# STATE OF MISSISSIPPI
# AND FEDERALLY ENFORCEABLE
# AIR POLLUTION CONTROL
# PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT AT A SYNTHETIC MINOR SOURCE

**THIS CERTIFIES THAT**

Sequa Corporation
1095 Mendell Davis Drive
Jackson, Mississippi
Hinds 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**

Krystal Rudolph

**AUTHORIZED SIGNATURE**
**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Issued: July 7, 2020** **Permit No.: 1080-00080**

**Effective Date: As specified herein.**

**Expires: June 30, 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. 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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)

11. 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).)

12. 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

6. 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.)

7. 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).)

8. 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).)

9. 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.)

10. 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.

| Emission Point | Description |
|---|---|
| AA-000 | Continuous Coil Coating Line, with emissions from the prime coater and prime curing oven and finish coater and finish curing oven routed to the Thermal Oxidizer (AE-001) for control of volatile organic compounds (VOC) and hazardous air pollutants (HAP) |
| AB-001 | 5.2 MMBTU/hr Natural Gas-fired Infrared Oven for drying water from cleaning and treatment of coil prior to coating |
| AB-002 | Inorganic Chemical Cleaning and Treatment Operation to prepare surface of coil for coating |
| AC-001 | 18.4 MMBTU/hr Natural Gas-fired Prime Curing Oven |
| AC-002 | 18.4 MMBTU/hr Natural Gas-fired Finish Curing Oven |
| AE-001 | 29.6 MMBTU/hr Natural Gas-fired Thermal Oxidizer |
| AE-002 | 29.4 MMBTU/hr Waste Heat Boiler [Uses waste heat from offgases of the Thermal Oxidizer (AE-001) to generate steam] |
| AF-001 | 568 Horsepower (HP) Kohler diesel fired emergency compression ignition (CI) internal combustion engine (ICE) for the backup power generator |

## 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. 1.3.A(1) and (2). | 3.1 | Opacity | Facility-wide opacity limitations |
| | 11 Miss. Admin. Code Pt. 2, R. 1.3.B. | 3.2 | | |
| AA-000 | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). | 3.3 | VOC | 95.0 tpy |
| | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).<br>(MACT Avoidance Limits) | 3.4 | HAPs | 9.0 tpy for any individual HAP and<br>22.5 tpy for all combined HAPs |
| AB-001, AF-001 | 11 Miss. Admin. Code Pt. 2, R. 1.3. D(1)(a). | 3.5 | PM<br>(filterable only) | 0.6 lb/MMBTU |
| AC-001, AC-002, and AE-001 | 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b). | 3.6 | PM<br>(filterable only) | $E = 0.8808 * I^{-0.1667}$ |
| AE-002 | 40 CFR Part 60, Subpart Dc<br>NSPS for Small Industrial-Commercial-Institutional Steam Generating Units<br>40 CFR 60.40c(a), Subpart Dc | 3.7 | $SO_2$ | NSPS Applicability |
| AA-000 | 40 CFR Part 60, Subpart TT<br>NSPS for Metal Coil Surface Coating<br>40 CFR 60.460, Subpart TT | 3.8 | VOC | NSPS Applicability |
| AA-000 | 40 CFR 60.462(a)(2) through (4), Subpart TT | 3.9 | VOC | Compliance Options (for each calendar month):<br>(1) 0.14 kg VOC/liter of coating solids applied; or<br>(2) 10% of the VOCs applied; or<br>(3) Between 0.14 and 0.28 kg VOC of coating solids applied when operating the thermal oxidizer intermittently |
| AF-001 | 40 CFR Part 63, Subpart ZZZZ<br>NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE)<br>40 CFR Part 63.6580, 63.6585(a) and (c), and 63.6590(a)(1)(iii), Subpart ZZZZ | 3.10 | HAP | MACT applicability |
| | 40 CFR 63.6640(f)(1), (2), and (4), Subpart ZZZZ | 3.11 | | Operating requirements |

3.1 For the entire facility, 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(1) and (2).)

3.2 For the entire facility, 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 3.1. 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, the permittee shall limit the emissions of Volatile Organic Compounds (VOC) to no more than 95.0 tons per year (tpy) for each consecutive 12-month period.

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

3.4 For Emission Point AA-000, the permittee shall limit the emissions of any individual hazardous air pollutant (HAP) to no more than 9.0 tpy for each consecutive 12-month period. The permittee shall limit the emissions of all combined HAPs to no more than 22.5 tpy for each consecutive 12-month period.

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

3.5 For Emission Points AB-001 and AF-001, the maximum permissible emission of ash and/or particulate matter 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).)

3.6 For Emission Points AC-001, AC-002, and AE-001, the maximum permissible emission of ash and/or particulate matter shall not exceed an emission rate determined by the equation:

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

where E is the emission rate in pounds per million BTU per hour heat input and I is the heat input in millions of BTU per hour.

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

3.7 For Emission Point AE-002, the permittee is subject to and shall comply with the applicable requirements of 40 CFR Part 60, Subpart Dc – New Source Performance Standards for Industrial, Commercial, and Institutional Steam Generating Units and the applicable General Provisions, 40 CFR 60, Subpart A. Emission Point AE-002 has no specific emission standards under Subpart Dc.

(Ref.: 40 CFR 60.40c(a), Subpart Dc)

3.8 For Emission Point AA-000, the permittee is subject to and shall comply with the applicable requirements of 40 CFR Part 60, Subpart TT – New Source Performance Standards for Metal Coil Surface Coating and the applicable General Provisions, 40 CFR 60, Subpart A.

(Ref.: 40 CFR 60.460, Subpart TT)

3.9 For Emission Point AA-000, the permittee shall comply with one of the following VOC limits:

(a) 0.14 kilogram VOC per liter (kg VOC/l) of coating solids applied for each calendar month when continuously operating the thermal oxidizer; or

(b) 10 percent of the VOC's applied for each calendar month (90 percent emission reduction) when continuously operating the thermal oxidizer; or

(c) A value between 0.14 (or a 90-percent emission reduction) and 0.28 kg VOC/l of coating solids applied for each calendar month when operating the thermal oxidizer intermittently.

The permittee shall operate the thermal oxidizer at the most recently demonstrated overall efficiency.

(Ref.: 40 CFR 60.462(a)(2) through (4), Subpart TT)

3.10 For Emission Point AF-001, the permittee is subject to and shall comply with the applicable requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ.

Emission Point AF-001 is an existing compression ignition (CI) emergency engine with a site rating greater than 500 HP that is located at an Area Source of HAP emissions. As such, the engine must meet the emergency operational requirements and scheduled maintenance activities of 40 CFR Part 63, Subpart ZZZZ and the General Provisions of Subpart A.

(Ref.: 40 CFR Part 63.6580, 63.6585(a) and (c), and 63.6590(a)(1)(iii), Subpart ZZZZ)

3.11 For Emission Point AF-001, the engine shall be considered an emergency RICE under Subpart ZZZZ provided the engine only operates in an emergency, during maintenance and testing, and during non-emergency situations for 50 hours per year as described in (c) below. If the permittee does not operate the engine according to the requirements in (a)-(c) below, the engine will not be considered an emergency engine under Subpart ZZZZ and must meet all requirements for non-emergency engines.

(a) There is no limit on the use of the engine during an emergency situation.

(b) The permittee may operate the engine for maintenance checks and readiness testing for a maximum of 100 hours per calendar year provided the tests are recommended by federal, state, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or insurance company associated with the engine. The permittee may petition the DEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating the federal, state, or local standards require maintenance testing of the engine beyond 100 hours per calendar year.

(c) An emergency engine may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in paragraph (b). Except as provided in 63.6640(f)(4)(i) and (ii), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(Ref.: 40 CFR 63.6640(f)(1), (2), and (4), Subpart ZZZZ)

## SECTION 4
## WORK PRACTICES

| Emission Point | Applicable Requirement | Condition Number(s) | Pollutant/ Parameter | Work Practice |
|---|---|---|---|---|
| AF-001 | 40 CFR Part 63.6603(a) and Item 4 of Table 2d of Subpart ZZZZ | 4.1 | HAP | Scheduled Maintenance Activities |
| | 40 CFR Part 63.6605, Subpart ZZZZ | 4.2 | | General Compliance |
| | 40 CFR Part 63.6625(e)(3), 63.6625(h), and Item 9 of Table 6 of Subpart ZZZZ | 4.3 | | General Operating Requirements |

4.1 For Emission Point AF-001, the permittee shall comply with the following requirements:

(a) Change oil and filter every 500 hours of operation or annually, whichever comes first, or perform an oil analysis at the same frequency in order to extend the oil change requirement in accordance with 40 CFR 63.6625(i).

(b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary;

(c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

If the engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practices according to the schedule listed in (a)–(c) above, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated.

(Ref.: 40 CFR Part 63.6603(a) and Item 4 of Table 2d of Subpart ZZZZ)

4.2 For Emission Point AF-001, the permittee shall, at all times, be in compliance with the applicable requirements of 40 CFR Part 63, Subpart ZZZZ, and operate and maintain the engine, including associated monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by Subpart ZZZZ have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the DEQ which may include, but is not limited to, monitoring

results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(Ref.: 40 CFR Part 63.6605, Subpart ZZZZ)

4.3 For Emission Point AF-001, the permittee shall operate and maintain the engine according to the manufacturer's emission-related written instructions or develop and follow a maintenance plan which provides to the extent practicable for the maintenance and operation of the engines in a manner consistent with good air pollution practice for minimizing emissions. The permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

(Ref.: 40 CFR Part 63.6625(e)(3), 63.6625(h), and Item 9 of Table 6 of Subpart ZZZZ)

## SECION 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. |
| | 40 CFR 63.1(b)(3) and 63.10(b)(3), Subpart A, and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 5.2 | HAP | Recordkeeping requirement for MACT applicability determinations |
| AA-000 | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 5.3 | VOC and HAP | Calculate monthly and 12-month rolling total emissions |
| | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 5.4 | Capture Efficiency | EPA Reference Method 204 |
| | 40 CFR 60.463(b), (c)(2), and (c)(4), Subpart TT | 5.5 | VOC | Demonstrate compliance monthly |
| | 40 CFR 60.464(a) and (b), Subpart TT | 5.6 | VOC | Determining the average VOC content of coatings used monthly |
| | 40 CFR 60.464(c), Subpart TT | 5.7 | Temperature | Continuously monitor and record combustion temperature of thermal oxidizer |
| | 40 CFR 60.465(e), Subpart TT | 5.8 | VOC | Records of data and calculations |
| | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 5.9 | Capture Efficiency | Monitoring plan |
| | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 5.10 | Destruction Efficiency and Capture Efficiency | Conduct performance test every five (5) years |
| AE-002 | 40 CFR Part 60.48c(g)(2), Subpart Dc | 5.11 | Fuel | Monthly natural gas combusted |
| AF-001 | 40 CFR 63.6655(a)(1), (2), and (5), and (e)(2) and 63.6660, Subpart ZZZZ | 5.12 | HAP | General recordkeeping |
| | 40 CFR Part 63.6655(f), Subpart ZZZZ | 5.13 | | Hours of operation |
| | 40 CFR Part 63.6625(f), Subpart ZZZZ | 5.14 | | Non-resettable hour meter |

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 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 For the entire facility, the permittee must keep a record of the applicability determination with regards to 40 CFR Part 63, Subparts SSSS and DDDDD on site at the source for a period of five (5) years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the permittee believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow DEQ to make a finding about the source's applicability status with regard to the relevant standard or other requirement. (The application submitted to obtain this synthetic minor operating permit may suffice as documentation under this requirement.)

(Ref.: 40 CFR 63.1(b)(3) and 63.10(b)(3), Subpart A, and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.3 For Emission Point AA-000, to demonstrate compliance with the VOC and HAP tpy limits, the permittee shall monitor and record the following information on a monthly basis for each coating, solvent, and other VOC- or HAP-containing material used:

(a) Quantity used (gal or lb),

(b) The percentage of VOC and individual HAP by weight,

(c) The density (lb/gal), unless material usages are measured in lb,

(d) The VOC emissions and individual and total HAP emissions from the use of these materials calculated for each month and for each consecutive 12-month period. VOC and HAP emissions may be reduced using the following equation, except during those times the thermal oxidizer is down while the coil coating line is operating:

$$E_a = VOC_u \textit{(or } HAP_u\textit{)} \times [1-(R/100)]$$

Where $E_a$ is the actual VOC mass emission rate or HAP emission rate in tons, $VOC_u$ (or $HAP_u$) is the actual VOC emissions or HAP emissions prior to control (i.e., uncontrolled), and R is the most recently demonstrated overall VOC reduction efficiency, %.

To determine the VOC and HAP content of the materials used, the permittee may utilize data supplied by the manufacturer, or analysis of VOC/HAP content by EPA Test

Method 24, 40 CFR 60, Appendix A. The permittee shall maintain records of this information for review by DEQ personnel upon request.

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

5.4 For Emission Point AA-000, the permittee shall demonstrate the capture efficiency (mass of total VOC captured and sent to the oxidizer) in accordance with EPA Reference Method 204 – Criteria for and Verification of a Permanent or Temporary Total Enclosure, 40 CFR 51, Appendix M.

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

5.5 For Emission Point AA-000, the permittee shall conduct a performance test for each calendar month according to the following procedures for determining monthly volume-weighted average emissions of VOC's in kg of coating solids applied:

(a) If the permittee continuously uses the capture system and control device to comply with Condition 3.9(a) or 3.9(b), the permittee shall demonstrate compliance according to the following procedures:

(1) Determine the overall reduction efficiency (R) for the capture system and control device. The permittee shall use the most recently determined overall reduction efficiency (R) for the performance test, providing control device and capture system operating conditions have not changed since the most recent test. The procedures in 40 CFR 60.463(c)(2)(i)(A), (B), and (C) shall be repeated when directed by the DEQ or when the permittee elects to operate the control device or capture system at conditions different from the most recent performance test. ***If the overall reduction efficiency (R) is equal to or greater than 0.90, the affected facility is in compliance and no further computations are necessary. If the overall reduction efficiency (R) is less than 0.90, the average total VOC emissions to the atmosphere per unit volume of coating solids applied (N) shall be computed as follows in paragraphs (2) through (4) below.***

(2) Calculate the volume-weighted average of the total mass of VOCs per unit volume of coating solids applied (G) during each calendar month using equations in 40 CFR 60.463(c)(1)(i)(A), (B), and (C).

(3) Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during each calendar month by the following equation:

$$N = G (1 – R)$$

(4) If the volume-weighted average mass of VOCs emitted to the atmosphere for each calendar month (N) is less than or equal to 0.14 kg/l of coating

solids applied, the permittee is in compliance. Each monthly calculation is a performance test.

(b) If the permittee intermittently uses the capture system and control device to comply with Condition 3.9(c), the permittee shall demonstrate compliance using the procedures in 40 CFR 60.463(c)(4).

(Ref.: 40 CFR 60.463(b), (c)(2), and (c)(4), Subpart TT)

5.6 For Emission Point AA-000, if the permittee complies with Condition 3.9(a), the permittee shall compute and record the average VOC content of coatings applied during each calendar month, according to the procedures in Condition 5.5(a)(2)-(4). If the permittee complies with the limit for intermittent use of the control device specified in Condition 3.9(c), then the permittee shall compute and record the average VOC content of coatings applied during each calendar month according to the procedures in Condition 5.5(b).

(Ref.: 40 CFR 60.464(a) and (b), Subpart TT)

5.7 For Emission Point AA-000, the permittee shall install, calibrate, operate, and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with Condition 3.9. This device shall have an accuracy of ±2.5 °C. or ±0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater. The permittee shall also record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in the thermal incinerator used to control emissions remains more than 28°C (50°F) below the temperature at which compliance with Condition 3.9 was demonstrated during the most recent measurement of incinerator efficiency. The permittee shall identify each such occurrence and its duration in accordance with the requirements of 40 CFR 60.7(c).

(Ref.: 40 CFR 60.464(c), Subpart TT)

5.8 For Emission Point AA-000, in accordance with Condition 5.1, the permittee shall maintain records of all data and calculations used to determine monthly VOC emissions and to determine the monthly emission limit, where applicable. Where compliance is achieved through the use of thermal incineration, each the permittee shall maintain, at the source, daily records of the incinerator combustion temperature.

(Ref.: 40 CFR 60.465(e), Subpart TT)

5.9 For Emission Point AA-000, the permittee shall develop a capture system monitoring plan containing the information specified in paragraphs (a) and (b) below. The permittee shall monitor the capture system in accordance with paragraph (c) below. The permittee shall make the monitoring plan available for inspection by the DEQ upon request.

(a) The monitoring plan shall identify the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test and any subsequent tests is maintained, explain why this parameter is appropriate for demonstrating ongoing compliance, and identify the specific monitoring procedures.

(b) The plan also shall specify operating limits at the capture system operating parameter value, or range of values, that demonstrates compliance with the overall reduction efficiency determined in Condition 5.5. The operating limits must represent conditions indicative of proper operation and maintenance of the capture system.

(c) The permittee shall conduct monitoring in accordance with the plan and shall record the date, duration, cause, and corrective action taken for instances the capture system is not operated within the parameters established in the plan.

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

5.10 For Emission Point AA-000, the permittee must conduct a performance test before March 25, 2023, and subsequent performance tests no later than five (5) years following the previous performance to establish the overall removal efficiency of the thermal oxidizer. For each performance test, the permittee shall determine the destruction or removal efficiency of the thermal oxidizer according to the procedures in 40 CFR 63.5160(d) and the capture efficiency of each capture system according to Condition 5.4. The permittee shall also confirm or re-establish the operating limits for thermal incinerator combustion temperature required by Condition 5.7 and for the applicable capture system parameter(s) required by Condition 5.9.

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

5.11 For Emission Point AE-002, the permittee shall maintain records of the amount of natural gas combusted during each calendar month.

(Ref.: 40 CFR Part 60.48c(g)(2), Subpart Dc)

5.12 For Emission Point AF-001, the permittee shall keep the following records:

(a) A copy of each notification and report submitted to comply with Subpart ZZZZ, including all supporting documentation.

(b) Records of the occurrence and duration of each malfunction of the engine or monitoring equipment.

(c) Records of actions taken during periods of malfunction to minimize emissions, including corrective actions taken to restore equipment to its normal and usual

manner of operation.

(d) Records of all maintenance done on each engine in order to demonstrate that you operated and maintained the engines according to the maintenance plan.

All records must be in a form suitable and readily available for expeditious review. Each record must be kept for a period of five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. These records may be kept in hard copy or electronic format.

(Ref.: 40 CFR 63.6655(a)(1), (2), and (5), and (e)(2), and 63.6660, Subpart ZZZZ)

5.13 For Emission Point AF-001, the permittee shall keep records of the hours of operation of the engine recorded using the engine's non-resettable hour meter. These records must indicate how many hours are spent in emergency operation, including what classified the operation as an emergency, and how many hours are spent in nonemergency operation.

(Ref.: 40 CFR Part 63.6655(f), Subpart ZZZZ)

5.14 For Emission Point AF-001, the permittee shall install and operate a non-resettable hour meter on the emergency engine, if one is not already installed.

(Ref: 40 CFR Part 63.6625(f), Subpart ZZZZ)

## 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 |
| | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 6.2 | Submit certified semiannual monitoring report |
| | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 6.3 | Responsible official certification |
| AA-000 | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 6.4 | Annual VOC and HAP reporting requirements |
| | 40 CFR 60.465(c), Subpart TT | 6.5 | Semiannual volume weighted average VOC reporting requirements |
| | 40 CFR 60.465(d), Subpart TT | 6.6 | Semiannual incinerator temperature drops |
| | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 6.7 | Semiannual deviations from capture system monitoring plan |
| | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 6.8 | Performance test notifications |

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 semiannual synthetic minor monitoring report postmarked no later than July 31 and January 31 for the preceding six-month period. This report shall address any required monitoring specified in the permit. 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. 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 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).)

6.4 For Emission Point AA-000, the permittee shall submit a report summarizing the following for each coating, solvent, or other VOC- or HAP-containing material used.

(a) Quantity used (gal or lb),

(b) The percentage of VOC and individual HAP by weight,

(c) The density (lb/gal), unless material usages are measured in lb, and

(d) The monthly and consecutive 12-month total VOC, individual HAP, and total HAP emissions and the overall removal efficiency used to calculate the emissions. (If there are periods the thermal oxidizer was not operated, these must be clearly indicated in the report and accounted for in the emissions calculations.)

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

6.5 For Emission Point AA-000, the permittee shall identify, record, and submit a written report to the DEQ semiannually of each instance in which the volume-weighted average of the local mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under Condition 3.9. If no such instances have occurred, a report stating this shall be submitted to the DEQ semiannually.

(Ref.: 40 CFR 60.465(c), Subpart TT and 40 CFR 60.7(e), Subpart A)

6.6 For Emission Point AA-000, the permittee shall also submit semiannual reports when the incinerator temperature drops below the minimum temperature as defined under Condition 5.7. If no such periods occur, the permittee shall state this in the report.

(Ref.: 40 CFR 60.465(d), Subpart TT)

6.7 For Emission Point AA-000, the permittee shall submit a semiannual report certifying that the capture system was operated in accordance with the approved capture system monitoring plan required by Condition 5.9. If there were any deviations from the operating limits specified in the plan, the permittee shall the date, duration, and corrective action taken to address the deviation. If there no such periods occur, the permittee shall state this in the report.

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

6.8 For Emission Point AA-000, the permittee shall submit the following notifications and/or documents prior to conducting a performance test:

(a) A written test protocol shall be submitted at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the DEQ. After the first successful submittal of a written test protocol in conjunction with a compliance test, the permittee may request that the resubmittal of the testing protocol be waived for subsequent testing by certifying in writing at least thirty (30) days prior to subsequent testing that all conditions for testing remain unchanged such that the original protocol can and will be followed.

(b) A notification of the scheduled test date(s) shall be submitted ten (10) days prior to the scheduled test date(s) so that an observer may be afforded the opportunity to witness the test(s).

(c) The results from each performance test shall be submitted to the DEQ within sixty (60) days following the completion of the test(s).

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