

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

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

**THIS CERTIFIES THAT**

ARI Railcar Services LLC, Bude Facility  
375 South Gerard Street  
Bude, Mississippi  
Franklin County

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with the Federal Clean Air Act and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), the regulations and standards adopted and promulgated thereunder, and the State Implementation Plan for operating permits for synthetic minor sources.

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**



**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Issued:** July 8, 2021

**Permit No.:** 0820-00019

**Effective Date:** As specified herein.

**Expires:** June 30, 2026

**Section 1.**

**A. GENERAL CONDITIONS**

1. This permit is for air pollution control purposes only.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
2. This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.4.D.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.4.D.)
3. Any activities not identified in the application are not authorized by this permit.  
(Ref.: Miss. Code Ann. 49-17-29 1.b)
4. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)
7. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)
8. The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:
  - a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and
  - b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission.  
(Ref.: Miss. Code Ann. 49-17-21)

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

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

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

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

11. This permit does not authorize a modification as defined in Regulation 11 Miss. Admin. Code Pt. 2, Ch.2., "Permit Regulations for the Construction and/or Operation of Air Emission Equipment." A modification may require a Permit to Construct and a modification of this permit. Modification is defined as "Any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

- a. Routine maintenance, repair, and replacement;
- b. Use of an alternative fuel or raw material by reason of an order under Sections 2(a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
- c. Use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
- d. Use of an alternative fuel or raw material by a stationary source which:
  - (1) The source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, or 40 CFR 51.166; or
  - (2) The source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, or 40 CFR 51.166;
- e. An increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I or 40 CFR 51.166; or
- f. Any change in ownership of the stationary source.

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

**B. GENERAL OPERATIONAL CONDITIONS**

1. Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in Regulation, 11 Miss. Admin. Code Pt. 2, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared.

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

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

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

3. Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits.

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

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

a. Upsets

- (1) For an upset defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:

- (i) An upset occurred and that the source can identify the cause(s) of the upset;
- (ii) The source was at the time being properly operated;
- (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
- (iv) That within 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
- (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or

caused a general nuisance to the public, the source provided notification to the Department.

- (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
- (3) This provision is in addition to any upset provision contained in any applicable requirement.
- (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.

b. Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.)

- (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
- (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).
- (3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

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

5. Compliance Testing: Regarding compliance testing:

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

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

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

1. For renewal of this permit, the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board. If the applicant submits a timely and complete application pursuant to this paragraph and the Permit Board, through no fault of the applicant, fails to act on the application on or before the expiration date of the existing permit, the applicant shall continue to operate the stationary source under the terms and conditions of the expired permit, which shall remain in effect until final action on the application is taken by the Permit Board. Permit expiration terminates the source's ability to operate unless a timely and complete renewal application has been submitted.

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

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

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

3. The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

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

4. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:
  - a. Persistent violation of any terms or conditions of this permit.
  - b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
  - c. A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

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

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

**SECTION 2  
EMISSION POINT DESCRIPTION**

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

Emission Point	Description
AA-001	2.50 MMBTU/hr Natural Gas-fired Air Heater Unit #1
AA-002	4.00 MMBTU/hr Natural Gas-fired Air Heater Unit #2
AA-003	2.50 MMBTU/hr Natural Gas-fired Air Heater Unit #3
AA-004	0.50 MMBTU/hr Natural Gas-fired Air Make-Up Unit #1
AA-005	0.50 MMBTU/hr Natural Gas-fired Air Make-Up Unit #2
AA-006	1.60 MMBTU/hr Natural Gas-fired Air Make-Up Unit #1
AA-007A	Steel Shot Blast Unit routed to Baghouse #1
AA-007B	Steel Shot Blast Unit routed to Baghouse #1
AA-008	Tank Lining Shop: Two (2) Individual Processing Lines (Lining Application Station)
AA-014	John Zink Flare for Railcar Cleaning rated at 500 scfm
AA-015	Steam Cleaning of Railcars controlled by flare
AA-016	Railcar Repair Shop
AA-017	Metal Shot Media Blasting routed to Baghouse #2
AA-018	Sand Blasting
AA-019	Paint Shop
AA-020	6.68 MMBTU/hr Natural Gas-fired Boiler Unit #1
AA-021	4.25 MMBTU/hr Natural Gas-fired Boiler Unit #2
AA-022	4.72 MMBTU/hr Natural Gas-fired Space Heaters
AA-025	0.98 MMBTU/hr Natural Gas-fired Curing Heater #1 (Ref. No. CH-1)
AA-026	0.98 MMBTU/hr Natural Gas-fired Curing Heater #2 (Ref. No. CH-2)
AA-027	0.98 MMBTU/hr Natural Gas-fired Curing Heater #3 (Ref. No. CH-3)
AA-028	0.98 MMBTU/hr Natural Gas-fired Curing Heater #4 (Ref. No. CH-4)
AA-030	30 hp Natural Gas-fired Air Supply #1
AA-031	30 hp Natural Gas-fired Air Supply #2
AA-032	30 hp Natural Gas-fired Air Supply #3
AA-033	30 hp Natural Gas-fired Air Supply #4
AA-034	20 hp Upblast Exhaust Ventilator (Ref. No. Air Exhaust Fan 1)
AA-035	20 hp Upblast Exhaust Ventilator (Ref. No. Air Exhaust Fan 2)
AA-036	20 hp Upblast Exhaust Ventilator (Ref. No. Air Exhaust Fan 3)
AA-037	20 hp Upblast Exhaust Ventilator (Ref. No. Air Exhaust Fan 4)
AA-038	5 hp Cambridge Direct Natural Gas-fired Make-Up Unit #1
AA-039	5 hp Cambridge Direct Natural Gas-fired Make-Up Unit #2
AA-040	Enclosed Sand Blasting Cabinet
AA-041	4.0 MMBTU/hr Natural Gas-fired Air Heater

AT-001	560-gallon Diesel Storage Tank (Ref. No. T-1)
AT-002	250-gallon Diesel Storage Tank (Ref. No. T-2)
AT-003	250-gallon Gasoline Storage Tank (Ref. No. T-3)
AT-004	4,000-gallon Sulfuric Acid Storage Tank



**SECTION 3  
EMISSION LIMITATIONS AND STANDARDS**

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.1	PM/PM <sub>10</sub> (filterable only)	≤ 90.0 tpy
		3.2	VOC	≤ 90.0 tpy
		3.3	HAP	≤ 23.0 tpy of total HAP, ≤ 9.0 tpy of single HAP
	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.4	Opacity	≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.5	Equivalent Opacity	≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.6	All Pollutants	Minimizing Pollutants
AA-001 AA-002 AA-003 AA-004 AA-005 AA-006 AA-020 AA-021 AA-022 AA-025 AA-026 AA-027 AA-028 AA-030 AA-031 AA-032 AA-033 AA-034 AA-035 AA-036 AA-037 AA-038 AA-039 AA-041	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.6	PM/PM <sub>10</sub> (filterable only)	≤ 0.6 lb/MMBTU
AA-001 AA-002 AA-003 AA-004 AA-005 AA-006 AA-022 AA-025 AA-026 AA-027 AA-028 AA-030 AA-031 AA-032 AA-033 AA-038	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.7	SO <sub>2</sub>	≤ 4.8 lb/MMBTU

AA-039 AA-041				
AA-014	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.8	Operation	Control flare operating requirements
	11 Miss. Admin. Code Pt. 2, R. 1.4.B(2).	3.9	H <sub>2</sub> S	One (1) grain per 100 standard cubic feet
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.10	Operation	Comply with 40 CFR 60.18
AA-015		3.11		Route emissions to flare (Emission Point AA-014)

3.1 For the entire facility, the permittee shall not emit more than 90.0 tons per year (tpy) of particulate matter (PM) and particulate matter less than 10 micrometers (PM<sub>10</sub>), as determined for each consecutive 12-month period on a rolling monthly basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Synthetic Minor Operating Permit issued April 22, 2004)

3.2 For the entire facility, the permittee shall not emit more than 90.0 tons per year (tpy) of volatile organic compounds (VOC), as determined for each consecutive 12-month period on a rolling monthly basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Synthetic Minor Operating Permit issued April 22, 2004)

3.3 For the entire facility, the permittee shall not emit more than 23.0 tons per year (tpy) of total combined hazardous air pollutants (HAPs) and no more than 9.0 tons per year of any single (HAP) as determined for each consecutive 12-month period on a rolling monthly basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Synthetic Minor Operating Permit issued April 22, 2004)

3.4 For the entire facility, except, as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial, or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided below:

- (a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one-hour period 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% 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 any one hour.

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

3.5 For the entire facility, except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure the observer's view to a

degree in excess of 40% opacity, equivalent to that provided in Condition 3.4. This shall not apply to vision obscuration caused by uncombined water droplets.

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

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

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

- 3.7 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-020, AA-021, AA-022, AA-025, AA-026, AA-027, AA-028, AA-030, AA-031, AA-032, AA-033, AA-034, AA-035, AA-036, AA-037, AA-038, AA-039, and AA-041, the permittee shall not exceed the maximum permissible emission rate of ash and/or particulate matter of 0.6 pounds per million BTU per hour heat input from fossil fuel burning installations of less than 10 million BTU per hour heat input.

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

- 3.8 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-022, AA-025, AA-026, AA-027, AA-028, AA-030, AA-031, AA-032, AA-033, AA-038, AA-039, and AA-041, the permittee shall not exceed the maximum permissible emission rate of 4.8 pounds sulfur oxides (measured as sulfur dioxide) per million BTU heat input from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer.

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

- 3.9 For Emission Point AA-014, the permittee shall operate the control flare according to 40 CFR 60.18(b) and the requirements specified below:

- (a) The control flare shall be operated at all times when emissions may be vented to it.
- (b) The flare shall be operated and maintained according to the manufacturer's recommendations.
- (c) The flare shall be operated with no visible emissions as determined by EPA Method 22, except for a period not to exceed a total of five (5) minutes during any two (2) consecutive hours.
- (d) The permittee shall maintain a flare pilot flame at all times when emission may be vented to the flare.
- (e) The flare shall only be used to with a combustion gas mixture whose net heating value is 300 BTU/scf or greater if the flare is air or steam-assisted. If the flare is non-assisted, the flare shall only be used with a combustion gas mixture whose net heating value is 200 BTU/scf or greater.

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

- 3.10 For Emission Point AA-014, the permittee shall not cause or permit the emissions of any gas stream which contains hydrogen sulfide (H<sub>2</sub>S) in excess of one (1) grain per 100

standard cubic feet (gr/100 scf). Gas streams containing hydrogen sulfide in excess of one (1) grain per 100 standard cubic feet shall be incinerated at temperatures not less than 1600°F for a period of not less than 0.5 seconds, or processed in such a manner which is equivalent to or more effective for the removal of hydrogen sulfide.

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

- 3.11 For Emission Point AA-015, the permittee shall route all gaseous emissions to the flare (Emissions Point AA-014) for control.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Construction Permit issued May 5, 2015)

**SECTION 4**  
**WORK PRACTICES**

This section was intentionally left black since no work practice standards apply to this permit action.

## SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
Facility Wide  AA-007A AA-007B AA-017	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain records for a minimum of 5 years.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2	PM/PM <sub>10</sub> (filterable only)	Record abrasive blasting and welding electrodes
		5.3	VOC and HAP	Recordkeeping
		5.4	PM/PM <sub>10</sub> (filterable only)	Monitoring and Recordkeeping
AA-014	40 CFR 63, Subpart A (General Provisions) 40 CFR 63.11(b)(1) and (5), Subpart A 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a).	5.5	Pilot Flame	Monitoring requirement and visual emissions test
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a).	5.6	Operation	Conformance with design
AA-014 AA-015	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.7	VOC and HAP	Monitoring and Recordkeeping

5.1 For the entire facility, the permittee shall retain all required records, monitoring data, supporting information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to DEQ as required by Applicable Rules and Regulations or this permit upon request.

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

5.2 For the entire facility, the permittee shall determine the following for particulate matter (PM) and particulate matter less than 10 micrometers (PM<sub>10</sub>) emissions and maintain sufficient records to document:

- (a) The amount of abrasive blasting medium consumed on a monthly basis and in each consecutive 12-month period on a rolling basis;
- (b) The amount of welding electrodes and/or medium consumed on a monthly basis and in each consecutive 12-month period on a rolling basis; and
- (c) The total PM and PM<sub>10</sub> emission rate in tons per month and tons per year for each consecutive 12-month period on a rolling basis.
- (d) The permittee may utilize data supplied by the manufacturer, or analysis of PM emissions by EPA Test Method 1-5, 40 CFR 60, Appendix A, and/or alternate EPA approved test method(s).

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

- 5.3 For the entire facility, the permittee shall determine the following for each coating, adhesive, solvent, or other VOC or HAP containing material used and maintain sufficient record to document:
- (a) The identification of each coating, adhesive, solvent, or other VOC or HAP containing material and the total gallons of each coating, adhesive, solvent, or other VOC or HAP containing material used ton a monthly basis and in each consecutive 12-month period;
  - (b) The VOC and/or HAP content(s) of each coating, adhesive, solvent, or other VOC or HAP containing material used with a description of the method used to determine the VOC and/or HAP content;
  - (c) The density of each coating, adhesive, solvent, or other VOC or HAP containing material used; and
  - (d) The total VOC emission rate, the emission rate of each individual HAP, and the total HAP emission rate in tons per year on a monthly basis and for each consecutive 12-month period on a rolling basis.

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

- 5.4 For Emission Point AA-007A, AA-007B, and AA-017, the permittee shall comply with the following to ensure compliance with the PM/PM<sub>10</sub> emission limitation:
- (a) Perform weekly inspections of the baghouses and maintain records of inspections in log form;
  - (b) Maintain records of all maintenance performed to maintain proper operation of the control equipment;
  - (c) Operate and maintain a system for monitoring the pressure drop across the baghouses; and
  - (d) Record the pressure drop for each baghouse system once per shift and compare to manufacturer's data to ensure that the baghouses are working within the manufacturer's specifications.

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

- 5.5 For Emission Point AA-014, the permittee shall comply with the monitoring requirements listed below:
- (a) The permittee shall continuously monitor and record the presence of the flare pilot flame by use of a thermocouple or any other equivalent device to detect the presence of a flame.
  - (b) The permittee shall monitor each flare to assure that it is operated and maintained in conformance with the design.
  - (c) The permittee shall demonstrate initial compliance for each flare with the visible emissions limits in Condition 3.9(c), within ninety (90) days of issuance of this permit by conducting an EPA Method 22 test for a period of two (2) consecutive hours. The test shall be conducted while the facility is operating at the

representative flow to the flare. The permittee shall monitor or use actual production rate to calculate the gas flow rates to the flares during the test. If a change is made at the facility, which causes the previous 2-hour visible emissions test to no longer be representative then the permittee must perform a Method 22 test within ninety (90) days of the change. If the visible emissions limit in Condition 3.9(c) is not met during the Method 22 test, corrective action(s), the permittee shall demonstrate compliance by performing an EPA Method 22 test for a period of two (2) hours.

- (d) Subsequent to the initial testing required in paragraph (c) above, the permittee shall perform monthly visible emissions test for a minimum of fifteen (15) minutes using EPA Method 22 while the facility is operating with gases being flared. If visible emissions are observed for a period greater than one (1) minute, corrective action shall be taken immediately. Immediately following completion of the corrective action(s), the permittee shall demonstrate compliance by performing an EPA Method 22 test for a period of two (2) hours and shall monitor and maintain records of the flare rate during the test. The monthly visible emissions tests shall be separated by at least fifteen (15) days between each test.

(Ref.: 40 CFR 63.11(b)(1) and (5), Subpart A, and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a).)

- 5.6 For Emission Point AA-014, the permittee shall comply with the following recordkeeping requirements outlined below:

- (a) The permittee shall maintain a copy of the flare manufacturer operating and maintenance recommendations and detailed records of all maintenance performed on the flare. These records shall be made available upon request during inspection by DEQ personnel.
- (b) The permittee shall maintain continuous records of the thermocouple or equivalent device output demonstrating the presence of a flame in the control flare whenever the facility is in operation.
- (c) The permittee shall maintain records of all EPA Method 22 tests and details of any corrective/preventative action(s) taken.
- (d) The permittee shall maintain records of all gas analyses performed to determine the net heating value of the gas being combusted in the flare.

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

- 5.7 For Emission Points AA-014 and AA-015, the permittee shall comply monitor and record the following:

- (a) The total number of railcars flared and steam cleaned in any consecutive 12-month period;
- (b) Each railcar pressure;
- (c) The contents of each railcar that is flared;
- (d) The capacity and contents of each railcar steam cleaned; and



- (e) The VOC and HAP emission rates in tons per year for each consecutive 12-month period.

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

## SECTION 6 REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	Report permit deviations within five (5) working days.
		6.2	Submit certified annual monitoring report.
		6.3	All documents submitted to DEQ shall be certified by a Responsible Official.
		6.4	Monitoring report for PM and PM <sub>10</sub>
		6.5	Monitoring report for VOC or HAP containing material
AA-014		6.6	Monitoring report for the flare
AA-014 AA-015		6.7	Railcar flaring emissions report

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

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

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

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

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

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

6.4 The permittee shall submit an annual monitoring report in accordance with Condition 6.2. This report shall provide the following:

- (a) The amount of abrasive blasting medium consumed on a monthly basis and in each consecutive 12-month period on a rolling basis;
- (b) The amount of welding electrodes and/or medium consumed on a monthly basis and in each consecutive 12-month period on a rolling basis; and
- (c) The total PM and PM<sub>10</sub> emission rate in tons per month and tons per year for each consecutive 12-month period on a rolling basis.

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

- 6.5 The permittee shall submit an annual monitoring report in accordance with Condition 6.2. This report shall provide the following:
- (a) The identification of each coating, adhesive, solvent, or other VOC or HAP containing material used;
  - (b) The VOC and/or HAP content(s) of each coating, adhesive, solvent, or other VOC or HAP containing material used;
  - (c) The total gallons of each coating, adhesive, solvent, or other VOC or HAP containing material used in each consecutive 12-month period; and
  - (d) The total VOC emission rate, the emission rate of each individual HAP, and the total HAP emission rate in tons per month and tons per year for each consecutive 12-month period.

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

- 6.6 For Emission Point AA-014, the permittee shall submit an annual report in accordance with Condition 6.2 including the following information:
- (a) Details of any periods when the pilot flame was not present when gases were being vented to the flare;
  - (b) Copies of data sheets for all EPA Method 22 tests performed during the reporting period, including data on gas flow rate to the flare where required by Conditions 5.5(c) & (d), and details of any accompanying corrective and preventative actions taken;

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

- 6.7 For Emission Point AA-014 and AA-015, the permittee shall submit an annual report in accordance with Condition 6.2 including the following information:
- (a) The total number of railcars flared and steam cleaned in any consecutive 12-month period;
  - (b) Each railcar pressure;
  - (c) The contents of each railcar that is flared;
  - (d) The capacity and contents of each railcar steam cleaned; and
  - (e) The VOC and HAP emission rates in tons per year for each consecutive 12-month period.

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