

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

**TO OPERATE AIR EMISSIONS EQUIPMENT**

**THIS CERTIFIES THAT**

Rite Hite Products  
601 Expressway Drive  
Horn Lake, Desoto County, Mississippi

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: December 14, 2020**

**Effective Date: As specified herein.**

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

*Krystal Rudolph*

**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Expires: November 30, 2025**

**Permit No.: 0680-00109**

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### **APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT**

### **APPENDIX B LIST OF REGULATIONS REFERENCED 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 three (3) or more years. Such a reopening shall be completed no later than eighteen (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 the 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 MDEQ at least thirty (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 MDEQ within a reasonable time any information the MDEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the MDEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to MDEQ 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 MDEQ 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 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<sup>st</sup> of each year. By July 1<sup>st</sup> 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 MDEQ by the first payment date of September 1<sup>st</sup>. 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 MDEQ, 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 the 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 MDEQ 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 Mississippi Administrative Code, Title 11, Part, 2, Chapter 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 Mississippi Administrative Code, Title 11, Part, 2, Chapter 2 – “Permit Regulations for the Construction and/or Operation of Air Emissions Equipment”, and may require modification of this permit in accordance with Mississippi Administrative Code, Title 11, Part 2, Chapter 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 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).)

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 five hundred (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 fifty (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 Part (c) of this condition 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 MDEQ within two (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 five (5) working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
    - (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the

Department.

- (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
  - (3) This provision is in addition to any upset provision contained in any applicable requirement.
  - (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- (b) Start-ups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) Start-ups 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 Mississippi Administrative Code, Title 11, 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 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**

<b>Emission Point</b>	<b>Description</b>
AA-001	Facility-Wide Surface Coating Operations [includes five (5) identical paint booths each equipped with dry filters]

### **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 that exceeds forty percent (40%) opacity subject to the exceptions provided in Parts (a) and (b) below:

- (a) Start-up operations may produce emissions, which exceed 40% opacity for up to fifteen (15) minutes per start-up in any one (1) hour and not to exceed three (3) start-ups per stack in any twenty-four (24) hour period.
- (b) Emissions resulting from soot blowing operations (i.e. ash removal) shall be permitted provided such emissions do not exceed sixty percent (60%) 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 (1) 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.)

**B. EMISSION POINT SPECIFIC EMISSION LIMITATIONS & STANDARDS**

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-001	40 CFR Part 63, Subpart M MMM – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Parts and Products,  40 CFR 63.3881(b) and 63.3882, Subpart M MMM	3.B.1	HAPs	Applicability
	40 CFR 63.3890(a)(1) and 63.3900(a)(1), Subpart M MMM	3.B.2	Organic HAPs	1.9 Pounds / Gallon Coating Solids (12-Month Rolling Period)
	40 CFR 63.3900(b), Subpart M MMM	3.B.3	Organic HAPs	Minimizing Emissions Requirement
	11 Miss. Admin. Code Pt. 2, R.2.2.B(10).	3.B.4	PM/PM <sub>10</sub> (filterable only)	Control Device Requirement

3.B.1 For Emission Point AA-001, the permittee is subject to and shall comply with all applicable standards found in 40 CFR Part 63, Subpart M MMM – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.

(Ref.: 40 CFR 63.3881(b) and 63.3882, Subpart M MMM)

3.B.2 For Emission Point AA-001, the permittee shall limit the emission of organic hazardous air pollutants (HAPs) to no more than 1.9 pounds per gallon of coating solids used during each 12-month rolling period at all times.

(Ref.: 40 CFR 63.3890(a)(1) and 63.3900(a)(1), Subpart M MMM)

3.B.3 For Emission Point AA-001, before January 5, 2021, the permittee shall operate and maintain the affected equipment in accordance with the provisions in 40 CFR 63.6(e)(1)(i), Subpart A.

On and after January 5, 2021, the permittee shall operate and maintain the affected equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by Condition 3.B.2 have been achieved. Determination of whether equipment is operating

in compliance with operation and maintenance requirements will be based on information available to the Administrator that 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 affected equipment.

(Ref.: 40 CFR 63.3900(b), Subpart M MMM)

- 3.B.4 For Emission Point AA-001, the permittee shall equip and maintain dry filters in each spray booth to effectively capture and control overspray solids from active spray finishing operations and minimize particulate matter (PM/PM<sub>10</sub> – filterable only) emissions.

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



C. INSIGNIFICANT AND TRIVIAL ACTIVITY EMISSION LIMITATIONS & STANDARDS

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

3.C.1 The maximum permissible emission of ash and/or particulate matter (PM) from fossil fuel-burning installations of less than ten (10) million BTU (MMBTU) per hour heat input shall not exceed 0.6 pounds per MMBTU 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 or SO<sub>2</sub>) per million BTU (MMBTU) heat input.

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

## **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 the EPA Region IV a certification of compliance with the permit terms and conditions, including emission limitations, standards, or work practices, by January 31<sup>st</sup> 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 31<sup>st</sup> and January 31<sup>st</sup> 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 6, Rule 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 MDEQ 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**

<b>Emission Point(s)</b>	<b>Applicable Requirement</b>	<b>Condition Number</b>	<b>Pollutant / Parameter Monitored</b>	<b>Monitoring / Recordkeeping Requirement</b>
AA-001	40 CFR 63.3941(a) – (d), 63.3942(a), 63.3951(a) – (g), and 63.3952(b); Subpart M MMM	5.B.1	Organic HAPs	Demonstrate Continuous Compliance with Emission Limitation
	40 CFR 63.3930(b), (c)(1), (d), (e), and (f); Subpart M MMM	5.B.2		Record and Maintain Applicable Material Data
	40 CFR 63.3930(c)(2); Subpart M MMM	5.B.3		Record and Maintain Calculations for the “ <i>Compliant Material</i> ” Option
	40 CFR 63.3930(c)(3), (g), and (h); Subpart M MMM	5.B.4		Record and Maintain Calculations / Data for the “ <i>Emission Rate without Add-On Controls</i> ” Option
	40 CFR 63.3930(j); Subpart M MMM	5.B.5		Record and Maintain Data for Deviations
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.6	PM (filterable only)	Perform Inspections and Maintenance Actions

5.B.1 For Emission Point AA-001, the permittee shall demonstrate continuous compliance with the organic HAP limitation specified in Condition 3.B.2 by using at least one (1) of the compliance options outlined in Part (b) or (c) [in conjunction with Part (a)] of this condition for all coatings, thinners and/or other additives, and cleaning materials used in a coating operation on a 12-month rolling period. The permittee may apply either of the compliance options to an individual coating operation, multiple coating operations as a group, or to the entire surface coating operation as a whole.

The permittee may use different compliance options for different coating operations or at different times on the same coating operation. Additionally, the permittee may employ different compliance options when different coatings are applied to the same part or when the same coating is applied to different parts. However, the permittee may not use different compliance options at the same time on the same coating operation.

(a) FOR ALL COMPLIANCE OPTIONS:

The permittee shall determine the following information for each coating, thinner and/or other additive, and cleaning material in accordance with the outlined procedures:

- (1) *Determine the mass fraction of organic HAP:* The permittee shall determine and maintain the organic HAP mass fraction for each material used during a 12-month rolling period by using one of the following methods:
  - (i) *EPA Test Method 311 (Appendix A in 40 CFR Part 63)* in accordance with the following specifications:
    - (A) The permittee shall count each organic HAP in Table 5 of Subpart MMMM that is measured to be present at 0.1% by mass or more and at 1.0% by mass or more for other compounds. Additionally, the permittee shall express the mass fraction of each organic HAP present as a value truncated to four decimal points.
    - (B) The permittee shall calculate the total mass fraction of organic HAPs in a material by adding up the individual organic HAP mass fractions and truncating the result to three (3) places after the decimal point.
  - (ii) *EPA Test Method 24 (Appendix A in 40 CFR Part 60)* – the permittee may use this method for coatings to determine the mass fraction of non-aqueous volatile matter and using that value as a substitute for the mass fraction of organic HAPs.

For reactive adhesives in which some of the HAPs react to form solids and are not emitted to the atmosphere, the permittee may use the alternative method contained in Appendix A of 40 CFR Part 63 – Subpart PPPP rather than Method 24. The permittee may use the volatile fraction that is emitted, as measured by the alternative method in the aforementioned Appendix A, as a substitute for the mass fraction of organic HAPs.

- (iii) *Alternative method* – the permittee may use an alternative test method for determining the mass fraction of organic HAPs once the MDEQ has approved it [which shall be submitted in accordance with 40 CFR 63.7(f); Subpart A].
- (iv) *Information from the supplier or manufacturer of the material* – the permittee may rely on information other than that generated by the test methods specified in Parts (i) through (iii) of this section (such as manufacturer's formulation data) if it represents each organic HAP in Table 5 of Subpart MMMM that is measured to be present at 0.1% by mass or more and at 1.0% by mass or more for other compounds.

If there is a disagreement between such information and results of a test conducted according to Parts (a)(1) through (3) of this condition, the test method results will take precedence unless (after consultation) the

permittee demonstrates to the satisfaction of the MDEQ that the data are correct.

- (v) *Solvent blends* – solvent blends may be listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAPs, which must be counted toward the total organic HAP mass fraction of the materials. When neither test data nor the manufacturer's data for solvent blends are available, the permittee may use the default values for the mass fraction of organic HAPs in the solvent blends listed in Table 3 or 4 of Subpart MMMM.

If the permittee uses the table(s), the permittee shall use the values in Table 3 for all solvent blends that match Table 3 entries. The permittee may only use Table 4 if the solvent blends in the materials the permittee uses do not match any of the solvent blends in Table 3 and it is only known whether the blend is aliphatic or aromatic. However, if the results of EPA Test Method 311 test indicate higher values than those listed on Table 3 or 4, the test method results will take precedence unless (after consultation) the permittee demonstrates to the satisfaction of the MDEQ that the data from Table 3 or 4 are correct.

- (2) *Determine the volume fraction of coating solids:* The permittee shall determine and maintain the volume fraction of coating solids (i.e. gallon of coating solids per gallon of coating) for each coating used during a 12-month rolling period by using one of the methods noted below:
  - (i) *ASTM Method D2697-03 (Reapproved 2014) or ASTM Method D6093-97 (Reapproved 2016)* – the permittee may use either of the noted ASTM methods to determine the volume fraction of coating solids for each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids.
  - (ii) *Alternative method* – the permittee may use an alternative test method for determining the volume fraction of a coating once the MDEQ has approved it [which shall be submitted in accordance with 40 CFR 63.7(f); Subpart A].
  - (iii) *Information from the supplier or manufacturer of the material* – The permittee may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer.
  - (iv) *Calculation of volume fraction of coating solids* – The permittee may determine the volume fraction of coating solids ( $V_s$ ) (in gallon of coating solids per gallon of coating) using Equation 1:

$$V_s = 1 - \frac{m_{vol}}{D_{avg}} \quad \text{(Eqn. 1)}$$

Where:

$m_{vol}$  = total volatile matter content of a coating (including any HAP, VOC) water, and exempt compounds determined in accordance with EPA Test Method 24), pounds of volatile matter per gallon of coating; and

$D_{avg}$  = average density of volatile matter in a coating, pounds of volatile of matter per gallon of volatile matter.

- (3) *Determine the density of each material used:* The permittee shall determine and maintain the density of each liquid coating, thinner and/or other additive, and cleaning material (as applicable) used during a 12-month rolling period from test results using ASTM Method D1475-13 or Method D2111-10 (Reapproved 2015), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials.

If there is disagreement between Method D1475-13 or Method D2111-10 test results and other such information sources, the test results will take precedence unless (after consultation) the permittee demonstrates to the satisfaction of the MDEQ that the formulation data are correct.

If the permittee purchases a material or monitor consumption by weight instead of volume, the permittee does not need to determine material density. Instead, the permittee may use the material weight in place of the combined terms for density and volume in Equation 5.

(b) FOR COMPLIANT MATERIAL OPTION:

To demonstrate compliance with this option, the permittee shall determine and maintain the organic HAP content of each coating in a coating operation or group of coating operations in accordance with the following procedures and those outlined in Part (a) of this condition (as applicable). Additionally, the permittee shall not use a thinner and/or other additive or cleaning material that contains organic HAPs in the corresponding coating operation or group of coating operations as determined by Part (a)(1):

- (1) *Determine the organic HAP content:* The permittee shall calculate and maintain the organic HAP content ( $H_C$ ) (in pounds organic HAP per gallon of coating solids) for each coating used during a month by using Equation 2:

$$H_C = \frac{(D_C)(W_C)}{V_C} \quad \text{(Eqn. 2)}$$



Where:

$D_C$  = density of a coating (in pounds per gallon) as determined by Part (a)(3) of this condition;

$W_C$  = mass fraction of organic HAPs in a coating (in pounds of organic HAP per pound of coating) as determined by Part (a)(1) of this condition; and

$V_C$  = volume fraction of coating solids (in gallons of coating solids per gallon of coating) as determined by Part (a)(2).

If the permittee chooses to comply with the emission limitation outlined in Condition 3.B.2 using the compliant material option, the use of any coating, thinner and/or other additive, or cleaning material that does not meet the specified criteria shall be considered a deviation from the stated emission limitation and subject the reporting requirements outlined in Condition 5.C.1(d).

(c) FOR EMISSION RATE WITHOUT ADD-ON CONTROLS OPTION:

To demonstrate compliance with this option, the permittee shall determine and maintain the organic HAP emission rate for coatings, thinners and/or other additives, and cleaning materials used in a coating operation or group of coating operations in accordance with the following procedures and those outlined in Part (a) of this condition (as applicable).

The permittee does not need to re-determine the mass of organic HAPs in coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site (or reclaimed off-site if the permittee has documentation showing that you received back the exact same materials that were sent off-site) and reused in the coating operation for which the emission rate without add-on controls option is used. If the permittee uses coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site, the amount of each used in a month may be reduced by the amount of each that is reclaimed (i.e. the amount used may be calculated as the amount consumed to account for materials that are reclaimed):

- (1) *Determine the volume of each material used:* The permittee monitor and maintain the volume (in gallons) of each coating, thinner and/or other additive, and cleaning material used during each month by measurement or usage records. If the permittee purchases materials or monitor consumption by weight instead of volume, the permittee does not need to determine the volume of each material used. Instead, the permittee may use the material weight in place of the combined terms for density and volume in Equation 5 for the applicable coating / thinner and/or other additive / cleaning material.

- (2) *Calculate the total volume of coating solids used:* The permittee shall calculate and maintain the combined volume (in gallons) of coatings solids for all coatings used ( $V_{st}$ ) during a month by using Equation 3:

$$V_{st} = \sum_{i=1}^m (Vol_{c,i})(V_{s,i}) \quad \text{(Eqn. 3)}$$

Where:

$Vol_{c,i}$  = total volume (in gallons) of each coating,  $i$ , used during a month;

$V_{s,i}$  = volume fraction of coating solids in each coating,  $i$ , used during a month as determined by Part (a)(2) of this condition; and

$m$  = number of coatings used during a month.

- (3) *Calculate the combined mass of organic HAP emissions:* The permittee shall calculate and maintain the combined total mass (in pounds) of organic HAPs contained in all coatings, thinners and/or other additives, and cleaning materials used ( $H_e$ ) during each month (minus the organic HAPs in certain waste materials) using Equation 4:

$$H_e = A + B + C - R_w \quad \text{(Eqn. 4)}$$

Where:

$A$  = total mass (in pounds) of organic HAPs of all coatings used during a month as calculated by Equation 5;

$B$  = total mass (in pounds) of organic HAPs of all thinners used during a month as calculated in Equation 5;

$C$  = total mass (in pounds) of organic HAPs of all cleaning materials used during a month as calculated in Equation 5; and

$R_w$  = total mass (in pounds) of organic HAPs in waste materials sent or designated for shipment to a hazardous waste treatment, storage, and disposal facility (TSDF) during a month as determined by Part (c)(3)(ii) of this condition [the permittee may assign a value of zero to " $R_w$ " if the permittee does not wish to use this allowance].

- (i) *Calculate the mass of organic HAPs in coatings / thinners and/or other additives / cleaning materials:* The permittee shall calculate and maintain the mass (in pounds) of organic HAPs in each category [i.e. coatings ( $A$ ), thinners and/or other additives ( $B$ ), and cleaning materials ( $C$ )] used during a month using Equation 5:

$$A / B / C = \sum_{i=1}^m (Vol_i)(D_i)(W_i) \quad \text{(Eqn. 5)}$$

Where:

$Vol_i$  = total volume (in gallons) of each coating / thinner and/or other additive / cleaning material,  $i$ , used during a month;

$D_i$  = density (in pounds per gallon) of each coating / thinner and/or other additive / cleaning material,  $i$ , used during a month;

$W_i$  = mass fraction of organic HAPs in each coating / thinner and/or other additive / cleaning material,  $i$ , used during a month [for reactive adhesives, use the mass fraction of organic HAPs that are emitted as determined using Appendix A of Subpart PPPP]; and

$m$  = number of different coatings / thinners and/or other additives / cleaning materials used during a month.

- (ii) *Determine the total mass of organic HAPs in waste materials sent or designated for shipment to a hazardous waste TSDF:* If the permittee chooses to account for the mass of organic HAPs contained in waste materials sent or designated for shipment to a hazardous waste TSDF, the permittee shall determine the mass in accordance with the following specifications:
- (A) The permittee may only include waste materials in the determination that are generated by coating operations for which the permittee uses Equation 1 and will be treated or disposed of by a facility that is regulated as a TSDF under 40 CFR Part 262, 264, 265, or 266. The TSDF may be either off-site or on-site. However, the permittee may not include organic HAPs contained in waste water.
  - (B) The permittee shall determine and record either the amount of waste materials sent to a TSDF during a month or the amount collected and stored during a month and designated for future transport to a TSDF. The permittee shall not include in the determination any waste materials sent to a TSDF during a month if the permittee has already included them in the amount collected and stored during a month or a previous month.
  - (C) The permittee shall determine and record the total mass of organic HAPs contained in the waste materials specified in Part (c)(3)(ii)(B) of this condition.

- (D) The permittee shall document and maintain the methodology used to determine both the amount of waste materials and the total mass of organic HAPs the materials contain. If waste manifests include this information, they may be used as part of the documentation of the amount of waste materials and the mass of organic HAPs contained in them.
- (4) *Calculate the organic HAP emission rate:* The permittee shall calculate and maintain the organic HAP emission rate ( $H_{yr}$ ) (in pounds of organic HAPs emitted per gallon of coating solids used) for each 12-month rolling period:

$$H_{yr} = \frac{\sum_{y=1}^n H_e}{\sum_{y=1}^n V_{st}} \quad \text{(Eqn. 6)}$$

Where:

$H_e$  = total mass (in pounds) of organic HAP emissions from all materials used during month,  $y$ , as calculated by Equation 4;

$V_{st}$  = total volume (in gallons) of coating solids used during month,  $y$ , as calculated by Equation 3;

$y$  = identifier for months; and

$n$  = the number of full or partial months in the compliance period (i.e. “ $n$ ” = 12).

If the organic HAP emission rate for any 12-month rolling period exceeds the emission rate outlined in Condition 3.B.2, the emission rate shall be considered a deviation from the stated emission limitation and subject the reporting requirements outlined in Condition 5.C.1(e).

(Ref.: 40 CFR 63.3941(a) – (d), 63.3942(a), 63.3951(a) – (g), and 63.3952(b); Subpart MMMM)

5.B.2 For Emission Point AA-001, the permittee shall record and maintain the following information (as applicable):

- (a) A current copy of information provided by material suppliers or manufacturers (such as manufacturer's formulation data) or test data used to determine the mass fraction of organic HAPs and the density for each coating, thinner and/or other additive, and cleaning material as well as the volume fraction of coating solids for each coating.

If the permittee conducted testing to determine either the mass fraction of organic HAPs, the density, or the volume fraction of coating solids, the permittee shall

maintain a copy of the complete test report. If the permittee uses information provided by the manufacturer or supplier of a material that was based on testing, the permittee shall maintain the summary sheet of results provided to the permittee by the manufacturer or supplier. The permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier.

- (b) A record of the coating operations on which the permittee used each compliance option and the time periods (beginning and ending dates and times) for each option the permittee used during each 12-month rolling period.
- (c) The product name / identification and the volume of each coating, thinner and/or other additive, and cleaning material used during each 12-month rolling period. If the permittee is using the compliant material option for all coatings used in an operation or group of operations, the permittee may maintain purchase records for each material used rather than a record of the volume used.
- (d) The mass fraction of organic HAPs for each coating, thinner and/or other additive, and cleaning material used during each 12-month rolling period unless the material is tracked by weight.
- (e) The volume fraction of coating solids for each coating used during each 12-month rolling period.

(Ref.: 40 CFR 63.3930(b), (c)(1), (d), (e), and (f); Subpart M MMM)

- 5.B.3 For Emission Point AA-001, the permittee shall record and maintain the calculation of the organic HAP content for each coating (as determined by Equation 2) when the permittee uses the “*compliant material*” option to demonstrate compliance with the organic HAP emission limitation specified in Condition 3.B.2.

(Ref.: 40 CFR 63.3930(c)(2); Subpart M MMM)

- 5.B.4 For Emission Point AA-001, the permittee shall maintain the following information when the permittee uses the “*emission rate without add-on controls*” option to demonstrate compliance with the organic HAP emission limitation in Condition 3.B.2:

- (a) The calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used in a month as determined by Equations 4 and 5;
- (b) The calculation of the total volume of coating solids used in a month as determined by Equation 3;
- (c) The calculation of the organic HAP emission rate for each 12-month rolling period as determined by Equation 6;

- (d) The density for each coating, thinner and/or other additive, and cleaning material used during each 12-month rolling period;
- (e) If the permittee uses the allowance in Equation 4 for organic HAPs contained in waste materials sent to or designated for shipment to a hazardous waste TSDF (i.e. “ $R_w$ ”), the permittee shall maintain the following information:
  - (1) The name and address of each hazardous waste TSDF to which the permittee sent waste materials;
  - (2) A statement of which subparts under 40 CFR Parts 262, 264, 265, and 266 apply to the hazardous waste TSDF;
  - (3) The date of each shipment;
  - (4) The identification of the coating operations producing waste materials included in each shipment and the month or months in which the permittee used the allowance for these materials in Equation 4;
  - (5) The methodology used in accordance with Condition 5.B.1(c)(3)(ii)(B) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a hazardous waste TSDF each month; and
  - (6) The methodology used to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, the methods used to generate the data, the frequency of testing or monitoring, and supporting calculations and documentation (including the waste manifest for each shipment).

(Ref.: 40 CFR 63.3930(c)(3), (g), and (h); Subpart M) M M M M

5.B.5 For Emission Point AA-001, the permittee shall record and maintain the date, time, and duration of each deviation from the emission limitation specified in Condition 3.B.2 before January 5, 2021 (as demonstrated by the “*compliant material*” option or the “*emission rate without add-on controls*” option).

On and after January 5, 2021, the permittee shall maintain the following information for each deviation:

- (a) The date, time, and duration of the deviation, as reported under Condition 5.C.1;
- (b) A list of the affected sources or equipment for which the deviation occurred and the cause of the deviation, as reported under Condition 5.C.1;
- (c) An estimate of the quantity of the organic HAPs emitted over the emission limitation specified in Condition 3.B.2 and a description of the method used to

calculate the estimate, as reported under Condition 5.C.1;

- (d) A record of actions taken to minimize emissions in accordance with Condition 3.B.3 and any corrective actions taken to return the affected unit to its normal or usual manner of operation.

(Ref.: 40 CFR 63.3930(j); Subpart M MMM)

- 5.B.6 For Emission Points AA-001, the permittee shall perform and record the regular inspection and replacement of dry filters in the spray booths in accordance with the manufacturer's instructions. Additionally, the permittee shall maintain documentation that identifies the capture efficiency of the filters used in the spray booths.

These records shall be kept in log form and made available for review upon request during any inspection visit by MDEQ personnel.

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

C. Specific Reporting Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Reporting Requirement
AA-001	40 CFR 63.3920(a)(3)(iv – v), (4) – (6) and 63.3942(c); Subpart MMMM	5.C.1	Organic HAPs	Submit a Semi-Annual Monitoring Report

5.C.1 For Emission Point AA-001, the permittee shall submit a semi-annual monitoring report (SMR) in accordance with Condition 5.A.4 that contains the following information (as applicable):

- (a) Identification of the compliance option or options specified in Condition 5.B.1 that the permittee used on each coating operation / group of operations during each reporting period. If the permittee switched between compliance options during a reporting period, the permittee shall report the beginning and ending dates for each option the permittee used.
- (b) If the permittee uses the “*emission rate without add-on controls*” compliance option [as outlined in Condition 5.B.1(c)], the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period.
- (c) *No deviations*: If there were no deviations from the organic HAP emission limitation specified in Condition 3.B.2 using the “*compliant material*” option and/or the “*emission rate without add-on controls*” option, the SMR must include a statement that there were no deviations from the emission limitation during the reporting period.

Additionally, if the “*compliant material*” option was used during a reporting period, the statement must include the following declarations:

- (1) No coatings were used that had an organic HAP content in excess of the noted emission limitation; and
  - (2) No thinner and/or other additive, or cleaning material that contained organic HAPs [as determined by Condition 5.B.1(a)(1)].
- (d) *Deviations – Compliant material option*: If the permittee used the compliant material option and there was a deviation from the organic HAP emission limitation in Condition 3.B.2, the SMR must contain the following information (as applicable):
- (1) Identification of each coating used that deviated from the emission limitation;



- (2) Each thinner and/or other additive and cleaning material used that contained organic HAPs;
  - (3) The dates and time periods each was used;
  - (4) The calculation of the organic HAP content (as determined by Equation 2) for each coating identified. The permittee does not need to submit background data supporting this calculation (e.g. information provided by coating suppliers or manufacturers, or test reports);
  - (5) The determination of the organic HAP mass fraction for each thinner and/or other additive and cleaning material. The permittee does not need to submit background data supporting this calculation (e.g. information provided by material suppliers or manufacturers, or test reports);
  - (6) Before January 5, 2021, a statement that details the cause of each deviation;
  - (7) On and after January 5, 2021, a statement that details the cause of each deviation (even if it is an unknown cause) and the following additional information:
    - (i) The number of deviations;
    - (ii) For each deviation, a list of the affected source or equipment;
    - (iii) An estimate of the organic HAP quantity (in pounds) emitted over the emission limitation specified in Condition 3.B.2 and a description of the method used to estimate the emissions; and
    - (iv) The actions took to minimize emissions in accordance with Condition 3.B.3.
- (e) *Deviations - Emission rate without add-on controls option:* If the permittee used the “*emission rate without add-on controls*” compliance option and there was a deviation from the emission limitation specified in Condition 3.B.2, the SMR must include the following information (as applicable):
- (1) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the emission limit;
  - (2) The calculations used to determine the rolling 12-month organic HAP emission rate for the compliance period in which the deviation occurred [including the calculations for Equations 3 through 6 and (if applicable) the calculation used to determine mass of organic HAPs in waste materials in accordance with Condition 5.B.1(c)(3)(ii)]. The permittee does not need to

submit background data supporting these calculations (e.g. information provided by materials suppliers or manufacturers, or test reports);

- (3) Before January 5, 2021, a statement that details the cause of each deviation;
- (4) On and after January 5, 2021, a statement that details the cause of each deviation (even if it is an unknown cause) and the following additional information:
  - (i) The number of deviations;
  - (ii) For each deviation, a list of the affected source or equipment;
  - (iii) An estimate of the organic HAP quantity (in pounds) emitted over the emission limitation specified in Condition 3.B.2 and a description of the method used to estimate the emissions; and
  - (iv) The actions took to minimize emissions in accordance with Condition 3.B.3.

(Ref.: 40 CFR 63.3920(a)(3)(iv – v), (4) – (6) and 63.3942(c); Subpart M MMM)

**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. Episodes	Regulations for the Prevention of Air Pollution Emergency
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
NM VOC	Non-Methane Volatile Organic Compounds
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM <sub>10</sub>	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 <sub>2</sub>	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound

## **APPENDIX B**

### **LIST OF REGULATIONS REFERENCED IN PERMIT**

**The full text of the regulations referenced in this permit may be found on-line at <http://www.deq.state.us.us> and <http://ecfr.gpoaccess.gov>, or the Mississippi Department of Environmental Quality (MDEQ) will provide a copy upon request. A list of regulations referenced in this permit is shown below:**

11 Miss. Admin. Code Pt. 2, Ch. 1, Mississippi Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants (Amended December 14, 2011)

11 Miss. Admin. Code Pt. 2, Ch. 6, Mississippi Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Air Emissions Operating Permit Regulations for the Purpose of Title V of the Federal Clean Air Act (Amended December 14, 2011)

40 CFR Part 82 - Title VI of the Clean Air Act (Stratospheric Ozone Protection)

40 CFR Part 63, Subpart A – General Provisions

40 CFR Part 63, Subpart MMMM – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products