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

TO OPERATE AIR EMISSIONS EQUIPMENT

## THIS CERTIFIES THAT

Tishomingo Acquisition LLC, dba TBEI, Tishomingo
1425 Highway 25 North
Tishomingo, Tishomingo 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) (i.e., the "Federal Act") 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:** _____

**Effective Date: As specified herein.**

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

_____

**AUTHORIZED SIGNATURE**
**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Expires:** _____ **Permit No.:** 2640-00002

1850 PER20260001

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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 The 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 following provisions:.

(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 EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions 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 a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.

(c) Reopenings shall not be initiated before a notice of such intent is provided to the Title V source by the Department of Environmental Quality (DEQ) 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 DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information claimed to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(e).)

1.6 The 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 DEQ an annual fee based on a fee schedule established by the Mississippi Commission on Environmental Quality (i.e., the "Commission"). The fee schedule shall be set each year by order of the Commission in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.

(a) A portion of the fee shall be based on the permittee's annual quantity of emissions. The permittee shall elect for "actual emissions" 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.

(i) "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.

(ii) "Allowable emissions" are those emissions limited by this permit as well as those emissions not expressly limited by this permit but otherwise allowed by this permit, as represented in the Title V application.

(iii) Not withstanding paragraphs (i) and (ii), a minimum annual fee shall be assessed in accordance with the fee schedule established by the Commission when calculating this portion of the fee.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.B(1).)

(b) A portion of the fee shall be based on the complexity of this permit, as determined by the number of air regulations applicable to the permittee on the date of the fee calculation in accordance with the fee schedule established by the Commission. Only air regulations required to be addressed by this permit may be included in the annual fee schedule.

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

(c) By July 1 of each year, the permittee shall submit a completed annual fee reporting form to the DEQ accompanied by all necessary calculations and supporting information to verify actual emissions. If the annual fee reporting form is not filled out completely and accurately or certified in accordance with Regulation 11 Miss. Admin. Code Pt. 2, R. 6.2.E., "allowable emissions" or other information necessary to determine the appropriate annual fee shall be used in the fee calculation.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.B(3)(c).)

(d) If the Commission determines that there is not sufficient information available to the permittee to accurately complete and submit the annual fee reporting form by July 1, but such information becomes available and is submitted to the DEQ after July 1, the fee calculation and assessment may be altered according to the annual fee schedule. No fee actually paid to the DEQ shall be refunded due to a change in the fee calculation.

If a fee is recalculated such that the amount assessed for an annual period is reduced and the permittee has already paid all or a portion of the fee, the revised fee assessment may not be reduced to an amount less than what the permittee has already paid regardless of the results of the recalculation.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.B(3)(d).)

(e) The fee shall be due September 1 of each year. However, the permittee may elect a quarterly payment method of four (4) equal payments with the payments due September 1, December 1, March 1 and June 1. The permittee shall notify the DEQ that the quarterly payment method will be used by September 1.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.E(1).)

(f) If at any time within the year the Commission determines that the information submitted by the permittee is insufficient or incorrect, the DEQ will notify the permittee of the deficiencies and the adjusted fee schedule. Past due fees as a result of the adjusted fee assessment will be due at the time of the next scheduled quarterly payment.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.E(1)(b).)

(g) If an annual fee is not paid within thirty (30) days after the due date, a penalty of ten (10) percent of the amount due shall at once accrue and be added thereto. If the fee is not paid in full (including any interest and penalty within sixty (60) days of the due date), the Permit Board may revoke the permit upon proper notice and hearing as required by law.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.E(1)(a).)

(h) If the permittee disagrees with the calculation or applicability of an annual 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.D.)

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

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

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)

1.11 The permittee shall allow the DEQ (or an authorized representative), upon the presentation of credentials and other documents as may be required by law, to perform the following:

(a) Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy (at reasonable times) any records that must be kept under the conditions of this permit;

(c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

(d) As authorized by the Federal Act, sample or monitor (at reasonable times) substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

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

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

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

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

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

1.14 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance upon satisfying one of the following conditions:

(a) Such applicable requirements are included and are specifically identified in the permit; or

(b) The Permit Board, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the permittee and the permit includes such determination (or a concise summary thereof).

(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 to register such a plan pursuant to Section 112(r) of the Federal Act.

(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 that is submitted at least six (6) months prior to the date of permit expiration.

If the permittee submits a timely and complete application for permit issuance (including for renewal), the failure to have a Title V permit is not a violation of the applicable 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 DEQ any additional information identified as being needed to process the application.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.A(1)(c), R. 6.4.B., and 6.4.C(2).)

1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (Ref.: Section 502(b)(10) of the Federal Act) if the following criteria are met:

(a) The changes are not modifications under any provision of Title I of the Federal 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 [i.e., at least seven (7) days or such other time frame as provided in other regulations for emergencies] and the notification includes the following information:

(1) A brief description of the change(s),

(2) The date on which the change will occur,

(3) Any change in emissions, and

(4) Any permit term or condition that is no longer applicable as a result of the change;

(d) The permit shield shall not apply to any Section 502(b)(10) change.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F(1).)

1.19 Should the Executive Director of the Mississippi Department of Environmental Quality declare an "Air Pollution Emergency Episode", the permittee will be required to operate in accordance with either the permittee's prepared "Emission Control Action Program(s)" or, in the absence of a prepared Emission Control Action Program, the appropriate requirements and "Emission Reduction Objectives" specified in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 3. – "Regulations for the Prevention of Air Pollution Emergency Episodes" – for the level of emergency declared and the permittee's source of air contamination.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)

1.20 Except as otherwise provided herein, a modification of the permittee's facility may require a Permit to Construct in accordance with the provisions specified in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 2. – "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment" – and may require modification of this permit in accordance with Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6. – "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act."

"Modification" is defined as any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

(a) Routine maintenance, repair, and replacement;

(b) Use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the "Federal Energy Supply and Environmental Coordination Act of

1974" (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the "Federal Power Act";

(c) Use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;

(d) Use of an alternative fuel or raw material by a stationary source which:

(1) The source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to Regulation 11 Miss. Admin. Code Pt. 2, Ch. 2. and/or Ch. 5.; or

(2) The source is approved to use under any permit issued under Regulation 11 Miss. Admin. Code Pt. 2, Ch. 2. and/or Ch. 5.;;

(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 Regulation 11 Miss. Admin. Code Pt. 2, Ch. 2. or Ch. 5.; or

(f) Any change in ownership of the stationary source.

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

1.21 An administrative permit amendment may be made by the Permit Board authorizing changes in ownership or operational control consistent with the following procedure:

(a) The Permit Board shall take action within sixty (60) days after receipt of a completed request for a permit transfer, unless a public hearing is scheduled. The Permit Board may incorporate such changes without providing notice to the public or affected State(s) provided that it designates any such permit revision as having been made pursuant to this paragraph.

(b) A permit transfer shall be approved upon satisfaction of the following:

(1) The applicant for transfer approval can demonstrate to the Permit Board it has the financial resources, operational expertise, and environmental compliance history over the last five (5) years to insure compliance with the terms and conditions of the permit to be transferred, except where this conflicts with State Law, and

(2) The Permit Board determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the DEQ.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.D(4)(a) and (b).)

1.22 This permit is a Federally approved operating permit under Title V of the Federal Act. All terms and conditions in this permit, including any provisions designed to limit the permittee's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission.

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

1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance.

Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or an Emergency Air Pollution Episode Alert imposed by the Executive Director of DEQ; and must meet the following buffer zones:

(a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.

(b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within fifty (50) yards of an occupied dwelling.

(c) Burning must not occur within 500 yards of commercial airport property, private airfields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator.

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

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

(a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)

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

(i) An upset occurred and that the source can identify the cause(s) of the upset;

(ii) The source was at the time being properly operated;

(iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;

(iv) That within five (5) working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other 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 Regulation 11 Mississippi Administrative Code, 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 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).

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

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

1.25 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements specified in 40 CFR Part 61, Subpart M (National Emission Standard for Asbestos), as adopted by reference in Regulation 11 Miss Admin. Code Pt. 2, R. 1.8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.8.)

# SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

| Emission Point | Description |
|---|---|
| AA-000 | Facility-Wide [Tishomingo Acquisition, LLC, (d.b.a. TBEI, Tishomingo)] |
| AA-009 | Surface Coating Operations [consists of three (3) spray booths with filters for PM control] |
| AA-010a | Abrasive Blasting Booth [equipped with a dust collector for PM control] |
| AA-010b | Two (2) Plasma Arc Cutters [equipped with dust collectors for PM control] |
| AA-011 | Bystronic Laser Cutting System [equipped with cartridge dust collector] |

## SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. FACILITY-WIDE EMISSION LIMITATIONS & STANDARDS

3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial, or waste disposal process, which exceeds forty (40) percent opacity subject to the exceptions provided in (a) and (b):

(a) Start-up operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per start-up in any one 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 shall be permitted provided such emissions do not exceed sixty (60) percent 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 hour.

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

3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Condition 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets.

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

3.A.3 The permittee shall not cause, permit, 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 Regulation 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 (Facility-Wide) | 11 Miss. Admin. Code Pt. 2, R. 1.3.F(1). | 3.B.1 | PM (filterable) | $E = 4.1 \times p^{0.67}$ |
| | 11 Miss. Admin. Code, Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permit issued October 28, 2002<br><br>**(PSD Avoidance Limit)** | 3.B.2 | VOCs | ≤ 240.0 tpy (Rolling 12-Month Total) |
| | | | | |
| AA-009<br>AA-010a<br>AA-010b<br>AA-011 | 11 Miss. Admin. Code, Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued December 21, 2021, and modified DATE<br><br>**(PSD Avoidance Limit)** | 3.B.3 | PM / $PM_{10}$ (filterable only) | No Bypass of Air Pollution Control Equipment |
| AA-009 | 40 CFR Part 63, Subpart MMMM – NESHAP for Surface Coating of Miscellaneous Metal Parts and Products<br><br>40 CFR 63.3881(a)(1), (b), 63.3901, and Table 2, Subpart MMMM | 3.B.4 | HAPs | General Applicability |
| | 40 CFR 63.3890(b)(1) and 63.3900(a)(1), Subpart MMMM | 3.B.5 | Organic HAPs | ≤ 2.6 Pounds per Gallon of Coating Solids (Each 12-Month Compliance Period) |
| AA-010a | 40 CFR Part 64 – Compliance Assurance Monitoring (CAM)<br><br>40 CFR 64.2(a), CAM | 3.B.6 | PM / $PM_{10}$ | General Applicability |

3.B.1 For Emission Point AA-000 (Facility-Wide), except as otherwise specified herein or limited herein, the permittee shall not cause or 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 following relationship:

$$E = 4.1 \times p^{0.67}$$

Where "E" is the emission rate in pounds per hour, and "p" is the process weight input rate in tons per hour.

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

3.B.2 For Emission Point AA-000 (Facility-Wide), the permittee shall limit the total emission of volatile organic compounds (VOCs) to no more than 240.0 tons per year (tpy) as determined on a rolling 12-month total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permit issued October 28, 2002 – PSD Avoidance Limit)

3.B.3 For Emission Points AA-009, AA-010a, AA-010b, and AA-011, the permittee shall not allow emissions to bypass air pollution control equipment associated with the corresponding process unit. In the event the control device malfunctions, the permittee shall cease operation of the process equipment until the control device returns to service.

(Ref.: 11 Miss. Admin. Code, Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued December 21, 2021, and modified DATE – PSD Avoidance Limit)

3.B.4 For Emission Pont AA-009, the permittee is subject and shall comply with the applicable requirements found in 40 CFR Part 63, Subpart MMMM – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products, and 40 CFR Part 63, Subpart A – General Provisions, as established in Table 2 of Subpart MMMM).

(Ref.: 40 CFR 63.3881(a)(1), (b), 63.3901, and Table 2, Subpart MMMM)

3.B.5 For Emission Point AA-009, the permittee shall at all times limit the emission of organic HAPs to no more than 2.6 pounds per gallon (or 0.31 kilograms per liter) of coating solids used during each rolling 12-month compliance period.

(Ref.: 40 CFR 63.3890(b)(1) and 63.3900(a)(1), Subpart MMMM)

3.B.6 For Emission Point AA-010a, the permittee is subject to and shall comply with all applicable requirements of 40 CFR Part 64 – Compliance Assurance Monitoring (CAM).

(Ref.: 40 CFR 64.2(a), Compliance Assurance Monitoring)

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 fossil fuel burning installations of less than ten (10) million BTU (MMBTU) per hour heat input shall not exceed 0.6 pounds per MMBTU per hour heat input.

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

3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) 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-009 | 40 CFR 63.3900(b), Subpart MMMM | 3.D.1 | HAPs | General Duty Clause |

3.D.1 For Emission Point AA-009, the permittee shall operate and maintain the equipment (including associated air pollution control equipment and monitoring equipment) in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times. The general duty to minimize emissions does not require any further efforts to reduce emissions if levels required by Subpart MMMM have been achieved.

The determination of whether equipment is operating in compliance with operation and maintenance requirements will be based on information available to the MDEQ that may include (but is not limited to) monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the equipment.

(Ref.: 40 CFR 63.3900(b), Subpart MMMM)

## 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 terms and conditions contained in this permit (including emission limitations, standards, or work practices) by January 31 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 information:

(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 the following information:

(a) The date, place as defined in the permit, and time of sampling or measurements;

(b) The date(s) analyses were performed;

(c) The company or entity that performed the analyses;

(d) The analytical techniques or methods used;

(e) The results of such analyses; and

(f) The operating conditions existing at the time of sampling or measurement.

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

5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

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

5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 of each calendar year for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with Regulation 11 Miss. Admin. Code Pt. 2, R. 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 semiannual basis. Additionally, any required quarterly reports shall be submitted by the end of the month following each calendar quarter period (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))

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 respective versions (or their equivalents) approved by 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 of this permit, the monitoring, testing, recordkeeping, and reporting requirements specified in 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 (Facility-Wide) | 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2). | 5.B.1 | VOCs | Calculate and Record Emissions (Monthly & Rolling 12-Month Totals) |
| AA-009 AA-010a AA-010b AA-011 | 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2). | 5.B.2 | PM / $PM_{10}$ | Perform and Record Routine Inspections on Air Pollution Control Devices |
| AA-009 | 40 CFR 63.3891(a) and (b), Subpart MMMM | 5.B.3 | Haps | Compliance Options Requirements |
| | 40 CFR 63.3930(a) – (c)(1) – (3), (d) – (h), and (j), Subpart MMMM | 5.B.4 | | Recordkeeping Requirements |
| | 40 CFR 63.3931(a), Subpart MMMM | 5.B.5 | | Maintain Records in a Suitable Format |
| | 40 CFR 63.3941(a) – (d), 63.3942(a) – (b), Subpart MMMM | 5.B.6 | | "Compliant Material Option" Requirements |
| | 40 CFR 63.3951(a) – (g) and63.3952(a) – (c), Subpart MMMM | 5.B.7 | | "Emission Rate without Add-on Controls Option" Requirements |
| AA-010a | 40 CFR 64.7(b) and (c), CAM | 5.B.8 | Operation & Maintenance | Operation and Maintenance Requirements for Monitoring System(s) |
| | 40 CFR 64.7(d), CAM | 5.B.9 | Corrective Action | Corrective Action Response to an Excursion / Exceedance of a CAM Indicator |
| | 40 CFR 64.8, CAM | 5.B.10 | QIP | Upon Request by the MDEQ, Develop a Quality Improvement Plan (QIP) |
| | 40 CFR 64.9(b), CAM | 5.B.11 | CAM Records | Maintain CAM Records as Specified |

5.B.1 For Emission Point AA-000 (Facility-Wide), the permittee shall calculate and record the emission of volatile organic compounds (VOCs) in tons on a monthly basis for each consecutive 12-month period on a rolling basis.

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

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

5.B.2 For Emission Points AA-009, AA-010a, AA-010b, and AA-011, the permittee shall perform and record an inspection that evaluates the performance capability of the air pollution control device associated with each process unit. For Emission Points AA-009 (Dry Filters), AA-010b (Dust Collectors), and AA-011, the permittee shall perform the inspection on a monthly basis. For Emission Point AA-010a (Dust Collector), the permittee shall perform the inspection on a weekly basis.

If a problem is noted during an inspection of a control device, the permittee shall perform the necessary maintenance to ensure operation in accordance with the design specifications. A written or electronic log that details the date, time, and any performed maintenance shall be maintained on-site. Additionally, the permittee shall maintain on-site sufficient components as is necessary to repair a control device.

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

5.B.3 For Emission Point AA-009, the permittee shall include all coatings (as defined in 40 CFR 63.3981, Subpart MMMM), thinners and/or other additives, and cleaning materials used in surface coating operations when determining whether the organic HAP emission rate is equal to or less than the emission limit specified in Condition 3.B.5. To make this determination, the permittee shall use at least one of the compliance options listed in paragraphs (a) or (b) of this condition.

The permittee may apply either of the noted compliance options to an individual coating operation, to multiple coating operations as a group, or to the entire coting operations. The permittee may also use different compliance options for different coating operations, or at different times on the same coating operation. The permittee may employ different compliance options when different coatings are applied to the same part or when the same coating is applied to different parts. However, the permittee may not use different compliance options at the same time on the same coating operation.

If the permittee switches between compliance options for any coating operation or group of coating operations, the permittee shall document this switch as required by Condition 5.B.4.

(a) Compliant Material Option: The permittee shall demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the emission limit specified in Condition 3.B.5 and that each thinner, other additive, and cleaning material used contains no organic HAPs in accordance with the requirements specified in Condition 5.B.6.

(b) Emission Rate without Add-on Controls Option: The permittee shall demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the emission limit specified in Condition 3.B.5 in accordance with the requirements of Condition 5.B.7 on a monthly basis.

(Ref.: 40 CFR 63.3891(a) and (b), Subpart MMMM)

5.B.4 For Emission Point AA-009, the permittee shall maintain the following documentation:

(a) A copy of each notification and report submitted to comply with Subpart MMMM as well as the supporting documentation for each notification and report.

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

If the permittee has conducted testing to determine the mass fraction of organic HAPs, density, or volume fraction of coating solids, a copy of the complete test report must be maintained. If the permittee uses information provided by the manufacturer or supplier of a material that was based on testing, a summary sheet of the test results must be maintained. However, the permittee is not required to obtain the full test report or other supporting documentation from the manufacturer or supplier.

(c) Records on the coating operations and the periods of time (i.e. the beginning / ending dates and times) for each compliance option used.

(d) For the "Compliant Material Option" – records that detail the calculation of the organic HAP content for each coating using the equation specified in Condition 5.B.6(d).

(e) For the "Emission Rate without Add-on Controls Option" – records that detail the calculation of the following values (as applicable):

(1) The total mass of organic HAPs for the coatings, thinners and/or other additives, and cleaning materials used each month in accordance with Equations 1, 1A, 1B, 1C, and 2 found in Condition 5.B.7;

(2) The mass of organic HAPs in waste materials in accordance with 40 CFR 63.3951(e)(4), Subpart MMMM;

(3) The total volume of coating solids used each month in accordance with Equation 2 found in Condition 5.B.7; and

(4) The organic HAP emission rate for each rolling 12-month compliance period in accordance with Equation 3 found in Condition 5.B.7.

(f) Records that detail the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the compliant material option is used for all coatings, the permittee may maintain purchase records for each material used rather than a record of the volume used.

(g) Records that detail the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material (unless the material is tracked by weight).

(h) Records that detail the volume fraction of coating solids in each coating used.

(i) For the "Emission Rate without Add-on Controls Option" – records that detail the density for each coating, thinner and/or other additive, and cleaning material used.

(j) If the permittee uses an allowance in Equation 1 found in Condition 5.B.7 for organic HAPs contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) in accordance with 40 CFR 63.3951(e)(4) – Subpart MMMM, the permittee shall maintain the following information:

(1) The name and address of each TSDF; a statement on which subparts under 40 CFR Parts 262, 264, 265, and 266 are applicable; and the date of each shipment.

(2) Identification of the coating operations and the month(s) in which the allowance for the waste materials was used.

(3) The methodology used in accordance with 40 CFR 63.3951(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month as well as the methodology to determine the mass of organic HAPs contained in these waste materials.

Any methodology must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation (including the waste manifest for each shipment).

(k) Records that detail the following information for each deviation from an emission limit:

(1) The date, time, and duration of each deviation;

(2) A list of the affected equipment and the cause of the deviation;

(3) An estimate of the quantity of each regulated pollutant emitted over the emission limit specified in Condition 3.B.5 and a description of the method used to calculate the estimate;

(4) Records that detail any actions taken to minimize emissions in accordance with Condition 3.D.1 and any corrective actions taken to return the affected equipment to its normal or usual manner of operation.

(Ref.: 40 CFR 63.3930(a) – (c)(1) – (3), (d) – (h), and (j), Subpart MMMM)

5.B.5 For Emission Point AA-009, the permittee shall maintain the records in a form suitable and readily available for expeditious review in accordance with 40 CFR 63.10(b)(1), Subpart A. Where appropriate, the records may be maintained as electronic spreadsheets or as a database. Any records submitted electronically via the EPA's Compliance and Emissions Data Reporting Interface (CEDRI) may be maintained in electronic format. However, this ability to maintain electronic copies does not affect the requirement for facilities to make records, data, and reports available upon request to the MDEQ or the EPA as part of an on-site compliance evaluation.

(Ref.: 40 CFR 63.3931(a), Subpart MMMM

5.B.6 For Emission Point AA-009, if the permittee uses the “Compliant Material Option” for any individual coating operation, any group of coating operations, or all the coating operations, the permittee shall use the following procedures on each coating, thinner and/or other additive, and cleaning material in the condition it is in when it is received from its manufacturer / supplier and prior to any alteration.

The permittee does not need to re-determine the organic HAP content of coatings, thinners and/or other additives, and cleaning materials that are reclaimed on-site (or reclaimed off-site if there is documentation showing that the materials received back are the exact same materials that were sent off-site) and reused in the coating operation for which the “Compliant Material Option” was used provided that these materials in their condition as received were demonstrated to comply with the compliant material option.

(a) Determine the mass fraction of organic HAP for each material used: The permittee shall determine the mass fraction of organic HAPs for each coating, thinner and/or other additive, and cleaning material used during the compliance period by using one (1) of the options outlined in 40 CFR 63.3941(a)(1) – (5), Subpart MMMM (i.e. EPA Test Method 311 in Appendix A of 40 CFR Part 63, EPA Test Method 24 in Appendix A of 40 CFR Part 60, an approved alternative method, information from the supplier / manufacturer of the materials, or solvent blends listed in Table 3 or 4 in Subpart MMMM).

(b) Determine the volume fraction of coating solids for each coating: The permittee shall determine the volume fraction of coating solids (in gallons of coating solids per gallon of coating) for each coating used during the compliance period by either a test, information provided by the supplier / manufacturer of the material, or calculation as specified in 40 CFR 63.3941(b)(1) – (4), Subpart MMMM.

If the test results do not agree with the information obtained from the supplier / manufacturer or calculations, the test results will take precedence unless (after consultation) the permittee demonstrates to the satisfaction of the enforcement agency that the formulation data are correct.

(c) Determine the density of each coating: Determine the density of each coating used during the compliance period from test results using ASTM Method D1475–13, (incorporated by reference – see 40 CFR 63.14), information from the supplier / manufacturer of the material, or specific gravity data for pure chemicals.

If there is disagreement between ASTM D1475–13 test results and the information provided by supplier / manufacturer, the test results will take precedence unless (after consultation) the permittee demonstrates to the satisfaction of the enforcement agency that the formulation data are correct.

(d) Determine the organic HAP content of each coating: Calculate the organic HAP content (in pounds of organic HAPs emitted per gallon of coating solids used) of each coating used during the compliance period using the following equation:

$$H_c = \frac{(D_C)(W_C)}{V_C}$$

Where:

$H_c$ = The organic HAP content of the coating, in pounds of organic HAPs emitted per gallon of coating solids used.

$D_c$ = The density of coating (in pounds of coating per gallon of coating), as determined in accordance with paragraph (c) of this condition.

$W_c$ = The mass fraction of organic HAPs in the coating (in pounds of organic HAPs per pounds of coating), as determined in accordance with paragraph (a) of this condition.

$V_c$ = The volume fraction of coating solids (in gallons of coating solids per gallon of coating), as determined in accordance with paragraph (b) of this condition.

(e) The calculated organic HAP content for each coating used during the compliance period must be less than / equal to the emission limit specified in Condition 3.B.5 and each thinner and/or other additive, and cleaning material used during the compliance period must contain no organic HAPs (as determined by paragraph (a) of this condition).

The use of any coating, thinner and/or other additive, or cleaning material that does not meet the criteria specified in this paragraph is a deviation from the applicable emission limit and must be reported in accordance with Condition 5.C.2(g).

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

5.B.7 For Emission Point AA-009, if the permittee may use the "Emission Rate without Add-on Controls Option" for any individual coating operation, any group of coating operations, or all the coating operations, the permittee shall use the following procedures for any coating operation. When calculating the organic HAP emission rate in accordance with this condition, the permittee shall not include any coatings, thinners and/or other additives, or cleaning materials used in coating operations for which the "Compliant Material Option" was used.

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

(a) Determine the mass fraction of organic HAP for each material: Determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each month according to the requirements in Condition 5.B.6(a).

(b) Determine the volume fraction of coating solids: Determine the volume fraction of coating solids (in gallons of coating solids per gallon of coating) for each coating used during each month in accordance with the requirements specified in Condition 5.B.6(b).

(c) Determine the density of each material: Determine the density of each liquid coating, thinner and/or other additive, and cleaning material used during each month from test results using ASTM D1475-13 ASTM D2111-10 (Reapproved 2015) (both incorporated by reference – see 40 CFR 63.14), information from the supplier / manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If the permittee is including powder coatings in the compliance determination, determine the density of powder coatings using ASTM D5965-02 (Reapproved 2013), (incorporated by reference – see 40 CFR 63.14), or information from the supplier.

If there is disagreement between ASTM D1475-13 or ASTM D2111-10

(Reapproved 2015) test results and other such information sources, the test results will take precedence unless (after consultation) the permittee demonstrates to the satisfaction of the enforcement agency that the formulation data are correct.

If the permittee purchases materials or monitors consumption by weight instead of volume, the permittee does not need to determine material density. Instead, the permittee may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, 1C, and 2 of this condition.

(d) Determine the volume of each material used: Determine the volume (in gallons) of each coating, thinner and/or other additive, and cleaning material used during each month by measurement or usage records. If the permittee purchases materials or monitors consumption by weight instead of volume, the permittee does not need to determine the volume of each material used. Instead, the permittee may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, and 1C of this condition.

(e) Calculate the mass of organic HAP emissions: The mass of organic HAP emissions is the combined mass of organic HAPs contained in all coatings, thinners and/or other additives, and cleaning materials used during each month minus the organic HAPs in certain waste materials and shall be calculated using Equation 1:

$$H_e = A + B + C - R_W \qquad \text{(Eqn. 1)}$$

Where:

$H_e$ = Total mass of organic HAP emissions during the month, in pounds.

A = The total mass of organic HAPs in the coatings used during the month, in pounds, as calculated by Equation 1A of this condition.

B = The total mass of organic HAPs in the thinners and/or other additives used during the month, in pounds, as calculated by Equation 1B of this condition.

C = The total mass of organic HAPs in the cleaning materials used during the month, in pounds, as calculated by Equation 1C of this condition.

$R_w$ = The total mass of organic HAPs in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the month, in pounds, as determined in accordance with paragraph (e)(4) of this condition. However, the permittee may assign a value of zero for "Rw" if the permittee does not wish to use this allowance.

(1) Calculate the total mass of organic HAPs in the coatings used during the month by using Equation 1A:

$$A = \sum_{i=1}^{m} (Vol_{C,i})(D_{c,i})(W_{c,i}) \qquad \text{(Eqn. 1A)}$$

Where:

A = The total mass of organic HAPs in the coatings used during the month, in pounds.

$Vol_{c,i}$ = The total volume of coating, i, used during the month, in gallons.

$D_{c,i}$ = The density of coating, i, in pounds of coating per gallon of coating.

$W_{c,i}$ = The mass fraction of organic HAPs in coating, i, in pounds of organic HAPs per pound of coating. For reactive adhesives (as defined in 40 CFR 63.3981, Subpart MMM), use the mass fraction of organic HAPs that is emitted as determined by using Appendix A in 40 CFR Part 63 – Subpart PPPP.

m = The number of different coatings used during the month.

(2) Calculate the total mass of organic HAPs in the thinners and/or other additives used during the month by using Equation 1B:

$$B = \sum_{j=1}^{n}(Vol_{t,i})(D_{t,i})(W_{t,i}) \qquad \text{(Eqn. 1B)}$$

Where:

B = The total mass of organic HAPs in the thinners and/or other additives used during the month, in pounds.

$Vol_{t,j}$ = The total volume of thinner and/or other additive, j, used during the month, in gallons.

$D_{t,j}$ = The density of thinner and/or other additive, j, in pounds per gallon.

$W_{t,j}$ = The mass fraction of organic HAPs in thinner and/or other additive, j, in pounds of organic HAPs per pounds of thinner and/or other additive. For reactive adhesives (as defined in 40 CFR 63.3981, Subpart MMMM), use the mass fraction of organic HAPs that is emitted as determined by using Appendix A in 40 CFR Part 63 – Subpart PPPP.

n = The number of different thinners and/or other additives used during the month.

(3) Calculate the total mass of organic HAPs in the cleaning materials used during the month by using Equation 1C:

$$C = \sum_{k=1}^{p}(Vol_{s,k})(D_{s,k})(W_{s,k}) \qquad \text{(Eqn. 1C)}$$

Where:

C = The total mass of organic HAPs in the cleaning materials used during the month, in pounds.

$Vol_{s,k}$ = The total volume of cleaning material, k, used during the month, in gallons.

$D_{s,k}$ = The density of cleaning material, k, in pounds per gallon.

$W_{s,k}$ = The mass fraction of organic HAPs in cleaning material, k, in pounds of organic HAPs per pound of material.

p = The number of different cleaning materials used during the month.

(4) If the permittee chooses to account for the mass of organic HAP contained in waste materials sent or designated for shipment to a hazardous waste

TSDF in Equation 1 of this condition, the permittee shall determine the mass in accordance with 40 CFR 63.3951(e)(4), Subpart MMMM.

(f) Calculate the total volume of coating solids used: Determine the total volume of coating solids used (in gallons), which is the combined volume of coating solids for all the coatings used during each month, by using Equation 2:

$$C = \sum_{i=1}^{m} (Vol_{c,i})(V_{s,i}) \qquad \text{(Eqn. 2)}$$

Where:

$V_{st}$ = The total volume of coating solids used during the month, in gallons.

$Vol_{c,i}$ = The total volume of coating, i, used during the month, in gallons.

$V_{s,i}$ = The volume fraction of coating solids for coating, i, in gallons of solids per gallon on coating, as determined in accordance with Condition 5.B.6(b).

m = The number of coatings used during the month.

(g) Calculate the organic HAP emission rate: Calculate the organic HAP emission rate for the compliance period, in pounds of organic HAPs emitted per gallon of coating solids used, by using Equation 3:

$$H_{yr} = \frac{\sum_{y=1}^{n} H_e}{\sum_{y=1}^{n} V_{st}} \qquad \text{(Eqn. 3)}$$

Where:

Hyr = The average organic HAP emission rate for the compliance period, in pounds of organic HAPs emitted per gallon of coating solids used.

He = The total mass of organic HAP emissions from all materials used during month, y, in pounds, as calculated by Equation 1 of this condition.

Vst = The total volume of coating solids used during month, y, in gallons, as calculated by Equation 2 of this condition.

y = The identifier for months.

n = The number of full or partial months in the compliance period (for the initial compliance period, "n" equals 12 if the compliance date falls on the first day of a month – otherwise "n" equals 13; for all following compliance periods, "n" equals 12).

The organic HAP emission rate for each compliance period (calculated using Equation 3 of this condition) must be less than / equal to the emission limit specified in Condition 3.B.5. The permittee shall perform the calculations in this condition on a monthly basis using data from the previous twelve (12) months of operation. If the organic HAP emission rate for any 12-month compliance period exceeds the emission limit specified in Condition 3.B.5, this is a deviation from the emission limit for that compliance period and must be reported as specified in Condition 5.C.2(g).

(Ref.: 40 CFR 63.3951(a) – (g) and 63.3952(a) – (c), Subpart MMMM)

5.B.8 For Emission Point AA-010a, the permittee shall comply with the following requirements for the monitoring required by the approved CAM Plan:

(a) Proper maintenance: The permittee shall maintain the monitoring, including (but not limited to) maintaining necessary parts for routine repairs of the monitoring equipment at all times.

(b) Continued operation: Except for (as applicable) monitoring malfunctions, associated repairs, and required quality assurance or control activities [including calibration checks and required zero and span adjustments (as applicable)], the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. The data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used, including in data averaging and calculations or in fulfilling a minimum data availability requirement (as applicable).

The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(Ref.: 40 CFR 64.7(b) and (c), Compliance Assurance Monitoring)

5.B.9 For Emission Point AA-010a, upon detecting an excursion or exceedance, the permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

The response shall include minimizing the period of any start-up, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused start-up or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard (as applicable).

The determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include (but is not limited to) monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(Ref.: 40 CFR 64.7(d), Compliance Assurance Monitoring)

5.B.10 For Emission Point AA-010a, in addition to the noted excursion threshold in the CAM plan, the MDEQ may require the permittee to develop and implement a Quality Improvement Plan (QIP) containing the elements specified in 40 CFR 64.8(b). The QIP shall be developed and implemented within one hundred eighty (180) days of written

notification from the MDEQ that a QIP is required.

The MDEQ may require the permittee make reasonable changes to the QIP if the QIP fails to address the cause of the control device performance problem or fails to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Implementation of a QIP shall not excuse the permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that applies.

(Ref.: 40 CFR 64.8, Compliance Assurance Monitoring)

5.B.11 For Emission Point AA-010a, the permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written QIP required pursuant to Condition 5.B.10 and any activities undertaken to implement a QIP, data used to document the adequacy of monitoring, and monitoring maintenance or corrective actions (as applicable).

As applicable, records of monitoring data and monitoring performance data should include date and time, who performed the analysis, analytical techniques or methods used, results and operating conditions at the time of the sampling or measurement. These records may be maintained in hard copy form or electronically, provided they are available for expeditious inspection and review.

(Ref.: 40 CFR 64.9(b), Compliance Assurance Monitoring)

## C. SPECIFIC REPORTING REQUIREMENTS

| Emission Point(s) | Applicable Requirement | Condition Number | Pollutant/ Parameter Monitored | Reporting Requirement |
|---|---|---|---|---|
| AA-000 (Facility-Wide) | 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1). | 5.C.1 | VOCs<br>PM / PM10 | Semi-Annual Reporting Requirements |
| AA-009 | 40 CFR 63.3920(a)(1) – (6) and (f), Subpart MMMM | 5.C.2 | Organic HAPs | Semi-Annual Reporting Requirements |
| AA-010a | 40 CFR 64.9(a), CAM | 5.C.3 | CAM Reporting | Semi-Annual Reporting Requirements |
| | 40 CFR 64.7(e), CAM | 5.C.4 | CAM Modification | Promptly Notify the MDEQ of Failure to Achieve Limit/Standard though No Excursion or Exceedance Was Indicated by Approved Monitoring |

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 contains the following information:

(a) The total emission of volatile organic compounds (VOCs) in tons based on both a monthly basis and a rolling 12-month total basis.

(b) A summary of any maintenance actions conducted on the air pollution control/monitoring equipment. The permittee shall include any period (in hours) in which air pollution control/monitoring equipment fails and/or malfunctions.

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

5.C.2 For Emission Point AA-009, the permittee shall submit a semi-annual monitoring report (SMR) in accordance with Condition 5.A.4 that contains the following information (as applicable):

(a) The company name and address.

(b) A statement by a responsible official with the official's name, title, and signature certifying the truth, accuracy, and completeness of the content of the report.

(c) The date of report and beginning / ending dates of the reporting period. The reporting period is the six-month period ending either on June 30 or December 31. Note that the information reported for each of the six (6) months in the reporting period will be based on the last twelve (12) months of data prior to the date of each monthly calculation.

(d) Identification of the compliance option(s) specified in Condition 5.B.3 that the permittee used on each coating operation during the reporting period. If there was a switch between compliance options during the reporting period, the permittee shall report the beginning and ending dates for each option that was used.

(e) If the permittee used the “Emission Rate without Add-on Controls Option”, the calculation results for each rolling 12-month organic HAP emission rate during each 6-month reporting period.

(f) No deviations: If there were no deviations from the emission limit specified in Condition 3.B.5, the semi-annual compliance report shall include a statement that there were no deviations from the emission limit during the reporting period.

(g) Deviations: If there was a deviation from the organic HAP limit in Condition 3.B.5, the semi-annual compliance report shall contain the following information:

(1) Compliant Material Option: If the permittee uses this option (as specified in Condition 5.B.6), the report shall contain the following information:

(i) An identification of each coating that deviated from the emission limit, and each thinner and/or other additive, and cleaning material used that contained organic HAP.

(ii) The dates, time, and duration that each coating, thinner and/or other additive, and cleaning material was used.

(iii) The calculation of the organic HAP content [as determined by Condition 5.B.6(d)] for each coating and the determination of the organic HAP mass fraction for each thinner and/or other additive and cleaning material.

The permittee does not need to submit background data supporting these calculations (e.g. information provided by each material supplier / manufacturer or test reports).

(2) Emission Rate without Add-on Controls Option: If the permittee uses this option (as specified in Condition 5.B.7), the report shall contain the following information:

(i) The beginning and ending dates during which the 12-month organic HAP emission rate exceeded the emission limit specified in Condition 3.B.5;

(ii) The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred;

(iii) The calculations from Equations 1, 1A through 1C, 2, and 3; and

(iv) The calculation used to determine mass of organic HAP in waste materials in accordance with 40 CFR 63.3951(e)(4), Subpart MMMM (if applicable).

The permittee does not need to submit background data supporting these calculations (e.g. information provided by each material supplier / manufacturer or test reports).

(3) A statement on the cause of each deviation (including any unknown cause – if applicable) and following information:

(i) The number of deviations;

(ii) For each deviation – the date, time, duration, and a list of the affected equipment;

(iii) An estimate of the quantity of each regulated pollutant emitted over the emission limit specified in Condition 3.B.5;

(iv) A description of the method used to estimate the emissions and the actions taken to minimize emissions in accordance with Condition 3.D.1.

(h) Once the reporting template has been available on the CEDRI website for one (1) year, the permittee shall submit the semi-annual compliance report to the EPA via the CEDRI. The CEDRI interface can be accessed through the EPA's CDX (https://cdx.epa.gov/).

(Ref.: 40 CFR 63.3920(a)(1) – (6) and (f), Subpart MMMM.)

5.C.3 For Emission Point AA-010a, the permittee shall submit reports in accordance with Condition 5.A.4 of the following information, as applicable:

(a) Summary information on the number, duration, and cause (including any unknown cause, if applicable) of excursions or exceedances (as applicable) and the corrective actions taken;

(b) Summary information on the number, duration, and cause (including any unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

(c) A description of the actions taken to implement a QIP during the reporting period as specified in Condition 5.B.10. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances.

(Ref.: 40 CFR 64.9(a), Compliance Assurance Monitoring)

5.C.4 For Emission Point AA-010a, if the permittee identifies a failure to achieve compliance with the emission limitation or standard for which the approved CAM monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes.

Such a modification may include (but is not limited to) reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or monitoring additional parameters.

(Ref.: 40 CFR 64.7(e), Compliance Assurance Monitoring)

## 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 | Department of Environmental Quality |
| EPA | 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 |
| MMBTU/H | 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 Part 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 |

# APPENDIX B

## CAM PLAN FOR EMISSION POINT AA-010A (ABRASIVE BLASTING BOOTH WITH DUST COLLECTOR)

| **Indicator** | Visible Emissions Evaluation (VEE) | Control Equipment Inspections |
|---|---|---|
| **Measurement Approach** | A visual observation of the dust collector exhaust will be performed daily while the process is operating.<br><br>When any emissions are observed, an EPA Reference Method 9 will be performed. | The dust collector will be inspected on a weekly basis to ensure that the abrasive blasting operations are properly controlled. |
| **Indicator Range**<br><br>**(including the corrective action taken for an excursion)** | An excursion is defined as opacity greater than 20%.<br><br>When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action plan required to correct the situation. All excursions will be documented and reported as necessary | An excursion is defined as control equipment malfunctions.<br><br>All excursions will be documented and reported, as necessary |
| **QIP Threshold** | Not more than 6 excursions in any semi-annual reporting period. | Not more than 6 excursions in any semi-annual reporting period. |
| **Data Representativeness** | Measurements are made at the dust collector exhaust. | Inspections and maintenance are conducted on the dust collector. |
| **Verification of Operational Status** | Recorded each day of operation. | N/A |
| **QA/QC Practices** | Person performing the VEE in accordance with EPA Reference Method 9 will be properly certified twice per year. | Weekly inspections and any required maintenance are performed as necessary. |
| **Monitoring Frequency** | Visible observations will be performed each day. If emissions are visible, then an EPA Reference Method 9 will be performed. | Weekly |
| **Data Collection Procedure** | Opacity observations and/or EPA Reference Method 9 VEEs will be recorded daily and kept in log form. | Weekly inspections are performed and documented by the observer. Any required maintenance is logged. |
| **Averaging Period** | EPA Reference Method: 15-second intervals and averaging 24 consecutive readings (6 minutes) | N/A |