

# State of Mississippi



## AIR POLLUTION CONTROL PERMIT

Permit To Construct Air Emissions Equipment

## THIS CERTIFIES

Taylor Power Systems Inc 120 Interstate Drive Richland, MS Rankin 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

Mississippi Department of Environmental Quality

Issued/Modified: JUL 1 2 2010

Expires:

Permit No. 2380-00129

Agency Interest # 52663

\*\*\* Official MDEQ Permit - Version 1.1 \*\*\*

## **Table of Contents**

Subject Item Inventory	
Facility Requirements.	]
General Information	<b>L</b> -
Other Relevant Documents:	

Taylor Power Systems Inc Subject Item Inventory Permit Number:2380-00129 Activity ID No.: PER20100001

## **Subject Item Inventory:**

ID	Designation	Description
AI52663		Manufacturer of generator sets.
AREA1	AA-001	Load Test Banks (Generator testing area.)
AREA2	AA-002	Metal Working Operations (Including, but not limited to cutting; welding; soldering; grinding; sanding; drilling.)
AREA3	AA-003	Surface Coating Operations (Including, but not limited to spray gun application; equipment cleaning.)
EQPT1	AA-004	275 Gallon Engine Oil Storage Tank
EQPT2	AA-005	275 Gallon Antifreeze Coolant 50/50 Storage Tank
EQPT3	AA-006	2,000 Gallon Diesel Fuel Storage Tank
EQPT4	AA-007	275 Gallon Unleaded Gasoline Storage Tank
EQPT5	AA-008	270 Gallon Diesel Fuel Storage Tank
EQPT6	AA-009	150 Gallon Diesel Fuel Storage Tank
EQPT7	AA-010	500 Gallon Used Oil Storage Tank
EQPT8	AA-011	500 Gallon Waste Antifreeze Storage Tank
EQPT9	AA-012	420 Gallon Diesel Fuel Storage Tank (Fuel used for the emergency generator.)
EQPT10	AA-013	Twenty (20) Natural Gas-fired Space Heaters (Each rated at 0.1 MMBTU/hr.)
EQPT11	AA-014	Two (2) Natural Gas-fired Space Heaters (Each rated at 0.2 MMBTU/hr.)
EQPT12	AA-015	175 kW Diesel-fired Emergency Generator

## **Subject Item Groups:**

ID	Description	Components
GRPT1	Facility-Wide Emissions	EQPT1 275 Gallon Engine Oil Storage Tank
		AREA3 Surface Coating Operations (Including, but not limited to spray gun application; equipment cleaning.)
		AREA1 Load Test Banks (Generator testing area.)
		EQPT2 275 Gallon Antifreeze Coolant 50/50 Storage Tank
		EQPT3 2,000 Gallon Diesel Fuel Storage Tank

Taylor Power Systems Inc Subject Item Inventory Permit Number:2380-00129 Activity ID No.: PER20100001

ID	Description	Components
GRPT1	Facility-Wide Emissions	EQPT4 275 Gallon Unleaded Gasoline Storage Tank
		AREA2 Metal Working Operations (Including, but not limited to cutting; welding; soldering; grinding; sanding; drilling.)
		EQPT6 150 Gallon Diesel Fuel Storage Tank
		EQPT7 500 Gallon Used Oil Storage Tank
		EQPT8 500 Gallon Waste Antifreeze Storage Tank
		EQPT9 420 Gallon Diesel Fuel Storage Tank (Fuel used for the emergency generator.)
		EQPT10 Twenty (20) Natural Gas-fired Space Heaters (Each rated at 0.1 MMBTU/hr.)
		EQPT11 Two (2) Natural Gas-fired Space Heaters (Each rated at 0.2 MMBTU/hr.)
		EQPT12 175 kW Diesel-fired Emergency Generator
		EQPT5 270 Gallon Diesel Fuel Storage Tank
GRPT2	Metal Fabrication and Finishing Operations	AREA3 Surface Coating Operations (Including, but not limited to spray gun application; equipment cleaning.)
		AREA2 Metal Working Operations (Including, but not limited to cutting; welding; soldering; grinding; sanding; drilling.)

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

Taylor Power Systems Inc Facility Requirements Permit Number:2380-00129 Activity ID No.: PER20100001

Page 1 of 28

## AI0000052663 Manufacturer of generator sets.:

## Submittal/Action Requirements:

Condition No.	Condition
S-1	General Condition: The permittee shall submit certification of construction: Due within thirty (30) days of completion of construction or installation of an approved stationary source or prior to startup, whichever is earlier. The notification shall certify that construction or installation was performed in accordance with the approved plans and specifications. In the event there is any change in construction from the previously approved plans and specifications or permit, the permittee shall promptly notify MDEQ in writing. If MDEQ determines the changes are substantial, MDEQ 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. [APC-S-2 V.D]
S-2	Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun. [APC-S-2 V.C(2)]
S-3	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. [APC-S-2 V.C(3)]

## Narrative Requirements:

### **General Condition:**

Condition No.	Condition
T-1	General Condition: The stationary source shall be designed and constructed so as to operate without causing a violation of any Applicable Rules and Regulations or this permit, 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. [APC-S-2 V.A]
T-2	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49_17_29 1.b]
T-3	General Condition: 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. [Miss. Code Ann. 49_17_29]

Taylor Power Systems Inc Facility Requirements Permit Number:2380-00129 Activity ID No.: PER20100001

Page 2 of 28

### **AI0000052663** (continued):

# Narrative Requirements:

### **General Condition:**

Condition No.	Condition
T-4	General Condition: 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 Regulation APC-S-1, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. [APC-S-1 10]
T-5	General Condition: The permittee shall allow the Mississippi Environmental Quality Commission, the Mississippi Environmental Quality Permit Board, MDEQ staff and/or their authorized representatives, upon the presentation of credentials:  a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and  b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring equipment or monitoring method required in this permit, and to sample any air emission. [Miss. Code Ann. 49_17_21]
T-6	General Condition: After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for good cause shown including, but not limited to, the following: a. Persistant violation of any terms or conditions of this permit; b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or c. A change in any condition that requires either a temporary or permanent reduction or elimination of previously authorized air emissions. [APC-S-2 II.C]
T-7	General Condition: Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control. [Miss. Code Ann. 49_17_39]

Condition No.	Condition
T-8	General Condition: This permit is for air pollution control purposes only. [APC-S-2 I.D]
T-9	General Condition: The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for operating without a valid permit pursuant to State Law. [APC-S-2 II.B(5)]
T-10	General Condition: 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. [APC-S-2 I.D(6)]

Taylor Power Systems Inc Facility Requirements Permit Number:2380-00129 Activity ID No.: PER20100001

Page 3 of 28

### **AI0000052663** (continued):

# Narrative Requirements:

Condition No.	Condition
T-11	General Condition: 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. [APC-S-2 II.B(7)]
T-12	General Condition: It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of 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. [APC-S-2 II.B(15)a]
T-13	General Condition: 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. [APC-S-2 II.B(15)b]
T-14	General Condition: The permit does not convey any property rights of any sort, or any exclusive privilege. [APC-S-2 II.B(15)c]
T-15	General Condition: 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. [APC-S-2 II.B(15)d]
T-16	General Condition: This permit shall not be transferred except upon approval of the Permit Board. [APC-S-2 XVI.B]
T-17	General Condition: 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. [APC-S-2 I.D(7)]
T-18	General Condition: 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. [APC-S-2 V.C(1)]
T-19	General Condition: A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee. [APC-S-2 V.D(3)]

Taylor Power Systems Inc Facility Requirements Permit Number:2380-00129 Activity ID No.: PER20100001

Page 4 of 28

### AI0000052663 (continued):

# Narrative Requirements:

Condition No.	Condition
T-20	General Condition: Except as prohibited in APC-S-2, Section V.D.7, 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 APC-S-2, Section XIII.G. [APC-S-2 V.D(4)]
T-21	General Condition: Except as otherwise specified in APC-S-2, Section V.D.7, 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. [APC-S-2 V.D(5)]
T-22	General Condition: Except as otherwise specified in APC-S-2, Section V.D.7, 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. [APC-S-2 V.D(6)]
T-23	General Condition: 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. [APC-S-2 V.D(7)]
T-24	General Condition: 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. [APC-S-2 VI.B(3, 4 and 6)]
T-25	General Condition: 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. [APC-S-2 V.A(4)]

Taylor Power Systems Inc Facility Requirements Permit Number:2380-00129 Activity ID No.: PER20100001

Page 5 of 28

## EQPT000000012 (AA-015) 175 kW Diesel-fired Emergency Generator:

Conditio	n	
No.	Parameter	Condition
L-1		For Emission Point AA-015, the permittee shall operate and maintain stationary CI ICE that achieve the emission standards as required in 40 CFR 60.4205 (see Condition L-12 on page 10 of the federally enforceable permit herein) according to the manufacturer's written instructions or procedures developed by the permittee that are approved by the engine manufacturer, over the entire life of the engine. [40 CFR 60.4206]
L-2		For Emission Point AA-015, beginning October 1, 2007, the permittee shall use diesel fuel that meets the requirements of 40 CFR 80.510(a). Beginning October 1, 2010, the permittee shall use diesel fuel that meets the requirements of 40 CFR 80.510(b). [40 CFR 60.4207(a) and (b)]
Monito	oring Requirements:	
Conditio	n	
No.	Parameter	Condition
M-1		For Emission Point AA-015, the permitee shall install a non-resettable hour meter and meet the monitoring requirements specified in 40 CFR 60.4211. [40 CFR 60.4209(a)]

Taylor Power Systems Inc Facility Requirements Permit Number:2380-00129 Activity ID No.: PER20100001

Page 6 of 28

## **EQPT0000000012** (continued):

# Monitoring Requirements:

Condition		
No.	Parameter	Condition
M-2		For Emission Point AA-015, the permittee is subject to the following compliance requirements:
		(a) operate and maintain according to the manufacturer's written instructions or procedures developed by the permittee that are approved by the engine manufacturer and meet the requirements in 40 CFR 89, 94, and/or 1068, as applicable to the permittee.
		(b) purchase engine(s) certified to the emission standards in 40 CFR 60.4205(b), as applicable, for the same model year and maximum engine power, installed and configured according to the manufacturer's specifications.
		(c) may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. There is no time limit on the use of emergency stationary ICE in emergency situations. The permittee may petition for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that the Federal, State, or local standards require maintenance and testing of emergency ICE beyond 100 hours per year. For owners and operators of emergency engines meeting standards under 40 CFR 60.4205 (but not 40 CFR 60.4204), any operation other than emergency operation, and maintenance and testing as permitted, is prohibited. [40 CFR 60.4211(a), 40 CFR 60.4211(c) and (e)]

Taylor Power Systems Inc Facility Requirements Permit Number:2380-00129 Activity ID No.: PER20100001

#### Page 7 of 28

## **GRPT0000000001 Facility-Wide Emissions:**

Condition		
No.	Parameter	Condition
L-1		For the entire facility, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity to obscure an observer's view to a degree in excess of 40%, as determined by EPA Test Method 9, 40 CFR 60, Appendix A. [APC-S-1 3.2]
L-2		For the entire facility, the maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input. [APC-S-1 3.4(a)1]
L-3		For the entire facility, the maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input4. [APC-S-1 4.1(a)]
L-4		For the entire facility, the permittee shall limit volatile organic compound (VOC) emissions to no more than 99.0 tons per year as determined for each consecutive 12-month period. [APC-S-2 II.B.10]
L-5		For the entire facility, the permittee shall limit hazardous air pollutant (HAP) emissions to no more than 9.90 tons per year of any single HAP and no more than 24.9 tons per year of total combined HAP as determined for each consecutive 12-month period. [APC-S-2 II.B.10]
L-6		For the entire facility, the permittee shall limit total particulate matter (PM) emissions to no more than 99.0 tons per year as determined for each consecutive 12-month period, by EPA Test Methods 1-5, 40 CFR Part 60, Appendix A, and EPA Test Methods 201 or 201A in conjunction. [APC-S-2 II.B.10]
L-7		For the entire facility, the permittee shall limit carbon monoxide (CO) emissions to no more than 99.0 tons per year as determined for each consecutive 12-month period. [APC-S-2 II.B.10]
L-8		For the entire facility, the permittee shall limit nitrogen oxide (NOx) emissions to no more than 99.0 tons per year as determined for each consecutive 12-month period. [APC-S-2 II.B.10]

Taylor Power Systems Inc Facility Requirements Permit Number:2380-00129 Activity ID No.: PER20100001

Page 8 of 28

## **GRPT0000000001** (continued):

Condition	n	
No.	Parameter	Condition
L-9		For the entire facility, the permittee is subject to and shall comply with 40 CFR Part 63, Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants for Area Sources for Nine Metal Fabrication and Finishing Source Categories, specifically 40 CFR 63.11514(a)(1) - Electrical and Electronic Equipment Finishing Operations and shall achieve compliance with the applicable provisions upon startup of the affected source. [40 CFR 63.11514(a)(1), 40 CFR 63.11515(b)]
L-10		For the entire facility, the permittee is subject to and shall comply with 40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE). [40 CFR 63.6585(c), 40 CFR 63.6590(a)(2)(iii) and (c)]
L-11		For the entire facility, the permittee is subject to and shall comply with 40 CFR Part 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (CI ICE). [40 CFR 60.4200(a)(2)(i)]
L-12		For the entire facility, which includes Emission Point AA-015, the permittee shall comply with 40 CFR 60.4202. As stated in 40 CFR 60.4202(a)(2), a manufacturer, for all pollutants beginning in model year 2007, shall comply with certification emission standards required in accordance with 40 CFR 89.112 and 89.113. [40 CFR 60.4205(b), 40 CFR 60.4202(a)((2)), 40 CFR 89.112 and 113]

Taylor Power Systems Inc Facility Requirements Permit Number:2380-00129 Activity ID No.: PER20100001

Page 9 of 28

## **GRPT0000000001** (continued):

# Monitoring Requirements:

Condition	<b>D</b>	
No.	Parameter	Condition
M-1		For the entire facility, the permittee shall determine the following for each coating, adhesive, solvent, or other VOC or HAP containing material used:
		(a) quantity used (gal);
		(b) the percentage of VOC by weight;
		(c) the percentage of HAP by weight; and
		(d) the density (lb/gal).
		The permittee may utilize data supplied by the manufacturer, or analysis of VOC and HAP content by EPA Test Method 311, 40 CFR Part 63, Appendix A, respectively. [APC-S-2 II.B(11)]
M-2		For the entire facility, the permitee shall determine the following for each generator tested:
		(a) size;
		(b) hours of operation; and
		(c) amount of fuel used. [APC-S-2 II.B(11)]
M-3		For the entire facility, the permittee shall determine the quantity of particulate producing materials which may include, but is not limited to, welding wire, electrodes (etc.), solder, metal, and cutting torch materials (fuel) used on a monthly basis and in any consecutive 12-month period. [APC-S-2 II.B(11)]
M-4		For the entire facility, for each affected source subject to visual fugitive emissions monitoring, visual determination of fugitive emissions shall be performed according to the procedures of EPA Method 22, of 40 CFR Part 60, Appendix A-7. The permittee shall conduct the EPA Method 22 test while the affected source is operating under normal conditions. The duration of each EPA Method 22 test shall be at least 15 minutes, and visible emissions will be considered to be present if they are detected for more than six minutes of the fifteen minute period. [40 CFR 63.11517(a)]

Taylor Power Systems Inc Facility Requirements Permit Number:2380-00129 Activity ID No.: PER20100001

Page 10 of 28

## **GRPT0000000001** (continued):

# Monitoring Requirements:

Condition	Danasatan	Constitution and the second se
No.	Parameter	Condition
M-5		For the entire facility, for each affected source subject visual fugitive emissions monitoring, visual determinations of fugitive emissions shall be performed in accordance with Condition M-4 on page 11 of the permit and according to paragraphs (a) through (d) of this condition.
		(a) Daily Method 22 Testing. Perform visual determinations of fugitive emissions once per day, on each day the process is in operation, during operation of the process.
		(b) Weekly Method 22 Testing. If no visible fugitive emissions are detected in consecutive daily EPA Method 22 tests, performed in accordance with paragraph (a) of this condition for 10 days of work day operation of the process, the permittee may decrease the frequency of EPA Method 22 testing to once every five days of operation of the process (one calendar week). If visible fugitive emissions are detected during these tests, the permittee shall resume EPA Method 22 testing of that operation once per day during each day that the process is in operation, in accordance with paragraph (a) of this condition.
		(c) Monthly Method 22 Testing. If no visible fugitive emissions are detected in four consecutive weekly EPA Method 22 tests performed in accordance with paragraph (b) of this condition, the permittee shall decrease the frequency of EPA Method 22 testing to once per 21 days of operation of the process (one calendar month). If visible fugitive emissions are detected during these tests, the permittee shall resume weekly EPA Method 22 in accordance with paragraph (b) of this condition.
		(d) Quarterly Method 22 Testing. If no visible fugitive emissions are detected in three consecutive monthly EPA Method 22 tests performed in accordance with paragraph (c) of this condition, the permittee may decrease the frequency of EPA Method 22 testing to once per 60 days of operation of the process (3 calendar months). If visible fugitive emissions are detected during these tests, the permittee shall resume monthly EPA Method 22 in accordance with paragraph (c) of this condition. [40 CFR 63.11517(b)]

Taylor Power Systems Inc Facility Requirements Permit Number:2380-00129 Activity ID No.: PER20100001

Page 11 of 28

### **GRPT0000000001** (continued):

# Record-Keeping Requirements:

Condition No.	Condition
R-1	For the entire facility, the permittee shall maintain sufficient records to document:
	(a) identification of each coating, adhesive, solvent or other VOC or HAP containing material used, and the total gallons of each coating and each solvent used on a monthly basis and in any consecutive 12-month period;
	(b) the VOC and HAP content(s) of each coating, adhesive, solvent or other VOC or HAP containing material used. A description of the method used to determine the VOC and HAP content shall accompany this data; and
	(c) the density of each coating, adhesive, solvent or other VOC or HAP containing material. [APC-S-2 II.B(10)]
R-2	For the entire facility, the permittee shall maintain sufficient records to document:
	(a) the size and hours of operation of each generator tested on a monthly basis and in any consecutive 12-month period;
	(b) the amount of fuel used each month during testing on a monthly basis and in any consecutive 12-month period; and
	(c) the CO and NOx emissions determined on a monthly basis and in any consecutive 12-month period. [APC-S-2 II.B(10)]
R-3	For the entire facility, the permittee shall maintain sufficient records to doument:
	(a) the quantity of PM producing materials which may include, but is not limited to, welding wire, electrodes (etc.), solder, metal, and cutting torch materials (fuel) used on a monthly basis and in any consecutive 12-month period; and
	(b) PM emissions in tons per year for any consecutive 12-month period. [APC-S-2 II.B(10)]
R-4	The permittee shall maintain copies of all records and reports on site for at least five (5) years and shall make them available upon request by Mississippi Department of Environmental Quality (MDEQ) personnel. [APC-S-2 II.B(10)]

Taylor Power Systems Inc Facility Requirements Permit Number:2380-00129 Activity ID No.: PER20100001

Page 12 of 28

#### **GRPT0000000001** (continued):

## Record-Keeping Requirements:

Condition No.	Condition
R-5	For the entire facility, the permittee shall collect and keep records of the data and information specified in paragraphs (a) through (k) of this condition, according to the requirements in paragraph (l) of this condition.

- (a) General compliance and applicability records. Maintain information specified in paragraphs (a)(1) through (2) of this condition for each affected source.
  - (1) each notification and report submitted to comply with this subpart, and the documentation supporting each notification and report.
- (2) records of the applicability determinations as in 40 CFR 63.11514(b)(1) through (5), listing equipment included in its affected source, as well as any changes to that and on what date they occurred, must be maintained for 5 years and be made available for inspector review at any time.
- (b) Visual determination of fugitive emissions records. Maintain a record of the information specified in paragraphs (b)(1) through (3) of this condition for each affected source which performs visual determination of fugitive emissions in accordance with 40 CFR 63.11517(a).
  - (1) the date and results of every visual determination of fugitive emissions;
  - (2) a description of any corrective action taken subsequent to the test; and
  - (3) the date and results of any follow-up visual determination of fugitive emissions performed after the corrective actions
- (c) Visual determination of emissions opacity records. Maintain a record of the information specified in paragraphs (c)(1) through (3) of this condition for each affected source which performs visual determination of emissions opacity in accordance with 40 CFR 63.11517(c).
  - (1) the date of every visual determination of emissions opacity;
  - (2) the average of the six-minute opacities measured by the test; and
  - (3) a description of any corrective action taken subsequent to the test.
- (d) maintain a record of the manufacturer's specifications for the control devices used to comply with 40 CFR 63.11516.
- (e) Spray paint booth filter records. Maintain a record of the filter efficiency demonstrations and spray paint booth filter maintenance activities, performed in accordance with 40 CFR 63.11516(d)(1)(ii) and (iii).
- (f) waterspray booth or water curtain efficiency tests. Maintain a record of the water curtain efficiency demonstrations performed in accordance with 40 CFR 63.11516(d)(1)(ii). [40 CFR 63.11519(c)]

Taylor Power Systems Inc Facility Requirements Permit Number:2380-00129 Activity ID No.: PER20100001

Page 13 of 28

#### **GRPT0000000001** (continued):

### Record-Keeping Requirements:

Condition No.	Condition
R-6	(g) HVLP or other high transfer efficiency spray delivery system documentation records. Maintain documentation of HVLP or other high transfer efficiency spray paint delivery system, in compliance with 40 CFR 63.11516(d)(3). This documentation must include the manufacturer's specifications for the equipment and any manufacturer's operation instructions. If the permittee has obtained written approval for an alternative spray application system in accordance with 40 CFR 63.11516(d)(2), the permittee shall maintain a record of that approval along with documentation of the demonstration of equivalency.

- (h) HVLP or other high transfer efficiency spray delivery system employee training documentation records. Maintain certification that each worker performing spray painting operations has completed the training specified in 40 CFR 63.11516(d)(6), with the date the initial training and the most recent refresher training was completed.
- (i) Visual determination of emissions opacity performed during the preparation (or revision) of the Site-Specific Welding Emissions Management Plan. The permittee shall maintain a record of each visual determination of emissions opacity performed during the preparation (or revision) of a Site-Specific Welding Emissions Management Plan, in accordance with 40 CFR 63.11516(f)(7)(iii).
- (j) Site-Specific Welding Emissions Management Plan. If the permittee has been required prepare a plan in accordance with 40 CFR 63.11516(f)(7)(iii), the permittee shall maintain a copy of your current Site-Specific Welding Emissions Management Plan in your records and it must be readily available for inspector review.
- (k) Manufacturer's instructions. If the permittee complies with 40 CFR Part 63, Subpart XXXXXX by operating any equipment according to manufacturer's instruction, the permittee shall keep these instructions readily available for inspector review.
- (l) Welding Rod usage. If the permittee operates a new or existing welding affected source which is not required to comply with the requirements of 40 CFR 63.11516(f)(3) through (8) because it uses less than 2,000 pounds per year of welding rod (on a rolling 12-month basis), the permittee shall maintain records demonstrating the welding rod usage on a rolling 12-month basis.
- (m) the permittee's records shall be maintained according to the requirements in paragraphs (m)(1) through (3) of this condition.
- (1) the permittee's records shall be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.
- (2) as specified in 40 CFR 63.10(b)(1), the permittee shall keep each record for 5 years following the date of each occurrence, measurement, corrective action, report, or record.
- (3) the permitee shall keep each record on-site for at least 2 years after the date of each occurrence, measurement, corrective action, report or record according to 40 CFR 63.10(b)(1). The permittee may keep the records off-site for the remaining 3 years. [40 CFR 63.11519(c)]

Taylor Power Systems Inc Facility Requirements Permit Number:2380-00129 Activity ID No.: PER20100001

Page 14 of 28

# Submittal/Action Requirements:

Condition No.	Condition
S-1	For the entire facility, the permittee shall submit annual reports providing:
	(a) identification of each coating, adhesive, solvent or other VOC or HAP containing material used;
	(b) the VOC and HAP content(s) of each coating, adhesive, solvent, or other VOC or HAP containing material used;
	(c) the total gallons of each coating, adhesive, solvent or other VOC or HAP containing material used in any consecutive 12-month period; and
	(d) the total VOC emission rate, the emission rate of each individual HAP and the total HAP emission rate in tons per year based on a consecutive 12-month period. [APC-S-2 II.B(11)]
S-2	For the entire facility, the permittee shall submit annual reports providing:
	(a) the size and hours of operation of each generator tested;
	(b) the amount of fuel used each month during testing; and
	(c) the CO and NOx emission rates in tons per year based on a consecutive 12-month period. [APC-S-2 II.B(11)]
S-3	For the entire facility, the permittee shall submit annual reports providing:
	(a) the quantity of PM producing materials which may include, but is not limited to, welding wire, electrodes (etc.), solder, metal, and cutting torch materials (fuel) used; and
	(b) the PM emission rate in tons per year based on a consecutive 12-month period. [APC-S-2 II.B(11)]
S-4	All reports shall be submitted no later than 30 days from the annual period ending December 31. [APC-S-2 II.B(11)]
S-5	The permittee shall report any exceedance of limitations outlined in this permit to the MDEQ no later than ten (10) days following the end of the month in which the exceedance occurred and shall report the cause of the exceedance and the action(s) taken and/or to be taken to correct it. [APC-S-2 II.B(11)]

Taylor Power Systems Inc Facility Requirements Permit Number:2380-00129 Activity ID No.: PER20100001

Page 15 of 28

### **GRPT0000000001** (continued):

## Submittal/Action Requirements:

Condition No.	Condition
S-6	For the entire facility, the permittee shall comply with the following reporting requirements for determining compliance with 40 CFR 63, Subpart XXXXXX:
	(a) Initial notification. The permittee shall submit the Initial Notification no later than 120 days after initial startup. The Initial Notification shall provide the information specified in paragraphs (a)(1) through (4) of this condition.
	<ol> <li>(1) the name, address, phone number and e-mail address of the owner and operator;</li> <li>(2) the address (physical location) of the affected source;</li> <li>(3) an identification of the relevant standard (i.e., 40 CFR Part 63, Subpart XXXXXX); and</li> <li>(4) a brief description of the type of operation. For example, a brief characterization of the types of products (e.g., aerospace components, sports equipment, etc.), the number and type of processes, and the number of workers usually employed.</li> </ol>
	(b) Notification of compliance status. The permittee shall submit a notification of compliance status within 120 days of initial startup. The permittee is required to submit the information specified in paragraphs (b)(1) through (3) of this condition with the notification of compliance status:
	<ul><li>(1) the company's name and address;</li><li>(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</li></ul>

completeness of the notification and a statement of whether the source has complied with all relevant standards and other requirements of this subpart; and

(3) the date of the notification of compliance status. [40 CFR 63.11519(a)]

Taylor Power Systems Inc Facility Requirements Permit Number:2380-00129 Activity ID No.: PER20100001

Page 16 of 28

#### **GRPT0000000001** (continued):

### Submittal/Action Requirements:

Condition	
No.	Condition
S-7	For the entire facility, the permittee shall comply with the following reporting requirements for determining compliance with 40 CFR Part 63, Subpart XXXXXX:

- (a) the permittee shall prepare and submit annual certification and compliance reports for each affected source according to the requirements of paragraphs (b) through (f) of this condition.
- (b) the permittee shall prepare and submit each annual certification and compliance report according to the dates specified in paragraphs (b)(1) through (3) of this condition. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
- (1) the first annual certification and compliance report shall cover the first annual reporting period which begins the day after the compliance date and ends on December 31.
  - (2) each subsequent annual certification and compliance report shall cover the subsequent semiannual reporting period from January 1 through December 31.
- (3) each annual certification and compliance report shall be prepared and submitted no later than January 31 and kept in a readily-accessible location for inspector review. If an exceedance has occurred during the year, each annual certification and compliance report shall be submitted along with the exceedance reports, and postmarked or delivered no later than January 31.
- (c) General requirements. The annual certification and compliance report shall contain the information specified in paragraphs (c)(1) through (3) of this condition, and the information specified in paragraphs (d) and (e) of this condition that is applicable to each affected source.
  - (1) company name and address;
- (2) statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report; and
- (3) date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31. Note that the information reported for the 12 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
- (d) Visual determination of fugitive emissions requirements. The annual certification and compliance report shall contain the information specified in paragraphs (d)(1) through (3) of this condition for each affected source which performs visual determination of fugitive emissions in accordance with 40 CFR 63.11517(a).
  - (1) the date of every visual determination of fugitive emissions which resulted in detection of visible emissions;
  - (2) a description of the corrective actions taken subsequent to the test; and
  - (3) the date and results of the follow-up visual determination of fugitive emissions performed after the corrective actions. [40 CFR 63.11519(b)]

Taylor Power Systems Inc Facility Requirements Permit Number:2380-00129 Activity ID No.: PER20100001

Page 17 of 28

#### **GRPT0000000001** (continued):

### Submittal/Action Requirements:

Condition No.	Condition
S-8	(e) Visual determination of emissions opacity requirements. The annual certification and compliance report shall contain the information specified in paragraphs (e)(1) through (3) of this condition for each affected source which performs visual determination of emissions opacity in accordance with 40 CFR 63.11517(c).

- (1) the date of every visual determination of emissions opacity;
- (2) the average of the six-minute opacities measured by the test; and
- (3) a description of any corrective action taken subsequent to the test.
- (f) Exceedances of 20 percent opacity for welding affected sources. As required by 40 CFR 63.11516(f)(7)(i), the permittee shall prepare an exceedance report whenever the average of the six-minute average opacities recorded during a visual determination of emissions opacity exceeds 20 percent. This report shall be submitted along with the annual certification and compliance report according to the requirements in paragraph (a) of this condition, and shall contain the information in paragraphs (f)(1) and (2) of this condition.
  - (1) the date on which the exceedance occurred; and
  - (2) the average of the six-minute average opacities recorded during the visual determination of emissions opacity.
- (g) Site-specific Welding Emissions Management Plan reporting. The permittee shall submit a copy of the records of daily visual determinations of emissions recorded in accordance with 40 CFR 63.11516(f)(7)(iv), and a copy of the Site-Specific Welding Emissions Management Plan and any subsequent revisions to the plan pursuant to 40 CFR 63.11516(f)(8), along with the annual certification and compliance report, according to the requirements in paragraph (a) of the previous condition. [40 CFR 63.11519(b)]

Taylor Power Systems Inc Facility Requirements Permit Number:2380-00129 Activity ID No.: PER20100001

Page 18 of 28

## **GRPT000000002** Metal Fabrication and Finishing Operations:

Condition No.	Parameter	Condition
L-1		For Emission Points AA-002 and AA-003, the permittee is subject to the Metal Finishing Hazardous Air Pollutant (MFHAP) provisions described in 40 CFR 63.11514(b)(2) through (5), for machining operations, grinding operations, welding operations, and surface coating operations (i.e. A MFHAP is any material that contains cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal), and contains manganese in amounts greater than or equal to 1.0 percent by weight (as the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material, is considered to be MFHAP). [40 CFR 63.11514(b)(2 - 5), 40 CFR 63.11522]
L-2		For Emission Point AA-002, the permittee shall implement management practices to minimize emissions of MFHAP for each machining operation that uses materials that contain MFHAP ro has the potential to emit MFHAP. These requirements do not apply when machining operations are being performed that do not use any materials containing MFHAP and do not have the potential to emit MFHAP.
		(a) the permittee shall take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and
		(b) the permittee shall operate all equipment associated with machining according to manufacturer's instructions. [40 CFR 63.11516(b)]

Taylor Power Systems Inc Facility Requirements Permit Number:2380-00129 Activity ID No.: PER20100001

Page 19 of 28

## **GRPT0000000002** (continued):

Condition			
No.	Parameter	Condition	
L-3		For Emission Point AA-002, the permittee shall comply with the requirements, as stated in this condition, for each dry grinding and dry polishing with machines operations that uses materials that contain MFHAP or has the potential to emit MFHAP. The requirements do not apply when dry grinding and dry polishing operations are being performed that do not use any materials containing MFHAP and do not have the potential to emit MFHAP.	
		(a) the permittee shall capture emissions and vent them to a filtration control device. The permittee shall demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices, as specified by the requirements in 40 CFR 63.11519(c)(4) (see paragraph (d) of Condition R-5 on page 14 of the federally enforceable permit herein).	
		<ul> <li>(b) the permittee shall implement management practices to minimize emissions of MFHAP as stated below:</li> <li>(1) the permittee shall take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and</li> <li>(2) the permittee shall operate all equipment associated with the operation of dry grinding and dry polishing with machines, including the filtration control device, according to manufacturer's instructions. [40 CFR 63.11516(c)]</li> </ul>	

Taylor Power Systems Inc Facility Requirements Permit Number:2380-00129 Activity ID No.: PER20100001

Page 20 of 28

#### **GRPT0000000002** (continued):

Condition	on	
No.	Parameter	Condition
L-4		For Emission Point AA-002, the permitee shall comply with the requirements, as stated in this condition, for each welding operation that uses materials that contain MFHAP or has the potential to emit MFHAP. If the welding affected source uses 2,000 pounds or more per year of welding rod containing one or more MFHAP (calculated on a rolling 12-month basis), the permittee shall demonstrate that management practices or fume control measures are being implemented by complying with the requirements in paragraphs (c) through (h) of this condition. The requirements in paragraphs (a) through (h) of this condition do not apply when welding operations are being performed that do not use any materials containing MFHAP or do not have the potential to emit MFHAP.
		(a) the permittee shall operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions. The permittee shall demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the capture and control devices, as specified by the requirements in 40 CFR 63.11519(c)(4) (see paragraph (d) of Condition R-5 on page 14 of the federally enforceable permit herein).
		(b) the permittee shall implement one or more of the management practices specified below to minimize emissions of MFHAP, as practicable, while maintaining the required welding quality through the application of sound engineering judgment.
		(1) use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW) - also called metal inert gas welding (MIG));
		(2) use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates; (3) use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding

- fume generation;
  (4) optimize welding process variables (e.g., electrode diameter, voltage, amperage, welding angle, shield gas flow rate,
- travel speed) to reduce the amount of welding fume generated; and
  - (5) use a welding fume capture and control system, operated according to the manufacturer's specifications.
- (c) Tier 1 compliance requirements for welding. The permittee shall perform visual determinations of welding fugitive emissions as specified in 40 CFR 63.11517(b) (see Condition M-5 on page 12 of the federally enforceable permit herein), at the primary vent, stack, exit, or opening from the building containing the welding operations. The permittee shall keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in 40 CFR 63.11519(c)(2) (see paragraph (b) of Condition R-5 on page 14 of the federally enforceable permit herein). [40 CFR 63.11516(f)]

Taylor Power Systems Inc Facility Requirements Permit Number:2380-00129 Activity ID No.: PER20100001

Page 21 of 28

#### **GRPT0000000002** (continued):

Condition No.	Parameter	Condition
L-5		(d) Requirements upon initial detection of visible emissions from welding. If visible fugitive emissions are detected during any

- visual determination required in paragraph (c) of this condition, the permittee shall comply with the requirements as stated below:
- (1) perform corrective actions that include, but are not limited to, inspection of welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with paragraph (b) of this condition. After completing such corrective actions, the permittee shall perform a follow-up inspection for visible fugitive emissions in accordance with 40 CFR 63.11517(a) (see Condition M-4 on page 11 of the federally enforceable permit herein), at the primary vent, stack, exit, or opening from the building containing the welding operations.
- (2) report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, and submit with the annual certification and compliance report as required by 40 CFR 63.11519(b)(5) (see paragraph (d) of Condition S-7 on page 18 of the federally enforceable permit herein).
- (e) Tier 2 requirements upon subsequent detection of visible emissions. If visible fugitive emissions are detected more than once during any consecutive 12 month period (notwithstanding the results of any follow-up inspections), the permittee shall comply with the requirements as stated below:
- (1) within 24 hours of the end of the visual determination of fugitive emissions in which visible fugitive emissions were detected, the permittee shall conduct a visual determination of emissions opacity, as specified in 40 CFR 63.11517(c) (see Condition M-1 on page 29 of the federally enforceable permit herein), at the primary vent, stack, exit, or opening from the building containing the welding operations.
- (2) in lieu of the requirement of paragraph (c) of this condition to perform visual determinations of fugitive emissions with EPA Method 22, the permittee shall perform visual determinations of emissions opacity in accordance with 40 CFR 63.11517(d) (see Condition M-2 on page 30 of the federally enforceable permit herein), using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
- (3) the permittee shall keep a record of each visual determination of emissions opacity performed in accordance with paragraphs (e)(1) or (2) of this condition, along with any subsequent corrective action taken, in accordance with the requirements in 40 CFR 63.11519(c)(3) (see paragraph (c) of Condition R-5 on page 14 of the federally enforceable permit herein).
- (4) the permittee shall report the results of all visual determinations of emissions opacity performed in accordance with paragraphs (e)(1) or (2) of this condition, along with any subsequent corrective action taken, and submit with the annual certification and compliance report as required by 40 CFR 63.11519(b)(6) (see paragraph (e) of Condition S-8 on page 19 of the federally enforceable permit herein). [40 CFR 63.11516(f)]

Taylor Power Systems Inc Facility Requirements Permit Number:2380-00129 Activity ID No.: PER20100001

Page 22 of 28

#### **GRPT0000000002** (continued):

Condition	_	
No.	Parameter	Condition
L-6		(f) Requirements for opacities less than or equal to 20 percent but greater than zero. For each visual determination of emissions opacity performed in accordance with paragraph (e) of this condition for which the average of the six-minute average opacities recorded is 20 percent or less but greater than zero, the permittee shall perform corrective actions, including inspection of all welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with paragraph (b) of this condition.
		(g) Tier 3 requirements for opacities exceeding 20 percent. For each visual determination of emissions opacity performed in accordance with paragraph (e) of this condition for which the average of the six-minute average opacities recorded exceeds 20 percent, the permittee shall comply with the requirements as stated below:
		(1) the permittee shall submit a report of exceedance of 20 percent opacity, along with the annual certification and compliance report, as specified in 40 CFR 63.11519(b)(8) (see paragraph (f) of Condition S-7 on page 18 of the federally enforceable permit herein) and according to the requirements of 40 CFR 63.11519(b)(1) (see paragraph (a) of Condition S-8 on page 19 of the federally enforceable permit herein).  (2) within 30 days of the opacity exceedance, the permittee shall prepare and implement a Site-Specific Welding Emissions Management Plan, as specified in paragraph (h) of this condition. If the permittee has already prepared a Site-Specific Welding Emissions Management Plan in accordance with this paragraph, the permittee shall prepare and implement a revised Site-Specific Welding Emissions Management Plan within 30 days.  (3) during the preparation (or revision) of the Site-Specific Welding Emissions Management Plan, the permittee shall continu

- to perform visual determinations of emissions opacity, beginning on a daily schedule as specified in 40 CFR 63.11517(d) (see Condition M-2 on page 30 of the federally enforceable permit herein), using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
- (4) the permittee shall maintain records of daily visual determinations of emissions opacity performed in accordance with paragraph (g)(3) of this condition, during preparation of the Site-Specific Welding Emissions Management Plan, in accordance with the requirements in 40 CFR 63.11519(b)(9) (see paragraph (g) of Condition S-8 on page 19 of the federally enforceable permit herein).
- (5) the permittee shall include these records in the annual certification and compliance report, according to the requirements of 40 CFR 63.11519(b)(1) (see paragraph (a) of Condition S-7 on page 18 of the federally enforceable permit herein). [40 CFR 63.11516(f)]

Taylor Power Systems Inc Facility Requirements Permit Number:2380-00129 Activity ID No.: PER20100001

Page 23 of 28

### **GRPT0000000002** (continued):

## Limitation Requirements:

Condition		
No.	Parameter	Condition
L-7		(h) Site-Specific Welding Emissions Management Plan. The Site-Specific Welding Emissions Management Plan shall comply with the requirements as stated below:
		<ol> <li>Site-Specific Welding Emissions Management Plan shall contain the following information in the paragraphs below:</li> <li>company name and address;</li> </ol>
		<ul> <li>(ii) a list and description of all welding operations which currently comprise the welding affected source;</li> <li>(iii) a description of all management practices and/or fume control methods in place at the time of the opacity exceedance;</li> <li>(iv) a list and description of all management practices and/or fume control methods currently employed for the welding affected source;</li> </ul>
		(v) a description of additional management practices and/or fume control methods to be implemented pursuant to paragraph (g)(2) of this condition, and the projected date of implementation; and
		(vi) any revisions to a Site-Specific Welding Emissions Management Plan shall contain copies of all previous plan entries, pursuant to paragraphs (h)(1)(iv) and (v) of this condition.
		(2) the Site-Specific Welding Emissions Management Plan shall be updated annually to contain current information, as required by paragraphs (h)(1)(i) throught (iii) of this condition, and submitted with the annual certification and compliance report, according to the requirement of 40 CFR 63.11519(b)(1) (see paragraph (a) of Condition S-7 on page 18 of the federally enforceable permit herein).
		(3) the permittee shall maintain a copy of the current Site-Specific Welding Emissions Management Plan in the records in a readily-accessible location for inspector review, in accordance with the requirements in 40 CFR 63.11519(c)(12) (see paragraph

(j) of Condition R-6 on page 15 of the federally enforceable permit herein). [40 CFR 63.11516(f)]

Taylor Power Systems Inc Facility Requirements Permit Number:2380-00129 Activity ID No.: PER20100001

Page 24 of 28

#### **GRPT0000000002** (continued):

#### **Limitation Requirements:**

rooms.

Condition No.	on Parameter	Condition
L-8		For Emission Point AA-003, the permittee shall implement the management practices, as stated below, when a spray-applied paint that contains MFHAP is being applied. These requirements do not apply when spray-applied paints that do not contain MFHAP are being applied.
		(a) Standards for spray painting for MFHAP control. All spray-applied painting of objects must meet the requirements of paragraphs (a)(1) through (3) of this condition. These requirements do not apply to affected sources located at Fabricated Structural Metal Manufacturing facilities, as described in Table 1, "Description of Source Categories Affected by this Subpart." or

(1) spray booths or spray rooms must have a full roof, at least two complete walls, and one or two complete side curtains or other barrier material so that all four sides are covered. The spray booths or spray rooms must be ventilated so that air is drawn into the booth and leaves only through the filter. The roof may contain narrow slots for connecting fabricated products to overhead cranes, and/or for cords or cables.

affected sources that spray paint objects greater than 15 feet (4.57 meters), that are not spray painted in spray booths or spray

- (2) all spray booths or spray rooms must be fitted with a type of filter technology that is demonstrated to achieve at least 98 percent capture of MFHAP. 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 40 CFR 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-High Volume Low Pressure) air atomized spray gun operating at 40 psi air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement.
- (3) the permittee shall perform regular inspection and replacement of the filters in all spray booths or spray rooms according to the manufacturer's instructions, and maintain documentation of these activities, as detailed in 40 CFR 63.11519(c)(5) (see paragraph (e) of Condition R-5 on page 14 of the federally enforceable permit herein).
- (4) as an alternative compliance requirement, spray booths or spray rooms equipped with a water curtain, called "waterwash" or "waterspray" booths or spray rooms that are operated and maintained according to the manufacturer's specifications and that achieve at least 98 percent control of MFHAP, may be used in lieu of the spray booths or spray rooms requirements of paragraphs (a)(1) through (3) of this condition. [40 CFR 63.11516(d)]

Taylor Power Systems Inc Facility Requirements Permit Number:2380-00129 Activity ID No.: PER20100001

Page 25 of 28

### **GRPT0000000002** (continued):

Condition		
No.	Parameter	Condition
L-9		(b) Standards for spray painting application equipment of all objects painted for MFHAP control. All paints applied via spray-applied painting 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 to achieve transfer efficiency comparable to one of these spray gun technologies for a comparable operation, and for which written approval has been obtained from the Administrator. 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 Efficient Test Procedure for Equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficiency Spray Guns, September 26, 2002", Revision 0 (incorporated by reference, see 40 CFR 63.14).  (c) Spray system recordkeeping. You must maintain documentation of the HVLP or other high transfer efficiency spray paint delivery methods, as detailed in 40 CFR 63.11519(c)(7) (see paragraph (g) of Condition R-6 on page 15 of the federally enforceable permit herein).
		(d) Spray gun cleaning. All cleaning of paint spray guns must be done with either non-HAP gun cleaning solvents, or in such a manner that an atomized mist of spray gun cleaning solvent and paint residue is not created outside of a container that collects the used gun cleaning solvent. Spray gun cleaning may be done with, for example, by 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 thse non-atomizing methods may also be used
		(e) Spray painting worker certification. All workers performing painting must be certified that they have completed training in the proper spray application of paints and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in paragraph (f) of condition L-10 on page 15 of the permit. The spray application of paint is prohibited by persons who are not certified as having completed the training described in paragraph (f) of condition L-10 on page 15 of the permit. The requirements of this paragraph do not apply to the students of an accredited painting training program who are under the direct supervision of an instructor who meets the requirements of this paragraph. The requirements of this paragraph do not apply to operators of robotic or automated painting operations. [40 CFR 63.11516(d)]

Taylor Power Systems Inc Facility Requirements Permit Number:2380-00129 Activity ID No.: PER20100001

Page 26 of 28

## **GRPT0000000002** (continued):

Condition No. Parameter	Condition	
L-10	(f) Spray painting training program content. Each owner or operator of an affected spray painting affected source must ensure and certify that all new and existing personnel, including contact personnel, who spray apply paints are trained in the proper application of paints as required by paragraph (e) in Condition L-9 on page 27 of the federally enforceable permit herein. The training program must include, at a minimum, the items listed in paragraphs (f)(1) through (3) of this condition.	
	<ul> <li>(1) a list of all current personnel by name and job description who are required to be trained;</li> <li>(2) hands-on, or in-house or external classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in paragraphs (f)(2)(i) through (iv) of this condition.</li> <li>(i) spray gun equipment selection, set up, and operation, including measuring paint viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.</li> <li>(ii) spray technique for different types of paints to improve transfer efficiency and minimize paint 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.</li> <li>(iii) routine spray booth and filter maintenance, including filter selection and installation.</li> <li>(iv) environmental compliance with the requirements of this subpart.</li> <li>(3) 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. Alternatively, owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training</li> </ul>	

Taylor Power Systems Inc Facility Requirements Permit Number:2380-00129 Activity ID No.: PER20100001

Page 27 of 28

## **GRPT0000000002** (continued):

Condition		
No.	Parameter	Condition
L-11		(g) Records of spray painting training. The permittee shall maintain records of employee training certification for use of HVLP or other high transfer efficiency spray paint delivery methods as detailed in 40 CFR 63.11519(c)(8) (see paragraph (h) of Condition R-6 on page 15 of the federally enforceable permit herein).
		(h) Spray painting training dates. As required by paragraph (e) of Condition L-9 on page 27 of the federally enforceable permit herein, all new and existing personnel at an affected spray painting affected source, including contract personnel, who spray apply paints must be trained by the dates specified in paragraphs (h)(1) and (2) of this condition.
		(1) if the permittee's source is a new source, all personnel must be trained and certified no later than 180 days after startup or 180 days after hiring, whichever is later. Training that was completed within 5 years prior to the date training is required, and that meets the requirements specified in paragraph (f)(2) of Condition L-10 on page 28 of the federally enforceable permit herein satisifies this requirement and is valid for a period not to exceed 5 years after the date the training is completed.  (2) if the permittee's source is an existing source, all personnel must be trained and certified no later than July 25, 2011, or 180 days after hiring, whichever is later. Worker training that was completed within 5 years prior to the date training is required, and that meets the requirements specified in paragraph (f)(2) of Condition L-10 on page 27 of the federally enforceable permit herein, satisfies this requirement and is valid for a period not to exceed 5 years after the date the training is completed.
		(i) Duration of training validity. Training and certification will be valid for a period not to exceed 5 years after the date the training is completed. All personnel must receive refresher training that meets the requirements of this section and be re-certified every 5 years. [40 CFR 63.11516(d)]
Monitor	ing Requirements:	
Condition		
No.	Parameter	Condition
M-1		For Emission Point AA-002, visual determination of emissions opacity shall be performed in accordance with the procedures of EPA Method 9, of 40 CFR Part 60, Appendix A-4, and while the affected source is operating under normal conditions. The duration of the EPA Method 9 test shall be thirty minutes. [40 CFR 63.11517(c)]

Taylor Power Systems Inc Facility Requirements Permit Number:2380-00129 Activity ID No.: PER20100001

Page 28 of 28

### **GRPT0000000002** (continued):

## Monitoring Requirements:

WIOIIIIOI	Wolntoring Requirements.		
Condition No.	Parameter	Condition	
M-2		For Emission Point AA-002, the permittee shall perform visual determination of emissions opacity in accordance with the previous condition in accordance with the schedule in paragraphs (a) through (e) of this condition.	
		(a) Daily Method 9 testing for welding. Tier 2 or 3. Perform visual determination of emissions opacity once per day during each day that the process is in operation.	
		(b) Weekly Method 9 testing for welding. Tier 2 or 3. If the avreage of the six minute opacities recorded during any of the daily consecutive EPA Method 9 tests performed in accordance with paragraph (a) of this condition does not exceed 20 percent for 10 days of operation of the process, the permittee may decrease the frequency of EPA Method 9 testing to once per five days of consecutive work day operation. If opacity greater than 20 percent is detected during any of these tests, the permittee may resume testing every day of operation of the process according to the requirements of paragraph (a) of this condition.	
		(c) Monthly Method 9 testing for welding. Tier 2 or 3. If the average of the six minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed in accordance with paragraph (b) of this condition does not exceed 20 percent for four consecutive weekly tests, the permittee may decrease the frequency of EPA Method 9 testing to once per every 21 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any monthly test, the permittee shall resume testing every five days of operation of the process according to the requirements of paragraph (b) of this condition.	
		(d) Quarterly Method 9 testing for welding. Tier 2 or 3. If the average of the six minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed in accordance with paragraph (c) of this condition does not exceed 20 percent for three consecutive monthly tests, the permittee may decrease the frequency of EPA Method 9 testing to once per every 120 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any quarterly test, the permittee shall resume testing every 21 days (month) of operation of the process according to the requirements of paragraph (c) of this condition.	
		(e) Return to Method 22 testing for welding. Tier 2 or 3. If, after two consecutive months of testing, the average of the six minute opacities recorded during any of the monthly EPA Method 9 tests performed in accordance with paragraph (c) of this condition does not exceed 20 percent, the permittee may resume EPA Method 22 testing as in paragraphs (c) and (d) of Condition M-5 on page 12 of the permit. In lieu of this, the permittee may elect to continue performing EPA Method 9 tests in accordance with paragraphs (c) and (d) of this condition. [40 CFR 63.11517(d)]	

## **GENERAL INFORMATION**

Taylor Power Systems Inc 120 Interstate Drive Richland, MS Rankin County

#### **Alternate/Historic Identifiers**

ID	Alternate/Historic Name	User Group	Start Date	End Date
52663	The Taylor Group, Inc.	Official Site Name	3/4/2010	
MSR001935	The Taylor Group, Inc., Taylor Power Systems, Inc.	GP-Baseline	3/17/2010	9/30/2010
238000129	Taylor Power Systems Inc	Air-Construction	7/12/2010	
238000129	Taylor Power Systems Inc	Air-Synthetic Minor Operating	7/12/2010	6/30/2015

**Basin:** Pearl River Basin

**Location Description:**