

STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Patrick Industries, Inc. dba Baymont Composites
26 Industrial Drive Access Road
Burnsville, Mississippi
Tishomingo County

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

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: _____

Permit No.: 2640-00070

SECTION 1. GENERAL CONDITIONS

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

determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).)

- 1.9 *Design and Construction Requirements:* The stationary source shall be designed and constructed so as to operate without causing a violation of an Applicable Rules and Regulations, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards, and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A(1)-(3).)

- 1.10 The necessary facilities shall be constructed to prevent any wastes or other products or substances to be placed in a location where they are likely to cause pollution of the air or waters of the State without the proper environmental permits.

(Ref.: Miss. Code Ann. 49-17-29(1) and (2))

- 1.11 *Fugitive Dust Emissions from Construction Activities:* The construction of the stationary source shall be performed in such a manner so as to reduce fugitive dust emissions from construction activities to a minimum.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A(4).)

- 1.12 *General Nuisances:* The permittee shall not cause, permit, or allow the emission of particles or any contaminants in sufficient amounts or of such duration from any process as to be injurious to humans, animals, plants, or property, or to be a public nuisance, or create a condition of air pollution.

(a) The permittee shall not cause or permit the handling, transporting, or storage of any material in a manner which allows or may allow unnecessary amounts of particulate matter to become airborne.

(b) When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than that from which it originated or to violate any other provision of 11 Miss. Admin. Code Pt. 2, Ch. 1, the Commission may order such corrected in a way that all air and gases or air and gasborne material leaving the building or equipment are controlled or removed prior to discharge to the open air.

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

1.13 *Right of Entry:* The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives upon presentation of credentials:

- (a) To enter at reasonable times 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) 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 contaminants or waste waters, fuel, process material, or other material which affects or may affect emission of air contaminants from any source.

(Ref.: Miss. Code Ann. 49-17-21)

1.14 *Permit Modification or Revocation:* After notice and opportunity for a hearing, the Permit Board may modify the permit or revoke it in whole or in part for good cause shown including, but not limited to:

- (a) Persistent violation of any of the terms or conditions of this permit;
- (b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
- (c) A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

1.15 *Public Record and Confidential Information:* Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality, Office of Pollution Control.

(Ref.: Miss. Code Ann. 49-17-39)

1.16 *Permit Transfer:* This permit shall not be transferred except upon approval of the Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B.)

1.17 *Severability:* The provisions of this permit are severable. If any provision of the permit, or the application of any provision of the permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(7).)

- 1.18 *Permit Expiration:* The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance, if construction is suspended for eighteen (18) months or more, or if construction is not completed within a reasonable time. The DEQ may extend the 18-month period upon a satisfactory showing that an extension is justified.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1)., R. 2.5.C(4)., and R. 5.2.)
- 1.19 *Certification of Construction:* A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(3).)
- 1.20 *Beginning Operation:* After certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by 11 Miss. Admin. Code Pt. 2, R. 2.13.G.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).)
- 1.21 *Application for a Permit to Operate:* The application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).)
- 1.22 *Operating Under a Permit to Construct:* Upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).)
- 1.23 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.
- (a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through

properly signed contemporaneous operating logs or other relevant evidence the following:

- (i) An upset occurred and that the source can identify the cause(s) of the upset;
 - (ii) The source was at the time being properly operated;
 - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
 - (iv) That within five (5) working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
 - (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
- (2) In any enforcement proceeding by the Commission, the source 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.
 - (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third-party enforcement actions.
- (b) Startups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
 - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).

- (3) Where an upset, as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., occurs during startup or shutdown, see the upset requirements above.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

1.24 *General Duty:* All air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants.

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

1.25 *Compliance Testing:* Regarding compliance testing:

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

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

SECTION 2. EMISSION POINT DESCRIPTION

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

Emission Point	Description
AA-001	Open Mold Spray Lay-up Line #1 consisting of Gel Coat Application Area, Cure Area, and Lamination Area
AA-002	Open Mold Spray Lay-up Line #2 consisting of a Gel Coat Application Area, Cure Area, and Lamination Area
AA-003	Open Mold Spray Line #3 consisting of a Gel Coat Application Area, Lamination Area, and Finishing Area.
AA-004	Finishing Area which includes trimming and grinding/sanding operations
AA-005	Natural Gas-Fired Fuel Burning Sources (i.e, space heaters and air makeup units, all of which are less than <10 MMBtu/hr)
AA-006	6,500 Gallon Resin Storage Tank #1
AA-007	6,500 Gallon Resin Storage Tank #2
AA-008	Touch-up operations where minor repairs are made to molds and manufactured units

SECTION 3. EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.1	VOC	≤ 249.0 tpy (PSD Avoidance)
			Total HAP	≤ 99.0 tpy (MACT Avoidance)
	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.2	Opacity	≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.3	Opacity	Equivalent Opacity
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.4	Fuel	Combust only natural gas
3.5		All Pollutants	Minimizing Pollutants	
AA-001 AA-002 AA-003	40 CFR 63, Subpart WWWW National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production	3.6	HAP	Applicability
	40 CFR 63.5785(a), 63.5790(a) and (b), 63.5795(a), and 63.5800, Subpart WWWW			
	40 CFR 63.5799(a), Subpart WWWW	3.7		Calculate weighted average organic HAP emissions factor
	40 CFR 63.5805(c), Subpart WWWW	3.8		Organic HAP emission limits
AA-001 AA-002 AA-003 AA-004	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.9	PM (filterable only)	Vent emissions to filters for control
AA-005	11 Miss. Admin Code Pt. 2, R. 1.3.D(1)(a)	3.10	PM (filterable only)	≤ 0.6 lbs/MMBtu
AA-008	40 CFR 53.5805(g), Subpart WWWW	3.11	HAP	Equipment repair operations

- 3.1 For the entire facility, the permittee shall limit the emissions of Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) from the facility to less than the following amounts, in tons per year (TPY) for each consecutive 12-month period on a rolling basis:
- (a) VOC \leq 249.0 TPY
 - (b) Total HAP \leq 99.0 TPY

The above limitations shall include aggregate emissions from all sources at the facility.

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

- 3.2 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial, or waste disposal process which exceeds forty (40) percent opacity. Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.

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

- 3.3 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in **Condition 3.2**. This shall not apply to vision obscuration caused by uncombined water droplets.

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

- 3.4 The permittee shall only combust natural gas in all combustion units operating at the facility.

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

- 3.5 The permittee shall operate all air emission equipment as efficiently as possible in order to minimize the emissions of air pollutants. Furthermore, the permittee shall perform routine maintenance on all air emissions equipment such that the equipment may be operated in an efficient manner.

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

- 3.6 For Emission Points AA-001, AA-002, and AA-003, the permittee is subject to and shall comply with all applicable requirements of the National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW and the General Provisions, 40 CFR 63, Subpart A.

(Ref.: 40 CFR 63.5785(a), 63.5790(a) and (b), 63.5795(a), and 63.5800, Subpart WWWW)

- 3.7 For Emission Points AA-001, AA-002, and AA-003, prior to startup, the permittee shall calculate a weighted average organic HAP emissions factor for the operations specified in **Condition 3.8** on a lbs/ton of resin and gel coat basis. The weighted average shall be based upon the projected operation for the 12 months subsequent to facility startup. Multiply the weighted average organic HAP emissions factor by projected resin use over the same period. The organic HAP emissions factor may be calculated based upon factors in Table 1 to Subpart WWWW, or any HAP emissions factor approved by DEQ and EPA, such as AP-42 or organic HAP emissions test data from similar facilities.

(Ref.: 40 CFR 63.5799(a), Subpart WWWW)

- 3.8 For Emission Points AA-001, AA-002, and AA-003, the permittee shall meet the following organic HAP emission limits:

- (a) Open Molding mechanical resin application
 - (1) Non CR/HS – ≤ 88 lbs HAP/ton resin
 - (2) Tooling – ≤ 254 lbs HAP/ton resin
- (b) Open Molding gel coat
 - (1) Tooling gel coat – ≤ 440 lbs HAP/ton gel coat
 - (2) White/off white pigmented gel coating – ≤ 267 lbs HAP/ton gel coat
 - (3) All other pigmented gel coating – ≤ 377 lbs HAP/ton gel coat

(Ref.: 40 CFR 63.5805(c), Table 3, Subpart WWWW)

- 3.9 For Emissions Points AA-001, AA-002, AA-003, and AA-004, the permittee shall vent emissions from the spray lay-up operations through fabric filters and vent emissions from the finishing operations to dust collectors for control of particulate matter.

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

- 3.10 For Emission Point AA-005, the permittee shall not have emissions of ash and/or particulate matter from fossil fuel burning installations of less than 10 MMBtu/hr that exceeds 0.6 lbs/MMBtu heat input.

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

- 3.11 For Emission Point AA-008, all repair operations as defined in 40 CFR 63.5785 must meet the applicable requirements in Tables 3 and 4 to Subpart WWWW and are not required to meet a 95 percent organic HAP emission reduction requirement.

(Ref.: 40 CFR 63.5805(g), Subpart WWWW)

SECTION 4. WORK PRACTICES

Emission Point	Applicable Requirement	Condition Number(s)	Work Practice
AA-001 AA-002 AA-003	40 CFR 63.5805(c), Subpart WWWW	4.1	Work Practice Standards

4.1 For Emission Points AA-001, AA-002, and AA-003, the permittee shall meet the following work practice standards:

- (a) The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
- (b) The permittee shall keep containers that store HAP containing materials closed or covered except during the addition or removal of materials. Bulk HAP containing materials storage tanks may be vented as necessary for safety.

(Ref.: 40 CFR 63.5805(c), Table 4, Subpart WWWW)

SECTION 5. MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain records for a minimum of 5 years.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2	VOC Total HAP	Facility wide recordkeeping requirements
AA-001 AA-002 AA-003	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.3	HAP	Maintain resin, gel coat, and catalyst usage
	40 CFR 63.5810(a), Subpart WWWW	5.4		Maintain emission factor calculations on a monthly basis
	40 CFR 63.5835(a) and (b) and 63.5900(c), Subpart WWWW	5.5		Comply with emission and work practice standards
	40 CFR 63.5840, Subpart WWWW	5.6		Demonstrate compliance upon startup
	40 CFR 63.5860, Subpart WWWW	5.7		Initial compliance
	40 CFR 63.5900(a)(2) and (4), Subpart WWWW	5.8		Continuous compliance
	40 CFR 63.5895(c) and (d), Subpart WWWW	5.9		Recordkeeping
	40 CFR 63.5915(a), (c), and (d), Subpart WWWW	5.10		
AA-001 AA-002 AA-003 AA-004	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	5.11	PM (filterable only)	Maintain records of emissions vented to filters
		5.12		Record maintenance performed on filters

5.1 The permittee shall retain all required records, monitoring data, supporting information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes, but is not limited to, 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 DEQ as required by Applicable Rules and Regulations or this permit upon request.

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

5.2 The permittee shall determine the following for each coating, catalyst, solvent, or other VOC or HAP containing material used and maintain sufficient records to document:

- (a) The identification of each coating, catalyst, solvent, or other VOC or HAP containing material used and the total gallons of each of these materials used on a monthly basis and in each consecutive 12-month period;
- (b) The VOC and HAP content(s) of each coating, catalyst, solvent, or other VOC or HAP containing material used. A description of the methods used to determine the VOC and HAP content shall accompany this data. The permittee may utilize data supplied by the manufacturer or an analysis of VOC and HAP content by EPA Test Method 24, 40 CFR 60, Appendix A and/or EPA Test Method 311, 40 CFR 63, Appendix A, and/or an alternate EPA approved test method;
- (c) The density of each coating, catalyst, solvent, or other VOC or HAP containing material used; and
- (d) To demonstrate compliance with the emission limits in **Condition 3.1**, the permittee shall calculate the total VOC emission rate, total HAP emission rate, and the emission rate of each individual HAP on a monthly basis and for each consecutive 12-month period on a rolling basis (tons/year).

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

- 5.3 For Emission Points AA-001, AA-002, and AA-003, the permittee shall maintain monthly records documenting the usage of each resin, gelcoat, and catalyst. VOC/HAP emissions from the usages are determined from the equations listed in Table 1 of 40 CFR 63, Subpart WWWW or the Unified Emission Factors for Open Molding of Composites Table. A material balance can be utilized for calculating VOC/HAP from catalysts. VOC/HAP emissions are determined on a monthly basis and for each consecutive 12-month period on a rolling basis (tons/year).

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

- 5.4 For Emission Points AA-001, AA-002, and AA-003, the permittee shall demonstrate compliance with the organic HAP emission limits in **Condition 3.8** by calculating the individual HAP emission factors as specified in 40 CFR 63.5810(a)(1) and (2). These calculations shall be completed within 30 days after the end of each month.

(Ref.: 40 CFR 63.5810(a), Subpart WWWW)

- 5.5 For Emission Points AA-001, AA-002, and AA-003, the permittee shall be in compliance with the work practice standards in **Condition 4.1** and the emission limits in **Condition 3.8** at all times. The permittee shall always operate and maintain the emission points, including any air pollution control and monitoring equipment according to the provision of 40 CFR 63.6(e)(1)(i), Subpart A.

(Ref.: 40 CFR 63.5835(a) and (b) and 63.5900(c), Subpart WWWW)

- 5.6 For Emission Points AA-001, AA-002, and AA-003, the permittee shall conduct performance evaluations, design evaluations, capture efficiency testing, and other initial compliance demonstrations upon startup, with the following exception: open molding operations that elect to meet an organic HAP emissions limit on a 12-month rolling average must initiate collection of the required data on the compliance date, and demonstrate compliance one (1) year after the startup date.

(Ref.: 40 CFR 63.5840, Subpart WWWW)

- 5.7 For Emission Points AA-001, AA-002, and AA-003, the permittee shall demonstrate initial compliance with Subpart WWWW by showing that the individual resins or gel coats meet the applicable organic HAP emission limits in **Condition 3.8**. The permittee shall demonstrate compliance using the calculations required in **Condition 3.7**.

(Ref.: 40 CFR 63.5860(a), Item 1 of Table 8, Subpart WWWW)

- 5.8 For Emission Points AA-001, AA-002, and AA-003, the permittee shall demonstrate continuous compliance by maintaining the following:
- (a) The permittee shall maintain organic HAP emissions factor values less than or equal to the appropriate organic HAP emission limits in **Condition 3.8**, on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate emission limits, as discussed in **Condition 5.9**.
 - (b) The permittee shall perform the work practice standards required in **Condition 4.1**.

(Ref.: 40 CFR 63.5900(a)(2) and (4), Subpart WWWW)

- 5.9 For Emission Points AA-001, AA-002, and AA-003, the permittee shall collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used to meet the HAP emission limitations in **Condition 3.8**. Resin use records may be based on purchase records if the permittee can reasonably estimate how the resin is applied. The organic HAP content records may be based on SDS or on resin specifications supplied by the resin supplier.

Resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emissions as defined in 40 CFR 63.5810(a). However, the permittee shall retain the records of resin and gel coat organic

HAP content, and a list of these resins and gel coats, along with their application methods, must be included in the semiannual report required in **Condition 6.5**.

(Ref.: 40 CFR 63.5895(c) and (d), Subpart WWWW)

5.10 For Emission Points AA-001, AA-002, and AA-003, the permittee shall retain the following records:

- (a) A copy of each notification and report submitted to comply with Subpart WWWW, including all documentation supporting any initial modification or notification of compliance status submitted.
- (b) Records of performance tests, design, and performance evaluations.
- (c) All data, assumptions, and calculations used to determine organic HAP emission factors or average organic HAP contents.
- (d) A certified statement that the permittee was in compliance with the work practice requirement in **Condition 4.1**.

(Ref.: 40 CFR 63.5915(a), (c), and (d), Subpart WWWW)

5.11 For Emission Points AA-001, AA-002, AA-003, and AA-004, the permittee shall maintain sufficient records to document the emission units are vented to fabric filters or dust collectors, as applicable, when operating. These records shall be maintained in log form and kept onsite for a period of at least five (5) years.

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

5.12 For Emission Points AA-001, AA-002, AA-003, and AA-004, the permittee shall perform regular inspections and maintenance as needed each week or more often if necessary to maintain proper operation of all fabric filters and dust collectors for achieving the desired PM control efficiency. Records of this maintenance shall be kept in log form onsite for a period of at least five (5) years.

The permittee shall maintain on hand at all times sufficient equipment as is necessary to repair, replace, and/or overhaul the pollution control equipment.

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

SECTION 6. REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1(a)	Report deviations within five (5) working days
		6.1(b)	Semiannual reporting
		6.1(c)	Certification by responsible official
	11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).	6.1(d)	Notification when construction does not begin or is suspended
	11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).	6.1(e)	Certification of completion of construction prior to operation
	11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).	6.1(f)	Notification of changes in construction
AA-001 AA-002 AA-003	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.2	Coating, catalyst, or solvent semiannual reporting requirements
	40 CFR 63.5799(c), Subpart WWWW	6.3	Recalculate organic HAP emissions yearly
	40 CFR 63.5900(b), Subpart WWWW	6.4	Report deviations
	40 CFR 63.5910(a), (c), and (d), Subpart WWWW	6.5	Submit semiannual compliance reports
	40 CFR 63.5910(b), Subpart WWWW	6.6	
	40 CFR 63.5905 and Item 5 of Table 13, Subpart WWWW	6.7	Submit notification of compliance status upon startup
	40 CFR 63.5860(a) and Items 2 and 3 of Table 9, Subpart WWWW	6.8	
AA-001 AA-002 AA-003 AA-004	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.9	Reporting Requirement

6.1 The permittee shall comply with the following general reporting requirements:

- (a) The permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began.

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

- (b) Beginning upon issuance of this permit and lasting until issuance or modification of the applicable operating permit, the permittee shall submit semiannual reports of any required monitoring by January 31st and July 31st for the preceding

calendar year. 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 11 Miss. Admin. Code Pt. 2, R. 2.1.C. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration. For any air emissions equipment not yet constructed and/or operating the report shall so note and include an estimated date of commencement of construction and/or startup, whichever is applicable.

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

- (c) Any document required by this permit to be submitted to the DEQ shall contain a certification signed by a responsible official stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

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

- (d) The permittee must notify DEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).)

- (e) Upon the completion of construction or installation of an approved stationary source or modification, and prior to commencing operation, the applicant shall notify the Permit Board that construction or installation was performed in accordance with the approved plans and specifications on file with the Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).)

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).)

6.2 The permittee shall submit semiannual reports in accordance with **Condition 6.1(b)**. This report shall include the following:

- (a) The identification of each coating, catalyst, solvent, or other VOC or HAP containing material used;
- (b) The VOC and HAP content(s) of each coating, catalyst, solvent, or other VOC or HAP containing material used;

- (c) The total gallons of each coating, catalyst, solvent, or other VOC or HAP containing material used in each consecutive 12-month period;
- (d) The total VOC emission rate, the total HAP emission rate, and the emission rate of each individual HAP in tons per month and tons per year for each consecutive 12-month period.

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

- 6.3 For Emission Points AA-001, AA-002, and AA-003, the permittee shall recalculate organic HAP emissions of the 12-month period ending June 30 or December 31, whichever date is first after startup. Subsequent calculations should cover the same periods and be included in the report required in **Condition 6.1b**.

(Ref.: 40 CFR 63.5799(c), Subpart WWWW)

- 6.4 For Emission Point AA-001, AA-002, and AA-003, the permittee shall report each deviation from each emission standard in **Condition 3.8** in accordance with **Condition 6.5**.

(Ref.: 40 CFR 63.5900(b), Subpart WWWW)

- 6.5 For Emission Points AA-001, AA-002, and AA-003, the permittee shall submit semiannual compliance reports in accordance with **Condition 6.1(b)** that contain the following information:

- (a) Company name and address.
- (b) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
- (c) Date of the report and beginning and ending dates of the reporting period.
- (d) If there are no deviations from any organic HAP emissions limitations in **Condition 3.8**, and there are no deviations from the requirements for work practice standards in **Condition 4.1**, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period.
- (e) For each deviation from an organic HAP emissions limitation and for each deviation from the requirements for work practice standards, the compliance report must contain the information in (1) and (2) below.
 - (1) The total operating time of each affected source during the reporting period.

- (2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

(Ref.: 40 CFR 63.5910(a), (c), and (d), Table 14, Subpart WWWW)

- 6.6 For Emission Points AA-001, AA-002, and AA-003, the permittee shall submit compliance reports according to the following:
 - (a) The first compliance report shall cover the period beginning on the compliance date (startup) and ending on June 30 or December 31, whichever date is first following the end of the first calendar half after the compliance date (startup).
 - (b) The first compliance report shall be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date.
 - (c) Each subsequent compliance report shall cover the semiannual reporting period from January 1 to June 30 or the semiannual reporting period from July 1 through December 31.
 - (d) Each subsequent compliance report shall be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
 - (e) Once a Title V Operating Permit (TVOP) is issued to the facility, the permittee shall submit all semiannual reports and the annual certification of compliance in accordance with the dates contained in the TVOP.

(Ref.: 40 CFR 63.5910(b), Subpart WWWW)

- 6.7 For Emission Points AA-001, AA-002, and AA-003, the permittee shall submit a Notification of Compliance Status as specified in 40 CFR 63.9(h), Subpart A within thirty (30) calendar days after startup.

(Ref.: 40 CFR 63.5905 and Item 5 of Table 13, Subpart WWWW)

- 6.8 For Emission Points AA-001, AA-002, and AA-003, the permittee shall demonstrate initial compliance with the work practice standards by submitting the following in the Notification of Compliance Status required in **Condition 6.7**:
 - (a) A certified statement that all cleaning materials, except styrene contained in the closed systems, or materials used to clean cured resin from application equipment, contain no HAP.
 - (b) A certified statement that all HAP-containing storage containers are kept close or covered except when adding or removing materials, and that any bulk storage tanks are vented only as necessary for safety.

(Ref.: 40 CFR 63.5860(a) and Items 2 and 3 of Table 9, Subpart WWWW)

- 6.9 For Emission Points AA-001, AA-002, AA-003 and AA-004, the permittee shall submit semi-annual reports in accordance with **Condition 6.1(b)**, containing the required documentation kept to comply with **Conditions 5.11 and 5.12**.

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