

STATE OF MISSISSIPPI AND FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL PERMIT

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

THIS CERTIFIES THAT

Keith Huber Corporation
14220 Highway 49 North
Gulfport, Mississippi
Harrison County

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

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: _____

Permit No.: 1020-00153

Effective Date: As specified herein.

Expires: [No more than 5 years from the issue date.]

Draft/Proposed [Date]

SECTION 1

A. GENERAL CONDITIONS

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

- (a) To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and
- (b) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission.

(Ref.: Miss. Code Ann. 49-17-21)

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

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

10. Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(7).)

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

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

12. This permit does not authorize a modification as defined in Mississippi Administrative Code, Title 11, Part 2, Chapter 2 – Permit Regulations for the Construction and/or Operation of Air Emission Equipment. A modification may require a Permit to Construct and a modification of this permit.

“Modification” is defined as [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:
 - 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 51.166; or
 - The source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.66;
 - (e) An increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or
 - (f) Any change in ownership of the stationary source.
- (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.C.(15).)

B. GENERAL OPERATIONAL CONDITIONS

1. Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in 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.)
2. Any diversion from or bypass of collection and control facilities is prohibited, except as provided for in Mississippi Administrative Code, Title 11, Part 2, Chapter 1 – Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)
3. Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits.
(Ref.: Miss. Code Ann. 49-17-29 1.a(i) and (ii).)
4. Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, 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 noncompliance, 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 startups 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 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, Rule 1.10.B.(2)(a) through (e).

- (3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

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

5. *Compliance Testing*: 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).)

C. PERMIT RENEWAL / MODIFICATION / TRANSFER / TERMINATION

1. For renewal of this permit, the applicant shall make application not less than one hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board.

If the applicant submits a timely and complete application pursuant to this paragraph and the Permit Board, through no fault of the applicant, fails to act on the application on or before the expiration date of the existing permit, the applicant shall continue to operate the stationary source under the terms and conditions of the expired permit, which shall remain in effect until final action on the application is taken by the Permit Board. Permit expiration terminates the source’s ability to operate unless a timely and complete renewal application has been submitted.

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

2. The permittee shall furnish to the 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 permit or, for information claimed 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. 2.2.B.(15)(d).)

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

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

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

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

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

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

SECTION 2
EMISSION POINT DESCRIPTION

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

Emission Point	Description
AA-000	Facility-Wide [Keith Huber Corporation]
AA-100	Facility-wide Abrasive Blasting Operations
AA-101	Two (2) Enclosed Sandblast Booth Exhaust with filter
AB-100	Facility-wide Metal Working Operations (Cutting; grinding; welding)
AC-100	Facility-wide Surface Coating Operations
AC-101	Four (4) Spray paint booths (equipped with dry filters)
AD-100	Facility-Wide Tank Storage
AD-101	500-Gallon Non-Highway Diesel Storage Tank
AD-102	500-Gallon Highway Diesel Storage Tank

SECTION 3 EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
AA-000 (Facility-wide)	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.1	Opacity	≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). (Title V Avoidance Limits)	3.2	HAPs	9.0 tpy (Individual) 23.0 tpy (Total) (Rolling 12-Month Totals)
			VOC	95.0 tpy (Rolling 12-Month Totals)
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.3	PM	$E = 4.1(p^{0.67})$
AA-100 AB-100 AC-100	40 CFR Part 63, Subpart XXXXXX - NESHAP Area Source Standards for Nine Metal Fabrication and Finishing Source Categories 40 CFR 63.11514(a)(2) and (b)(1-5); Subpart XXXXXX	3.4	HAP	General Applicability

3.1 For Emission Point AA-000 (Facility-Wide), except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity. This shall not apply to vision obscuration caused by uncombined water droplets.

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

3.2 For Emission Point AA-000 (Facility-Wide), the permittee shall limit the respective emission of volatile organic compound (VOCs) emissions to no more than 95.0 tpy, hazardous air pollutant (HAP) emissions to no more than 9.0 tpy for any individual HAP, and no more than 23.0 tpy for all HAPs in total, based on a rolling 12-month total.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2. B.(10). - Title V Avoidance Limit)

3.3 For Emission Point AA-000, the permittee shall not allow the emission of particulate matter (PM) in total quantities in any one (1) hour from any manufacturing process (which

includes any associated stacks, vents, outlets, or combination thereof) to exceed the amount determined by the relationship:

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

where “E” is the emission rate in pounds per hour and “p” is the process weight input rate in tons per hour. Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs.

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

- 3.4 For Emission Points AA-100, AB-100, and AC-100, the permittee is subject to and shall comply with the applicable requirements of 40 CFR Part 63, Subpart XXXXXX – National Emission Standards for Hazardous Air Pollutants (NESHAP) Area Source Standards for Nine Metal Fabrication and Finishing Source Categories and 40 CFR Part 63, Subpart A – General Provisions (as required in Table 2 of Subpart XXXXXX).

For purpose of the permit, a material is considered as containing a “metal fabrication / finishing hazardous air pollutant” (MFHAP) if it contains cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (wt.%) (as the metal) or if it contains manganese in amounts greater than or equal to 1.0 wt.% (as the metal).

(Ref.: 40 CFR 63.11514(a)(2), (b)(1) - (5); Subpart XXXXXX)

SECTION 4 WORK PRACTICES STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Work Practice
AA-100	40 CFR 63.11516(a)(1), Subpart XXXXXX	4.1	MFHAPs	Requirements for enclosed and unvented dry abrasive blasting operations
AB-100	40 CFR 63.11516(b); Subpart XXXXXX	4.2	MFHAPs	Requirements for Machining Operations
	40 CFR 63.11516(c); Subpart XXXXXX	4.3		Requirements for Dry Grinding and Dry Polishing with Machines
	40 CFR 63.11516(f)(1) - (2); Subpart XXXXXX	4.4		Requirements for Welding Operations
AC-100	40 CFR 63.11516(d)(1)(i through iii); Subpart XXXXXX	4.5	MFHAPs	Requirements for spray-painting operations
	40 CFR 63.11516(d)(2); Subpart XXXXXX	4.6		Spray gun transfer efficiency requirements
	40 CFR 63.11516(d)(4); Subpart XXXXXX	4.7		Spray gun cleaning requirements
	40 CFR 63.11516(d)(6), Subpart XXXXXX	4.8		Spray paint training requirements
	40 CFR 63.11516(d)(5),(8)&(9), Subpart XXXXXX	4.9		Spray paint training certification requirements

4.1 For Emission Point AA-100, for a dry abrasive blasting operation consisting of an abrasive blasting chamber that is totally enclosed and unvented, as defined in 40 CFR 63.11522, the permittee must implement management practices to minimize emissions of MFHAP as described below:

- (a) The permittee must minimize dust generation during emptying of abrasive blasting enclosures; and
- (b) The permittee must operate all equipment associated with dry abrasive blasting operations according to the manufacturer's instructions.

(Ref.: 40 CFR 63.11516(a)(1); Subpart XXXXXX.)

4.2 For Emission Point AB-100, the permittee must implement the following management practices for each machining operation (as defined in 40 CFR 63.11522, Subpart XXXXXX) to minimize MFHAP emissions.

These requirements **do not** apply when a machining operation is being performed that does not use any materials containing MFHAPs and do not have the potential to emit MFHAPs.

- (a) The permittee must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and
- (b) The permittee must operate all equipment associated with machining according to manufacturer's instructions.

(Ref.: 40 CFR 63.11516(b); Subpart XXXXXX)

4.3 For Emission Point AB-100, the permittee must comply with the following requirements for any “dry grinding and dry polishing with machine” operation that uses materials containing a MFHAP:

- (a) The permittee must capture emissions and vent them to a filtration control device. The permittee must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices as specified by Condition 5.3(d).
- (b) The permittee must implement the following management practices to minimize the emission of MFHAPs:
 - (1) The permittee must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions (as practicable); and
 - (2) The permittee must operate all equipment associated with the operation of dry grinding and dry polishing with machines (including the filtration control device) in accordance with the manufacturer's instructions.

(Ref.: 40 CFR 63.11516(c); Subpart XXXXXX)

4.4 For Emission Point AB-100, the permittee must comply with the following requirements for any welding operation.

These requirements do not apply when a welding operation is being performed that does not use any materials containing MFHAPs or do not have the potential to emit MFHAPs.

- (a) The permittee must operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions. The permittee must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the capture and control devices as specified by Condition 5.3(d).

- (b) The permittee must implement one or more of the management practices specified below to minimize the emission of MFHAPs (as practicable) while maintaining the required welding quality through the application of sound engineering judgment:
- (1) Use welding processes with reduced fume generation capabilities (e.g. gas metal arc welding (GMAW) – also called metal inert gas welding (MIG));
 - (2) Use welding process variations (e.g. pulsed current GMAW), which can reduce fume generation rates;
 - (3) Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation;
 - (4) Optimize welding process variables (e.g. electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated; and
 - (5) Use a welding fume capture and control system that is operated in accordance with the manufacturer's specifications.

(Ref.: 40 CFR 63.11516(f)(1) - (2); Subpart XXXXXX)

- 4.5 For Emission Point AC-100, the permittee must comply with the following requirements for any spray-painting operations that uses materials containing MFHAPs:

These requirements **do not** apply when a spray-painting operation is being performed that does not use any materials containing MFHAPs or do not have the potential to emit MFHAPs.

- (a) The spray booths or spray rooms must have a full roof, at least two complete walls, and one or two complete side curtains or other barrier material so that all four sides are covered. The spray booths or spray rooms must be ventilated so that air is drawn into the booth and leaves only through the filter. The roof may contain narrow slots for connecting fabricated products to overhead cranes, and/or for cords or cables.
- (b) All spray booths or spray rooms must be fitted with a type of filter technology that is demonstrated to achieve at least 98 percent capture of MFHAP. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992". The test coating for measuring filter efficiency shall be a high-solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-High Volume Low Pressure) air-atomized spray gun operating at 40 psi air pressure; the air flow rate across the filter shall be 150 feet per minute. The permittee may use published filter efficiency data

provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement.

- (c) You must perform regular inspection and replacement of the filters in all spray booths or spray rooms according to manufacturer's instructions, and maintain documentation of these activities, as detailed in Condition 5.3(f).

(Ref.: 40 CFR 63.11516(d)(1)(i through iii); Subpart XXXXXX)

- 4.6 For Emission Point AC-100, the permittee shall apply all paints (via spray-applied painting) with a high-volume, low-pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated to achieve transfer efficiency comparable to one of these spray gun technologies for a comparable operation, and for which written approval has been obtained from the MDEQ. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002", Revision 0.

(Ref.: 40 CFR 63.11516(d)(2); Subpart XXXXXX)

- 4.7 For Emission Point AC-100, all cleaning of paint spray guns must be done with either non-HAP gun cleaning solvents, or in such a manner that an atomized mist of spray of gun cleaning solvent and paint residue is not created outside of a container that collects the used gun cleaning solvent. Spray gun cleaning may be done with, for example, by hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of these non-atomizing methods may also be used.

(Ref.: 40 CFR 63.11516(d)(4); Subpart XXXXXX.)

- 4.8 For Emission Point AC-100, the permittee must ensure and certify that all new and existing personnel, including contract personnel, who spray apply paints are trained in the proper application of paints as required by Condition 4.9. The training program must include, at a minimum, the items listed below:

- (a) A list of all current personnel by name and job description who are required to be trained;
- (b) Hands-on, or in-house or external classroom instruction that addresses, at a minimum, initial and refresher training in the following topics:

- (1) Spray gun equipment selection, set up, and operation, including measuring paint viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.
 - (2) Spray technique for different types of paints to improve transfer efficiency and minimize paint usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.
 - (3) Routine spray booth and filter maintenance, including filter selection and installation.
 - (4) Environmental compliance with the requirements of Subpart XXXXXX.
- (c) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Alternatively, the permittee who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in Condition 4.8(b) of this Condition are not required to provide the initial training.

(Ref.: 40 CFR 63.11516(d)(6), Subpart XXXXXX.)

4.9 For Emission Point AC-100, all workers performing painting must be certified that they have completed training in the proper spray application of paints and the proper setup and maintenance of spray equipment. The spray application of paint is prohibited by persons who are not certified as having completed the training described in Condition 4.8. Workers performing painting must be trained and certified as required below:

- (a) All personnel must be trained and certified no later than 180 days after hiring. Training that was completed within 5 years prior to the date training is required, and that meets the requirements specified in Condition 4.8 satisfies this requirement and is valid for a period not to exceed 5 years after the date the training is completed.
- (b) Training and certification will be valid for a period not to exceed 5 years after the date the training is completed. All personnel must receive refresher training that meets the requirements of this subpart and be re-certified every 5 years.

(Ref.: 40 CFR 63.11516(d)(5),(8)&(9), Subpart XXXXXX.)

SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain Records For a Minimum of Five (5) Years
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2	VOCs HAPs	Calculate Emissions (Monthly and Rolling 12-Month Totals)
	40 CFR 63.11519(c) (1),(2),(4),(5),(7) (8), (11),(13), and (14); Subpart XXXXXX 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.3	MFHAPs	Recordkeeping Requirements
AB-100	40 CFR 63.11516(f)(3), (5)-(7), and 63.11517(a); Subpart XXXXXX	5.4	Fugitive Emissions	Perform “Tiered” Compliance Requirements for Welding Operations (As Applicable)
	40 CFR 63.11516(f)(4)(i and ii); Subpart XXXXXX	5.5	Opacity	Perform Corrective Actions (As Applicable)
AC-100	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.6	VOCs HAPs	Maintain Records For Any and All Coatings, Adhesives, Solvents, etc. that are VOC/HAP-Containing Materials Keep Records of the VOC/HAP Content of All Materials Used Calculate Monthly and 12-Month Rolling VOC and HAP Emissions
	40 CFR 63.11516(d)(3) and (7); Subpart XXXXXX	5.7	MFHAPs	Recordkeeping Requirements

- 5.1 For Emission Point AA-000 (Facility-Wide), the permittee shall retain all required records, monitoring data, supporting information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart

recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to the MDEQ as required by Applicable Rules and Regulations of this permit upon request.

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

- 5.2 For Emission Points AA-000 (Facility-Wide), the permittee shall calculate and record the emissions of VOCs, each individual HAP and all HAPs combined in tons on a monthly basis and for each consecutive 12-month period on a rolling basis.

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

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

- 5.3 For Emission Points AA-100 (Facility-Wide), the permittee shall maintain documentation that details the following information:

- (a) Each notification and report submitted to comply with Subpart XXXXXX (including any documentation supporting a notification and/or report);
- (b) Records on each applicability determination that lists the equipment included within an affected source (as well as any changes to that and on what date they occurred);
- (c) For each visual determination of fugitive emissions performed in accordance with Condition 5.5(b), the permittee shall maintain the following information:
 - (1) The date and results of each determination;
 - (2) A description of any corrective actions implemented as a result of a visual determination; and
 - (3) The date and results of any follow-up visual determination of fugitive emissions performed after the corrective actions;
- (d) The manufacturer's specifications for any control device(s) used to comply with a work management practice specified in Conditions 4.1 through 4.3 (as applicable);
- (e) Maintain a record of the filter efficiency demonstrations and spray paint booth filter maintenance activities, performed in accordance with Condition 4.5(b) and (c).
- (f) Maintain documentation of HVLP or other high transfer efficiency spray paint delivery systems, in compliance with Condition 5.7(a), "Requirements for spray

painting of all objects.” This documentation must include the manufacturer's specifications for the equipment and any manufacturer's operation instructions. If you have obtained written approval for an alternative spray application system in accordance with Condition 4.6, “Spray painting of all objects,” you must maintain a record of that approval along with documentation of the demonstration of equivalency.

- (g) A record of each visual determination of emissions opacity performed during the preparation (or revision) of a Site-Specific Welding Emissions Management Plan (SSWEMP);
- (h) If the permittee complies with a work management practice specified in Condition 4.1 through 4.3 by operating the equipment in accordance with the manufacturer's instruction, the permittee shall maintain the corresponding instructions; and
- (i) The quantity of each welding rod used that contains a MFHAP (in tons) based on a rolling 12-month total basis and the individual HAP content of each welding rod used.

(Ref.: 40 CFR 63.11519(c)(1), (2), (4),(5),(7),(8),(11),(13), and (14); Subpart XXXXXX)
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).)

5.4 For Emission Points AB-100, the permittee shall demonstrate compliance with the work management practices specified in Condition 4.4 by performing the following “tiers” **if** the permittee uses at least 2,000 pounds of welding rod that contains a MFHAP based on a rolling 12-month total:

- (a) **Tier 1** - The permittee shall perform a visual determination of fugitive emissions at the primary vent, stack, exit, or opening from the building that contains the welding operations in accordance with Condition 5.5.
- (b) **Tier 2** - If visible fugitive emissions are detected more than once during any consecutive 12 month period (notwithstanding the results of any follow-up inspections), the permittee must comply with 40 CFR 63.11515 (f)(5)(i) through (iv).

(Ref.: 40 CFR 63.11516(f)(3), and (5)-(7), and 63.11517(a); Subpart XXXXXX)

5.5 For Emission Points AB-100, the permittee shall perform the following corrective actions for initial detection of visible emissions from welding operations (as applicable):

- (a) If visible fugitive emissions are detected during any visual determination performed in accordance with Condition 5.4(a), perform corrective actions that include (but are not limited to) the following action items:

- (1) The inspection of welding fume sources; and

- (2) The evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with Condition 4.4(b).
- (b) The duration of any Method 22 test shall be at least fifteen (15) consecutive minutes, and visible emissions will be considered present if they are detected for more than six (6) minutes of any 15-minute period.
- (c) Upon completing such corrective actions, the permittee shall perform a one-time follow-up inspection for visible fugitive emissions in accordance with Condition 5.4(a)
- (Ref.: 40 CFR 63.11516(f)(4)(i and ii), and 63.11517(a); Subpart XXXXXX)
- 5.6 For Emission Point AC-100, the permittee shall maintain documentation that details the following information on each coating, adhesive, thinner, solvent, or other VOC- / HAP-containing material used on a monthly basis:
- (a) The identification or product name;
- (b) The total quantity used (in gallons);
- (c) The VOC and/or HAP content (in weight percent) as well as a description of the method used to determine the VOC and/or HAP content.
- The permittee may utilize data supplied by either the manufacturer or an analysis of the VOC and/or HAP content by an applicable test method (i.e. EPA Test Method 24, EPA Test Method 311, and/or an alternative EPA-approved test method).
- (d) The density (in pounds per gallon); and
- (e) The solids content (in weight percent) (as applicable).
- Additionally, the permittee shall calculate and record the emission of VOCs and HAPs in tons on a monthly basis and for each consecutive 12-month period on a rolling basis.
- (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).)
- 5.7 For Emission Point AC-100, the permittee must comply with the following requirements for any spray-painting operations that uses materials containing MFHAPs:
- (a) The permittee shall maintain documentation of the HVLPP or other high transfer efficiency spray paint delivery methods, as conditioned 5.3(f).

- (b) The permittee must maintain records of employee training certification for use of HVLP or other high transfer efficiency spray paint delivery methods as detailed in condition 5.3(f).

(Ref.: 40 CFR 63.11516(d)(3) and (7); Subpart XXXXXX)

**SECTION 6
REPORTING REQUIREMENTS**

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	Report permit deviations within five (5) working days.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.2	Submit certified annual monitoring report.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.3	All documents submitted to MDEQ shall be certified by a Responsible Official.
	40 CFR 63.11519(b)(4)(5), Subpart XXXXXX	6.4	Submit Annual Monitoring Report

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

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

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

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

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

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

- 6.4 For Emission Point AA-000 (Facility-Wide), the permittee shall submit an annual certification and compliance report for each affected operation covered under Subpart XXXXXX in accordance with Condition 6.2. This report shall provide the following information:

- (a) Company name and address;
- (b) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report; and
- (c) Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31st. Note that the information reported for the twelve (12) months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
- (d) Report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions.

(Ref.: 40 CFR 63.11519(b)(4) and (5); Subpart XXXXXX)