



**State of Mississippi**



**FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL PERMIT**

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

**THIS CERTIFIES**

Leading Edge Mississippi Inc  
173 5th Avenue, Building 449  
Greenville, MS  
Washington 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 the Federal Clean Air Act and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. set., Mississippi Code of 1972), the regulations and standards adopted and promulgated thereunder, and the State Implementation Plan for operating permits for synthetic minor sources.

**Mississippi Environmental Quality Permit Board**

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**Mississippi Department of Environmental Quality**

Issued/Modified: JUN 13 2012

Expires: AUG 31 2013

Permit No. 2800-00047

Agency Interest # 1255

## Table of Contents

Subject Item Inventory.....	i
Facility Requirements.....	1
General Information.....	A-1
Other Relevant Documents:	

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Leading Edge Mississippi Inc

Subject Item Inventory

Permit Number:2800-00047

Activity ID No.: PER20120001

### Subject Item Inventory:

ID	Designation	Description
AI1255		Manufacturer of stripped and surface coated aircraft.
AREA2	AA-001	Surface Coating Operations
AREA7	AA-002	Fuel Burning Equipment [Including, but not limited to natural gas-fired space heating; wastewater evaporators.]

### KEY

ACT = Activity

AREA = Area

CONT = Control Device

IA = Insignificant Activity

RPNT = Release Point

AI = Agency Interest

CAFO = Concentrated Animal Feeding Operation

EQPT = Equipment

MAFO = Animal Feeding Operation

TRMT = Treatment

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Leading Edge Mississippi Inc  
Facility Requirements  
Permit Number:2800-00047  
Activity ID No.: PER20120001

Page 1 of 14

### AI0000001255 Manufacturer of stripped and surface coated aircraft.:

#### Limitation Requirements:

Condition No.	Parameter	Condition
L-1		For the entire facility, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity to obscure an observer's view to a degree in excess of 40%, as determined by EPA Test Method 9, 40 CFR 60, Appendix A. [APC-S-1 , 3.2]
L-2		For the entire facility, the maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input. [APC-S-1 , 3.4(a)(1)]
L-3		For the entire facility, the permittee shall not allow the emission of particulate matter in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship $E = (4.1) * (p \text{ to the power of } 0.67)$ , where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour. (Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs.). [APC-S-1 , 3.6(a)]
L-4		For the entire facility, the maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. [APC-S-1 , 4.1(a)]
L-5		For the entire facility, the permittee shall limit volatile organic compound (VOC) emissions to no more than 99.0 tons per year as determined for each consecutive 12-month period. [APC-S-2 , II.B.10]
L-6		For the entire facility, the permittee shall limit hazardous air pollutant (HAP) emissions to no more than 9.90 tons per year of any single HAP and no more than 24.90 tons per year of total combined HAP as determined for each consecutive 12-month period. [APC-S-2 , II.B.10]
L-7		For the entire facility, the permittee is subject to and shall comply with 40 CFR Part 63, Subpart HHHHHH - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. [40 CFR 63.11170 (a)(3) and (b), 40 CFR 63.11171(e)]

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Leading Edge Mississippi Inc  
Facility Requirements  
Permit Number:2800-00047  
Activity ID No.: PER20120001

Page 2 of 14

### AI0000001255 (continued):

#### Monitoring Requirements:

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Condition No.	Parameter	Condition
M-1		<p>For the entire facility, the permittee shall determine the following for each coating, adhesive, solvent, or other VOC or HAP containing material used:</p> <ul style="list-style-type: none"><li>(a) quantity used (gal);</li><li>(b) the percentage of VOC by weight;</li><li>(c) the percentage of HAP by weight; and</li><li>(d) the density (lb/gal).</li></ul> <p>The permittee may utilize data supplied by the manufacturer, or analysis of VOC and HAP content by EPA Test Method 311, 40 CFR Part 63, Appendix A, respectively. [APC-S-2 , II.B.11]</p>

#### Record-Keeping Requirements:

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Condition No.	Condition
R-1	<p>For the entire facility, the permittee shall maintain sufficient records to document:</p> <ul style="list-style-type: none"><li>(a) identification of each coating, adhesive, solvent or other VOC or HAP containing material used, and the total gallons of each coating and each solvent used on a monthly basis and in any consecutive 12-month period;</li><li>(b) the VOC and HAP content(s) of each coating, adhesive, solvent or other VOC or HAP containing material used. A description of the method used to determine the VOC and HAP content shall accompany this data; and</li><li>(c) the density of each coating, adhesive, solvent or other VOC or HAP containing material. [APC-S-2 , II.B.10]</li></ul>

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Leading Edge Mississippi Inc  
Facility Requirements  
Permit Number:2800-00047  
Activity ID No.: PER20120001

Page 3 of 14

### AI0000001255 (continued):

#### Record-Keeping Requirements:

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Condition No.	Condition
R-2	The permittee shall maintain copies of all records and reports on site for at least five (5) years and shall make them available upon request by Mississippi Department of Environmental Quality (MDEQ) personnel. [APC-S-2 , II.B.10]

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#### Submittal/Action Requirements:

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Condition No.	Condition
S-1	<p>For the entire facility, the permittee shall submit a monitoring report due annually by the 31st of January for the preceding calendar year. This report shall provide the following:</p> <ul style="list-style-type: none"><li>(a) identification of each coating, adhesive, solvent or other VOC or HAP containing material used;</li><li>(b) the VOC and HAP content(s) of each coating, adhesive, solvent, or other VOC or HAP containing material used;</li><li>(c) the total gallons of each coating, adhesive, solvent or other VOC or HAP containing material used in any consecutive 12-month period; and</li><li>(d) the total VOC emission rate, the emission rate of each individual HAP and the total HAP emission rate in tons per year based on a consecutive 12-month period. [APC-S-2 , II.B.11]</li></ul>
S-2	Except as otherwise specified herein, the permittee shall Submit a certified annual synthetic minor monitoring report: Due annually, by the 31st of January for preceding calendar year. This report shall address any required monitoring specified in the permit. [APC-S-2 , II.B.11]
S-3	General Condition: Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began. [APC-S-2 , II.B.10]

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Leading Edge Mississippi Inc  
Facility Requirements  
Permit Number:2800-00047  
Activity ID No.: PER20120001

Page 4 of 14

### AI0000001255 (continued):

#### Narrative Requirements:

Condition No.	Condition
T-1	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49-17-29 1.b]
T-2	General Condition: The permittee shall at all times maintain in good working order and operate as efficiently as possible all air pollution control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit. [APC-S-2 , V.A]
T-3	General Condition: Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering state waters without the proper environmental permits. [Miss. Code Ann. 49-17-29 1.a(i and ii)]
T-4	General Condition: Any diversion from or bypass of collection and control facilities is prohibited except as provided for in Regulation APC-S-1, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. [APC-S-1 , Section 10]
T-5	General Condition: 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. [APC-S-2 , X]
T-6	General Condition: The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials: (a) To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and (b) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission. [Miss. Code Ann. 49-17-21]
T-7	General Condition: After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to: (a) Violation of any terms or conditions of this permit (b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or (c) A change in any condition that required either a temporary or permanent reduction or elimination of authorized air emissions. [APC-S-2 , II.C]
T-8	General Condition: This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for this permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of the permit. [APC-S-2 , II.B.15(b)]

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Leading Edge Mississippi Inc  
Facility Requirements  
Permit Number:2800-00047  
Activity ID No.: PER20120001

### AI0000001255 (continued):

#### Narrative Requirements:

Condition No.	Condition
T-9	General Condition: Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control. [Miss. Code Ann. 49-17-39]
T-10	General Condition: The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations. [APC-S-2 , II.B.15(c)]
T-11	General Condition: Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances. [APC-S-2 , II.B.7]
T-12	General Condition: This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board. [APC-S-2 , XVI.B]
T-13	General Condition: This permit is for air pollution control purposes only. [APC-S-2 , I.D.1]
T-14	General Condition: This permit is a Federally-approved permit to operate a synthetic minor source as described in Regulation APC-S-2, Section IV.D. [APC-S-2 , IV.D]
T-15	General Condition: 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. [APC-S-2 , I.D.7]
T-16	General Condition: The permittee shall furnish to MDEQ within a reasonable time any information MDEQ 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 MDEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to MDEQ along with a claim of confidentiality. [APC-S-2 , II.B.15(d)]

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Leading Edge Mississippi Inc  
Facility Requirements  
Permit Number:2800-00047  
Activity ID No.: PER20120001

Page 6 of 14

### AI0000001255 (continued):

#### Narrative Requirements:

Condition No.	Condition
T-17	<p>General Condition: This permit does not authorize a modification as defined in APC-S-2, "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment". Modification is defined as "Any physical change in or change in the method of operation of a facility which increases actual emissions or 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:</p> <ul style="list-style-type: none"><li>(a) routine maintenance, repair, and replacement;</li><li>(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;</li><li>(c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;</li><li>(d) use of an alternative fuel or raw material by a stationary source which: (i) 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 (ii) the source is approved to use under any permit issued under 40 CFR 52.51 or under regulations approved pursuant to 40 CFR 51.166;</li><li>(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 52.51, or under regulations approved pursuant to Subpart I or 40 CFR 51.166; or</li><li>(f) any change in ownership of the stationary source" [APC-S-2 , I.D.2]</li></ul>
T-18	<p>General Condition: It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. [APC-S-2 , II.B.15(a)]</p>
T-19	<p>General Condition: The permittee shall retain all required records, monitoring data, supported information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to MDEQ as required by Applicable Rules and Regulations or this permit upon request. [APC-S-2 , IX]</p>
T-20	<p>General Condition: The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit. [APC-S-2 , II.B.5]</p>

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Leading Edge Mississippi Inc  
Facility Requirements  
Permit Number:2800-00047  
Activity ID No.: PER20120001

Page 7 of 14

### AI0000001255 (continued):

#### Narrative Requirements:

Condition No.	Condition
T-21	<p>General Condition: Emergencies</p> <p>(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.</p> <p>(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.</p> <p>(c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence as follows: (i) an emergency occurred and that the permittee can identify the cause(s) of the emergency; (ii) the permitted facility was at the time being properly operated; (iii) 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 (iv) the permittee submitted notice of the emergency to MDEQ within two (2) working days of the time when emission limitations were exceeded due to the emergency which contained a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(d) In any enforcement proceeding, the permittee seeking to establish the occurrence of any emergency has the burden of proof.</p> <p>(e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein. [APC-S-2 , II.B.10]</p>
T-22	<p>General Condition: Upsets</p> <p>(a) 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 five (5) working days of the time the upset began which contained a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.</p> <p>(c) This provision is in addition to any upset provision contained in any applicable requirement. [APC-S-1 , Section 10]</p>

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Leading Edge Mississippi Inc  
Facility Requirements  
Permit Number:2800-00047  
Activity ID No.: PER20120001

### AI0000001255 (continued):

#### Narrative Requirements:

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Condition No.	Condition
T-23	<p>General Condition: Startups and Shutdowns</p> <p>(a) 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.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.</p> <p>(c) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply. [APC-S-1 , Section 10]</p>
T-24	<p>General Condition: Maintenance</p> <p>(a) 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 MDEQ within five (5) working days of the time the maintenance began or such other times as allowed by MDEQ, which contained a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.</p> <p>(c) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. [APC-S-1 , Section 10]</p>
T-25	<p>General Condition: For renewal of this permit the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board. [APC-S-2 , VIII]</p>

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Leading Edge Mississippi Inc  
Facility Requirements  
Permit Number:2800-00047  
Activity ID No.: PER20120001

Page 9 of 14

### AREA000000002 (AA-001) Surface Coating Operations:

#### Limitation Requirements:

Condition No.	Parameter	Condition
L-1		<p>For Emission Point AA-001, the permittee is subject to the following compliance requirements:</p> <p>(a) all painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The minimum requirement for training and certification are described in paragraph (f) below. The spray application of surface coatings is prohibited by persons who are not certified as having completed the training described in paragraph (f) below.</p> <p>(b) all spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the requirements of paragraph (b)(1) below and either paragraph (b)(2), (3), or (4) below.</p> <p>(1) all spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992" (incorporated by reference, see 40 CFR 63.14 of subpart A of this part). The test coating for measuring filter efficiency shall be a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-HVLP) air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement. The requirements of this paragraph do not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications.</p> <p>(2) spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more</p>

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Leading Edge Mississippi Inc

Facility Requirements

Permit Number:2800-00047

Activity ID No.: PER20120001

Page 10 of 14

L-2

Continued from Condition No. L-1 of the federally enforceable permit herein (Page 9), for Emission Point AA-001:

(c) all spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002" (incorporated by reference, see 40 CFR 63.14 of subpart A of this part). The requirements of this paragraph do not apply to painting performed by students and instructors at paint training centers. The requirements of this paragraph do not apply to the surface coating of aerospace vehicles that involves the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; to the application of coatings on aerospace vehicles that contain fillers that adversely affect atomization with HVLP spray guns; or to the application of coatings on aerospace vehicles that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).

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

(e) as provided in 40 CFR 63.6(g), the U.S. Environmental Protection Agency may choose to grant permission to use an alternative to the emission standards in this section after the permittee requests approval to do so according to 40 CFR 63.6(g)(2). [40 CFR 63.11173]

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Leading Edge Mississippi Inc  
Facility Requirements  
Permit Number:2800-00047  
Activity ID No.: PER20120001

Page 11 of 14

### AREA0000000002 (continued):

#### Limitation Requirements:

Condition No.	Parameter	Condition
L-3		<p>Continued from Condition No. L-2 of the federally enforceable permit herein (Page 10), for Emission Point AA-001:</p> <p>(f) ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in 40 CFR 63.11180, are trained in the proper application of surface coatings as required by paragraph (a) above. The training program must include, at a minimum, the items listed in paragraphs (f)(1) through (3) below.</p> <p>(1) a list of all current personnel by name and job description who are required to be trained;</p> <p>(2) hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in paragraphs (f)(2)(i) through (iv) below.</p> <p>(i) spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.</p> <p>(ii) spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.</p> <p>(iii) routine spray booth and filter maintenance, including filter selection and installation.</p> <p>(iv) environmental compliance with the requirements of this subpart.</p> <p>(3) a description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. The permittees who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in paragraph (f)(2) above are not required to provide the initial training required by that paragraph to these painters.</p> <p>(g) as required by paragraph (a) above, all new and existing personnel at an affected source, including contract personnel, who spray apply surface coatings, as defined in 40 CFR 63.11180, must be trained and certified no later than 180 days after hiring. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in paragraph (f)(2) above, satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed. Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire. Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements above and be re-certified every five years. [40 CFR 63.11173]</p>

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Leading Edge Mississippi Inc  
Facility Requirements  
Permit Number:2800-00047  
Activity ID No.: PER20120001

### AREA0000000002 (continued):

#### Limitation Requirements:

Condition No.	Parameter	Condition
L-4		<p>For Emission Point AA-001, the permittee shall submit the following notifications:</p> <p>(a) Initial Notification. The permittee shall submit an initial notification providing the information specified in paragraphs (a)(1) through (7) below.</p> <ol style="list-style-type: none"><li>(1) the company name, if applicable;</li><li>(2) the name, title, street address, telephone number, e-mail address (if available), and signature of the owner and operator, or other certifying company official;</li><li>(3) the street address (physical location) of the affected source and the street address where compliance records are maintained, if different;</li><li>(4) an identification of the relevant standard (i.e., this subpart, 40 CFR Part 63, Subpart HHHHHH);</li><li>(5) a brief description of the type of operation. For all surface coating operations, indicate whether the source is a motor vehicle and mobile equipment surface coating operation or a miscellaneous surface coating operation, and include the number of spray booths and preparation stations, and the number of painters usually employed at the operation.</li><li>(6) a statement of whether the source is already in compliance with each of the relevant requirements of this subpart.</li><li>(7) certify in the initial notification that the source is already in compliance. If you are certifying in the initial notification that the source is in compliance with the relevant requirements of this subpart, then include also a statement by a responsible official with that official's name, title, phone number, e-mail address (if available) and signature, certifying the truth, accuracy, and completeness of the notification, a statement that the source has complied with all the relevant standards of this subpart, and that this initial notification also serves as the notification of compliance status.</li></ol> <p>(b) Notification of Compliance Status. If the permittee did not certify in the initial notification that the source is already in compliance, then the permittee must submit a notification of compliance status providing the information specified in paragraphs (b)(1) through (3) below.</p> <ol style="list-style-type: none"><li>(1) the company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.</li><li>(2) the name, title, address, telephone, e-mail address (if available) and signature of the permittee, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance.</li><li>(3) the date of the Notification of Compliance Status. [40 CFR 63.11175]</li></ol>

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Leading Edge Mississippi Inc  
Facility Requirements  
Permit Number:2800-00047  
Activity ID No.: PER20120001

Page 13 of 14

### AREA0000000002 (continued):

#### Record-Keeping Requirements:

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Condition No.	Condition
R-1	<p>For Emission Point AA-001, the permittee shall keep the records specified in paragraphs (a) through (f) below:</p> <ul style="list-style-type: none"><li>(a) certification that each painter has completed the training specified in 40 CFR 63.11173(f) with the date the initial training and the most recent refresher training was completed.</li><li>(b) documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in 40 CFR 63.11173(e)(3)(i).</li><li>(c) documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the Administrator to achieve a transfer efficiency equivalent to that of an HVLP spray gun, according to the procedure in 40 CFR 63.11173(e)(4).</li><li>(d) copies of any notification submitted as required by 40 CFR 63.11175 and copies of any report submitted as required by 40 CFR 63.11176.</li><li>(e) records of any deviation from the requirements in 40 CFR 63.11173, 63.11174, 63.11175, or 63.11176. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.</li><li>(f) records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report. [40 CFR 63.11177]</li></ul>
R-2	<p>For Emission Point AA-001, the permittee shall maintain copies of the records specified in 40 CFR 63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period. [40 CFR 63.11178]</p>

**Permit to Operate Air Emissions Equipment at a Synthetic Minor Source**

Leading Edge Mississippi Inc  
Facility Requirements  
Permit Number:2800-00047  
Activity ID No.: PER20120001

**AREA0000000002 (continued):**

**Submittal/Action Requirements:**

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Condition	
No.	Condition
S-1	<p>For Emission Point AA-001, the permittee shall submit an Annual Notification of Changes Report. The permittee shall submit a report in each calendar year in which information previously submitted in either the initial notification required by 40 CFR 63.11175(a), Notification of Compliance, or a previous annual notification of changes report submitted under this paragraph, has changed. Deviations from the relevant requirements in 40 CFR 63.11173 on the date of the report will be deemed to be a change. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the information specified in paragraphs (a) and (b) below.</p> <p>(a) the company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.</p> <p>(b) the name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance. [40 CFR 63.11176]</p>

## GENERAL INFORMATION

Leading Edge Mississippi Inc  
173 5th Avenue, Building 449  
Greenville, MS  
Washington County

### Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
1255	Leading Edge Mississippi, Inc.	Official Site Name	7/18/2003	
2815100047	Leading Edge Mississippi Inc	Air-AIRS AFS (MDEQ USE ONLY)	10/12/2000	7/18/2003
MS0000876888	Leading Edge Aircraft Painting, Inc.	Hazardous Waste-EPA ID	5/25/2000	7/2/2009
280000047	Leading Edge Aircraft Painting, Inc.	Air-State Operating	10/25/1994	11/1/1999
MSU096135	Leading Edge Aircraft Painting, Inc.	Water - SOP	5/27/1997	5/26/2002
1255	Leading Edge Aircraft Painting, Inc.	Historic Site Name	10/25/1994	7/18/2003
2815100047	Leading Edge Mississippi Inc	Air-AIRS AFS	7/18/2003	
280000047	Leading Edge Mississippi Inc	Air-Synthetic Minor Operating	8/29/2003	7/31/2008
280000047	Leading Edge Mississippi Inc	Air-Construction	8/29/2003	
MSU096135	Leading Edge Mississippi Inc	Water - SOP	5/27/2004	4/30/2009
280000047	Leading Edge Mississippi Inc	Air-Synthetic Minor Operating	9/11/2008	8/31/2013
MS0000876888	Leading Edge Mississippi Inc	Hazardous Waste-EPA ID	7/2/2009	
MSU096135	Leading Edge Mississippi Inc	Water - SOP	7/13/2009	6/30/2014

**Basin:** Mississippi River Basin - direct dischargers to N

**Location Description:**PG- Plant Entrance (General). Data collected by David Hall on 11/16/2005. Located at Greenville Airport.