# STATE OF MISSISSIPPI AIR POLLUTION CONTROL TITLE V PERMIT

## TO OPERATE AIR EMISSIONS EQUIPMENT

### THIS CERTIFIES THAT

Huntington Ingalls, Inc., Ingalls Shipbuilding Division, Pascagoula Operations
1000 Jerry St. Pe' Highway
Pascagoula, Mississippi
(Jackson County)

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

Permit Issued: February 14, 2011

**Effective Date: As specified herein.** 

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: <u>January 31, 2016</u> Permit No.: 1280-00041

**Modified:** May 31, 2011

Modified: November 15, 2011

## **TABLE OF CONTENTS**

|            | GENERAL CONDITIONS                                         |
|------------|------------------------------------------------------------|
| SECTION 2. | EMISSION POINTS & POLLUTION CONTROL DEVICES12              |
| SECTION 3. | EMISSION LIMITATIONS & STANDARDS14                         |
| SECTION 4. | COMPLIANCE SCHEDULE22                                      |
| SECTION 5. | MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS23       |
| SECTION 6. | ALTERNATIVE OPERATING SCENARIOS40                          |
| SECTION 7. | TITLE VI REQUIREMENTS41                                    |
|            |                                                            |
| APPENDIX A | LIST OF ABBREVIATIONS USED IN THIS PERMIT                  |
| APPENDIX E | 3 40 CFR PART 60, APPENDIX A, METHOD 24 – DETERMINATION OF |
|            | VOLATILE MATTER CONTENT, WATER CONTENT, DENSITY,           |
|            | VOLUME SOLIDS, AND WEIGHT SOLIDS OF SURFACE COATINGS       |
| APPENDIX ( | C 40 CFR PART 63, SUBPART II – NATIONAL EMISSION STANDARDS |
|            | FOR HAZARDOUS AIR POLLUTANTS FOR SHIPBUILDING AND          |
|            | SHIP REPAIR (SURFACE COATING)                              |
| APPENDIX I | 40 CFR PART 63, SUBPART ZZZZ – NATIONAL EMISSION           |
|            | STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR                 |
|            | STATIONARY RECIPROCATING INTERNAL COMBUSTION               |
|            | ENGINES (RICE)                                             |
| APPENDIX E | 40 CFR PART 60, SUBPART IIII – STANDARDS OF PERFORMANCE    |
|            | FOR STATIONARY COMPRESSION IGNITION INTERNAL               |
|            | COMBUSTION ENGINES (CI ICE)                                |
| APPENDIX F | 40 CFR PART 64 – NORTHROP GRUMMAN SHIPBUILDING, INC.'S     |
|            | INDIVIDUAL AND SOURCE SPECIFIC COMPLIANCE ASSURANCE        |
|            | MONITORING PLAN                                            |
|            | MACHINE CAME TO A MART                                     |

- 1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (Ref.: APC-S-6, Section III.A.6.a.)
- 1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (Ref.: APC-S-6, Section III.A.6.b.)
- 1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (Ref.: APC-S-6, Section III.A.6.c.)
- 1.4 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: APC-S-6, Section III.A.6.d.)
- 1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: APC-S-6, Section III.A.6.e.)
- 1.6 The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref.: APC-S-6, Section III.A.5.)
- 1.7 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation APC-S-6.
  - (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as

those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission. (Ref.: APC-S-6, Section VI.A.2.)

- (b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee. (Ref.: APC-S-6, Section VI.A.2.) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time. (Ref.: APC-S-6, Section VI.D.2.)
- (c) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due. (Ref.: APC-S-6, Section VI.D.)
- (d) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition. (Ref.: APC-S-6, Section VI.C.)
- 1.8 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (Ref.: APC-S-6, Section III.A.8.)
- 1.9 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (Ref.: APC-S-6, Section II.E.)
- 1.10 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:
  - (a) enter upon the permittee's premises where a Title V source is located or emissionsrelated activity is conducted, or where records must be kept under the conditions of this permit;

- (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. (Ref.: APC-S-6, Section III.C.2.)
- 1.11 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere. (Ref.: APC-S-1, Section 3.9(a))
- Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970. (Ref.: APC-S-1, Section 3.9(b))
- 1.13 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source. (Ref.: APC-S-6, Section III.F.1.)
- 1.14 Nothing in this permit shall alter or affect the following:
  - (a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
  - (b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - (c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
  - (d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act. (Ref.: APC-S-6, Section III.F.2.)
- 1.15 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan. (Ref.: APC-S-6, Section III.H.)
- 1.16 Expiration of this permit terminates the permittee's right to operate unless a timely and 1670 PER20100001.5

complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application. (Ref.: APC-S-6, Section IV.C.2., Section IV.B., and Section II.A.1.c.)

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

Modification is defined as "[a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

- (a) routine maintenance, repair, and replacement;
- (b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
- (c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
- (d) use of an alternative fuel or raw material by a stationary source which:
  - (1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or
  - (2) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166;
- (e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or
- (f) any change in ownership of the stationary source."
- 1.20 Any change in ownership or operational control must be approved by the Permit Board. (Ref.: APC-S-6, Section IV.D.4.)
- 1.21 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission. (Ref.: APC-S-6, Section III.B.1)
- 1.22 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest

management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.

- (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.
- (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.
- (c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator. (Ref.: APC-S-1, Section 3.7)
- 1.23 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies.
  - (a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
  - (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.
  - (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
    - (1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
    - (2) the permitted facility was at the time being properly operated;

- (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein. (Ref.: APC-S-6, Section III.G.)
- 1.24 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, shutdowns and maintenance.
  - (a) Upsets (as defined by APC-S-1, Section 2.37)
    - (1) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
      - (i) an upset occurred and that the permittee can identify the cause(s) of the upset;
      - (ii) the source was at the time being properly operated;
      - (iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;
      - (iv) the permittee submitted notice of the upset to the DEQ within 5 working days of the time the upset began; and
      - (v) the notice of the upset shall contain a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.
    - (2) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.

- (3) This provision is in addition to any upset provision contained in any applicable requirement.
- (b) Startups and Shutdowns (as defined by APC-S-1, Sections 2.34 & 2.29)
  - (1) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows:
    - (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above;
    - (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or
    - (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.
  - (2) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.
  - (3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply.

#### (c) Maintenance.

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

- other requirements of Applicable Rules and Regulations or any applicable permit;
- (iv) the permittee submitted notice of the maintenance to the DEQ within 5 working days of the time the maintenance began or such other times as allowed by DEQ; and
- (v) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.
- (2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.
- (3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. (Ref.: APC-S-1, Section 10)
- 1.25 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation APC-S-1, Section 8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

## SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

| Emission Point | Description                                                                                                                                    |
|----------------|------------------------------------------------------------------------------------------------------------------------------------------------|
| AA-001         | Plate Line Abrasive Blasting (equipped with dust collector) {West Bank, NE end of Fab Shop}                                                    |
| AA-002         | Shape Line Abrasive Blasting (equipped with dust collector) {West Bank, SE end of Fab Shop}                                                    |
| AA-003         | Plate Line Primer Application (equipped with dust collector and regenerative thermal oxidizer) {West Bank, NE end of Fab Shop}                 |
| AA-004         | Shape Line Primer Application and Drying Oven (equipped with dust collector and regenerative thermal oxidizer) {West Bank, SE end of Fab Shop} |
| AA-011         | 40-Wheel Wheelabrator (Ref. 95-48) (equipped with dust collectors) {West Bank}                                                                 |
| AA-012         | Outdoor Blasting (Ref. 95-49) {West Bank}                                                                                                      |
| AA-013         | Welding (Ref. 95-51) {West Bank}                                                                                                               |
| AA-014         | Oil/Water Separator (Ref. 95-55) {West Bank Resource Recovery}                                                                                 |
| AA-015         | Carpenter Shop (Ref. 95-105) (equipped with baghouse and cyclone) {West Bank}                                                                  |
| AA-020         | Indoor Paint Shop (Bldg. 2108; Ref. 95-60) (equipped with filter system) {West Bank, SW of Wheelabrator}                                       |
| AA-023         | Facility Wide Fugitives from Adhesives, Solvents, and other VOHAP Containing Chemicals (Ref. 95-52) {West Bank}                                |
| AA-025         | Intermediate Outdoor Painting {West Bank}                                                                                                      |
| AA-026         | Final Interior Painting {West Bank}                                                                                                            |
| AA-027         | Final Exterior Painting (West Bank)                                                                                                            |
| AB-001         | 24 MMBTUH Metal Processing Annealing Furnace (Ref. 3123-035) {West Bank, East of Flame Spray}                                                  |
| AB-002         | Sulfuric Acid (H <sub>2</sub> SO <sub>4</sub> ) Pickling Scrubber (equipped with mist eliminator) {West Bank, South of Annealing Furnace}      |
| AB-003         | Plastisol Operation {West Bank, East of Flame Spray}                                                                                           |
| AB-004         | Painting Operation in Metal Processing Area {West Bank, East end of Pickling Plant}                                                            |
| AD-001         | 660 Ton "Goliath" Crane with Two (2) 2172 HP Diesel Engines                                                                                    |
| AD-002         | Blast and Paint Hall (equipped with dust collector systems and catalytic thermal oxidizer)                                                     |
| AD-003         | Blast and Paint Hall (equipped with dust collectors)                                                                                           |

## Page 13 of 42 Permit No. 1280-00041

| Emission Point | Description                                                                                      |
|----------------|--------------------------------------------------------------------------------------------------|
| AD-008         | Miscellaneous Natural Gas-fired Units (Ref. FB-2)                                                |
| AD-010         | Abrasive Blasting Vacuum Units (Ref. MP1)                                                        |
| AD-011         | West Bank IPD Shop (Ref. MP2 and MP3) (each equipped with baghouse)                              |
| AD-012         | Five (5) Oxyfuel Cutting Robots at West Bank Fab Shop (equipped with dust collectors) (Ref. MP4) |
| AD-014         | Manual Oxyfuel Cutting (Ref. MP6)                                                                |
| AD-015         | One (1) 12,000 Gallon Bulk Gasoline Storage Tank                                                 |
| AD-016         | 47 HP Emergency Generator Deutz – Multipurpose Warehouse (Ref. 3801-056)                         |
| AD-017         | 40 HP Emergency Generator Caterpillar – Gate 2 (Ref. 3801-096)                                   |
| AD-018         | 1341 HP Emergency Generator Caterpillar C32 – Admin. 1 (Ref. 3801-138)                           |
| AD-019         | 80 HP Backup Fire Pump Patterson – H <sub>2</sub> 0 Well (Ref. 3151-027)                         |
| AD-020         | 80 HP Backup Fire Pump Patterson – Booster Pump (Ref. 3151-028)                                  |
| AD-022         | 275 HP Emergency Generator Caterpillar – Sewer Plant (Ref. 3801-092)                             |
| AD-023         | 275 HP Emergency Generator Caterpillar – Gate 1 (Ref. 3801-093)                                  |
| AD-025         | 1341 HP Emergency Generator Caterpillar C32 – Gate 4 (Ref. 3801-139)                             |
| AD-026         | 1341 HP Emergency Generator Caterpillar C32 – Facility Building (Ref. 3801-140)                  |
| AD-027         | 1505 HP Emergency Generator Caterpillar – Security/HR Building                                   |
| AD-028         | 125 HP Fire Pump – (Ref. 3159-146) {East Bank}                                                   |
| AD-029         | 220 HP Waterwell Emergency Pump – (Ref. 1502-034) {East Bank}                                    |
| AD-030         | 250 HP Fire Pump Patterson – (Ref. 3159-143) {South Blast and Paint Hall}                        |
| AD-031         | 1341 HP Emergency Generator Caterpillar C32 – Admin 4                                            |

#### SECTION 3. EMISSION LIMITATIONS & STANDARDS

#### A. Facility-Wide Emission Limitations & Standards

- 3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).
  - (a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.
  - (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour. (Ref.: APC-S-1, Section 3.1)
- 3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Paragraph 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: APC-S-1, Section 3.2)

#### B. Emission Point Specific Emission Limitations & Standards

| Emission<br>Point(s)          | Applicable Requirement                                                                                                                      | Condition<br>Number(s) | Pollutant/<br>Parameter                        | Limit/Standard                         |
|-------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|------------------------|------------------------------------------------|----------------------------------------|
| AA-001,<br>AA-002,<br>AA-011, | Mississippi State Regulation APC-S-1,<br>Section 3.2 (Condition 3.A.2 of the<br>federally enforceable permit herein);                       |                        | Opacity (3.A.2)                                | Not to exceed 40%                      |
| AD-003 &<br>AD-011            | Mississippi State Regulation APC-S-1,<br>Section 3.6(a) (Condition 3.A.3 of the<br>federally enforceable permit herein);<br>40 CFR 64.2(a). | 3.B.1                  | PM/PM <sub>10</sub> /PM <sub>2.5</sub> (3.A.3) | $E = 4.1p^{0.67}$                      |
| AA-003 &<br>AA-004            | Established in the federally enforceable permit issued February 17, 2006.                                                                   | 3.B.2                  | VOC                                            | Not to exceed 39.0 tons per year (TPY) |
| AA-003 &<br>AA-004            | Established in the federally enforceable permit issued February 17, 2006; 40 CFR 64.2(a).                                                   | 3.B.3                  | VOC                                            | Combustion chamber temperature.        |

## Page 15 of 42 Permit No. 1280-00041

| Emission<br>Point(s)                                                                                                 | Applicable Requirement                                                                   | Condition<br>Number(s)      | Pollutant/<br>Parameter                | Limit/Standard                                                                               |
|----------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|-----------------------------|----------------------------------------|----------------------------------------------------------------------------------------------|
| AA-003,<br>AA-004,<br>AA-020,<br>AA-025,<br>AA-026,<br>AA-027,<br>AB-004 &<br>AD-002                                 | Mississippi State Regulation APC-S-1,<br>Section 8.1; 40 CFR 63.781 and 40<br>CFR 63.783 | 3.B.4,<br>3.B.5,<br>& 3.B.6 | VOHAP                                  | An as-applied VOHAP content limit dependent on the type of coating.                          |
| AD-008,<br>AD-016<br>through<br>AD-020,<br>AD-022,<br>AD-023, &<br>AD-025<br>through<br>AD-031                       | Mississippi State Regulation APC-S-1,<br>Section 3.4(a)(1)                               | 3.C.1<br>&<br>1.19          | PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 0.6 lb/MMBTUH or as otherwise limited by facility modification restrictions                  |
| AB-001 &<br>AD-001                                                                                                   | Mississippi State Regulation APC-S-1,<br>Section 3.4(a)(2)                               | 3.B.7<br>&<br>1.19          | PM/PM <sub>10</sub> /PM <sub>2.5</sub> | $E = 0.8808 * \Gamma^{0.1667}$ or as otherwise limited by facility modification restrictions |
| AA-013,<br>AA-015,<br>AB-001,<br>AD-002,<br>AD-009,<br>AD-010.<br>AD-012 &<br>AD-014                                 | Mississippi State Regulation APC-S-1,<br>Section 3.2                                     | 3.A.2<br>&<br>1.19          | Opacity                                | Not to exceed 40%                                                                            |
| AA-004,<br>AA-012,<br>AA-013,<br>AA-015,<br>AD-002,<br>AD-009,<br>AD-010,<br>AD-012 &<br>AD-014                      | Mississippi State Regulation APC-S-1,<br>Section 3.6(a)                                  | 3.A.3<br>&<br>1.19          | PM/PM <sub>10</sub> /PM <sub>2.5</sub> | $E = 4.1 \text{ p}^{0.67}$ or as otherwise limited by facility modification restrictions     |
| AB-001,<br>AD-001,<br>AD-008,<br>AD-016<br>through<br>AD-020,<br>AD-022,<br>AD-023, &<br>AD-025<br>through<br>AD-031 | Mississippi State Regulation APC-S-1,<br>Section 4.1(a)                                  | 3.C.2<br>&<br>1.19          | $\mathrm{SO}_2$                        | 4.8 lbs/MMBTU or as otherwise limited by facility modification restrictions                  |
| AD-001                                                                                                               | Established in the federally enforceable permit issued February 17, 2006.                | 3.B.9                       | NOx                                    | Not to exceed 35.45 TPY                                                                      |

## Page 16 of 42 Permit No. 1280-00041

| Emission<br>Point(s)                               | Applicable Requirement                                                                                                           | Condition<br>Number(s) | Pollutant/<br>Parameter                | Limit/Standard                                                         |
|----------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|------------------------|----------------------------------------|------------------------------------------------------------------------|
| AA-020,<br>AA-025 &<br>AD-002                      | Established in the federally enforceable permit issued February 17, 2006.                                                        | 3.B.10                 | VOC                                    | Not to exceed 84.40 TPY                                                |
|                                                    | Established in the federally                                                                                                     | 3.B.13                 | PM/PM <sub>10</sub> /PM <sub>2.5</sub> | Not to exceed 319.26 TPY                                               |
| Entire<br>Facility                                 | enforceable permit issued<br>February 17, 2006.                                                                                  | 3.B.14                 | NOx                                    | Not to exceed 84.02 TPY                                                |
|                                                    |                                                                                                                                  | 3.B.15                 | VOC                                    | Not to exceed 338.31 TPY                                               |
| AD-002                                             | Established in the federally enforceable permit issued February 17, 2006.                                                        | 3.B.16                 | VOC                                    | Catalyst inlet temperature.                                            |
| AD-016,<br>AD-028, &<br>AD-029                     | 40 CFR Part 63, Subpart ZZZZ –<br>NESHAP for Stationary RICE                                                                     | 3.B.17                 |                                        | 40 CFR 63.6585(a) and (b);<br>63.6590(a)(1)(ii)                        |
| AD-017,<br>AD-019,                                 | 40 CFR Part 63, Subpart ZZZZ –<br>NESHAP for Stationary RICE                                                                     | 3.B.17                 | Applicability                          | 40 CFR 63.6585(a) and (b);<br>63.6590(a)(2)(ii)                        |
| AD-020,<br>AD-022,<br>AD-023 &<br>AD-030           | 40 CFR Part 63, Subpart ZZZZ – NESHAP for Stationary RICE (subject to 40 CFR Part 60, Subpart IIII – NSPS for Stationary CI ICE) | 3.B.18                 |                                        | 63.6590(c)(6) and (7)                                                  |
| AD-018,<br>AD-025<br>through<br>AD-027 &<br>AD-031 | 40 CFR Part 63, Subpart ZZZZ –<br>NESHAP for Stationary RICE                                                                     | 3.B.17                 |                                        | 40 CFR 63.6585(a) and (b);<br>63.6590(a)(2)(i) and<br>63.6590(b)(1)(i) |
| AD-016,<br>AD-028 &                                | 40 CFR Part 63, Subpart ZZZZ –                                                                                                   | 3.B.19                 | Compliance<br>Requirements             | 40 CFR 63.6595(a)(1) and (c)                                           |
| AD-028 &<br>AD-029                                 | NESHAP for Stationary RICE                                                                                                       |                        | Work Practice<br>Requirements          | 40 CFR 63.6602 and Table 2c of the Subpart                             |
| AD-017,<br>AD-022,<br>AD-023 &<br>AD-030           | 40 CFR Part 60, Subpart IIII – NSPS for Stationary CI ICE                                                                        | 3.B.18                 | Applicability                          | 40 CFR 60.4200(a)(2)(i)                                                |
| AD-019 &<br>AD-020                                 | Tor Stationary Crice                                                                                                             | 5120                   | ,                                      | 40 CFR 60.4200(a)(2)(ii)                                               |

| Emission<br>Point(s)                                | Applicable Requirement                                       | Condition<br>Number(s) | Pollutant/<br>Parameter    | Limit/Standard               |
|-----------------------------------------------------|--------------------------------------------------------------|------------------------|----------------------------|------------------------------|
| AD-017,<br>AD-022 &<br>AD-023                       |                                                              | 3.B.21                 | Emission                   | 40 CFR 60.4205(b)            |
| AD-019,<br>AD-020 &<br>AD-030                       | 40 CFR Part 60, Subpart IIII – NSPS for Stationary CI ICE    | 3.B.22                 | Standards                  | 40 CFR 60.4205(c)            |
| AD-017,                                             | ,                                                            | 3.B.23                 | Duration                   | 40 CFR 60.4206               |
| AD-019,<br>AD-020,<br>AD-022,<br>AD-023 &<br>AD-030 |                                                              | 3.B.24                 | Fuel<br>Requirements       | 40 CFR 60.4207(b)            |
| AD-018,<br>AD-025<br>through<br>AD-027 &<br>AD-031  | 40 CFR Part 63, Subpart ZZZZ –<br>NESHAP for Stationary RICE | 3.B.25                 | Compliance<br>Requirements | 40 CFR 63.6595(a)(3) and (c) |

- 3.B.1 For Emission Points AA-001, AA-002, AA-011, AD-003, and AD-011, to ensure proper operation and efficiency of devices for particulate matter control, the permittee shall perform visible emission evaluations in accordance with Condition 5.B.1 of the federally enforceable permit herein. (Ref.: APC-S-1, Sections 3.2 & 3.6(a); 40 CFR 64.2(a))
- 3.B.2 For Emission Points AA-003 and AA-004 (combined), the permittee shall limit volatile organic compound emissions to no more than 39.0 tons per year for any consecutive 12-month period. (Ref.: Federally enforceable permit issued February 17, 2006.)
- 3.B.3 For Emission Points AA-003 and AA-004, to ensure proper combustion of volatile organic compounds, each thermal oxidizer must be operated such that the chamber temperature is at a level determined by required testing in accordance with Conditions 5.B.3 and 5.B.4 of the federally enforceable permit herein. (Ref.: 40 CFR 64.2(a))
- 3.B.4 Marine surface coating operations, Emission Points AA-003, AA-004, AA-020, AA-025, AA-026, AA-027, AB-004, and AD-002, are affected by and shall comply with 40 CFR Part 63, Subpart II National Emission Standards for Hazardous Air Pollutants for Shipbuilding and Ship Repair. (Ref.: 40 CFR 63.781(a))
- 3.B.5 For Emission Points AA-003, AA-004, AA-020, AA-025, AA-026, AA-027, AB-004, and AD-002, the permittee shall not cause or allow the application of any coating to a ship with an as-applied VOHAP content exceeding the applicable limit given in Table 2 of Appendix B, as determined by the procedures described in Condition 5.B.6 (a) through (d) of the federally enforceable permit herein. For compliance procedures described in Condition 5.B.6 (a) through (c) of the federally enforceable permit herein, VOC shall be used as a surrogate for VOHAP, and Method 24 of 40 CFR Part 60 Appendix A, shall be used as the

definitive measure for determining compliance. For compliance procedures described in Condition 5.B.6 (d) of the federally enforceable permit herein, the permittee shall use an alternative test method capable of measuring independent VOHAP to determine compliance. The method must be submitted to and approved by the MDEQ. (Ref.: 40 CFR 63.783(a))

- 3.B.6 For Emission Points AA-003, AA-004, AA-020, AA-025, AA-026, AA-027, AB-004, and AD-002, the coatings which are used in volumes of less than 52.8 gallons per year for one coating and a total of less than 264 gallons per year for all exempted coatings, shall be required to meet only the requirements of Condition 5.B.9 of the federally enforceable permit herein. (Ref.: 40 CFR 63.781(b))
- 3.B.7 The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of greater than 10 million BTU per hour heat input shall not exceed an emission rate as determined by the relationship

$$E = 0.8808 * I^{-0.1667}$$

where E is the emission rate in pounds per million BTU per hour heat input and I is the heat input in million BTU per hour. (Ref.: APC-S-1, Section 3.4(a)(2))

- 3.B.8 For Emission Point AA-015, the permittee shall not operate the Carpenter Shop without existing control devices in operation, in accordance with Mississippi State Regulation APC-S-1, Section 10. (Ref.: APC-S-1, Section 10)
- 3.B.9 For Emission Point AD-001, the permittee shall limit nitrogen oxide emissions to no more than 35.45 tons per year for any consecutive 12-month period. The permittee shall utilize the source specific emission factors determined for nitrogen oxide emissions, established in an initial performance test conducted in October 2001 in accordance with EPA Reference Method 7, 40 CFR 60, Appendix A. (Ref.: Federally enforceable permit issued February 17, 2006.)
- 3.B.10 For Emission Points AA-020, AA-025, and AD-002, the permittee shall limit volatile organic compound emissions to no more than 84.40 tons per year for any consecutive 12-month period. (Ref. Federally enforceable permit issued February 17, 2006.)
- 3.B.11 For Emission Point AD-011, the permittee shall not operate the blast booths without existing control devices in operation. The control devices shall be operated in accordance with Mississippi State Regulation APC-S-1, Section 10. (Ref.: APC-S-6, Section III.A.1)
- 3.B.12 For Emission Point AD-013, the permittee shall not operate the blast booths without existing control devices in operation. The control devices shall be operated in accordance with Mississippi State Regulation APC-S-1, Section 10. (Ref.: APC-S-6, Section III.A.1)

- 3.B.13 For the entire facility, the permittee shall limit particulate matter (less than 10 microns) emissions to no more than 319.26 tons per year for any consecutive 12-month period. (Ref.: Federally enforceable permit issued February 17, 2006.)
- 3.B.14 For the entire facility, the permittee shall limit nitrogen oxide emissions to no more than 84.02 tons per year for any consecutive 12-month period. (Ref.: Federally enforceable permit issued February 17, 2006.)
- 3.B.15 For the entire facility, the permittee shall limit volatile organic compound emissions to no more than 338.31 tons per year for any consecutive 12-month period. (Ref.: Federally enforceable permit issued February 17, 2006.)
- 3.B.16 For Emission Point AD-002, to ensure proper combustion of volatile organic compounds, the catalytic oxidizer must be operated such that the catalyst inlet temperature is at a level determined by required testing in accordance with Condition 5.B.17 of the federally enforceable permit herein. (Ref.: Federally enforceable permit issued February 17, 2006.)
- 3.B.17 For Emission Points AD-016 through AD-020, AD-022, AD-023, and AD-025 through AD-031, 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). (Ref.: 40 CFR 63.6585(a) and (b); 40 CFR 63.6590(a)(1)(ii); 40 CFR 63.6590(a)(2)(ii); 40 CFR 63.6590(a)(2)(i) and (b)(1)(i))
- 3.B.18 For Emission Points AD-017, AD-019, AD-020, AD-022, AD-023, and AD-030, 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). (Ref.: 40 CFR 63.6590(c)(6) and (7); 40 CFR 60.4200(a)(2)(i); 40 CFR 60.4200(a)(2)(ii))
- 3.B.19 For Emission Points AD-016, AD-028, and AD-029, the permittee shall comply with the applicable emission and operating limitations (see Condition 3.B.20 of the federally enforceable permit herein) no later than October 19, 2013. (Ref.: 40 CFR 63.6595(a)(1) and (c))
- 3.B.20 For Emission Points AD-016, AD-028, and AD-029, the permittee shall comply with the following emission and operating limitations:
  - (a) change oil and filter every 500 hours of operation or annually, whichever comes first;
  - (b) inspect spark plugs every 1,000 hours of operation or annually, whichever comes first; and
  - (c) inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

- (Ref.: 40 CFR 63.6602 and Table 2c of the Subpart)
- 3.B.21 For Emission Points AD-017, AD-022, and AD-023, 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.] (Ref.: 40 CFR 60.4205(b))
- 3.B.22 For Emission Points AD-019, AD-020, and AD-030, the permittee shall comply with the emission standards in Table 4 of this Subpart, for all pollutants. (Ref.: 40 CFR 60.4205(c))
- 3.B.23 For Emission Points AD-017, AD-019, AD-020, AD-022, AD-023, and AD-030, the permittee shall operate and maintain stationary CI ICE that achieve the emission standards as required in 40 CFR 60.4205 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. (Ref.: 40 CFR 60.4206)
- 3.B.24 For Emission Points AD-017, AD-019, AD-020, AD-022, AD-023, and AD-030, beginning October 1, 2010, the permittee shall use diesel fuel that meets the requirement of 40 CFR 80.510(b) for nonroad diesel fuel. (Ref.: 40 CFR 60.4207(b))
- 3.B.25 For Emission Points AD-018, AD-025 through AD-027, and AD-031, the permittee shall comply with the applicable emission and operating limitations upon startup of the affected source. (Ref.: 40 CFR 63.6595(a)(3) and (c))

#### C. Insignificant and Trivial Activity Emission Limitations & Standards

| Applicable Requirement                                     | Condition<br>Number(s) | Pollutant/<br>Parameter                | Limit/Standard                                                                     |
|------------------------------------------------------------|------------------------|----------------------------------------|------------------------------------------------------------------------------------|
| Mississippi State Regulation<br>APC-S-1, Section 3.4(a)(1) | 3.C.1 & 1.19           | PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 0.6 lbs/MMBTU or as otherwise limited by facility modification restrictions        |
| Mississippi State Regulation<br>APC-S-1, Section 4.1(a)    | 3.C.2 & 1.19           | $\mathrm{SO}_2$                        | 4.8 lbs/MMBTU or as otherwise limited by facility modification restrictions        |
| Mississippi State Regulation<br>APC-S-1, Section 3.6(a)    | 3.A.3                  | PM/PM <sub>10</sub> /PM <sub>2.5</sub> | $E = 4.1 \ p^{0.67}$ or as otherwise limited by facility modification restrictions |
| Mississippi State Regulation<br>APC-S-1, Section 3.2       | 3.A.2                  | Opacity                                | Not to exceed 40%                                                                  |

- 3.C.1 The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input. (Ref.: APC-S-1, Section 3.4(a)(1))
- 3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. (Ref.: APC-S-1,

Section 4.1(a))

#### D. <u>Work Practice Standards</u>

| Emission<br>Point(s)                                                                 | Applicable Requirement | Condition<br>Number(s) | Pollutant/<br>Parameter | Limit/Standard                                                                               |
|--------------------------------------------------------------------------------------|------------------------|------------------------|-------------------------|----------------------------------------------------------------------------------------------|
| AA-003,<br>AA-004,<br>AA-020,<br>AA-025,<br>AA-026,<br>AA-027,<br>AB-004 &<br>AD-002 | 40 CFR 63.783(b)       | 3.D.1                  | VOHAP                   | Handling and transfer procedures for VOHAP containing coatings, and inspection of equipment. |

- 3.D.1 For Emission Points AA-003, AA-004, AA-020, AA-025, AA-026, AB-004, and AD-002, the permittee shall ensure that:
  - (a) All handling and transfer of VOHAP-containing materials to and from containers, tanks, vats, drums, and piping systems is conducted in a manner that minimizes spills.

(Ref.: 40 CFR 63.783(b)(1))

(b) All containers, tanks, vats, drums, and piping systems are free of cracks, holes, and other defects and remain closed unless materials are being added to or removed from them.

(Ref.: 40 CFR 63.783(b)(2))

#### SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:
  - (a) the identification of each term or condition of the permit that is the basis of the certification;
  - (b) the compliance status;
  - (c) whether compliance was continuous or intermittent;
  - (d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
  - (e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit. (Ref.: APC-S-6, Section III.C.5.a.,c.,&d.)

# SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

- A. <u>General Monitoring, Recordkeeping and Reporting Requirements</u>
- 5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.
- 5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:
  - (a) the date, place as defined in the permit, and time of sampling or measurements;
  - (b) the date(s) analyses were performed;
  - (c) the company or entity that performed the analyses;
  - (d) the analytical techniques or methods used;
  - (e) the results of such analyses; and
  - (f) the operating conditions existing at the time of sampling or measurement. (Ref.: APC-S-6, Section III.A.3.b.(1)(a)-(f))
- 5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. (Ref.: APC-S-6, Section III.A.3.b.(2))
- 5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with APC-S-6, Section II.E. (Ref.: APC-S-6, Section III.A.3.c.(1))
- 5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) days of the time the deviation began. (Ref.: APC-S-6, Section III.A.3.c.(2))

- 5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the DEQ and the EPA.
- 5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

#### B. Specific Monitoring and Recordkeeping Requirements

| Emission Point(s)                                                | Pollutant/ Parameter<br>Monitored                                                        | Monitoring/Recordkeeping<br>Requirement                                                                                                                | Condition<br>Number | Applicable Requirement                                                                                                                               |
|------------------------------------------------------------------|------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                  | PM/PM <sub>10</sub> /PM <sub>2.5</sub>                                                   | Weekly observation for the presence of any visible emissions                                                                                           |                     | Federally enforceable permit issued February                                                                                                         |
| AA-001, AA-002,<br>AA-011, AD-003<br>& AD-011                    | Opacity                                                                                  | consistent with determining compliance with Condition 3.B.1 of the federally enforceable permit herein.                                                | 5.B.1               | 17, 2006; Mississippi<br>State Regulation APC-S-<br>6, Section III.A.3; 40<br>CFR 64.3(a) and (b),<br>64.6, 64.7, and 64.8                           |
| AA-003 &<br>AA-004                                               | VOC                                                                                      | Monthly inventory of paint usage.                                                                                                                      | 5.B.2               | Mississippi State<br>Regulation APC-S-6,<br>Section III.A.3                                                                                          |
|                                                                  |                                                                                          | Utilization of established site-<br>specific stack test data.                                                                                          |                     | Federally enforceable                                                                                                                                |
| AA-003 &<br>AA-004                                               | AA-004 combustion chamber temper consistent with determining compliance with Condition 3 | maintain records of the combustion chamber temperature consistent with determining compliance with Condition 3.B.3 of the federally enforceable permit | 5.B.3 &<br>5.B.4    | permit issued February<br>17, 2006; Mississippi<br>State Regulation APC-S-<br>6, Section III.A.3; 40<br>CFR 64.3(a) and (b),<br>64.6, 64.7, and 64.8 |
| AA-003, AA-004,<br>AA-020, AA-025,<br>AA-026, AB-004<br>& AD-002 | VOHAP                                                                                    | Determination of VOHAP limit and certification of compliance.                                                                                          | 5.B.5,<br>5.B.6     | 40 CFR 63.785                                                                                                                                        |
| AA-003, AA-004,<br>AA-020, AA-025,<br>AA-026, AB-004<br>& AD-002 | VOHAP                                                                                    | Test methods and procedures.                                                                                                                           | 5.B.7               | 40 CFR 63.786(a), (b), and (c)                                                                                                                       |
| AA-003, AA-004,<br>AA-020, AA-025,<br>AA-026, AB-004<br>& AD-002 | VOHAP                                                                                    | Use of forms and procedures.                                                                                                                           | 5.B.8               | 40 CFR 63.786(d)                                                                                                                                     |
| AA-003, AA-004,<br>AA-020, AA-025,<br>AA-026, AB-004<br>& AD-002 | VOHAP                                                                                    | General Provisions -<br>recordkeeping requirements and<br>standard specific recordkeeping                                                              | 5.B.9               | 40 CFR 63.788(a) and (b)                                                                                                                             |

## Page 25 of 42 Permit No. 1280-00041

| Emission Point(s)                                                | Pollutant/ Parameter<br>Monitored      | Monitoring/Recordkeeping<br>Requirement                                                                                                                                               | Condition<br>Number | Applicable Requirement                                                                                                    |
|------------------------------------------------------------------|----------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|---------------------------------------------------------------------------------------------------------------------------|
| AA-003, AA-004,<br>AA-020, AA-025,<br>AA-026, AB-004<br>& AD-002 | VOHAP                                  | "Low usage exempt" recordkeeping requirements.                                                                                                                                        | 5.B.10              | 40 CFR 63.781(b) and 63.788 (b)(1)                                                                                        |
| AA-020, AA-025<br>& AD-002                                       | VOC                                    | Monthly inventory of paint usage.                                                                                                                                                     | 5.B.11              | Mississippi State<br>Regulation APC-S-6,<br>Section III.A.3                                                               |
| AD-001                                                           | NOx                                    | Monthly fuel usage records.                                                                                                                                                           | 5.B.12              | Mississippi State<br>Regulation APC-S-6,<br>Section III.A.3                                                               |
|                                                                  | PM/PM <sub>10</sub> /PM <sub>2.5</sub> | Monthly blasting material, paint, welding rod, and fuel usage records.                                                                                                                | 5.B.14              | Mississippi State<br>Regulation APC-S-6,<br>Section III.A.3                                                               |
| Entire Facility                                                  | NOx                                    | Monthly fuel usage records.                                                                                                                                                           | 5.B.15              | Mississippi State<br>Regulation APC-S-6,<br>Section III.A.3                                                               |
|                                                                  | VOC                                    | Monthly inventory of paint usage.                                                                                                                                                     | 5.B.16              | Mississippi State<br>Regulation APC-S-6,<br>Section III.A.3                                                               |
|                                                                  | VOC                                    | Utilization of established site-<br>specific stack test data.                                                                                                                         | 5.B.17              | Federally enforceable<br>permit issued February<br>17, 2006; Mississippi<br>State Regulation APC-S-<br>6, Section III.A.3 |
| AD-002                                                           |                                        | Continuously monitor and maintain records of the catalytic inlet temperature consistent with determining compliance with Condition 3.B.16 of the federally enforceable permit herein. |                     |                                                                                                                           |
| AD-016, AD-018,<br>AD-025 through<br>AD-029 &<br>AD-031          | General Requirements                   | Compliance with general requirements.                                                                                                                                                 | 5.B.18              | 40 CFR 63.6605(a) and (b)                                                                                                 |
| AD-016, AD-028<br>& AD-029                                       | Monitoring                             | Monitoring requirements.                                                                                                                                                              | 5.B.19              | 40 CFR 63.6625(e), (f), (h), (i) and (j), and Table 2c of the Subpart                                                     |
| AD-016, AD-018,<br>AD-025 through                                | Continuous                             | Continuous compliance requirements.                                                                                                                                                   | 5.B.20              | 40 CFR 63.6635(a)-(c)                                                                                                     |
| AD-029 &<br>AD-031                                               | Compliance                             | Continuous compliance demonstration.                                                                                                                                                  | 5.B.21              | 40 CFR 63.6640(a), (b), (e), and (f)(1)                                                                                   |
| AD-016, AD-028<br>& AD-029                                       | Recordkeeping                          | Recordkeeping requirements.                                                                                                                                                           | 5.B.22              | 40 CFR 63.6655(a), (d),<br>(e), and (f); 40 CFR<br>63.6660                                                                |

| Emission Point(s)                                        | Pollutant/ Parameter<br>Monitored | Monitoring/Recordkeeping<br>Requirement | Condition<br>Number | Applicable Requirement          |
|----------------------------------------------------------|-----------------------------------|-----------------------------------------|---------------------|---------------------------------|
| AD-017, AD-019,                                          | Monitoring                        | Monitoring requirements.                | 5.B.23              | 40 CFR 60.4209                  |
| AD-017, AD-019,<br>AD-020, AD-022,<br>AD-023 &<br>AD-030 | Demonstration of Compliance       | Compliance requirements.                | 5.B.24              | 40 CFR 60.4211(a), (c), and (e) |
|                                                          | Recordkeeping                     | Recordkeeping requirements.             | 5.B.25              | 40 CFR 60.4214(b)               |

- 5.B.1 For Emission Points AA-001, AA-002, AA-011, AD-003, and AD-011, the permittee shall perform a weekly observation for the presence of any visible emissions to demonstrate compliance with Condition 3.B.1 of the federally enforceable permit herein.
  - (1) The operator shall conduct an observation/EPA Reference Method 22 test for the presence of visible emissions from all stacks and other emission points of this equipment on a weekly basis. Observations shall be conducted during daylight hours and while the equipment is in operation. If visible emissions (not including condensed water vapor) are observed, the operator shall:
    - (a) Within 24 hours, take corrective action that eliminates the visible emissions or verify that the unit causing the emissions and any associated air pollution control equipment are operating normally, in accordance with design and standard procedures, and under the same conditions in which compliance was achieved in the past, and
    - (b) If visible emissions are not eliminated, have a certified visual emissions observer determine compliance with the opacity standard using EPA Reference Method 9 within three business days, and
    - (c) Report the visible emissions as a potential deviation (or as a violation if demonstrated by EPA Reference Method 9) according to the reporting requirements of this permit.
  - (2) The operator shall keep records of the following items for a minimum of five years:
    - (a) Identification of stack or emission point;
    - (b) Results of all required visual observations;
    - (c) Description of corrective actions or statement of verification under (1)(a) above and record of testing under (1)(b) above; and
    - (d) Date and time any visible emissions were abated.

This shall serve as compliance for complying with 40 CFR Part 64.3(a) and (b), and the specific Compliance Assurance Monitoring Plan established in the permittee's application for which the permit has been based upon. (Ref.: APC-S-6, Section III.A.3; 40 CFR 64.3(a) and (b), 64.6, 64.7, and 64.8)

- 5.B.2 For Emission Points AA-003 and AA-004 (combined), the permittee shall assure compliance with the volatile organic compound emission limitation by keeping a monthly inventory of paint usage. The paint usage will be converted to monthly volatile organic compound emissions using certified MSDS's and EPA Reference Method 24, 40 CFR 60, Appendix A test results, and the tested VOC destruction efficiencies (Conditions 5.B.3 and 5.B.4 of the federally enforceable permit herein) for these points. A 12-month consecutive total of volatile organic compound emissions will be calculated each month. (Ref.: APC-S-6, Section III.A.3)
- 5.B.3 For Emission Point AA-003, the permittee shall utilize the site-specific stack test data established in the Title V permit to operate issued February 17, 2006 (performed in accordance with EPA Reference Method 25A, 40 CFR 60, Appendix A to establish a volatile organic compound destruction efficiency; achieving the maximum production rate at which Emission Point AA-003 operated; after completion of repair activities to the Plate Line painting operations; combustion chamber temperature readings recorded during the stack test; establishing a minimum combustion chamber temperature following the performance test). The permittee is also required to continuously monitor and maintain sufficient records of the combustion chamber temperature to demonstrate compliance with Condition 3.B.3 of the federally enforceable permit herein. The permittee shall maintain copies of all inspections or calibrations. Maintenance inspections shall be performed regularly. Calibrations shall be performed annually. This shall serve as compliance for complying with 40 CFR 64.3(a) and (b), and the specific Compliance Assurance Monitoring Plan established in the permittee's application for which this permit is based upon. (Ref.: APC-S-6, Section III.A.3; 40 CFR 64.3(a) and (b), 64.6, 64.7, and 64.8)
- 5.B.4 For Emission Point AA-004, the permittee is required to utilize the source specific volatile organic compound destruction efficiency, established in a (re-conducted initial) performance test conducted in October 2008 (submitted to the MDEQ on October 29, 2008) in accordance with EPA Reference Method 25A, 40 CFR 60, Appendix A. The permittee is also required to continuously monitor and maintain sufficient records of the combustion chamber temperature (established following the initial performance test conducted in December 2004) to demonstrate compliance with Condition 3.B.3 of the federally enforceable permit herein. The permittee shall maintain copies of all inspections or calibrations. Maintenance inspections shall be performed regularly. Calibrations shall be performed annually. This shall serve as compliance for complying with 40 CFR 64.3(a) and (b), and the specific Compliance Assurance Monitoring Plan established in the permittee's application for which this permit is based upon. (Ref.: APC-S-6, Section III.A.3; 40 CFR 64.3(a) and (b), 64.6, 64.7, and 64.8)
- 5.B.5 For each batch of coating received for use in Emission Points AA-003, AA-004, AA-1670 PER20100001.27

020, AA-025, AA-026, AB-004, and AD-002, the permittee shall:

- (a) determine the coating category and applicable VOHAP limit as specified in Condition 3.B.5 of the federally enforceable permit herein; and
- (b) certify the as-supplied VOC content of the batch of coating in accordance with 40 CFR 63.785(a)(2), using a certification supplied by the manufacturer or by performing certification testing personally.

(Ref.: 40 CFR 63.785(a))

- 5.B.6 For Emission Points AA-003, AA-004, AA-020, AA-025, AA-026, AB-004, and AD-002, as an alternative to testing each batch of coating, *as applied*, the permittee may determine compliance with the applicable limits determined in Condition 5.B.5 of the federally enforceable permit herein using any combination of the following procedures. The procedure used for each coating shall be determined and documented prior to application. (Ref.: 40 CFR 63.785(b))
  - (a) For coatings to which thinning solvent (or any other material) will not be added under any circumstance or to which only water is added, the permittee shall:
    - (1) Certify the as-applied VOC content of each batch of coating.
    - (2) Notify the persons responsible for applying the coating that no thinning solvent may be added to the coating by affixing a label to each container of coating in the batch or through another means described in the implementation plan required in 40 CFR 63.787(b).
    - (3) If the certified as-applied VOC content of each batch of coating used during a calendar month is less than or equal to the applicable VOHAP limit in 40 CFR 63.783(a) (either in terms of g/L of coating or g/L of solids), then compliance is demonstrated for that calendar month, unless a violation is revealed using Method 24 of Appendix A to 40 CFR Part 60.

(Ref.: 40 CFR 63.785(c)(1))

- (b) For a coating to which thinning solvent is routinely or sometimes added, the permittee shall:
  - (1) Prior to the first application of each batch, designate a single thinner for the coating and calculate the maximum allowable thinning ratio (or ratios) using the equation and procedures specified in 40 CFR 63.785(c)(2)(i).
  - (2) Prior to the first application of each batch, notify painters and other

persons, as necessary, of the designated thinner and maximum allowable thinning ratio(s) for each batch of the coating by affixing a label to each container of coating or through another means described in the implementation plan required in 40 CFR 63.787(b).

- (3) By the 15th day of each calendar month, determine the volume of each batch of the coating used, as supplied during the previous month.
- (4) By the 15th day of each calendar month, determine the total allowable volume of thinner for the coating used during the previous month using the equation specified in 40 CFR 63.785(c)(2)(iv).
- (5) By the 15th day of each calendar month, determine the volume of thinner actually used with the coating during the previous month.

(Ref.: 40 CFR 63.785(c)(2))

- (c) For coatings to which the same thinning solvent (or other material) is routinely or sometimes added, the permittee shall:
  - (1) Designate a single thinner to be added to each coating during the month and "group" coatings according to their designated thinner.
  - (2) Prior to the first application of each batch, calculate the maximum allowable thinning ratio (or ratios, if the affected source complies with the cold weather limits in addition to the other limits specified in Table 2 of Appendix B) for each batch of coating in the group using the equations in 40 CFR 63.785 (c)(2).
  - (3) Prior to the first application of each "batch," notify painters and other persons, as necessary, of the designated thinner and maximum allowable thinning ratio(s) for each batch in the group by affixing a label to each container of coating or through another means described in the implementation plan required in 40 CFR 63.787(b).
  - (4) By the 15th day of each calendar month, determine the volume of each batch of the group used, as supplied, during the previous month.
  - (5) By the 15th day of each calendar month, determine the total allowable volume of thinner for the group for the previous month using the equation specified in 40 CFR 63.785(c)(2)(iv)(Eqn. 3).
  - (6) By the 15th day of each calendar month, determine the volume of thinner actually used with the group during the previous month.

(Ref.: 40 CFR 63.785(c)(3))

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

(Ref.: 40 CFR 63.785(c))

- 5.B.7 For Emission Points AA-003, AA-004, AA-020, AA-025, AA-026, AB-004, and AD-002, the permittee shall use the following test methods and procedures as applicable:
  - (a) When using the compliance procedures described in Condition 5.B.6 (a) through (c) of the federally enforceable permit herein, the permittee shall use test methods and procedures as described in 40 CFR 63.786(a).
  - (b) When using the compliance procedure described in Condition 5.B.6 (d) of the federally enforceable permit herein, the permittee shall use test methods and procedures as described in 40 CFR 63.786(b).
  - (c) When using batch formulation data as a test method, the permittee shall use test methods and procedures as described in 40 CFR 63.786(c).
- 5.B.8 The permittee shall use the forms and procedures as referenced in 40 CFR 63.786(d).
- 5.B.9 For Emission Points AA-003, AA-004, AA-020, AA-025, AA-026, AB-004, and AD-002, the permittee shall perform the applicable recordkeeping:
  - (a) the recordkeeping requirements specified in 63.10(a), (b), and (f); (Ref.: 40 CFR 63.788(a))
  - (b) the recordkeeping requirements specified in 63.10(c), if the permittee uses add-on control systems; and (Ref.: 40 CFR 63.788(a))
  - (c) the applicable recordkeeping requirements specified in 40 CFR 63.788(b).
- 5.B.10 For Emission Points AA-003, AA-004, AA-020, AA-025, AA-026, AB-004, and AD-002, the coatings which are used in volumes of less than 52.8 gallons per year, provided the total volume of coatings exempted under this condition does not exceed 264 gallons per year, shall be required to meet only the following:
  - (a) The permittee shall clearly label the coating as "low-usage exempt". (Ref.: 40 CFR 63.781(b))
  - (b) The permittee shall record the total volume of coating applied at the source to ships. Such records shall be compiled monthly and maintained for a minimum of five (5) years. (Ref.: 40 CFR 63.788(b)(1))

- 5.B.11 For Emission Points AA-020, AA-025, and AD-002, the permittee shall assure compliance with the volatile organic compound emission limitation by keeping a monthly inventory of paint usage. The paint usage will be converted to monthly volatile organic compound emissions using certified MSDS's and EPA Reference Method 24, 40 CFR 60, Appendix A test results, and the tested VOC destruction efficiency (Condition 5.B.17 of the federally enforceable permit herein) for Emission Point AD-002. A 12-month consecutive total of volatile organic compound emissions will be calculated each month. (Ref.: APC-S-6, Section III.A.3)
- 5.B.12 For Emission Point AD-001, the permittee shall assure compliance with the nitrogen oxide emission cap of 35.45 tons per year by keeping monthly records of fuel usage, utilizing the tested emission factor (Condition 3.B.9 of the federally enforceable permit herein) for this emission point, and maintaining a 12-month consecutive total of fuel consumption. (Ref.: APC-S-6, Section III.A.3)
- 5.B.13 For the purpose of compliance demonstration, all testing shall be performed with sources operating at maximum capacity. (Ref.: APC-S-2, Section VI.B.7; APC-S-6, Section III.A.1)
- 5.B.14 For the entire facility, the permittee shall assure compliance with the particulate matter emission cap of 319.26 tons per year by keeping monthly records of blasting material, paint, welding rods, and fuel used or issued on a 12-month consecutive basis. (Ref.: APC-S-6, Section III.A.3)
- 5.B.15 For the entire facility, the permittee shall assure compliance with the nitrogen oxide emission cap of 84.02 tons per year by keeping monthly records of fuel usage on a 12-month consecutive basis. (Ref.: APC-S-6, Section III.A.3)
- 5.B.16 For the entire facility, the permittee shall assure compliance with the volatile organic compound emission cap of 338.31 tons per year by keeping a monthly inventory of paint, adhesives, solvents, and other VOHAP containing chemicals used or issued on a 12-month consecutive basis. (Ref.: APC-S-6, Section III.A.3)
- 5.B.17 For Emission Point AD-002, the permittee shall perform an initial stack test within 180 days of restoring the control equipment to full operation, in accordance with EPA Reference Method 25A, 40 CFR 60, Appendix A, establishing a volatile organic compound destruction efficiency. Catalytic inlet temperature readings shall be recorded during the stack test; establishing a minimum catalytic inlet temperature following the performance test. The permittee shall continuously monitor and maintain sufficient records of the catalytic inlet temperature to demonstrate compliance with Condition 3.B.16 of the federally enforceable permit herein. The permittee shall maintain copies of all inspections or calibrations. Maintenance inspections shall be performed regularly. Calibrations shall be performed annually. (Ref.: APC-S-6, Section III.A.3)
- 5.B.18 For Emission Points AD-016, AD-018, AD-025 through AD-029, and AD-031, the permittee shall comply with the applicable emission and operating limitations of 40 CFR 1670 PER20100001.31

- 63, Subpart ZZZZ. At all times, the permittee shall operate and maintain the stationary RICE, including associated air pollution control and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the MDEQ which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. (Ref.: 40 CFR 63.6605(a) and (b))
- 5.B.19 For Emission Points AD-016, AD-028, and AD-029, the permittee shall comply with the following requirements:
  - (a) operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which shall provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. (Ref.: 40 CFR 63.6625(e)(1))
  - (b) install a non-resettable hour meter if one is not already installed. (Ref.: 40 CFR 63.6625(f))

(Ref.: 40 CFR 63.6625(e), (f), (h), (i) and (j), and Table 2c of the Subpart)

- 5.B.20 For Emission Points AD-016, AD-018, AD-025 through AD-029, and AD-031, the permittee shall comply with emission and operating limitations by monitoring and collecting data in accordance with the following:
  - (a) except for monitor malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall monitor continuously at all times that the stationary RICE is operating.
  - (b) the permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels. The permittee shall, however, use all the valid data collected during all other periods.

(Ref.: 40 CFR 63.6635(a)-(c))

- 5.B.21 For Emission Points AD-016, AD-018, AD-025 through AD-029, and AD-031, the permittee shall comply with the following requirements:
  - (a) demonstrate continuous compliance with each applicable emission limitation and operating limitation in Tables 1a, 1b, 2a, 2b, 2c, and 2d

- (that applies) according to methods specified in Table 6 of the Subpart. (Ref.: 40 CFR 63.6640(a))
- (b) report each instance (deviations from the emission limitations or operating limitations in the Subpart) in which an emission limitation or operating limitation was not met, that applies, in accordance with the requirements in 40 CFR 63.6650. (Ref.: 63.6640(b))
- report each instance in which requirements in Table 8 of the Subpart (that apply) were not met. (Ref.: 63.6640(e))
- (d) operate the emergency stationary RICE according to the following requirements (Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (d)(1) through(3) below, is prohibited. If the engine is not operated according to the requirements in paragraphs (d)(1) through (3) below, the engine will not be considered an emergency engine under the Subpart and will need to meet all requirements for non-emergency engines.):
  - (1) there is no time limit on the use of emergency stationary RICE in emergency situations.
  - (2) may operate the emergency stationary RICE 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. 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 Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year.
  - (3) may operate the emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that the permittee may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The

engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by this paragraph, as long as the power provided by the financial arrangement is limited to emergency power.

(Ref.: 40 CFR 63.6640(f)(1))

(Ref.: 40 CFR 63.6640(a), (b), (e), and (f)(1))

- 5.B.22 For Emission Points AD-016, AD-028, and AD-029, the permittee shall comply with the following record-keeping requirements:
  - (a) for applicable emission and operating limitations, the permittee shall keep the records described below:
    - (1) a copy of each notification and report submitted to comply with the Subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted, according to the requirement in 40 CFR 63.10(b)(2)(xiv). (Ref.: 40 CFR 63.6655(a)(1))
    - (2) records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. (Ref.: 40 CFR 63.6655(a)(2))
    - records of performance tests and performance evaluations as required in 40 CFR 63.10(b)(2)(viii). (Ref.: 40 CFR 63.6655(a)(3))
    - (4) records of all required maintenance performed, when applicable, on the air pollution control and monitoring equipment. (Ref.: 40 CFR 63.6655(a)(4))
    - (5) records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. (Ref.: 40 CFR 63.6655(a)(5))
  - (b) keep the records required in Table 6 of the Subpart to show continuous compliance with each emission or operating limitation that applies. (Ref.: 40 CFR 63.6655(d))

- (c) keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to the permittee's maintenance plan. (Ref.: 40 CFR 63.6655(e)(1) and (2))
- (d) keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee shall 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. If the engine is used for demand response operation, the permittee shall keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response. (Ref.: 40 CFR 63.6655(f)(1))
- records shall be in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1). (Ref.: 40 CFR 63.6660(a))
- (f) 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, maintenance, corrective action, report, or record. (Ref.: 40 CFR 63.6660(b))
- records shall be kept readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). (Ref.: 40 CFR 63.6660(c))

(Ref.: 40 CFR 63.6655(a), (d), (e), and (f); 40 CFR 63.6660)

- 5.B.23 For Emission Points AD-017, AD-019, AD-020, AD-022, AD-023, and AD-030, the permittee shall meet the monitoring requirements specified in 40 CFR 60.4211 and install a non-resettable hour meter prior to startup of the engine (Ref.: 40 CFR 60.4209(a) (for emergency))
- 5.B.24 For Emission Points AD-017, AD-019, AD-020, AD-022, AD-023, and AD-030, the permittee shall adhere to the following compliance requirements:
  - (a) if required to comply with the emission standards specified in the Subpart, the permittee shall operate and maintain the stationary CI internal combustion engine and control device (if any) according to the manufacturer's written instructions or procedures developed by the permittee that are approved by the engine manufacturer. In addition, the permittee may only change those settings that are permitted by the manufacturer. The permittee shall also meet the requirements of 40 CFR Parts 89, 94 and/or 1068, as they apply. (Ref.: 40 CFR 60.4211(a))
  - (b) if required to comply with the emission standards specified in 40 CFR 60.4205(b) or 40 CFR 60.4205(c), the permittee shall comply by purchasing an engine certified to

the emission standards in 40 CFR 60.4204(b), or 40 CFR 60.4205(b) or (c), as applicable, for the same model year and maximum (or in the case of fire pumps, NFPA nameplate) engine power. The engine must be installed and configured according to the manufacturer's specifications. (Ref.: 40 CFR 60.4211(c))

(c) emergency stationary ICE 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. Anyone 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 Federal, State, or local standards require maintenance and testing of emergency ICE beyond 100 hours per year. For 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 in this section, is prohibited. (Ref.: 40 CFR 60.4211(e))

(Ref.: 40 CFR 60.4211(a), (c), and (e))

5.B.25 For Emission Points AD-017, AD-019, AD-020, AD-022, AD-023, and AD-030, if the stationary CI internal combustion engine is an emergency stationary internal combustion engine, the permittee is not required to submit an initial notification. Starting with the model years in Table 5 to the Subpart, if the emergency engine does not meet the standards applicable to non-emergency engines in the applicable model year, the permittee shall keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The permittee shall record the time of operation of the engine and the reason the engine was in operation during that time. (Ref.: 40 CFR 60.4214(b))

#### C. <u>Specific Reporting Requirements</u>

| Emission Point(s) | Pollutant/<br>Parameter<br>Monitored | Reporting Requirement | Condition<br>Number | Applicable Requirement       |
|-------------------|--------------------------------------|-----------------------|---------------------|------------------------------|
| AA-001, AA-002,   | Opacity                              | Semiannual reporting. | 5.C.1               | Mississippi State Regulation |

| Emission Point(s)                                                        | Pollutant/<br>Parameter<br>Monitored   | Reporting Requirement                                                                 | Condition<br>Number | Applicable Requirement                                                    |  |
|--------------------------------------------------------------------------|----------------------------------------|---------------------------------------------------------------------------------------|---------------------|---------------------------------------------------------------------------|--|
| AA-011, AD-003<br>& AD-011                                               | PM/PM <sub>10</sub> /PM <sub>2.5</sub> |                                                                                       |                     | APC-S-6, Section III.A.3; 40<br>CFR 64.9.                                 |  |
| AA-003 & AA-004                                                          | VOC                                    | Semiannual reporting.                                                                 | 5.C.2               | Mississippi State Regulation<br>APC-S-6, Section III.A.3                  |  |
| AA-003 & AA-004                                                          | VOC                                    | Stack test report.                                                                    | 5.C.3               | Mississippi State Regulation<br>APC-S-6, Section III.A.3; 40<br>CFR 64.9. |  |
| AA-003, AA-004,<br>AA-020, AA-025,<br>AA-026, AA-027,<br>AB-004 & AD-002 | VOHAP                                  | General Provisions -<br>Notification<br>requirements and<br>implementation plan.      | 5.C.4               | 40 CFR 63.787                                                             |  |
| AA-003, AA-004,<br>AA-020, AA-025,<br>AA-026, AA-027,<br>AB-004 & AD-002 | VOHAP                                  | General Provisions -<br>Reporting requirements<br>and standard specific<br>reporting. | 5.C.5               | 40 CFR 63.788(a) and (c)                                                  |  |
| AA-020, AA-025<br>& AD-002                                               | VOC                                    | Semiannual reporting.                                                                 | 5.C.6               | Mississippi State Regulation<br>APC-S-6, Section III.A.3                  |  |
| AD-001                                                                   | NOx                                    | Semiannual reporting.                                                                 | 5.C.7               | Mississippi State Regulation<br>APC-S-6, Section III.A.3                  |  |
| Entire Facility                                                          | PM/PM <sub>10</sub> /PM <sub>2.5</sub> | Semiannual reporting.                                                                 | 5.C.8               | Mississippi State Regulation<br>APC-S-6, Section III.A.3                  |  |
|                                                                          | NOx                                    | Semiannual reporting.                                                                 | 5.C.9               | Mississippi State Regulation<br>APC-S-6, Section III.A.3                  |  |
| Entire Facility                                                          | VOC                                    | Semiannual reporting.                                                                 | 5.C.10              | Mississippi State Regulation<br>APC-S-6, Section III.A.3                  |  |
| AD-018, AD-025 through<br>AD-027 & AD-031                                | Notifications                          | Notification requirements.                                                            | 5.C.11              | 40 CFR 63.6645(f)                                                         |  |

- 5.C.1 For Emission Points AA-001, AA-002, AA-011, AD-003, and AD-011, the permittee shall submit semiannual reports summarizing the results of Condition 5.B.1 of the federally enforceable permit herein, in accordance with 40 CFR 64.9. (Ref.: APC-S-6, Section III.A.3; 40 CFR 64.9)
- 5.C.2 For Emission Points AA-003 and AA-004 (combined), the permittee shall demonstrate compliance with the volatile organic compound emission cap through monthly inventories of paint issued, which is totaled on a 12-month consecutive basis. A summary of this recordkeeping shall be submitted every six (6) months in accordance with Condition 5.A.4 of the federally enforceable permit herein. (Ref.: APC-S-6, Section III.A.3)
- 5.C.3 For Emission Points AA-003 and AA-004, the permittee shall submit a report summarizing the results of Conditions 5.B.3 (no later than 30 days following the initial stack test) and 5.B.4 of the federally enforceable permit herein in accordance with 40 CFR 64.9. (Ref.: APC-S-6, Section III.A.3; 40 CFR 64.9)

- 5.C.4 For Emission Points AA-003, AA-004, AA-020, AA-025, AA-026, AA-027, AB-004, and AD-002, the permittee has performed the applicable notifications:
  - (a) notifications in accordance with 40 CFR 63.9(a) through (d) and (i) through (j); (Ref.: 40 CFR 63.787(a))
  - (b) notifications in accordance with 40 CFR 63.9(e) through (h) if the permittee uses add-on controls systems; and (Ref.: 40 CFR 63.787(a))
  - (c) an implementation plan in accordance with 40 CFR 63.787(b).

The aforementioned implementation plan for this facility was received by the MDEQ on July 10, 1996.

- 5.C.5 For Emission Points AA-003, AA-004, AA-020, AA-025, AA-026, AA-027, AB-004, and AD-002, the permittee shall perform the applicable reporting:
  - (a) the reporting requirements specified in 63.10(a), (d), and (f); (Ref.: 40 CFR 63.788(a))
  - (b) the reporting requirements specified in 63.10(e), if the permittee uses add-on control systems; and (Ref.: 40 CFR 63.788(a))
  - (c) the applicable reporting requirements specified in 63.788(c).
- 5.C.6 For Emission Points AA-020, AA-025, and AD-002, the permittee shall demonstrate compliance with the volatile organic compound emission cap through monthly inventories of paint issued, which is totaled on a 12-month consecutive basis. A summary of this recordkeeping shall be submitted every six (6) months in accordance with Condition 5.A.4 of the federally enforceable permit herein. (Ref.: APC-S-6, Section III.A.3)
- 5.C.7 For Emission Point AD-001, the permittee shall demonstrate compliance with the nitrogen oxide emission cap through monthly recordkeeping of fuel usage, which is totaled on a 12-month consecutive basis. The usage is to be multiplied by the emission factor determined per Condition 3.B.9 of the federally enforceable permit herein. A summary of this recordkeeping shall be submitted every six (6) months in accordance with Condition 5.A.4 of the federally enforceable permit herein. (Ref.: APC-S-6, Section III.A.3)
- 5.C.8 For the entire facility, the permittee shall demonstrate compliance with the particulate matter emission cap through monthly records of blasting material, paint, welding rods, and fuel used or issued, which is totaled on a 12-month consecutive basis. A summary of this recordkeeping shall be submitted every six (6) months in accordance with Condition 5.A.4 of the federally enforceable permit herein. (Ref.: APC-S-6, Section III.A.3)

- 5.C.9 For the entire facility, the permittee shall demonstrate compliance with the nitrogen oxide emission cap through monthly recordkeeping of fuel usage, which is totaled on a 12-month consecutive basis. A summary of this recordkeeping shall be submitted every six (6) months in accordance with Condition 5.A.4 of the federally enforceable permit herein. (Ref.: APC-S-6, Section III.A.3)
- 5.C.10 For the entire facility, the permittee shall demonstrate compliance with the volatile organic compound emission cap through monthly inventories of paint, adhesives, solvents, and other VOHAP containing chemicals used or issued, which is totaled on a 12-month consecutive basis. A summary of this recordkeeping shall be submitted every six (6) months in accordance with Condition 5.A.4 of the federally enforceable permit herein. (Ref.: APC-S-6, Section III.A.3)
- 5.C.11 For Emission Points AD-018, AD-025 through AD-027, and AD-031, if required to submit an Initial Notification, but otherwise not affected by the requirements of the Subpart in accordance with 40 63.6590(b), the permittee's notification should include the information in 40 CFR 63.9(b)(2)(i) through (v), and a statement that the stationary RICE has no additional requirements and explain the basis of the exclusion. (Ref.: 40 CFR 63.6645(f))

#### SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

#### SECTION 7. TITLE VI REQUIREMENTS

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

- 7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A Production and Consumption Controls.
- 7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B Servicing of Motor Vehicle Air Conditioners.
- 7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E

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

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

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

#### **APPENDIX A**

#### **List of Abbreviations Used In this Permit**

| APC-S-1 | Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants     |
|---------|---------------------------------------------------------------------------------------------|
| APC-S-2 | Permit Regulations for the Construction and/or Operation of Air Emissions Equipment         |
| APC-S-3 | Regulations for the Prevention of Air Pollution Emergency Episodes                          |
| APC-S-4 | Ambient Air Quality Standards                                                               |
| APC-S-5 | Regulations for the Prevention of Significant Deterioration of Air Quality                  |
| APC-S-6 | Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean |
|         | Air Act                                                                                     |
| APC-S-7 | Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act  |
| BACT    | Best Available Control Technology                                                           |
| CEM     | Continuous Emission Monitor                                                                 |
| CEMC    | Canting and Emission Manitagina Contagn                                                     |

CEMS Continuous Emission Monitoring System

CFR Code of Federal Regulations

CO Carbon Monoxide

COM Continuous Opacity Monitor

COMS Continuous Opacity Monitoring System

DEQ Mississippi Department of Environmental Quality EPA United States Environmental Protection Agency

gr/dscf Grains Per Dry Standard Cubic Foot

HP Horsepower

HAP Hazardous Air Pollutant lbs/hr Pounds per Hour

M or K Thousand

MACT Maximum Achievable Control Technology

MM Million

MMBTUH Million British Thermal Units per Hour

NA Not Applicable

NAAQS National Ambient Air Quality Standards

NESHAP National Emissions Standards For Hazardous Air Pollutants, 40 CFR 61

or

National Emission Standards For Hazardous Air Pollutants for Source Categories, 40 CFR 63

NMVOC Non-Methane Volatile Organic Compounds

NO<sub>x</sub> Nitrogen Oxides

NSPS New Source Performance Standards, 40 CFR 60

O&M Operation and Maintenance

PM Particulate Matter

PM<sub>10</sub> Particulate Matter less than 10 Fm in diameter

ppm Parts per Million

PSD Prevention of Significant Deterioration, 40 CFR 52

SIP State Implementation Plan

SO<sub>2</sub> Sulfur Dioxide TPY Tons per Year TRS Total Reduced Sulfur

VEE Visible Emissions Evaluation
VHAP Volatile Hazardous Air Pollutant
VOC Volatile Organic Compound

### **APPENDIX B**

#### 40 CFR PART 60 APPENDIX A

METHOD 24 - DETERMINATION OF VOLATILE MATTER CONTENT, WATER CONTENT, DENSITY, VOLUME SOLIDS, AND WEIGHT SOLIDS OF SURFACE COATINGS

# **APPENDIX C**

#### 40 CFR PART 63 SUBPART II

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SHIPBUILDING AND SHIP REPAIR (SURFACE COATING)

# **APPENDIX D**

#### 40 CFR PART 63 SUBPART ZZZZ

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR RECIPROCATING INTERNAL COMBUSTION ENGINES (RICE)

# **APPENDIX E**

40 CFR PART 60, SUBPART IIII

STANDARDS OF PERFORMANCE FOR STATIONARY COMPRESSION IGNITION INTERNAL COMBUSTION ENGINES (CI ICE)

### **APPENDIX F**

**40 CFR PART 64** 

# NORTHROP GRUMMAN SHIPBUILDING, INC.'S INDIVIDUAL AND SOURCE SPECIFIC COMPLIANCE ASSURANCE MONITORING PLAN