

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

**TO OPERATE AIR EMISSIONS EQUIPMENT**

**THIS CERTIFIES THAT**

Sequa Corporation (d.b.a. Precoat Metals)  
1095 Mendell Davis Drive  
Jackson, Hinds 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: October 27, 2021**

**Effective Date: As specified herein.**

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

*Krystal Rudolph*

**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Expires: September 30, 2026**

**Permit No.: 1080-00080**

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

## SECTION 1. GENERAL CONDITIONS

1.1 The permittee must comply with all conditions of this permit. Any permit non-compliance 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) Re-openings shall not be initiated before a notice of such intent is provided to the Title V source by the Mississippi Department of Environmental Quality (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 the 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 – “Air Emissions Operating Permit Regulations for Purposes of Title V of the Federal Clean Air Act”.

- (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions.

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

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

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

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

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

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

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

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

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

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

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

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

- 1.10 Any document required by this permit to be submitted to the MDEQ 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, emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (d) As authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

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

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

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

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

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

- 1.14 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source.

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

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

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

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

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

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

- 1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V Operating Permit (TVOP). If the permittee submits a timely and complete application, the failure to have a TVOP 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 timeframe as provided in other regulations for emergencies] and the notification includes the following:
  - (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 MDEQ 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 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, silvi-cultural 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 an Emergency Air Pollution Episode Alert imposed by the Executive Director of the MDEQ 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 air fields, 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 non-compliance 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) following are met.
- (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
  - (1) An emergency occurred and that the permittee can identify the cause(s) of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other

requirements in the permit; and

- (4) The permittee submitted notice of the emergency to the 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, start-ups, 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 non-compliance, and the corrective actions taken and;
    - (v) That as soon as practicable but no later than twenty-four (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 start-ups and shutdowns unless source specific emission limitations or work practice standards for start-ups 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 start-ups and shutdowns. Source specific emission limitations or work practice standards established for start-ups 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 start-up 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 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.)

- 1.27 Regarding compliance testing (if applicable):

- (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).)

**SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES**

Emission Point	Description
AA-000	Facility-Wide [Sequa Corporation (d.b.a. Precoat Metals)]
AA-001	Continuous Coil Coating Line [consists of the prime coater and the finish coater; emissions are routed to the Thermal Oxidizer (Emission Point AE-001) for control of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs)]
AB-001	5.2 MMBTU / Hour Natural Gas-Fired Infrared Oven [for drying water from cleaning and treatment of coil prior to coating]
AB-002	Inorganic Chemical Cleaning and Treatment Operations [prepares the surface of coils for coating]
AC-001	18.4 MMBTU / Hour Natural Gas-Fired Prime Curing Oven [emissions are routed to the Thermal Oxidizer (Emission Point AE-001) for control of VOCs and HAPs]
AC-002	18.4 MMBTU / Hour Natural Gas-Fired Finish Curing Oven [emissions are routed to the Thermal Oxidizer (Emission Point AE-001) for control of VOCs and HAPs]
AE-001	29.6 MMBTU / Hour Natural Gas-Fired Thermal Oxidizer
AE-002	29.4 MMBTU / Hour Waste Heat Steam Generating Unit [uses waste heat from off-gases of the Thermal Oxidizer (Emission Point AE-001) to generate steam]
AF-001	568 HP (424 kW) Kohler Diesel-Fired Emergency Compression-Ignition (CI) Generator Engine [manufactured in 1996]

### **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 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 (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 or allow the discharge into the ambient air from any point source any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity equivalent to that provided in Condition 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets.

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

3.A.3 The permittee shall not cause or allow the emission of particles or any contaminants in sufficient amounts or of such duration from any process as to be injurious to humans, animals, plants, or property, or to be a public nuisance, or create a condition of air pollution.

- (a) The permittee shall not cause or permit the handling, transporting, or storage of any material in a manner, which allows or may allow unnecessary amounts of particulate matter to become airborne.
- (b) When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than that from which it originated or to violate any other provision of 11 Miss. Admin. Code Pt. 2, Ch. 1, the Commission may order such corrected in a way that all air and gases or air and gas-borne material leaving the building or equipment are controlled or removed prior to discharge to the open air.

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

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

<b>Emission Point(s)</b>	<b>Applicable Requirement</b>	<b>Condition Number</b>	<b>Pollutant / Parameter</b>	<b>Limit / Standard</b>
AA-000	11 Miss. Admin. Code, Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued October 27, 2021 <b>(PSD Avoidance Limit)</b>	3.B.1	VOCs	249.0 tpy (Rolling 12-Month Total)
AA-001 AC-001 AC-002	40 CFR Part 60, Subpart TT – Standards of Performance for Metal Coil Surface Coating 40 CFR 60.460, Subpart TT	3.B.2	VOCs	General Applicability
	40 CFR 60.462(a)(2) and (3), Subpart TT	3.B.3		0.14 Kilograms / Liter of Coating Solids Applied, or Emit 10% of the Total VOCs Applied (90% Emission Reduction) (Each Calendar Month)
	40 CFR Part 63, Subpart SSSS – NESHAP for Metal Coil Surface Coating 40 CFR 63.5090(a) and (e), 63.5140(c), and Table 2, Subpart SSSS	3.B.4	Organic HAPs	General Applicability
	40 CFR 63.5120(a)(2), Subpart SSSS	3.B.5		0.046 Kilograms / Liter of Solids Applied (Rolling 12-Month Period)
	40 CFR 63.5121(a) and Table 1, Subpart SSSS	3.B.6	Establish Operating Limits	
AB-001 AF-001	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.B.7	PM (filterable)	0.6 Pounds / MMBTU
AC-001 AC-002 AE-001	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.B.8	PM (filterable)	$E = 0.8808 (I^{-0.1667})$
AF-001	40 CFR Part 63, Subpart ZZZZ NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE) 40 CFR 63.6585(a) and (c), and 63.6590(a)(1)(i); Subpart ZZZZ	3.B.9	HAPs	General Applicability
	40 CFR 63.6640(f)(1) – (3); Subpart ZZZZ	3.B.10		Operational Requirements



3.B.1 For Emission Point AA-000 (Facility-Wide), the permittee shall limit the emission of volatile organic compounds (VOCs) to no more than 249.0 tons per year (tpy) based on a rolling 12-month total.

(Ref.: 11 Miss. Admin. Code, Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued October 27, 2021 – PSD Avoidance Limit)

3.B.2 For Emission Points AA-001, AC-001, and AC-002, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 60, Subpart TT – Standards of Performance for Metal Coil Surface Coating and 40 CFR Part 60, Subpart A – General Provisions.

(Ref.: 40 CFR 60.460; Subpart TT)

3.B.3 For Emission Points AA-001, AC-001, and AC-002, the permittee shall comply with one (1) of the following emissions standards:

(a) Discharge into the atmosphere no more than 0.14 kilograms of VOCs per liter of coating solids applied for each calendar month; or

(b) Discharge into the atmosphere no more than ten (10) percent of the total VOCs applied [i.e. ninety (90) percent emission reduction] for each calendar month while continuously using the thermal oxidizer operated at the most recently demonstrated overall efficiency.

(Ref.: 40 CFR 60.462(a)(2) and (a)(3); Subpart TT)

3.B.4 For Emission Points AA-001, AC-001, and AC-002, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 63, Subpart SSSS – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Metal Coil Surface Coating and 40 CFR Part 63, Subpart A – General Provisions (as noted in Table 2 of Subpart SSSS).

For the purpose of this permit, the application of incidental markings (including letters, numbers, or symbols) that are added to bare metal coils and used for product identification or for product inventory control do not apply to Subpart SSSS. However, the application of letters, numbers, or symbols to a coated metal coil is considered part of the coil coating process and subject to Subpart SSSS.

(Ref.: 40 CFR 63.5090(a) and (e), 63.5140(c), and Table 2; Subpart SSSS)

3.B.5 For Emission Points AA-001, AC-001, and AC-002, the permittee shall limit the emission of organic HAPs to no more than 0.046 kilograms per liter of solids applied [or 0.38 pounds per gallon of solids applied] based on a rolling 12-month period.

(Ref.: 40 CFR 63.5120(a)(2); Subpart SSSS)

3.B.6 For Emission Points AA-001, AC-001, AC-002, and AE-001, except during periods of start-up and shutdown, the permittee shall comply with the following operating limits at all times after establishing in accordance with the applicable testing:

- (a) **For a thermal oxidizer:** maintain the average combustion temperature in any 3-hour period at or above the combustion temperature limit established in accordance with Condition 5.B.5(b)(2); and
- (b) **For an emission capture system:** maintain the operating parameter value (or range of values) specified in Condition 5.B.5(c)(2) that represent the conditions indicative of proper operation and maintenance of the capture system.

(Ref.: 40 CFR 63.5121(a), 63.5140(a), and Table 1; Subpart SSSS)

3.B.7 For Emission Points AB-001 and AF-001, the maximum permissible emission of ash and/or particulate matter (PM) 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.B.8 For Emission Points AC-001, AC-002, and AE-001, the maximum permissible emission of ash and/or particulate matter (PM) from each unit shall not exceed an emission rate determined by the following relationship:

$$E = 0.8808(I^{0.1667})$$

Where “E” is the emission rate in pounds per MMBTU per hour heat input and “I” is the heat input in MMBTU per hour.

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

3.B.9 For Emission Point AF-001, the permittee is subject to and shall comply with the applicable requirements found in 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE).

(Ref.: 40 CFR 63.6585(a) and (b), and 63.6590(b)(3)(iii); Subpart ZZZZ)

3.B.10 For Emission Point AF-001, any operation of the engine for any reason other than emergency operation, maintenance and testing, and operation in non-emergency situations for fifty (50) hours per year is prohibited. If an engine is not operated in accordance with paragraphs (a) through (c) of this condition, the engine will not be considered an emergency engine under the referenced regulation and shall meet all requirements for a corresponding non-emergency engine.

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

- (b) The permittee may operate an engine for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, or the insurance company accompanied with the engine. Maintenance checks and readiness testing of an engine is limited to a maximum of one hundred (100) hours per calendar year. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing. However, a petition is not required if the permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of the engine beyond 100 hours per calendar year.
- (c) The permittee may operate an engine for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(Ref.: 40 CFR 63.6640(f)(1) – (3); Subpart ZZZZ)

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 lbs. / MMBTU
11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.C.2	SO <sub>2</sub>	4.8 lbs. / 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) 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) per MMBTU heat input.

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

**D. WORK PRACTICE STANDARDS**

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-001 AC-001 AC-002	40 CFR 63.5140(b); Subpart SSSS	3.D.1	Organic HAPs	General Duty Clause

3.D.1 For Emission Points AA-001, AC-001, and AC-002, the permittee shall operate and maintain each unit (including associated air pollution control equipment and monitoring 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 Subpart SSSS have been achieved. The determination of whether a unit is operating in compliance with operation and maintenance requirements will be based on information available to the MDEQ 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 unit.

(Ref.: 40 CFR 63.5140(b); Subpart SSSS)

## **SECTION 4. COMPLIANCE SCHEDULE**

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices by January 31 of each calendar year 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 and January 31 of calendar year 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. The 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-000	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(2).	5.B.1	VOCs	Calculate Emissions (Monthly and Rolling 12-Month Total)
AA-001 AC-001 AC-002	40 CFR 60.463(c)(2); Subpart TT	5.B.2	VOCs	Continuous Compliance Requirements
	40 CFR 60.463(c)(1) and 60.464(a); Subpart TT	5.B.3		Calculate the Average VOC Content of Coatings Used (Monthly)
AA-001 AC-001 AC-002 AE-001	40 CFR 60.465(e); Subpart TT	5.B.4	VOCs	Maintain All Data and Calculations on VOC Emissions Maintain Daily Records on the Combustion Temperature (Thermal Oxidizer)
	40 CFR 63.5150(a)(4) and 63.5160(b) – (e); Subpart SSSS	5.B.5	Organic HAPs	Determination and Monitoring Requirements
	40 CFR 63.5150(b); Subpart SSSS	5.B.6	Capture System Operating Parameters Combustion Temperature	Definition of a Deviation
	40 CFR 63.5170(d)(2) and (f)(1); Subpart SSSS	5.B.7	Organic HAPs	Continuous Compliance Demonstration Requirements
	40 CFR 63.5190(a)(1), (a)(2), and (a)(5); Subpart SSSS	5.B.8		Recordkeeping Requirements
	AE-001	40 CFR 60.464(c); Subpart TT	5.B.9	Combustion Temperature
40 CFR 63.5150(a)(3) and (a)(4); Subpart SSSS		5.B.10	Operational Requirements	
AF-001	40 CFR 63.6625(f) and 63.6655(f); Subpart ZZZZ	5.B.11	Emergency Engine Status	Monitor Hours of Operation (Emergency and Non-Emergency)

5.B.1 For Emission Point AA-000 (Facility-Wide), the permittee shall demonstrate compliance with emission limitation specified in Condition 3.B.1 by calculating and recording the total emission of volatile organic compounds (VOCs) from all sources that can reasonably emit the pollutant(s) in tons both on a monthly and rolling 12-month total basis.

Unless otherwise specified herein, the permittee shall include all reference data used to validate calculated emissions from each source (e.g. operational data, applicable emission factors, engineering judgement determinations, performance testing results, etc.).

For each coating, solvent, or other VOC-containing material used, the permittee shall maintain the following information:

- (a) The quantity used (in gallons or pounds);
- (b) The total VOC content (by percent weight);
- (c) The density (in pounds per gallon);
- (d) The permittee shall calculate the VOC emissions from the use of these materials on a monthly basis and shall determine VOC emissions on a rolling 12-month total basis. VOC emissions may be reduced using the following equation to account for operation of the thermal oxidizer and recovery of spent solvent:

$$E_a = VOC_u \left( 1 - \frac{ORE}{100} \right)$$

Where:

$E_a$  = the actual VOC mass emission rate (in tons per year) based on a rolling 12-month total;

$VOC_u$  = the actual VOC usage rate (in tons per year) based on a rolling 12-month average; and

ORE = the most recently demonstrated VOC destruction / reduction efficiency (in percent).

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

5.B.2 For Emission Points AA-001, AC-001, and AC-002, the permittee shall demonstrate continuous compliance with the VOC emission limits specified in Condition 3.B.3 by conducting a performance test each calendar month using the following procedures:

- (a) **Determine the overall reduction efficiency (“R”) for the capture system and control device:** For the initial performance test, the permittee shall utilize Equations 5 – 7 outlined in 40 CFR 60.463(c)(2)(i)(A) – (C), Subpart TT to determine “R”. For subsequent testing, the permittee may use the most recently determined “R” if the thermal oxidizer and capture system operating conditions have not changed since the most recent test.

In the event that the permittee elects to operate the thermal oxidizer or an emissions capture system at conditions different from the most recent performance test (or if

directed by the MDEQ), the permittee shall repeat the determination of “R” by utilizing Equations 5 – 7 to determine “R”.

If “R” is equal to or greater than 0.90, the permittee is in compliance and no further computations are necessary.

If “R” is less than 0.90, the permittee shall demonstrate compliance with the limit specified in Condition 3.B.3(a) by computing the average total VOC emissions to the atmosphere per unit volume of coating solids applied (“N”) in accordance with the procedure outlined in paragraphs (b) – (d) of this condition.

- (b) **Calculate the volume-weighted average of the total mass of VOCs per unit volume of coating solids applied (“G”):** The permittee shall calculate “G” for each calendar month by utilizing Equations 1 – 3 outlined in 40 CFR 60.463(c)(1)(i)(A) – (C), Subpart TT.
- (c) **Calculate the volume-weighted average of VOC emissions to the atmosphere (“N”):** The permittee shall calculate “N” for each calendar month by utilizing the following equation:

$$N = G (1 - R)$$

If “N” is less than or equal to 0.14 kilograms of VOCs per liter of coating solids applied, the permittee is in compliance.

(Ref.: 40 CFR 60.463(c)(2); Subpart TT)

- 5.B.3 For Emission Points AA-001, AC-001, and AC-002, if the overall reduction efficiency (“R”) is less than 0.90 (as determined in Condition 5.B.2), the permittee shall calculate and record the average VOC content of coatings applied (in kilograms per liter) for each calendar month.

Additionally, the permittee shall maintain the following information for each calendar month:

- (a) The composition of each coating applied and each VOC-based solvent added to a coating (including how the VOC content was determined);
- (b) The volume (in gallons) of each coating applied; and
- (c) The mass fraction of each VOC-based solvent added a coating.

(Ref.: 40 CFR 60.463(c)(1) and 60.464(a); Subpart TT)

- 5.B.4 For Emission Points AA-001, AC-001, AC-002, and AE-001, the permittee shall maintain all data and calculations used to determine monthly VOC emissions and the monthly emission limit (where applicable). Additionally, the permittee shall maintain daily records on the combustion temperature of the thermal oxidizer.

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

5.B.5 For Emission Points AA-001, AC-001, AC-002, and AE-001, the permittee shall determine and maintain the following information (as applicable):

(a) **For The Coating Materials Applied:**

- (1) ***Organic HAP content:*** The permittee shall determine the organic HAP weight fraction of each coating material applied by utilizing one (1) of the procedures in outlined 40 CFR 63.5160(b)(1) – (4); Subpart SSSS.
- (2) ***Solids content and density:*** The permittee shall determine the solids content (by volume) and density of each coating material applied by utilizing an appropriate ASTM test method outlined in 40 CFR 63.5160(c), Subpart SSSS (or an EPA-approved alternative method – as applicable). The manufacturer of an applicable material may also perform the specified testing and provide the results to the permittee.

Additionally, the permittee may rely on the formulation data provided by a material provider to determine the solids content. However, in the event of any inconsistency between test data obtained with an appropriate test method and formulation data, the test data will govern.

(b) **For The Control Device (Thermal Oxidizer):**

- (1) ***Destruction / removal efficiency:*** The permittee shall establish the destruction / removal efficiency by conducting an initial performance test before March 25, 2023. Thereafter, subsequent testing shall be conducted no later than five (5) years after the previous test completed to re-establish the destruction / removal efficiency.

Each test shall be performed such that the inlet and outlet of the thermal oxidizer is evaluated simultaneously in accordance with the specifications outlined in 40 CFR 63.5160(d)(1)(i) – (x), Subpart SSSS.

The permittee shall conduct each performance test under representative operating conditions. Operations during periods of start-up, shutdown, or non-operation do not constitute representative conditions for the purpose of a performance test. Moreover, the permittee may not conduct a performance test during periods of malfunction. The permittee shall record and maintain all applicable process information that is necessary to document operating conditions during a test and explain why the conditions represent normal operation.

- (2) ***Operating Limit:*** The permittee shall establish a minimum combustion temperature as the operating limit during each performance test required by

sub-paragraph (b)(1) in accordance with 40 CFR 63.5160(d)(3)(i), Subpart SSSS.

(c) **For The Coating Equipment (Coating Stations and Ovens):**

- (1) ***Capture System:*** The permittee shall develop a capture system monitoring plan for each system that identifies the following information:
  - (i) The operating parameter to be monitored to ensure that the capture efficiency determined by sub-paragraph (c)(2);
  - (ii) The explanation as to why the specified parameter is appropriate for demonstrating on-going compliance;
  - (iii) The operating limit(s) for the capture system; and
  - (iii) The specific monitoring procedures.
- (2) ***Capture Efficiency:*** The permittee shall determine the capture efficiency for the capture system of each work-station or oven by utilizing one (1) of the following methods (as applicable):
  - (i) For an enclosure that meets the criteria for a permanent total enclosure (PTE), the permittee may assume it achieves 100% capture efficiency.

However, the permittee must confirm that the capture system is a PTE by demonstrating that it meets the requirements outlined in Section 6 of EPA Test Method 204 (or an EPA-approved alternative method) and that all exhaust gases from the enclosure are delivered to the thermal oxidizer.
  - (ii) The permittee may determine the capture efficiency in accordance with the protocols for testing with temporary total enclosures specified in EPA Test Methods 204A through F. However, the permittee may exclude never-controlled work-stations from such capture efficiency determinations.
  - (iii) The permittee may use any capture efficiency protocol and test methods that satisfy the criteria of either the “Data Quality Objective” or the “Lower Confidence Limit” approach as described in Appendix A of 40 CFR Part 63, Subpart KK – National Emission Standards for the Printing and Publishing Industry. However, the permittee may exclude never-controlled work-stations from such capture efficiency determinations.

(Ref.: 40 CFR 63.5150(a)(4) and 63.5160(b) – (e); Subpart SSSS)

5.B.6 For Emission Point AA-001, AC-001, AC-002, and AE-001, if an operating parameter monitored in accordance with Condition 5.B.8 is out of the allowed range specified in Condition 3.B.6, it will be considered a deviation from the operating limit.

(Ref.: 40 CFR 63.5150(b); Subpart SSSS)

5.B.7 For Emission Point AA-001, AC-001, AC-002, and AE-001, as a result of choosing the organic HAP compliance option specified in Condition 3.B.5, the permittee shall maintain the following information in accordance with the specified provisions:

- (a) Whenever a work station is operated, continuously monitor the operating parameter established in accordance with Condition 5.B.5(c)(1).
- (b) Calculate the overall organic HAP control efficiency (“**R**”) by using Equation 7 of Subpart SSSS.
- (c) Measure the mass (in kilograms) of each coating material applied in each work-station during the month.
- (d) Calculate the total organic HAPs emitted during each month (“**H<sub>e</sub>**”) by using Equation 8 of Subpart SSSS [for periods when the thermal oxidizer has not operated above the operating limit established in accordance with Condition 5.B.7(b)(2), the destruction / removal efficiency is determined to be zero].
- (e) Calculate the mass organic HAP emission rate based on volume of solids applied (in kilograms per liter) (“**L<sub>ANNUAL</sub>**”) for each rolling 12-month period by using Equation 6 of Subpart SSSS.

If “**L<sub>ANNUAL</sub>**” is less than or equal to 0.046 kilograms of organic HAPs per liter of coating solids applied, the permittee is in compliance.

- (f) **Compare actual performance to the required operating limits:** The permittee shall demonstrate compliance with the operating limits specified in Condition 3.B.6 for each 3-hour period by comparing actual monitoring data to the required limits.

(Ref.: 40 CFR 63.5170(d)(2) and (f)(1); Subpart SSSS)

5.B.8 For Emission Point AA-001, AC-001, AC-002, and AE-001, the permittee shall maintain the following information:

- (a) Records on the compliance option used and the time periods (beginning and ending dates and times) for each used option;
- (b) The following records on all measurements needed to demonstrate compliance with Subpart SSSS:
  - (1) Control device and capture system operating parameter data in accordance with Condition 5.B.5(b) and (c);

- (2) Organic HAP content data for the purpose of demonstrating compliance in accordance with Condition 5.B.5(a)(1);
  - (3) Volatile matter and solids content data for the purpose of demonstrating compliance in accordance with Condition 5.B.5(a)(2);
  - (4) The overall control efficiency determination using capture efficiency tests and thermal oxidizer destruction /removal efficiency tests in accordance with Condition 5.B.5(b)(1) and (c)(2); and
  - (5) Material usage, HAP usage, volatile matter usage, solids usage, and compliance demonstrations using this data in accordance with Condition 5.B.9;
- (c) For each deviation from an emission limitation reported under Condition 5.C.4(e), records on the following information (as applicable):
- (1) The date, time, and duration of the deviation;
  - (2) A list of equipment for which the deviation occurred and the cause of the deviation;
  - (3) An estimate on the quantity of organic HAPs emitted over the emission limitation specified in Condition 3.B.6 or any applicable operating limit established in accordance with Condition 5.B.5, and a description of the method used to calculate the estimate.
  - (4) A record of actions taken to minimize emissions in accordance with Condition 3.D.1 and any corrective actions taken to return the affected unit to its normal or usual manner of operation.

(Ref.: 40 CFR 63.5190(a)(1), (2), and (5); Subpart SSSS)

- 5.B.9 For Emission Point AE-001, the permittee shall also record all periods (during actual coating operations) in excess of three (3) hours during which the average temperatures in any thermal incinerator used to control emissions from an affected facility remains more than 28°C (50°F) below the temperature at which compliance with Condition 3.B.3 was demonstrated during the most recent measurement of incinerator efficiency. The permittee shall identify each such occurrence and its duration in accordance with the requirements of 40 CFR 60.7(c), Subpart A.

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

- 5.B.10 For Emission Point AE-001, the permittee shall install, calibrate, maintain, and operate temperature monitoring equipment in accordance with the manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must either be verified every three (3) months or replaced.

The permittee shall replace the equipment either if it is chosen not to perform the calibration or if the equipment cannot be calibrated properly. Each temperature monitoring device must be equipped with a continuous recorder. The device must have an accuracy of  $\pm 1$  percent of the temperature being monitored (in degrees Celsius), or  $\pm 1$  degree Celsius (whichever is greater). Additionally, the permittee shall install the thermocouple or temperature sensor in the combustion chamber at a location in the combustion zone.

(Ref.: 40 CFR 63.5150(a)(3)(i); Subpart SSSS)

- 5.B.11 For Emission Point AF-001, the permittee shall monitor and record (via a non-resettable hour meter) the hours of operation for each engine on a monthly basis for both emergency and non-emergency service. Additionally, the permittee shall detail (in writing) and maintain what classified each occurrence as either an emergency or a non-emergency.

(Ref.: 40 CFR 63.6625(f) and 63.6655(f); Subpart ZZZZ)



C. Specific Reporting Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Reporting Requirement
AA-000	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.1	VOCs	Submit a Semi-Annual Report on Emissions
AA-001 AC-001 AC-002 AE-001	40 CFR 60.465(c) and (d); Subpart TT	5.C.2		Submit a SMR on Exceedances
	40 CFR 63.5180(c) – (f), (g)(2), and (h); Subpart SSSS	5.C.3	Organic HAPs	Reporting Requirements
	40 CFR 63.5181(c); Subpart SSSS 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.4		
AE-001	40 CFR 63.5181(a); Subpart SSSS 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.C.5	Organic HAPs	Reporting Requirements
AF-001	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.6	Emergency Engine Status	Submit a SMR on the Hours of Operation

5.C.1 For Emission Point AA-000 (Facility-Wide), the permittee shall submit a semi-annual monitoring report (SMR) in accordance with Condition 5.A.4 that details the total emission of VOCs on both a monthly and rolling 12-month total basis. The report shall also include all reference data (e.g. operational data, engineering judgement determinations, performance testing results, etc.) .

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

5.C.2 For Emission Points AA-001, AC-001, AC-002, and AE-001, the permittee shall submit a written report to the MDEQ in accordance with Condition 5.A.4 that details the following information:

- (a) Each instance in which the volume-weighted average of the mass of VOCs emitted to the atmosphere per volume of applied coating solids (“N”) is greater than the limit specified under Condition 3.B.3(a).
- (b) Each instance in which the combustion temperature of the thermal oxidizer drops below the minimum temperature established in Condition 5.B.5(b)(2).

If no such instances have occurred, the report shall state as such.

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

5.C.3 For Emission Points AA-001, AC-001, AC-002, and AE-001, the permittee shall submit the following reports to the MDEQ and the EPA (as applicable):

(a) The permittee shall submit a “Notification of Performance Test” to the MDEQ at least sixty (60) calendar days before the performance test is scheduled to begin. This notification (and the site-specific test plan required under 40 CFR 63.7(c)(2), Subpart A) shall identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained.

The permittee may consider the operating parameter identified in the site-specific test plan to be approved unless explicitly disapproved or unless comments received from the MDEQ require monitoring of an alternate parameter.

(b) The permittee shall submit the results from a performance test to the MDEQ and the EPA in accordance with Condition 5.C.5 before the close of business on the 60<sup>th</sup> day after completion of the performance test.

(c) The permittee shall submit a “Notification of Compliance Status” in accordance with 40 CFR 63.9(h), Subpart A no later than thirty (30) calendar days after the end of the initial rolling 12-month period.

(d) In accordance with Condition 5.A.4, the permittee shall submit a semi-annual compliance report containing the following information:.

(1) The company name and address.

(2) A statement by a responsible official with that official’s name, title, and signature, certifying the accuracy of the content of the report.

(3) Identification of the compliance option or options used during the reporting period. If the permittee switched between compliance options during the reporting period, the permittee shall report the beginning dates the permittee used each option.

(4) A statement that there were no deviations from the organic HAP emission limit specified in Condition 3.B.5 (or any other compliance option) or the applicable operating limits established in accordance with Condition 3.B.6 during the reporting period.

(4) For each deviation of a compliance option or any applicable operating limit, the report shall include the following information:

(i) The total operating time of the coating line during the reporting period.

- (ii) The number, date, time, duration, and cause of deviation from a compliance option or any applicable operating limit established in accordance with Condition 3.B.6 (including an unknown cause – if applicable), and any corrective action taken.
- (iii) The number, date, time, duration, cause (including an unknown cause), and descriptions of corrective actions taken for continuous parameter monitoring systems that are inoperative.
- (iv) The number, date, time, duration, cause (including an unknown cause), and descriptions of corrective actions taken for continuous parameter monitoring systems that are out of control as specified in 40 CFR 63.8(c)(7), Subpart A.
- (v) A list of the equipment, an estimate on the quantity of each regulated pollutant emitted over the applicable compliance option, a description of the method used to estimate the emissions, and the actions taken to minimize emissions in accordance with Condition 3.D.1.

(Ref.: 40 CFR 63.5180(c) – (f), (g)(2), and (h); Subpart SSSS)

- 5.C.4 For Emission Points AA-001, AC-001, AC-002, and AE-001, the permittee shall submit the semi-annual compliance report required by Condition 5.C.3(c) to the EPA via the CEDRI website no later than one (1) year after the reporting template specific to Subpart SSSS has been available. The CEDRI interface can be accessed through the EPA's CDX: <https://cdx.epa.gov>.

If the reporting form for the semi-annual compliance report specific to Subpart SSSS is not available in CEDRI at the time that this report is due, the permittee shall submit the report to the EPA at the appropriate address listed in 40 CFR 63.13, Subpart A. The permittee shall refer to 40 CFR 63.5181(c), Subpart SSSS for additional requirements pertaining to the electronic submittal of semi-annual compliance reports.

Regardless of the requirement to submit electronic copies of reports, a hard-copy of the required reports shall be submitted to the MDEQ.

(Ref.: 40 CFR 63.5181(c); Subpart SSSS)

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

- 5.C.5 For Emission Point AE-001, the permittee must submit the results of each performance test required by Condition 5.C.3(b) to the EPA through its Electronic Reporting Tool (ERT): <https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert>.

Additionally, the permittee shall also submit a hard-copy of any performance test results to the MDEQ.

(Ref.: 40 CFR 63.5181(a); Subpart SSSS and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 5.C.6 For Emission Point AF-001, the permittee shall submit a semi-annual monitoring report (SMR) in accordance with Condition 5.A.4 that details the hours of operation for the engine. The report shall include how many hours are spent for emergency operation, what classified the operation as an emergency, how many hours are spent for non-emergency operation, and the reason for the non-emergency operation.

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

## **SECTION 6. ALTERNATIVE OPERATING SCENARIOS**

6.1 None permitted.

## SECTION 7. TITLE VI REQUIREMENTS

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

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

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

# APPENDIX A

## List of Abbreviations Used In this Permit

11 Miss. Admin. Code Pt. 2, Ch. 1.	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
11 Miss. Admin. Code Pt. 2, Ch. 2.	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
11 Miss. Admin. Code Pt. 2, Ch. 3.	Regulations for the Prevention of Air Pollution Emergency Episodes
11 Miss. Admin. Code Pt. 2, Ch. 4.	Ambient Air Quality Standards
11 Miss. Admin. Code Pt. 2, Ch. 5.	Regulations for the Prevention of Significant Deterioration of Air Quality
11 Miss. Admin. Code Pt. 2, Ch. 6.	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
11 Miss. Admin. Code Pt. 2, Ch. 7.	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lb/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