

**STATE OF MISSISSIPPI  
AND FEDERALLY ENFORCEABLE  
AIR POLLUTION CONTROL**

**PERMIT**

**TO OPERATE AIR EMISSIONS EQUIPMENT AT A  
SYNTHETIC MINOR SOURCE**

**THIS CERTIFIES THAT**

Anel Corporation  
3244 Highway 51 South  
Winona, Mississippi  
Carroll 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. seq., 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**



**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

Issued: FEB 12 2020

Permit No.: 0340-00010

Effective Date: As specified herein.

Expires: January 31, 2025

**Section 1.**

**A. GENERAL CONDITIONS**

1. This permit is for air pollution control purposes only.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
2. This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.4.D.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.4.D.)
3. Any activities not identified in the application are not authorized by this permit.  
(Ref.: Miss. Code Ann. 49-17-29 1.b)
4. 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.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of 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.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)
7. 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.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)
8. 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.

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

9. 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)

10. 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.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(7).)

11. This permit does not authorize a modification as defined in Regulation 11 Miss. Admin. Code Pt. 2, Ch.2., "Permit Regulations for the Construction and/or Operation of Air Emission Equipment." A modification may require a Permit to Construct and a modification of this permit. Modification is defined as "Any 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 Part 51, Subpart I, or 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 Part 51, Subpart I, or 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 Part 51, Subpart I or 40 CFR 51.166; or
- f. Any change in ownership of the stationary source.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.C(15).)

**B. GENERAL OPERATIONAL CONDITIONS**

1. 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, 11 Miss. Admin. Code Pt. 2, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.10.)

2. Any diversion from or bypass of collection and control facilities is prohibited, except as provided for in 11 Miss. Admin. Code Pt. 2, R. 1.10., "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants."

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

3. 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.

(Ref.: Miss. Code Ann. 49-17-29 1.a(i and ii))

4. Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.

a. Upsets

- (1) For an upset defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., 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 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 by 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 this regulation, 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 Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

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

5. 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).)

**C. PERMIT RENEWAL / MODIFICATION / TRANSFER / TERMINATION**

1. 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. If the applicant submits a timely and complete application pursuant to this paragraph and the Permit Board, through no fault of the applicant, fails to act on the application on or before the expiration date of the existing permit, the applicant shall continue to operate the stationary source under the terms and conditions of the expired permit, which shall remain in effect until final action on the application is taken by the Permit Board. Permit expiration terminates the source's ability to operate unless a timely and complete renewal application has been submitted.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.8.)

2. The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

3. 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).)

4. 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. Persistent 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 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.)

5. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board.

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

**SECTION 2**  
**EMISSION POINT DESCRIPTION**

The permittee is authorized to operate air emissions equipment, as described in the following table.

<b>Emission Point</b>	<b>Description</b>
AA-000	Entire Facility
AA-100	Surface Coating Operations (2 Paint Booths)
AA-200	Fuel Burning Equipment (Propane gas-fired space heaters with a Total Capacity of 0.091 MMBTU/hr)
AA-300	Manufacturing Operations (Welding, shot blasting, oxyfuel burner, plasma cutter, turret punch, and two (2) laser cutters)
AA-400	Facility Wide Storage Tanks (One (1) 10,000 Gallon Propane Storage Tank)



**SECTION 3  
EMISSION LIMITATIONS AND STANDARDS**

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity	≤ 40% except during startup
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2	Opacity	≤ 40%
	11 Miss. Admin. Code Pt. 2, R.1. 3.D(1)(a).	3.3	PM	0.6 lb/MMBTU
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.4	PM	$E = 4.1p^{0.67}$
	11 Miss. Admin. Code Pt. 2, R. 1.3.C.	3.5	PM	Nuisance Clause
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.6	SO <sub>2</sub>	4.8 lb/MMBTU
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.7	VOC	99.0 tpy
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.8	HAP	9.90 tpy/24.90 tpy
	40 CFR Part 63, Subpart XXXXXX- National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories; 40 CFR 63.11514(a)(4).	3.9	HAP	General Applicability

3.1 For Emission Point AA-000 (Facility-Wide), 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 following exception. 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.)

3.2 For Emission Point AA-000 (Facility-Wide), 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.)

- 3.3 For Emission Point AA-000 (Facility-Wide), for installations of less than 10 million BTU per hour heat input, emission of ash and/or Particulate Matter (PM) from fossil fuel burning shall not exceed 0.6 pounds per million BTU per hour heat input.

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

- 3.4 For Emission Point AA-000 (Facility-Wide), except as otherwise specified herein, the permittee shall limit the emissions of Particulate Matter (PM) to no more than the rate determined by the following relationship:

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

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.

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

- 3.5 For Emission Point AA-000 (Facility-Wide), the permittee shall not cause 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.

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

When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment and cause a nuisance to a property other than the one from which it originated or any other provision of this regulation is violated, the MDEQ may order that all air and gases or air and gas-borne 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.)

- 3.6 For Emission Point AA-000 (Facility-Wide), the maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)

- 3.7 For Emission Point AA-000 (Facility-Wide), the permittee shall limit volatile organic compound (VOC) emissions to no more than 99.0 tons per year (TPY) as determined for each consecutive 12-month period.

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

- 3.8 For Emission Point AA-000 (Facility-Wide), the permittee shall limit hazardous air pollutant (HAP) emissions to no more than 9.90 tons per year (TPY) of any single HAP and no more than 24.90 TPY of total combined HAPs as determined for each consecutive 12-month period.

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

- 3.9 For Emission Point AA-000 (Facility-Wide), the permittee is subject to 40 CFR Part 63, Subpart XXXXXX- National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories and Subpart A- General Provisions as specified in Table 2 of Subpart XXXXXX.

(Ref.: 40 CFR Part 63, Subpart XXXXXX- National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories; 40 CFR 63.11514(a)(4).)

**SECTION 4  
WORK PRACTICES**

<b>Emission Point</b>	<b>Applicable Requirement</b>	<b>Condition Number(s)</b>	<b>Pollutant/Parameter</b>	<b>Work Practice</b>
AA-300	40 CFR 63.11516(a)(1), Subpart XXXXXX	4.1	MFHAP	Requirements for enclosed dry abrasive blasting operations
	40 CFR 63.11516(a)(2), Subpart XXXXXX	4.2	MFHAP	Requirements for vented dry abrasive blasting operations
	40 CFR 63.11516(b), Subpart XXXXXX	4.3	MFHAP	Requirements for machining operations
	40 CFR 63.11516(f)(1)&(2), Subpart XXXXXX	4.4	MFHAP	Requirements for welding operations
AA-100	40 CFR 63.11516(d)(1), Subpart XXXXXX.	4.5	MFHAP	Requirements for spray-painting operations
	40 CFR 63.11516(d)(2), Subpart XXXXXX	4.6	MFHAP	Spray gun transfer efficiency requirements
	40 CFR 63.11516(d)(4), Subpart XXXXXX	4.7	MFHAP	Spray gun cleaning requirements
	40 CFR 63.11516(d)(6), Subpart XXXXXX	4.8	MFHAP	Spray paint training requirements
	40 CFR 63.11516(d)(5),(8)&(9), Subpart XXXXXX	4.9	MFHAP	Spray paint training certification requirements

4.1 For Emission Point AA-300, for a dry abrasive blasting operation consisting of an abrasive blasting chamber that is totally enclosed and unvented, as defined in 40 CFR 63.11522, the permittee must implement management practices to minimize emissions of MFHAP as described below:

- (a) The permittee must minimize dust generation during emptying of abrasive blasting enclosures; and
- (b) The permittee must operate all equipment associated with dry abrasive blasting operations according to the manufacturer's instructions.

(Ref.: 40 CFR 63.11516(a)(1), Subpart XXXXXX.)

4.2 For Emission Point AA-300, for a dry abrasive blasting operation which has a vent allowing any air or blast material to escape, the permittee must comply with the requirements below:

- (a) The permittee must capture emissions and vent them to a filtration control device. The permittee must operate the filtration control device according to manufacturer's instructions and must demonstrate compliance with this

requirement by maintaining a record of the manufacturer's specifications for the filtration control devices, as specified by the requirements in 40 CFR 63.11519(c)(4).

- (b) The permittee must implement the management practices to minimize emissions of MFHAP as specified below:
  - (1) The permittee must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and
  - (2) The permittee must enclose dusty abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive materials; and
  - (3) The permittee must operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions.

(Ref.: 40 CFR 63.11516(a)(2), Subpart XXXXXX.)

4.3 For Emission Point AA-300, for machining operations, the permittee must implement management practices to minimize emissions of MFHAP as specified below:

- (a) The permittee must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and
- (b) The permittee must operate all equipment associated with machining according to manufacturer's instructions.

(Ref.: 40 CFR 63.11516(b), Subpart XXXXXX.)

4.4 For Emission Point AA-300, for welding operations, the permittee must comply with the requirements below:

- (a) The permittee must operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions. The permittee must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the capture and control devices, as specified by the requirements in Section 5.
- (b) The permittee must implement one or more of the management practices specified below to minimize emissions of MFHAP, as practicable, while maintaining the required welding quality through the application of sound engineering judgment.
  - (1) Use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW) - also called metal inert gas welding (MIG));
  - (2) Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates;
  - (3) Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation;

- (4) Optimize welding process variables (e.g., electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated; and
- (5) Use a welding fume capture and control system, operated according to the manufacturer's specifications.

(Ref.: 40 CFR 63.11516(f)(1)&(2), Subpart XXXXXX.)

4.5 For Emission Point AA-100, for spray painting operations, the permittee must meet the standards below for MFHAP control:

- (a) Spray booths or spray rooms must have a full roof, at least two complete walls, and one or two complete side curtains or other barrier material so that all four sides are covered. The spray booths or spray rooms must be ventilated so that air is drawn into the booth and leaves only through the filter. The roof may contain narrow slots for connecting fabricated products to overhead cranes, and/or for cords or cables.
- (b) All spray booths or spray rooms must be fitted with a type of filter technology that is demonstrated to achieve at least 98 percent capture of MFHAP. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992". The test coating for measuring filter efficiency shall be a high-solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-High Volume Low Pressure) air-atomized spray gun operating at 40 psi air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement.
- (c) The permittee must perform regular inspection and replacement of the filters in all spray booths or spray rooms according to manufacturer's instructions, and maintain documentation of these activities, as detailed in Section 5.
- (d) As an alternative compliance requirement, spray booths or spray rooms equipped with a water curtain, called "waterwash" or "waterspray" booths or spray rooms that are operated and maintained according to the manufacturer's specifications and that achieve at least 98 percent control of MFHAP, may be used in lieu of the spray booths or spray rooms requirements of paragraphs (a) through (c) of this Condition.

(Ref.: 40 CFR 63.11516(d)(1), Subpart XXXXXX.)

4.6 For Emission Point AA-100, all paints applied via spray-applied painting must be applied with a high-volume, low-pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated to achieve transfer efficiency comparable to one of these spray gun technologies for a comparable operation, and for which written approval has been obtained from the MDEQ. 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", Revision 0.

(Ref.: 40 CFR 63.11516(d)(2), Subpart XXXXXX.)

4.7 For Emission Point AA-100, all cleaning of paint spray guns must be done with either non-HAP gun cleaning solvents, or in such a manner that an atomized mist of spray of gun cleaning solvent and paint residue is not created outside of a container that collects the used gun cleaning solvent. Spray gun cleaning may be done with, for example, by hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of these non-atomizing methods may also be used.

(Ref.: 40 CFR 63.11516(d)(4), Subpart XXXXXX.)

4.8 For Emission Point AA-100, the permittee must ensure and certify that all new and existing personnel, including contract personnel, who spray apply paints are trained in the proper application of paints as required by Condition 4.9. The training program must include, at a minimum, the items listed below:

- (a) A list of all current personnel by name and job description who are required to be trained;
- (b) Hands-on, or in-house or external classroom instruction that addresses, at a minimum, initial and refresher training in the following topics:
  - (1) Spray gun equipment selection, set up, and operation, including measuring paint viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.
  - (2) Spray technique for different types of paints to improve transfer efficiency and minimize paint usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.
  - (3) Routine spray booth and filter maintenance, including filter selection and installation.
  - (4) Environmental compliance with the requirements of this subpart.

- (c) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Alternatively, the permittee 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 (b) of this Condition are not required to provide the initial training.

(Ref.: 40 CFR 63.11516(d)(6), Subpart XXXXXX.)

- 4.9 For Emission Point AA-100, all workers performing painting must be certified that they have completed training in the proper spray application of paints and the proper setup and maintenance of spray equipment. The spray application of paint is prohibited by persons who are not certified as having completed the training described in Condition 4.8. Workers performing painting must be trained and certified as required below:

- (a) All personnel must be trained and certified no later than 180 days after hiring. Training that was completed within 5 years prior to the date training is required, and that meets the requirements specified in Condition 4.8 satisfies this requirement and is valid for a period not to exceed 5 years after the date the training is completed.
- (b) Training and certification will be valid for a period not to exceed 5 years after the date the training is completed. All personnel must receive refresher training that meets the requirements of this subpart and be re-certified every 5 years.

(Ref.: 40 CFR 63.11516(d)(5),(8)&(9), Subpart XXXXXX.)



**SECTION 5  
MONITORING AND RECORDKEEPING REQUIREMENTS**

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain records for a minimum of 5 years.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2	VOC/HAP	Monitor and record VOC/HAP content monthly and in any consecutive 12-month period
	11 Miss. Admin. Code Pt. 2, R 2.2.B(11).	5.3	VOC/HAP	Maintenance on pollution control equipment
	Ref.: 40 CFR 63.11519(c)(1),(4)-(8),(13)&(14), Subpart XXXXXX.	5.4	MFHAP	Recordkeeping

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 all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to MDEQ as required by Applicable Rules and Regulations or this permit upon request.

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

5.2 For Emission Point AA-000 (Facility-Wide), the permittee shall maintain sufficient records to document:

- (a) identification of each coating, adhesive, solvent or other VOC or HAP containing material used, and the total gallons of each coating and each solvent used on a monthly basis and in any consecutive 12-month period;
- (b) the VOC and HAP content(s) (percent weight) of each coating, adhesive, solvent or other VOC or HAP containing material used. A description of the method used to determine the VOC and HAP content shall accompany this data; and
- (c) the density (lb/gal) of each coating, adhesive, solvent or other VOC or HAP containing material
- (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.

The permittee may utilize data supplied by the manufacturer, or analysis of VOC or HAP content by EPA Test Method 311, 40 CFR Part 63, Appendix A, respectively.

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

- 5.3 The permittee shall perform regular maintenance on the control equipment according to the manufacturer design and recommendations. This maintenance shall be kept in log form and made available to MDEQ during inspections.

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

- 5.4 For Emission Point AA-000 (Facility-wide), the permittee must keep records of the information specified below in accordance with Condition 5.1:

- (a) Each notification and report that the permittee submitted to comply with Subpart XXXXXX, and the documentation supporting each notification and report;
- (b) Records of the applicability determinations, listing equipment included in its affected source, as well as any changes to that and on what date they occurred, must be maintained for 5 years and be made available for inspector review at any time;
- (c) Maintain a record of the manufacturer's specifications for the control devices used to comply with Section 4;
- (d) Maintain a record of the filter efficiency demonstrations and spray paint booth filter maintenance activities;
- (e) Maintain a record of the water curtain efficiency demonstrations;
- (f) Maintain documentation of HVLP or other high transfer efficiency spray paint delivery systems. This documentation must include the manufacturer's specifications for the equipment and any manufacturer's operation instructions. If the permittee has obtained written approval for an alternative spray application system, the permittee must maintain a record of that approval along with documentation of the demonstration of equivalency;
- (g) Maintain certification that each worker performing spray painting operations has completed the training specified in Section 4 with the date the initial training and the most recent refresher training was completed;
- (h) If the permittee complies with this subpart by operating any equipment according to manufacturer's instruction, the permittee must keep these instructions readily available for inspector review;
- (i) If the permittee is not required to comply with the requirements of 40 CFR 63.11516(f)(3) through (8) because it uses less than 2,000 pounds per year of welding rod (on a rolling 12-month basis), the permittee must maintain records demonstrating the welding rod usage on a rolling 12-month basis.

(Ref.: 40 CFR 63.11519(c)(1),(4)-(8),(13)&(14), Subpart XXXXXX.)

## 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	Report permit deviations within five (5) working days.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.2	Submit certified annual monitoring report.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.3	All documents submitted to MDEQ shall be certified by a Responsible Official.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.4	Submit Annual Monitoring Report

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

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

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

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

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

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

6.4 For Emission Point AA-000 (Facility-Wide), 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:

- (a) identification of each coating, adhesive, solvent or other VOC or HAP containing material used;

- (b) the VOC and HAP content(s) of each coating, adhesive, solvent, or other VOC or HAP containing material used;
- (c) the total gallons of each coating, adhesive, solvent or other VOC or HAP containing material used in any consecutive 12-month period; and
- (d) the total VOC emission rate, the emission rate of each individual HAP and the total HAP emission rate in tons per year based on a consecutive 12-month period.

All instances of deviations from permit requirements must be clearly identified in the report. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration.

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