

**STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
TITLE V PERMIT**

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Water Way Inc, Paul Edmondson Road Facility
1601 Paul Edmondson Road
Iuka, Mississippi
Tishomingo County

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

Permit Issued: June 20, 2016

Permit Modified: September 23, 2020

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

Krystal Rudolph

AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: May 31, 2021

Permit No.: 2640-00057

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APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT

SECTION 1. GENERAL CONDITIONS

1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(a).)

1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(b).)

1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(c).)

1.4 Prior to its expiration, this permit may be reopened in accordance with the provisions listed below.

(a) This permit shall be reopened and revised under any of the following circumstances:

- (1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of 3 or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.
- (2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
- (3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.

- (4) The Administrator or the Permit Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- (b) Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.
- (c) Reopenings shall not be initiated before a notice of such intent is provided to the Title V source by the DEQ at least 30 days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.G.)

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(e).)

- 1.6 This permit does not convey any property rights of any sort, or any exclusive privilege.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(d).)

- 1.7 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. 6.3.A(5).)

- 1.8 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.

- (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of

the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).)

- (b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).)

- (c) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D(2).)

- (d) The fee shall be due September 1 of each year. By July 1 of each year, the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.)

- (e) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.C.)

1.9 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(8).)

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)

1.11 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- (a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(2).)

1.12 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere.

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

1.13 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970.

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

1.14 Compliance with the conditions of this permit shall be deemed compliance with any

applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(1).)

1.15 Nothing in this permit shall alter or affect the following:

- (a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
- (b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- (c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
- (d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(2).)

1.16 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.H.)

1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C(2)., R. 6.4.B., and R. 6.2.A(1)(c).)

1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:

- (a) the changes are not modifications under any provision of Title I of the Act;
- (b) the changes do not exceed the emissions allowable under this permit;

- (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:
 - (1) a brief description of the change(s),
 - (2) the date on which the change will occur,
 - (3) any change in emissions, and
 - (4) any permit term or condition that is no longer applicable as a result of the change;
- (d) the permit shield shall not apply to any Section 502(b)(10) change.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F(1).)

- 1.19 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 11 Miss. Admin. Code Pt. 2, Ch. 3., "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)

- 1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 11 Miss. Admin. Code Pt. 2, Ch. 2., "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations 11 Miss. Admin. Code Pt. 2, Ch. 6., "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

- (a) routine maintenance, repair, and replacement;
- (b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;

- (c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
- (d) use of an alternative fuel or raw material by a stationary source which:
 - (1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51, 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 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).)

1.21 Any change in ownership or operational control must be approved by the Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.D(4).)

1.22 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.B(1).)

1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.

- (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.
- (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.
- (c) Burning must not occur within 500 yards of commercial airport property, private airfields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator.

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

1.24 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies:

- (a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
- (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.
- (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
 - (1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - (2) the permitted facility was at the time being properly operated;
 - (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - (4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency.

This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.G.)

1.25 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 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 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.)

- 1.26 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation 11 Miss Admin. Code Pt. 2, R. 1.8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

(Ref.: 11 Miss Admin. Code Pt. 2, R. 1.8.)

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-001	Gel Coat and Resin application to flat panels using an automated reciprocator system #1
AA-002	Gel Coat (Tooling) for Mold Production and Repairs
AA-003	Resin (Tooling) for Mold Production and Repairs
AA-004	Resin Closed Mold Process for Fiberglass Parts production Rooftop and Sidewall Infusion
AA-005	6,400 gallons Polyester Resin Fixed Roof Storage Tank
AA-006	5,500 gallons Polyester Resin Fixed Roof Storage Tank
AA-007	CNC Routing, Cutting, and Sanding on Roof tops and Side walls for Motorhomes protected by dust collectors.
AA-009	175.6 HP Natural Gas Fired Emergency Generator, Manufactured in 2001 (Ref. No.: EMG-1)
AA-010	Gel Coat and Resin application to flat panels using an automated reciprocator system #2
AA-011	Gel Coat Booth for the production of Slide out Boxes
AA-012	CNC Routing, Cutting, and Sanding on Roof tops and Side walls for Motorhomes protected by dust collectors.

SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. Facility-Wide Emission Limitations & Standards

3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).

(a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.

(b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour.

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

3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Condition 3.A.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.A.3 Except as otherwise specified or limited herein, the permittee shall not cause or allow the emission of particulate matter in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship

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

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).)

B. Emission Point Specific Emission Limitations & Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-001 AA-002 AA-003 AA-004 AA-005 AA-006 AA-010 AA-011	40 CFR 63, Subpart WWWW (National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production) 40 CFR 63.5785(a), 63.5790(a) and (b)	3.B.1		General Applicability
AA-001 AA-002 AA-003 AA-004 AA-005 AA-006 AA-010 AA-011	40 CFR 63.5835(a) and (c), Subpart WWWW	3.B.2		General Provisions
AA-001 AA-002 AA-003 AA-010 AA-011	40 CFR 63.5805(c), Items 6, 3, and 2 of Table 3 to Subpart WWWW, Subpart WWWW	3.B.3	HAP	<p><u>Open molding gel coat:</u></p> <p>(1) <u>White/off white pigmented</u> Emission limit : 267 lb HAP/ton_{gelcoat}</p> <p>(2) <u>Other pigmented</u> Emission limit : 377 lb HAP/ton_{gelcoat}</p> <p>(3) <u>Tooling</u> Emission limit : 440 lb HAP/ton_{gelcoat}</p> <p><u>Open molding manual resin application:</u></p> <p>(1) <u>Tooling</u> Emission limit: 157 lb HAP/ton_{resin}</p> <p><u>Open molding mechanical resin application:</u></p> <p>(1) <u>Non-CR/HS</u> Emission limit: 88 lb HAP/ton_{resin}</p> <p>(2) <u>Tooling</u> Emission limit: 254 lb HAP/ton_{resin}</p>

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-009	40 CFR 63, Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines) 40 CFR 63.6580, 63.6585(b), Subpart ZZZZ	3.B.4	HAP	General Applicability
	40 CFR 63.6605, Subpart ZZZZ	3.B.5		General Provisions
	40 CFR 63.6625(e), (f), (h), (i), 60.6640(a), Item 9 of Table 6, Subpart ZZZZ	3.B.6		Operational Requirement
	40 CFR 63.6640(f)(1), (2)(i), (3), Subpart ZZZZ	3.B.7		Operational Requirement

3.B.1 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-010, and AA-011, the permittee is subject to and shall comply with all applicable standards of the National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW) and General Provisions (40 CFR 63, Subpart A).

(Ref.: 40 CFR 63. 5785(a), 63.5790(a) and (b), Subpart WWWW)

3.B.2 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-010, and AA-011, the permittee shall be in compliance at all times with Condition 3.B.3 and Condition 3.D.1. The permittee shall always operate and maintain the emission sources, including air pollution control and monitoring equipment, according to the provisions in 40 CFR 63.6(e)(1)(i), Subpart A.

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

3.B.3 For Emission Points AA-001, AA-002, AA-003, AA-010, and AA-011, the permittee shall comply with the following limitations at all times, based on a 12-month rolling average:

(a) Emission Points AA-001, AA-010, and AA-011, when using gel coating applications, the permittee shall limit HAP emissions according to the following types of operation:

- (1) For white/off white pigmented gel coatings, the organic HAP emissions limit is 267 pounds of organic HAP emitted per ton of gel coat applied,
- (2) For all other pigmented gel coatings, the organic HAP emissions limit is 377 pounds of organic HAP emitted per ton of gel coat applied,

- (b) Emission Point AA-002, when using gel coating applications, the permittee shall limit HAP emissions according to the following types of operation:
 - (1) For tooling operations, the organic HAP emissions limit is 440 pounds of organic HAP emitted per ton of gel coat applied,
- (c) Emission Point AA-003, when using resin applications, the permittee shall limit HAP emissions according to the following types of operation:
 - (1) For tooling operations using manual resin applications, the organic HAP emissions limit is 157 pounds of organic HAP emitted per ton of resin applied,
 - (2) For tooling operations using mechanical resin applications, the organic HAP emissions limit is 254 pounds of organic HAP emitted per ton of resin applied, and
 - (3) For non-corrosion-resistant and/or high strength (non-CR/HS) operations using mechanical resin applications, the emission limit is 113 pounds of organic HAP emitted per ton of resin applied.

(Ref.: 40 CFR 63.5805(c), Items 6, 3, and 2 of Table 3 to Subpart WWWW, Subpart WWWW)

- 3.B.4 For Emission Point AA-009, the permittee is subject to and shall comply with all applicable standards of the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) and General Provisions (40 CFR 63, Subpart A).

(Ref.: 40 CFR 63.6580, 63.6585(b), Subpart ZZZZ)

- 3.B.5 For Emission Point AA-009, the permittee shall be in compliance with the emission limitations, operating limitations, and other requirements of Subpart ZZZZ that apply at all times.

At all times the permittee shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to MDEQ which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(Ref.: 40 CFR 63.6605, Subpart ZZZZ)

3.B.6 For Emission Point AA-009, the permittee shall operate and maintain the stationary RICE according to the following:

- (a) The permittee shall operate and maintain the engine according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
- (b) The permittee shall install a non-resettable hour meter if one is not already installed.
- (c) 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.
- (d) The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Condition 3.D.2. The oil analysis must be performed at the same frequency specified for changing the oil in Condition 3.D.2. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the permittee shall change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee shall change the oil within 2 business days or before commencing operation, whichever is later. The permittee shall keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

(Ref.: 40 CFR 63.6625(e), (f), (h), (i), 60.6640(a), Item 9 of Table 6, Subpart ZZZZ)

3.B.7 For Emission Point AA-009, the permittee shall operate the emergency stationary RICE according to the following requirements. In order for the engine to be considered an emergency stationary RICE under 40 CFR 63, Subpart ZZZZ, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (a) through (c) of this condition, is prohibited. If the RICE is not operated according to the requirements in paragraphs (a) through (c) of this condition, the engine will not be considered an emergency engine under 40 CFR 63, Subpart ZZZZ and must meet all requirements for non-emergency engines.

- (a) There is no time limit on the use of emergency stationary RICE in emergency situations.
- (b) The permittee shall operate the emergency stationary RICE for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to a maximum of 100 hours per calendar year. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.
- (c) The permittee shall operate the emergency stationary RICE 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. 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 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)(i), (3), Subpart ZZZZ)

C. Insignificant and Trivial Activity Emission Limitations & Standards

Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.C.1	PM	0.6 lbs/MMBTU
11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.C.2	SO ₂	4.8 lbs/MMBTU

3.C.1 The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input.

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

3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.

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

D. Work Practice Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-001 AA-002 AA-003 AA-004 AA-005 AA-006 AA-010 AA-011	40 CFR 63.5805(c), Items 1, 2, 3, 6, 7, and 8 of Table 4 to Subpart WWWW, 40 CFR 63.5900(a)(4) and (c), Subpart WWWW	3.D.1	HAP	Work Practice Standards
AA-009	40 CFR 63.6602, 63.6625(h), Item 6 of Table 2c to Subpart ZZZZ, 63.6625(j), Subpart ZZZZ	3.D.2	HAP	Work Practice Standards

3.D.1 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-010, and AA-011, the permittee shall comply with the following work practice standards:

- (a) For Emission Point AA-004, the permittee shall uncover, unwrap or expose only one charge per mold cycle per closed molding machine.
- (b) For Emission Points AA-001, AA-002, AA-003, AA-010, and AA-011, 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.
- (c) For Emission Points AA-005 and AA-006, 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.
- (d) The permittee shall use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation ¹.
- (e) The permittee shall close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement ¹.

- (f) The permittee shall keep the mixer covers closed which actual mixing is occurring except when adding materials or changing covers to the mixing vessels ⁱ.

ⁱContainers of five (5) gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin).

The permittee shall demonstrate continuous compliance, at all times, by performing the work practice required for each operation.

(Ref.: 40 CFR 63.5805(c), Items 1, 2, 3, 6, 7, and 8 of Table 4 to Subpart WWWW, 40 CFR 63.5900(a)(4) and (c), Subpart WWWW)

3.D.2 For Emission Point AA-009, the permittee shall comply with the following requirements:

- (a) Change oil and filter every 500 hours of operation or annually, whichever comes firstⁱ;
- (b) Inspect spark plugs 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 an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements according to the schedule listed in paragraphs (a) through (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.

ⁱThe permittee may utilize an oil analysis program in order to extend the specified oil change requirement. The oil analysis shall be performed every 500 hours of operation or annually, whichever comes first. The analysis program must at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the permittee must change the oil within 2 business days of receiving the results of the analysis; if the Emission Point AA-009 is not in operation when the results of the analysis are received, the permittee shall

change the oil within 2 business days or before commencing operation, whichever is later. The permittee shall keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for Emission Point AA-009. The analysis program must be part of the maintenance plan for the engine.

(Ref.: 40 CFR 63.6602, Item 6 of Table 2c to Subpart ZZZZ, 63.6625(j), Subpart ZZZZ)

SECTION 4. COMPLIANCE SCHEDULE

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(5)(a), (c), & (d).)

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. General Monitoring, Recordkeeping and Reporting Requirements

5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:

- (a) the date, place as defined in the permit, and time of sampling or measurements;
- (b) the date(s) analyses were performed;
- (c) the company or entity that performed the analyses;
- (d) the analytical techniques or methods used;
- (e) the results of such analyses; and
- (f) the operating conditions existing at the time of sampling or measurement.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(1).)

5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(2).)

5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31st and January 31st for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 6.2.E.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(2).)

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

- 5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

B. Specific Monitoring and Recordkeeping Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
AA-001 AA-002 AA-003 AA-004 AA-005 AA-006 AA-010 AA-011	40 CFR 63.5915(a), (c), and (d), Subpart WWWW	5.B.1	HAP	Maintain Records of Notifications, Reports, Emissions Data, and Compliance Statements
	40 CFR 63.5920(a) through (d), Subpart WWWW	5.B.2		Recordkeeping Requirement
AA-001 AA-002 AA-003 AA-010 AA-011	40 CFR 63.5810(d) and Table 7, Subpart WWWW	5.B.3	HAP	Method for Determining Compliance
	40 CFR 63.5895(c) and (d), Subpart WWWW	5.B.4		Maintain Records of Resins
	40 CFR 63.5900(a)(2) and (c), Subpart WWWW	5.B.5		Continuous Compliance
AA-001	Construction Permit issued on <u>February 25, 2008</u> and Title V Operating Permit issued on <u>August 11, 2011</u>	5.B.6	PM	Record Filter Usage
		5.B.7		Filter Monitoring
AA-009	40 CFR 63.6625(f), Subpart ZZZZ	5.B.8	HAP	Install Non-Resettable Hour Meter
	40 CFR 63.6655(a)(1), (2), (4), (d), (e), (f)(2), 63.6660, Subpart ZZZZ	5.B.9		Recordkeeping Requirement
	40 CFR 63.6660, Subpart ZZZZ	5.B.10		Recordkeeping Requirement

5.B.1 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-010, and AA-011, the permittee shall keep the following applicable records:

- (a) A copy of each notification and report submitted to comply with 40 CFR 63, Subpart WWWW, including records in 40 CFR 63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction and all documentation supporting any Initial Notification or Notification of Compliance Status submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv);
- (b) The permittee shall keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents; and
- (c) The permittee shall keep a certified statement that the permittee is in compliance with the work practice requirements in 3.D.1.

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

5.B.2 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-010, and AA-011, the permittee shall maintain all applicable records in the following manner:

- (a) The permittee shall maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to 40 CFR 63.10(b)(1);
- (b) The permittee shall keep each record for 5 (five) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record;
- (c) These records shall be kept onsite for at least 2 (two) years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee may keep the records offsite for the remaining 3 (three) years; and
- (d) The permittee may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

(Ref.: 40 CFR 63.5920(a) through (d), Subpart WWWW)

5.B.3 For Emission Points AA-001, AA-002, AA-003, AA-010, and AA-011, the permittee shall demonstrate compliance with the standards in Condition 3.B.2 using one of the following compliance options:

- (a) Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Condition 3.B.2 as specified in 40 CFR 63.5810(a);

- (b) Demonstrate that, on average, compliance with the individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type as specified in 40 CFR 63.5810(b);
- (c) Demonstrate compliance with a weighted average emission limit as specified in 40 CFR 63.5810(c); and
- (d) Meet the organic HAP emission limit for one application method and use the same resin(s) for all application methods of that resin type as specified in 40 CFR 63.5810(d).

The permittee may switch between compliance options listed in (a) through (d) above. If the permittee changes to an option based on a 12-month rolling average, the permittee must base the average on the previous 12 months of data calculated using the compliance option the permittee is changing to, unless the permittee was previously using an option that did not require you to maintain records of resin and gel coat use. In this case, the permittee must immediately begin collecting resin and gel coat data and demonstrate compliance 12 months after changing options.

(Ref.: 40 CFR 63.5810 and Table 7, Subpart WWWW)

5.B.4 For Emission Points AA-001, AA-002, AA-003, AA-010, and AA-011, the permittee shall monitor and collect data to demonstrate continuous compliance by the following as applicable:

- (a) The permittee shall collect and keep records of resin and gel coat used, organic HAP content, and operation where the resin is used when the permittee is meeting either the organic HAP emissions or content limits. Resin use records may be based on purchase records if the permittee can reasonably estimate how the resin is applied. The organic HAP records may be based on MSDS or on resin specifications supplied by the resin supplier.
- (b) Resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet Condition 3.B.2. However, the permittee shall retain the records of resin and gel coat organic HAP content, and shall include the list of these resins and gel coats and identify their application methods in their semiannual compliance reports. If after the permittee have initially demonstrated that a specific combination of an individual resin or gel coat, application method, and controls meets its applicable emission limit, and the resin or gel coat changes or the organic HAP content increases, or permittee change the application method or controls, then the permittee shall again demonstrate that the individual resin or gel coat comply with Condition 3.B.2. If any of the previously mentioned changes results in a situation where an individual resin or gel coat exceeds its applicable emission limit as stated in Condition 3.B.2, the permittee shall begin collecting resin or gel coat use

record and calculate compliance using one of the averaging options on a 12-month rolling average.

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

- 5.B.5 For Emission Points AA-001, AA-002, AA-003, AA-010, and AA-011 shall demonstrate continuous compliance with Condition 3.B.3, at all times, by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed Condition 3.B.2, 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 organic HAP emissions limits in Condition 5.B.4.

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

- 5.B.6 For Emission Point AA-001, the permittee shall maintain sufficient records to document the emission unit was operated while the filters were operational. These records shall be maintained in log form and made available upon request by DEQ personnel.

(Ref.: Construction Permit issued on February 25, 2008 and Title V Operating Permit issued on August 11, 2011)

- 5.B.7 For Emission Point AA-001, the permittee shall perform regular inspections and maintenance as needed each week or more often if necessary to maintain proper operation of all filters for achieving the desired PM control efficiency. Records of this maintenance shall be kept in log form and made available upon request by DEQ personnel. 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.: Construction Permit issued on February 25, 2008 and Title V Operating Permit issued on August 11, 2011)

- 5.B.8 For Emission Point AA-009, the permittee shall install a non-resettable hour meter on the engine if one is not already installed.

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

- 5.B.9 For Emission Point AA-009, the permittee shall keep the following records:

- (a) A copy of each report submitted to comply with Subpart ZZZZ.
- (b) Records of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment) or the air pollution control and monitoring equipment.

- (c) Records of all required maintenance performed on the air pollution control and monitoring equipment.
- (d) Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

The permittee shall keep the records required in Table 6 of Subpart ZZZZ to show continuous compliance with each emission or operating limitation that applies to you.

The permittee shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate that it operated and maintained the stationary RICE according to its maintenance plan.

The permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for the purposes specified in 40 CFR 63.6640(f)(2)(ii) or (iii) or 40 CFR 63.6640(f)(4)(ii), the permittee must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes.

(Ref.: 40 CFR 63.6655(a)(1), (2), (4), (5), (d), (e)(2), and (f)(1), Subpart ZZZZ)

5.B.10 For Emission Point AA-009, the permittee shall maintain records as follows:

- (a) Records shall be in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1).
- (b) The permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
- (c) The permittee shall keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1).

(Ref.: 40 CFR 63.6660, Subpart ZZZZ)

C. Specific Reporting Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Reporting Requirement
AA-001	40 CFR 63.5805(e), Subpart WWWW	5.C.1	HAP	Submit Notification concerning HAP threshold exceedance.
AA-002	40 CFR 63.5900(d), Subpart WWWW	5.C.2		Deviation Report
AA-003		40 CFR 63.5905 and Table 13 of Subpart WWWW, Subpart WWWW		5.C.3
AA-004	40 CFR 63.5910(a) through (d), (f), and (i), Subpart WWWW			5.C.4
AA-005	40 CFR 63.5910(a) through (d), (f), and (i), Subpart WWWW	5.C.4	HAP	Semiannual Compliance Report
AA-006				
AA-010	40 CFR 63.5910(a) through (d), (f), and (i), Subpart WWWW	5.C.4	HAP	Semiannual Compliance Report
AA-011				
AA-009	40 CFR 63.6640(b) and Table 2c, Footnote 1, Subpart ZZZZ	5.C.5	HAP	Deviation Report

5.C.1 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-010, and AA-011, in accordance with Condition 5.A.4, the permittee shall notify MDEQ if the facility meets or exceeds the 100 tpy of HAP threshold in any calendar year. The permittee may at the same time request a one-time exemption from the requirements of paragraph 3.B.2 in the compliance report if the permittee can demonstrate all of the following:

- (a) The exceedance of the threshold was due to circumstances that will not be repeated.
- (b) The average annual organic HAP emissions from the potentially affected operations for the last 3 years were below 100 tpy.
- (c) Projected organic HAP emissions for the next calendar year are below 100 tpy, based on projected resin and gel coat use and the HAP emission factors calculated according to the procedures in 40 CFR 63.5799.

If the permittee applies for an exemption and subsequently exceeds the 100 tpy HAP emission thresholds over the next 12-month period, the permittee shall notify the MDEQ in the semiannual report, the exemption is removed, and the permittee shall comply with 40 CFR 63.5805(d) within 3 years from the time the organic HAP emissions first exceeded the threshold.

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

5.C.2 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-010, and AA-011, the permittee shall report each deviation from each standard in Condition 3.B.2 and Condition 3.D.1. The deviations must be reported according to the

requirements in 5.C.4.

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

- 5.C.3 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-010, and AA-011, the permittee shall submit all applicable notifications from Table 13 of 40 CFR 63, Subpart WWWW. If the permittee changes any information submitted in any notification, the Permittee shall submit the changes in writing to the MDEQ within 15 calendar days after the change.

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

- 5.C.4 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-010, and AA-011, the permittee shall submit a semiannual compliance report in accordance with 5.A.4. The compliance report shall contain the following:

- (a) Company name and address.
- (b) Statement by a responsible official with that officials 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 a startup, shut down, or malfunction occurs during the reporting period and actions are consistent with the startup, shut down, and malfunction plan, the compliance report must include the information in 40 CFR 63.10(d)(5)(i).
- (e) If there are no deviations from any organic HAP emissions limitations or the work practice standards, include a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period.
- (f) For each deviation from an organic HAP emissions limitation and work practice standard that occurs, the compliance report shall contain 5.B.2 (a) through (d) and the following information:
 - (1) The total operating time of each affected source during the reporting period, and
 - (2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.
- (g) The permittee shall report any exceedance of the 100-tpy organic HAP emissions threshold if that exceedance would make the permittee subject to 40 CFR 63.5805(d). Include with the compliance report any request for an exemption as specified in 5.C.1.

If the permittee receive the exemption and subsequently exceed the 100-tpy organic HAP emissions threshold, this exceedance shall be reported as required in 40 CFR 63.5805(f).

- (h) Where multiple compliance options are available, the permittee shall state in next compliance report if compliance options have changed since the last compliance report.

(Ref.: 40 CFR 63.5910(a) through (d), (f), and (i), Subpart WWWW)

- 5.C.5 For AA-009, the permittee shall report each instance in which the management practices were not met. These instances are deviations and must be reported within five (5) business days in accordance with Condition 5.A.5.

If the engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements on the schedule required, 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. Sources must report any failure to perform the work practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.

(Ref.: 40 CFR 63.6640(b) and Table 2c, Footnote 1, Subpart ZZZZ)

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

SECTION 7. TITLE VI REQUIREMENTS

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

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

as persons selling, offering for sale, and/or purchasing class I, class II, or non-exempt substitute refrigerants.

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

APPENDIX A

List of Abbreviations Used In this Permit

11 Miss. Admin. Code Pt. 2, Ch. 1.	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
11 Miss. Admin. Code Pt. 2, Ch. 2.	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
11 Miss. Admin. Code Pt. 2, Ch. 3.	Regulations for the Prevention of Air Pollution Emergency Episodes
11 Miss. Admin. Code Pt. 2, Ch. 4.	Ambient Air Quality Standards
11 Miss. Admin. Code Pt. 2, Ch. 5.	Regulations for the Prevention of Significant Deterioration of Air Quality
11 Miss. Admin. Code Pt. 2, Ch. 6.	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
11 Miss. Admin. Code Pt. 2, Ch. 7.	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lbs/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards for Hazardous Air Pollutants, 40 CFR 61 or National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR 63
NMVOC	Non-Methane Volatile Organic Compounds
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM ₁₀	Particulate Matter less than 10 µm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound