All vessels that store or process materials containing benzene or methylene chloride must be kept covered at all times, except for quality control testing and product sampling, addition of materials, material removal, or when the vessel is empty. The vessel is empty if:
 - (1) All materials containing benzene or methylene chloride have been removed that can be removed using the practices commonly employed to remove materials from that type of vessel, e.g., pouring, pumping, and aspirating; and
 - (2) No more than 2.5 centimeters (one inch) depth of residue remains on the bottom of the vessel, or no more than 3 percent by weight of the total capacity of the vessel remains in the vessel.
- (d) Leaks and spills of materials containing benzene or methylene chloride must be minimized and cleaned up as soon as practical, but no longer than 1 hour from the time of detection.
- (e) Rags or other materials that use a solvent containing benzene or methylene chloride for cleaning must be kept in a closed container. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.

(Ref.: 40 CFR 63.11601(b), Subpart CCCCCC)

SECTION 4
WORK PRACTICES

This page was intentionally left blank. There are no Work Practice Standards that apply to this permit action.

**SECTION 5
MONITORING AND RECORDKEEPING REQUIREMENTS**

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain records for a minimum of 5 years
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2	VOC/HAP	Calculate and record VOC and HAP emissions monthly
		5.3	Visible Emissions	Weekly visible observations for visible emissions
AA-005	40 CFR 60.4243(a), Subpart JJJJ	5.4	VOC/HAP	Compliance Requirements
	40 CFR 60.4245(a), Subpart JJJJ	5.5		Recordkeeping
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.6	Recordkeeping	Hours of Operation
AA-006 AA-007 AA-008 AA-009 AA-010 AA-011 AA-012 AA-013 AA-014 AA-015 AA-016 AA-017 AA-018 AA-019 AA-020 AA-021 AA-022 AA-023 AA-024 AA-025 AA-026 AA-027 AA-028 AA-029 AA-030	40 CFR 63.11603(c), Subpart CCCCCC	5.7	HAP	Recordkeeping

5.1 For the Entire Facility, the permittee shall retain all required records, monitoring data, supporting information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this

permit. Copies of such records shall be submitted to MDEQ as required by Applicable Rules and Regulations or this permit upon request.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.9.)

5.2 For the Entire Facility, the permittee shall demonstrate compliance with the facility-wide VOC and HAP limits by calculating and recording the emissions of VOC and HAP for each calendar month and the total emissions for each consecutive 12-month period. All emission sources of VOC and HAP shall be accounted for and calculated as follows:

- (a) Storage Tanks – The permittee shall use the actual monthly throughput of VOC/HAP containing material to determine the emissions from each tank.
- (b) Fugitive Emissions from Equipment Leaks – The permittee shall use EPA’s Protocol for Equipment Leak Emission Estimates (EPA-453/R-95-017) to determine fugitive emissions associated with equipment leaks. The factors used must be documented and all calculations maintained on file at the facility.
- (c) Mixing Operations – The permittee shall keep records of the actual throughput of each VOC/HAP containing material used in the mixing operations to calculate VOC and HAP emissions based on either:
 - (1) The emissions factor of 20 lb/ton used in the application or
 - (2) Results from actual testing performed on the mixing tank vents. For use of actual test results, the permittee shall use an EPA approved test method and submit test reports conducted during the calendar year with the annual compliance report required herein.
- (d) Fuel Burning Equipment – Monthly fuel usage and the corresponding EPA AP-42 factor shall be used to calculate VOC and HAP emissions resulting from fuel combustion.

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

5.3 For the Entire Facility, the permittee shall perform weekly visual observations of emissions. If any visible emissions are detected, the permittee shall take corrective action as expeditiously as practicable. Further, the permittee shall maintain a record and/or a log documenting all visual observations/tests, the nature and cause of any visible emissions, any corrective action(s) taken to prevent or minimize the emissions, and the date and time when visible emission observations were conducted.

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

5.4 For Emission Point AA-005, the permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must

document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

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

5.5 For Emission Point AA-005, the permittee shall comply by purchasing an engine certified to the emission standards in 40 CFR 60.4231(a) through (c), as applicable, for the same engine class and maximum engine power. In addition, the permittee shall meet one of the requirements specified in (a) and (b).

- (a) If you operate and maintain the certified stationary SI internal combustion engine and control device according to the manufacturer's emission-related written instructions, the permittee shall keep records of conducted maintenance to demonstrate compliance, but no performance testing is required. The permittee shall also meet the requirements as specified in 40 CFR part 1068, subparts A through D, as they apply. If you adjust engine settings according to and consistent with the manufacturer's instructions, the stationary SI internal combustion engine will not be considered out of compliance.
- (b) If you do not operate and maintain the certified stationary SI internal combustion engine and control device according to the manufacturer's emission-related written instructions, your engine will be considered a non-certified engine, and you must demonstrate compliance according to the following: If you are an owner or operator of a stationary SI internal combustion engine greater than or equal to 100 HP and less than or equal to 500 HP, the permittee shall keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, the permittee shall conduct an initial performance test within 1 year of engine startup to demonstrate compliance.

(Ref.: 40 CFR 60.4243(a), Subpart JJJJ)

5.6 For Emission Point AA-005, the permittee shall keep records of the following information:

- (a) All notifications submitted to comply with this subpart and all documentation supporting any notification.
- (b) Maintenance conducted on the engine.
- (c) If the stationary SI internal combustion engine is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR parts 90, 1048, 1054, and 1060, as applicable.

- (d) If the stationary SI internal combustion engine is not a certified engine or is a certified engine operating in a non-certified manner and subject to 40 CFR 60.4243(a)(2), documentation that the engine meets the emission standards.

(Ref.: 40 CFR 60.4245(a), Subpart JJJJ)

5.7 For Emission Points AA-006 through AA-030, the permittee shall maintain the records specified in (a) through (d) in accordance with paragraphs (e) through (f), for five years after the date of each recorded action.

- (a) As required in 40 CFR 63.10(b)(2)(xiv), the permittee shall keep a copy of each notification that was submitted in accordance with 40 CFR 63.11603(a) (Condition 6.6), and all documentation supporting any Notification of Applicability and Notification of Compliance Status that was submitted.
- (b) The permittee shall keep a copy of each Annual Compliance Certification Report prepared in accordance with 40 CFR 63.11603(b) (Condition 6.7).
- (c) The permittee shall keep records of all inspections and tests as required by 40 CFR 63.11602(b).
- (d) The records must be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1).
- (e) As specified in 40 CFR 63.10(b)(1), the permittee shall keep each record for 5 years following the date of each recorded action.
- (f) The permittee shall keep each record onsite for at least 2 years after the date of each recorded action according to 40 CFR 63.10(b)(1). You may keep the records offsite for the remaining 3 years.

(Ref.: 40 CFR 63.11603(c), Subpart CCCCCC)

**SECTION 6
REPORTING REQUIREMENTS**

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	Submit certified annual monitoring report
		6.2	All documents submitted to MDEQ shall be certified by a Responsible Official
		6.3	Annual VOC and HAP Emissions
		6.4	Annual report of Visible Emissions Evaluations
AA-006 AA-007 AA-008	40 CFR 63.11603(a), Subpart CCCCCC	6.5	Notifications
AA-009 AA-010 AA-011 AA-012 AA-013 AA-014 AA-015 AA-016 AA-017 AA-018 AA-019 AA-020 AA-021 AA-022 AA-023 AA-024 AA-025 AA-026 AA-027 AA-028 AA-029 AA-030	40 CFR 63.11603(b), Subpart CCCCCC	6.6	Annual Compliance Certification Report

6.1 Except as otherwise specified herein, the permittee shall submit a certified annual synthetic minor monitoring report postmarked no later than 31st of January for the preceding calendar year. This report shall address any required monitoring specified in the permit. All instances of deviations from permit requirements must be clearly identified in the report. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration.

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

6.2 Any document required by this permit to be submitted to the MDEQ shall contain a certification signed by a responsible official stating that, based on information and belief

formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

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

- 6.3 For the Entire Facility, the permittee shall submit annual compliance reports of the VOC and HAP emissions for each calendar month and each consecutive 12-month period, in accordance with Condition 6.1.

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

- 6.4 For the Entire Facility, the permittee shall submit a report summarizing the required recordkeeping specified in Condition 5.3, in accordance with Condition 6.1. The report shall include, at a minimum, any visible emissions detected, any corrective action undertaken, results of any Method 9 opacity observations, and any weekly inspections not performed.

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

- 6.5 For Emission Points AA-006 through AA-030, the permittee shall submit the notifications identified below:

- (a) The permittee shall submit an initial notification of applicability required by 40 CFR 63.9(b)(2) no later than 180 days after initial start-up of the operations. The notification of applicability must include the information specified in (1) through (3).
- (1) The name and address of the owner or operator;
 - (2) The address (i.e., physical location) of the affected source; and
 - (3) An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date.
- (b) The permittee shall submit a Notification of Compliance Status within 180 days after initial start-up. This Notification of Compliance Status must include the information specified in (1) and (2).
- (1) Your company's name and address;
 - (2) A statement by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification, a description of the method of compliance (i.e., compliance with management practices, installation of a wet or dry scrubber) and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart.

(Ref.: 40 CFR 63.11603(a), Subpart CCCCCC)

- 6.6 For Emission Points AA-006 through AA-030, the permittee shall prepare an annual compliance certification report to be submitted with the annual report required by Condition 6.3 and in accordance with the requirements in paragraphs (a) through (c). This report does not need to be submitted unless a deviation from the requirements of this subpart has occurred. When a deviation from the requirements of this subpart has occurred, the annual compliance certification report must be submitted along with the deviation report.
- (a) The permittee shall prepare and, if applicable, submit each annual compliance certification report according to the dates specified in (1) through (3).
 - (1) The first annual compliance certification report must cover the first annual reporting period which begins the day of the compliance date and ends on December 31.
 - (2) Each subsequent annual compliance certification report must cover the annual reporting period from January 1 through December 31.
 - (3) Each annual compliance certification report must be prepared no later than January 31 and kept in a readily-accessible location for inspector review. If a deviation has occurred during the year, each annual compliance certification report must be submitted along with the deviation report, and postmarked no later than February 15.
 - (b) The annual compliance certification report must contain the information specified in (1) through (3).
 - (1) Company name and address;
 - (2) A statement in accordance with 40 CFR 63.9(h) of the General Provisions that is signed by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart; and
 - (3) Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period beginning on January 1 and ending on December 31.
 - (c) If a deviation has occurred during the reporting period, the permittee shall include a description of deviations from the applicable requirements, the time periods during which the deviations occurred, and the corrective actions taken. This deviation report must be submitted along with your annual compliance certification report, as required by paragraph (a).

(Ref.: 40 CFR 63.11603(b), Subpart CCCCCC)