

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

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Nautic Star, LLC
500 Waterway Drive
Amory, Monroe 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: July 7, 2022

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

Krystal Rudolph

AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: June 30, 2027

Permit No.: 1840-00025

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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 (Nautic Star, LLC)
AA-100	Boat Spray-Up, Molding, and Assembly Operations
AA-101	Spray-Up Operations [consists of gel coat mixing and application conducted within open plant area or common application areas (twenty (20) in total) – each booth equipped with filter pads]
AA-102	Molding Operations [consists of resin mixing and application; conducted within open plant area or the common application areas]
AA-103	Assembly Operations [consists of grinding, sanding, and polishing activities (emissions are released to the interior of the building); includes carpet / fabric installation]
AA-105	Two (2) 6,000-Gallon Polyester Resin Storage Tanks

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 the exceptions provided below:

- (a) Start-up operations may produce emissions that 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

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-000	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Title V Operating Permit issued April 6, 2000 (PSD Avoidance Limit)	3.B.1	VOCs	249.0 tpy (Rolling 12-Month Total)
AA-100	40 CFR Part 63, Subpart VVVV – NESHAP for Boat Manufacturing 40 CFR 63.5683(a) – (c), 63.5689, 63.5692(b), and 63.5773; Subpart VVVV	3.B.2	Organic HAPs	General Applicability
AA-101 AA-102	40 CFR 63.5698(a), (b), and (d); Subpart VVVV	3.B.3	Organic HAPs	Applicable Limit for Open-Molding Operations (Rolling 12-Month Average)
	40 CFR 63.5734(a); Subpart VVVV	3.B.4		Content Limit for Cleaning Solvents
AA-102	40 CFR 63.5714(b) – (d); Subpart VVVV	3.B.5	Organic HAPs	Applicable Limits for Filled Resin Usage
AA-103	40 CFR 63.5740(b); Subpart VVVV	3.B.6	Organic HAPs	Content Limit for Carpet and Fabric Adhesives
AA-105	40 CFR Part 63, Subpart EEEE – NESHAP: Organic Liquids Distribution (Non-Gasoline) 40 CFR 63.2334(a) and 63.2338(a); Subpart EEEE	3.B.7	Organic HAPs	General Applicability

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., established in the Title V Operating Permit issued April 6, 2000 – PSD Avoidance Limit)

3.B.2 For Emission Point AA-100, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 63, Subpart VVVV– National Emission Standards for Hazardous Air Pollutants (NESHAP) for Boat Manufacturing and 40 CFR Part 63, Subpart A – General Provisions (as required in Table 8 of Subpart VVVV).

For the purpose of this permit, the permittee is considered an “existing” source.

(Ref.: 40 CFR 63.5683(a) – (c), 63.5689, 63.5692(b), and 63.5773; Subpart VVVV)

3.B.3 For Emission Points AA-101 and AA-102, unless otherwise specified herein, the permittee shall limit the total emission of organic hazardous air pollutants (HAPs) from all open-molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat operations to the quantity (in kilograms) calculated by the following equation (based on a rolling 12-month rolling average):

$$HAP_{Limit} = [46(M_R) + 159(M_{PG}) + 291(M_{CG}) + 54(M_{TR}) + 214(M_{TG})]$$

Where:

HAP_{Limit} = the total allowable organic HAPs that can be emitted from the all open molding operations, kilograms.

M_R = the mass of production resin used in the past twelve (12) months, in megagrams;

M_{PG} = the mass of pigmented gel coat used in the past twelve (12) months, in megagrams;

M_{CG} = the mass of clear gel coat used in the past twelve (12) months, in megagrams;

M_{TR} = the mass of tooling resin used in the past twelve (12) months, in megagrams; and

M_{TG} = the mass of tooling gel coat used in the past twelve (12) months, in megagrams.

For the purpose of this permit, the following materials used in open-molding are exempt above-noted emissions calculation:

(a) Production resins (including skin coat resins) that must meet specifications for use in military vessels or must be approved by the U.S. Coast Guard for use in the construction of lifeboats, rescue boats, and other life-saving appliances approved under 46 CFR, Chapter I – Subchapter Q or the construction of small passenger vessels regulated by 46 CFR Chapter I – Subchapter T.

Production resins for which this exemption is used must be applied with non-atomizing (non-spray) resin application equipment.

(b) Pigmented, clear, and tooling gel coat used for part or mold repair touch-up that does not exceed one (1) percent by weight of all gel coat used on a rolling 12-month average basis; and

(c) Pure, one hundred (100) percent vinylester resin used for skin coats. This exemption does not apply to blends of vinylester and polyester resins used for skin coats, and the total resin materials cannot exceed five (5) percent by weight of all resin used on a rolling 12-month average basis.

(Ref.: 40 CFR 63.5698(a), (b), and (d); Subpart VVVV)

- 3.B.4 For Emission Points AA-101 and AA-102, the permittee shall only use cleaning solvents that contain no more than five (5) percent organic HAPs by weight for the routine flushing of resin and gel coat application equipment (e.g. spray guns flow-coaters, brushes, rollers, and squeegees).

For the purpose of this permit, the specified organic HAP content limit does not apply to the removal of cured resin or gel coat from application equipment.

(Ref.: 40 CFR 63.5734(a); Subpart VVVV)

- 3.B.5 For Emission Point AA-102, unless otherwise specified herein, the permittee shall comply with the following emission limitations (as applicable) **if** a filled production resin or filled tooling resin is used:

- (a) *For a filled production resin* – no more than forty-six (46) kilograms of organic HAPs per megagram of filled resin applied; and
- (b) *For a filled tooling resin* – no more than fifty-four (54) kilograms of organic HAPs per megagram of filled resin applied;

If filled resin usage is included in the “emissions averaging option” procedure outlined in Condition 5.B.4, the above-noted organic HAP limitations do not apply.

For the purpose of this permit, a “filled resin” is a resin to which an inert material has been added to change the viscosity, density, shrinkage, or other physical properties.

(Ref.: 40 CFR 63.5714(b) – (d); Subpart VVVV)

- 3.B.6 For Emission Point AA-103, the permittee shall only use carpet and fabric adhesives that contain no more than five (5) percent organic HAP by weight.

(Ref.: 40 CFR 63.5740(a); Subpart VVVV)

- 3.B.7 For Emission Point AA-105, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 63, Subpart EEEE – NESHAP: Organic Liquids Distribution (Non-Gasoline) and 40 CFR Part 63, Subpart A – General Provisions (as required in Table 12 of Subpart EEEE).

(Ref.: 40 CFR 63.2334(a) and 63.2338(a); Subpart EEEE)

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 lb. / MMBTU
11 Miss. Admin. Code Pt. 2, R. 1.4.A.(1).	3.C.2	SO ₂	4.8 lb. / MMBTU

3.C.1 The maximum permissible emission of ash and/or particulate matter (PM) from any fossil fuel burning installation of less than ten (10) million BTU (MMBUT) 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-100	40 CFR 63.5731(a) and (b); Subpart VVVV	3.D.1	Organic HAPs	Standard for Resin and Gel Coat Mixing Containers
	40 CFR 63.5734(b); Subpart VVVV	3.D.2		Standards for Solvent-Storing Containers

3.D.1 For Emission Point AA-100, the permittee shall at all times cover all resin and gel coat mixing containers with a capacity equal to / greater than 208 liters (including those used for on-site mixing of putties and poly-putties) with no visible gaps in place.

For the purpose of this permit, the specified work practice standard does not apply when a material is manually added to / removed from a container or when mixing / pumping equipment is placed in / removed from a container.

(Ref.: 40 CFR 63.5731(a) and (b); Subpart VVVV)

3.D.2 For Emission Point AA-100, the permittee shall store organic HAP-containing solvents used for the removal of cured resin or gel coat in containers with covers. The covers shall have no visible gaps and shall be in place at all times (except when equipment to be cleaned is placed in or removed from the container).

For containers with a capacity greater than 7.6 liters, the distance from the top of the container to the solvent surface shall be no less than 0.75 times the diameter of the container. Additionally, the containers that store organic HAP-containing solvents used for removing cured resin or gel coat are exempt from the requirements specified in 40 CFR part 63, Subpart T.

For the purpose of this permit, a “cured resin or gel coat” means resin or gel coat that has changed from a liquid to a solid.

(Ref.: 40 CFR 63.5734(b); Subpart VVVV)

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 March 1 (or February 29 – when applicable) of each year for the preceding calendar year. If the permit was reissued or modified during the course of the preceding calendar year, the compliance certification shall address each version of the permit. 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), and (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. Supporting 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 August 29 and March 1 (or February 29 – when applicable) of each year for the preceding six-month period (i.e. January 1 – June 30; July 1 – December 31). 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.

For applicable periodic reporting requirements in 40 CFR Parts 60, 61, and 63, the permittee shall comply with the deadlines in this condition for reporting conducted on a semi-annual basis. Additionally, any required quarterly reports shall be submitted by the end of the month following each calendar quarter (i.e. April 30, July 31, October 31, and

January 31), and any required annual reports shall be submitted by January 31 following each calendar year.

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

(Ref.: 40 CFR 60.19(c), 61.10(g), and 63.10(a)(5); Subpart A)

- 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).)

- 5.A.8 Unless otherwise specified in Section 4, the monitoring, testing, recordkeeping, and reporting requirements of Section 5 herein supersede the requirements of any preceding permit to construct and/or operate upon permit issuance.

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

B. SPECIFIC MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Monitoring / Recordkeeping Requirement
AA-000	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.1	VOCs	Calculate and Record Emissions (Monthly and Rolling 12-Month Total)
AA-100	40 CFR 63.5758(a); Subpart VVVV	5.B.2	Organic HAPs	Determine the Total Content of Each Applicable Material
	40 CFR 63.5767(a) – (c); Subpart VVVV	5.B.3		Recordkeeping Requirements
AA-101 AA-102	40 CFR 63.5704(a)(1) – (3) and 63.5714(d); Subpart VVVV	5.B.4	Organic HAPs	Calculate Emissions (Rolling 12-Month Average)
	40 CFR 63.5707(a), (b), and (d); Subpart VVVV	5.B.5		Maintain and Implement an “Implementation Plan”
	40 CFR 63.5731(c) and (d); Subpart VVVV	5.B.6		Conduct a Visual Inspection on Each Applicable Mixing Container Monthly
	40 CFR 63.5737(a) – (c); Subpart VVVV	5.B.7		Determine the Content of Each Cleaning Solvent Conduct a Visual Inspection on Each Applicable Container Monthly
AA-102	40 CFR 63.5714(a); Subpart VVVV	5.B.8	Organic HAPs	Calculate the Content of Each Filled Resin (As Applicable)
AA-103	40 CFR 63.5740(b); Subpart VVVV	5.B.9	Organic HAPs	Calculate the Content of Each Applicable Adhesive
AA-105	40 CFR 63.2343(b)(3); Subpart EEEE	5.B.10	True Vapor Pressure	Maintain Documentation that Indicates the Annual Average True Vapor Pressure of the Total Organic HAP

5.B.1 For Emission Point AA-000 (Facility-Wide), the permittee shall demonstrate compliance with the emission limitation specified in Condition 3.B.1 by calculating and recording the total emission of VOCs in tons on both a monthly and rolling 12-month total basis.

Unless otherwise specified herein, the permittee shall include all reference data used to validate calculated emissions (e.g. operational data, applicable emission factors, manufacturer’s specifications, engineering judgement determinations, etc.).

Additionally, the permittee shall maintain documentation that details the following information for each coating, adhesive, solvent, spray material, or any other material that contains a VOC used on a monthly basis:

- (a) The identification or product name;

- (b) The total quantity (in either pounds or gallons) used;
- (c) The VOC content (in percent weight) as well as a description of the method used to determine the VOC content;
- (e) The density (in pounds per gallon); and
- (f) The total quantity (in either pounds or gallons) recovered as well as a description of the method used to determine the quantity recovered.

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

5.B.2 For Emission Point AA-100, the permittee shall determine the organic HAP content for each material used in an open-molding resin and gel coat operation and/or a carpet and fabric adhesive operation by utilizing one (1) of the following methods:

- (a) EPA Test Method 311 (found in Appendix A of 40 CFR Part 63) – For determining the mass fraction of organic HAPs, the permittee shall use the following procedures:
 - (1) Include each organic HAP that is measured to be present at 0.1 percent by weight or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens [as specified in 29 CFR 1910.1200(d)(4), Subpart Z] and at 1.0 percent by weight or more for other compounds. Express the mass fraction of each organic HAP measured as a value truncated to four places after the decimal point.
 - (2) Calculate the total organic HAP content in the test material by adding up the individual organic HAP contents and truncating the result to three (3) places after the decimal point.
- (b) EPA Test Method 24 (found in Appendix A of 40 CFR Part 60) – The permittee may use EPA Test Method 24 to determine the mass fraction of non-aqueous volatile matter in aluminum coatings and use that value as a substitute for mass fraction of organic HAPs.
- (c) ASTM D1259-85 (Standard Test Method for Nonvolatile Content of Resins) – The permittee may use ASTM D1259-85 to measure the mass fraction of volatile matter in resins and gel coats for open molding operations and use that value as a substitute for mass fraction of organic HAPs.
- (d) Alternative Method – The permittee may use an alternative test method for determining mass fraction of organic HAPs if the permittee obtains prior approval by the MDEQ. The permittee must follow the procedure outlined in 40 CFR 63.7(f), Subpart A to submit an alternative test method for approval.
- (e) Information from the supplier or manufacturer of the material – The permittee may rely on information [other than that generated by the test methods specified in

paragraphs (a) – (d) of this condition] such as manufacturer's formulation data in accordance with the following procedures:

- (1) Include each organic HAP that is present at 0.1 percent by weight or more for any OSHA-defined carcinogen and at 1.0 percent by weight or more for other compounds.
- (2) If the organic HAP content is provided by the material supplier / manufacturer as a range, the permittee shall use the upper limit of the range for determining compliance.

If a separate measurement of the total organic HAP content is determined using a test method(s) specified in paragraph (a) – (d) of this condition exceeds the upper limit of the total organic HAP content range provided by the material supplier / manufacturer, the permittee shall use the measured organic HAP content to determine compliance.

- (3) If the organic HAP content is provided as a single value, the permittee may assume the value is a manufacturing target value, and the actual organic HAP content may vary from the target value.

If a separate measurement of the total organic HAP content using the methods specified in paragraphs (a) – (d) of this condition is less than two (2) percentage points higher than the total organic HAP content value provided by the material supplier / manufacturer, the permittee may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by two (2) percentage points or more, the permittee shall use the measured organic HAP content to determine compliance.

- (f) *Solvent Blends* – Solvent blends may be listed as single components for some regulated materials in certifications provided by manufacturers / suppliers. Solvent blends may contain organic HAPs that must be counted toward the total organic HAP content of the materials. When detailed organic HAP content data for solvent blends are not available, the permittee may use the organic HAP content values that are listed in Table 5 or 6 of Subpart VVVV.

The permittee may use Table 6 of Subpart VVVV only if the solvent blends in the materials used do not match any of the solvent blends in Table 5 of Subpart VVVV and it is known only whether the blend is either aliphatic or aromatic. However, if the test results indicate higher values than those listed in Table 5 or 6 of Subpart VVVV, the test results shall be used for determining compliance.

(Ref.: 40 CFR 63.5758(a); Subpart VVVV)

- 5.B.3 For Emission Point AA-100, the permittee shall maintain documentation on the following information:

- (a) A copy of each notification and report that was submitted to comply with Subpart VVVV (including all supporting documentation); and
- (b) The total amounts of open molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP contents for each operation (expressed as weight-percent).

For open molding production resin and tooling resin, the permittee shall record the amounts of each applied by atomized and non-atomized methods.

(Ref.: 40 CFR 63.5767(a) – (c); Subpart VVVV)

5.B.4 For Emission Points AA-101 and AA-102, the permittee shall demonstrate compliance with the organic HAP emission limitation specified in Condition 3.B.3 by utilizing the “emissions averaging option” in accordance with the following requirements:

- (a) Utilize the applicable method(s) specified in Condition 5.B.2 to determine organic HAP content for each resin and gel coat;
- (b) Utilize the following equations to demonstrate that the emission of organic HAPs do not exceed the applicable limit (based on a rolling 12-month average):

- (1) **Weighted-average maximum achievable control technology (MACT) model point value (“PV_{OP}”)**: The permittee shall calculate each applicable value at the end of every month by using Equation 1:

$$PV_{OP} = \frac{\sum_{i=1}^n (M_i PV_i)}{\sum_{i=1}^n (M_i)} \quad (\text{Eqn. 1})$$

Where

PV_{OP} = the weighted-average maximum achievable control technology (MACT) model point value for an individual open-molding operation (i.e. PV_R , PV_{PG} , PV_{CG} , PV_{TR} , or PV_{TG}), in kilograms of HAPs per megagram of material applied;

M_i = the mass of resin or gel coat “ i ” used within an operation in the past twelve (12) months, in megagrams;

n = the number of different open molding resins and gel coats used within an operation in the past twelve (12) months; and

PV_i = the MACT model point value for resin or gel coat “ i ” used within an operation in the past twelve (12) months, in kilograms of HAPs per megagram of material applied.

The permittee shall use the equations outlined in Table 3 of Subpart VVVV to calculate “ PV_i ” for each resin and gel coat used in each operation in the past twelve (12) months.

- (2) **Annual organic HAP emissions (“HAP”)**: The permittee shall calculate the organic HAP emissions (based on a rolling 12-month average) by using Equation 2 at the end of every twelfth (12th) month:

$$HAP = [(PV_R)(M_R) + (PV_{PG})(M_{PG}) + (PV_{CG})(M_{CG}) + (PV_{TR})(M_{TR}) + (PV_{TG})(M_{TG})]$$

Where

HAP = the total organic HAP emissions calculated using MACT model point values from each operation, in kilograms;

PV_R = the weighted-average MACT model point value for production resin used in the past twelve (12) months, in kilograms per megagram;

M_R = the total mass of production resin used in the past twelve (12) months, in megagrams;

PV_{PG} = the weighted-average MACT model point value for pigmented gel coat used in the past twelve (12) months, in kilograms per megagram;

M_{PG} = the total mass of pigmented gel coat used in the past twelve (12) months, in megagrams;

PV_{CG} = the weighted-average MACT model point for clear gel coat used in the past twelve (12) months, in kilograms per megagram;

M_{CG} = the total mass of clear gel coat used in the past twelve (12) months, in megagrams;

PV_{TR} = the weighted-average MACT model point value for tooling resin used in the past twelve (12) months, in kilograms per megagram;

M_{TR} = the total mass of tooling resin used in the past twelve (12) months, in megagrams;

PV_{TG} = the weighted-average MACT model point value for tooling gel coat used in the past 12 months, in kilograms per megagram;

M_{TG} = the total mass of tooling gel coat used in the past twelve (12) months, in megagrams;

- (3) If the permittee includes the usage of filled resin (production and/or tooling) into the “emissions averaging option”, the calculated “ PV_F ” value(s) [as

determined by Equation 3] shall be incorporated as a respective “ PV_i ” value into Equation 1.

- (c) Maintain documentation that details the following information for each resin and gel coat:
 - (1) The HAP content;
 - (2) The amount of material used each month; and
 - (3) The application method used for production resin and tooling resin (this information is not required all production resins and tooling resins are applied with non-atomized technology); and
 - (4) The calculations performed in accordance with paragraphs (b) of this condition.

(Ref.: 40 CFR 63.5704(a)(1) – (3) and 63.5714(d); Subpart VVVV)

5.B.5 For Emission Points AA-101 and AA-102, the permittee shall maintain on-site an up-to-date “Implementation Plan” that details the following information for all open-molding operations:

- (a) A respective description of each operation included within Equation 2 and the steps taken to maintain compliance with all applicable requirements;
- (b) The maximum organic HAP content of the materials used, the application method used (if any atomized resin application methods are used in Equation 2), and any other methods used to control emissions; and
- (c) The calculations that show the operations covered by the plan comply with the organic HAP emission limitation specified in Condition 3.B.4.

(Ref.: 40 CFR 63.5707(a), (b), and (d); Subpart VVVV)

5.B.6 For Emission Points AA-101 and AA-102, the permittee shall demonstrate compliance with the work practice standard specified in Condition 3.D.1 by conducting a visual inspection on all applicable mixing containers at least once per month. Each visual inspection should ensure that each applicable container has a cover with no visible gaps between the cover and container (or between the cover and equipment passing through the cover).

The permittee shall maintain documentation that details which mixing containers are subject to Condition 3.D.1 and results of each visual inspection (including a description of any repairs or corrective actions taken).

(Ref.: 40 CFR 63.5731(c) and (d); Subpart VVVV)

- 5.B.7 For Emission Points AA-101 and AA-102, the permittee shall demonstrate compliance with the content limitation specified in Condition 3.B.4 by determining and recording the organic HAP content of each applicable cleaning solvent in accordance with one (1) of the methods specified in Condition 5.B.2.

If the permittee recycles cleaning solvents on-site, the permittee may demonstrate compliance by utilizing documentation from the solvent manufacturer / supplier or a measurement of the organic HAP content of the cleaning solvent as originally obtained from the solvent supplier.

Additionally, the permittee shall perform a visual inspection on each container that holds organic HAP-containing solvents used for removing cured resin and gel coat at least once per month to ensure that each container has a cover with no visible gaps. The permittee shall maintain documentation that details the results of each visual inspection and any repairs made to a cover.

(Ref.: 40 CFR 63.5737(a) – (c); Subpart VVVV)

- 5.B.8 For Emission Point AA-102, the permittee shall demonstrate compliance with the organic HAP emission limitations specified in Condition 3.B.5 (as applicable) **if** a filled production resin or filled tooling resin is used on an as-applied basis:

$$PV_F = PV_u \times \frac{(100 - \%Filler)}{100} \quad \text{(Eqn. 3)}$$

Where:

PV_F = the as-applied MACT model point value for a filled production resin or tooling resin, in kilograms of organic HAPs per megagram of filled material;

PV_u = the MACT model point value for the neat (unfilled) resin (i.e. before filler is added) as calculated using the formulas outlined in Table 3 of Subpart VVVV; and

$\%Filler$ = the weight-percent of filler in the as-applied filled resin system.

(Ref.: 40 CFR 63.5714(a); Subpart VVVV)

- 5.B.9 For Emission Point AA-103, the permittee shall demonstrate compliance with the content limit specified in Condition 3.B.6 by determining and recording the organic HAP content of each carpet and fabric adhesive in accordance with one (1) of the methods specified in Condition 5.B.2.

(Ref.: 40 CFR 63.5740(b); Subpart VVVV)

- 5.B.10 For Emission Point AA-105, the permittee shall maintain up-to-date documentation that verifies each storage tank is not required to be controlled under the requirements of 40

CFR Part 63, Subpart EEEE. Additionally, the documentation shall include the annual average true vapor pressure of the organic HAP content within the stored polyester resin mixture(s).

(Ref.: 40 CFR 63.2343(b)(3); Subpart EEEE)

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 Monitoring Report
AA-100	40 CFR 63.5761(b); Subpart VVVV	5.C.2	Organic HAPs	Notify the MDEQ on Any Change to a Previously Submitted Notification
	40 CFR 63.5707(e), 63.5764(b)(4), (5), (c)(1) – (7), and 63.5765(d) – (f); Subpart VVVV	5.C.3		Submit a Semi-Annual Compliance Report

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 following information:

- (a) The total emission of VOCs (in tons) based on a monthly and rolling 12-month basis; and
- (b) For each coating, adhesive, solvent, spray material, or any other material that contains a VOC used in a reporting period, the corresponding report shall include the following information:
 - (1) The identification or product name;
 - (2) The total quantity (in either pounds or gallons) used each month;
 - (3) The VOC content (in percent weight);
 - (4) The density (in pounds per gallon); and
 - (5) The total quantity (in either pounds or gallons) of each material recovered.

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

5.C.2 For Emission Point AA-100, the permittee shall notify the MDEQ if any information contained within a previously submitted notification (as required by Subpart VVVV) has changed no later than fifteen (15) days after actual change.

(Ref.: 40 CFR 63.5761(b); Subpart VVVV)

5.C.3 For Emission Point AA-100, the permittee shall submit a compliance report to the MDEQ in accordance with Condition 5.A.4 that details the following information:

- (a) The description of any changes in the manufacturing process since the last SMR;

- (b) A statement or table that displays the following information for each applicable operation:
 - (1) The applicable organic HAP content limit,
 - (2) The applicable application equipment requirement; and/or
 - (3) The applicable MACT model point value.

Additionally, the statement or table shall indicate either the actual weighted-average organic HAP content or the weighted-average MACT model point value (if applicable) for each applicable operation based on a rolling 12-month average period.

- (c) A statement that indicates compliance with applicable emission limits and/or work practice standards (if applicable);
- (d) If there has been a deviation from an applicable emission limit or work practice standard, the compliance report shall include the following information:
 - (1) A description of the operation involved in the deviation;
 - (2) The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation;
 - (3) A description of any corrective action(s) taken to minimize the deviation and any actions taken to prevent the deviation from happening again; and
 - (4) A statement on whether or not the permittee was in compliance for the rolling 12-month averaging period.
- (e) An updated copy of the “Implementation Plan” if a revision is made during a reporting period.

Additionally, the permittee shall submit each semi-annual compliance report to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI) that can be accessed through the CDX (<https://cdx.epa.gov/>). The permittee shall use the appropriate electronic report template on the CEDRI website (<https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri>) for Subpart VVVV. Nonetheless, the permittee shall submit each report by the deadline specified in Condition 5.A.4 (regardless of the method in which the report is submitted).

If permittee claims some of the required information to be submitted via CEDRI is “confidential business information” (CBI), the permittee shall submit a complete report (including the information claimed to be CBI) to the EPA using the appropriate form from the CEDRI website or an alternate electronic file consistent with the XML schema listed on the CEDRI website.

The permittee shall submit the file on a compact disc, flash drive, or other commonly used electronic storage medium and clearly mark the medium as CBI. The electronic medium shall be submitted to the following address:

U.S. EPA/OAQPS/CORE CBI Office,
Attention: Group Leader – Measurement Policy Group, MD C404-02
4930 Old Page Road
Durham, NC 27703

The above-noted file (with the CBI omitted) must be submitted to the EPA via the CDX.

The permittee may assert a claim of EPA system outage or force majeure for failure to comply with the required electronic submission via the CDX in accordance with 40 CFR 63.5765(e) or (f), Subpart VVVV.

(Ref.: 40 CFR 63.5707(e), 63.5764(b)(4), (5), (c)(1) – (7), and 63.5765(d) – (f); Subpart VVVV)

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 containing class I, class II or non-exempt substitute refrigerants;
 - (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

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 Part 61, or National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR Part 63
NMVOC	Non-Methane Volatile Organic Compounds
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM ₁₀	Particulate Matter less than 10 µm in diameter
PM _{2.5}	Particulate Matter less than 2.5 µm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOHAP	Volatile Organic Hazardous Air Pollutant
VOC	Volatile Organic Compound