STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
TITLE V PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

BlueScope Coated Products LLC
951 Prisock Road
Jackson, Mississippi
Hinds 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 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:[Date not to exceed 5 years from issuance] **Permit No.:** 1080-00068

2070 PER20250001

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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

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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-001	Continuous Coil Coating Line [consists of cleaning, treating, and coating activities – emissions captured in a permanent total enclosure and routed to a 46.0 MMBTU/hr natural gas-fired thermal oxidizer (exhaust of thermal oxidizer provides heat for the ovens)]
AA-002	10,000-gallon Virgin Solvent Storage Tank

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-001	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Permit to Construct issued May 10, 1994, and modified in Title V Operating Permit issued August 3, 2020 (PSD Avoidance Limit)	3.B.1	VOC	≤ 240.0 tpy
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.B.2	PM (filterable)	$E = 4.1 \times p^{0.67}$
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.B.3		$E = 0.8808 \times I^{-0.1667}$
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.B.4	SO_2	≤ 4.8 lb/MMBTU
	40 CFR 60, Subpart TT (Standards of Performance for Metal Coil Surface Coating) 40 CFR 60.460, Subpart TT	3.B.5	VOC	Applicability
	40 CFR 60.462(a)(2) and (3), Subpart TT	3.B.6		≤ 0.14 kg VOC/L; or ≤ 10% of applied VOC each month (90% emission reduction)
	40 CFR 63, Subpart SSSS (National Emission Standards for Hazardous Air Pollutant: Surface Coating of Metal Coil) 40 CFR 63.5090(a), (e), 63.5140(c), and Table 2, Subpart SSSS	3.B.7	HAP	Applicability
	40 CFR 63.5120(a)(2) and (b), Subpart SSSS	3.B.8		≤ 0.046 kg organic HAP/L
	40 CFR 63.5121(a) and Items #1 and #3 of Table 1, Subpart SSSS	3.B.9		Thermal Oxidizer and Capture System operating limits
	40 CFR 63.5140(a), Subpart SSSS	3.B.10		Operating limit
	40 CFR 64 (Compliance Assurance Monitoring) 40 CFR 64.2(a), CAM	3.B.11	VOC	Applicability

3.B.1 For Emission Point AA-001, the permittee shall limit the emission of volatile organic compounds (VOC) 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 Permit to Construct issued May 10, 1994, and modified in Title V Operating Permit issued August 3, 2020 – PSD Avoidance Limit)

3.B.2 For Emission Point AA-001, the permittee shall not cause, permit 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 relations:

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

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.3 For Emission Point AA-001, for fossil fuel burning installations greater than 10 million BTU per hour heat input, the maximum permissible emission of ash and/or particulate matter (PM) shall not exceed a rate as determined by the following relationship:

$E = 0.8808 \times I^{-0.1667}$

Where "E" is the emission rate in pounds per million BTU (MMBTU) per hour heat input, and "I" is the heat input in millions of BTU per hour.

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

3.B.4 For Emission Point AA-001, except as otherwise specified or limited herein, the maximum discharge of sulfur oxides (SO_X) 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 or SO_2) per million BTU (MMBTU) heat input.

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

3.B.5 For Emission Point AA-001, the permittee is subject to and shall comply with the applicable provisions of 40 CFR 60, Subpart TT, Standards of Performance for Metal Coil Surface Coating, and 40 CFR 60, Subpart A, General Provisions.

(Ref.: 40 CFR 60.460, Subpart TT)

3.B.6 For Emission Point AA-001, the permittee shall not cause to be discharged into the atmosphere more than:

(a) 0.14 kilogram VOC per liter (kg VOC/L) of coating solids applied for each calendar month; or

(b) 10 percent of the VOC's applied for each calendar month (90 percent emission reduction).

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

3.B.7 For Emission Point AA-001, the permittee is subject to and shall comply with the applicable provisions of 40 CFR 63, Subpart SSSS, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil, and 40 CFR 63, Subpart A, General Provisions, as established in Table 2 of Subpart SSSS.

This subpart does not apply to the application of incidental markings (including letters, numbers, or symbols) that are added to bare metal coils that are used for only product

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identification or for product inventory control. The application of letters, numbers, or symbols to a coated metal coil is considered a coil coating process and part of the coil coating affected source.

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

3.B.8 For Emission Point AA-001, the permittee shall limit the emission of organic HAP to no more than 0.046 kilograms (kg) of organic HAP per liter (L) of solids applied during each 12-month compliance period. The permittee must demonstrate compliance with these standards by following the procedures in Condition 5.B.12.

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

3.B.9 For Emission Point AA-001, the permittee shall meet the operating limits below. The permittee must meet the operating limits established during the most recent performance test required in Condition 5.B.9 at all times after the permittee has established them.

(a) For the thermal oxidizer, the average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.5160(d)(3)(i), Subpart SSSS.

(b) For the emission capture system, develop a monitoring plan that identifies operating parameter to be monitored and specifies operating limits according to paragraph (b) of Condition 5.B.10.

(Ref.: 40 CFR 63.5121(a) and Items #1 and #3 of Table 1, Subpart SSSS)

3.B.10 For Emission Point AA-001, the permittee must be in compliance with the applicable emission standards in Condition 3.B.8 and the operating limits in Condition 3.B.9 at all times.

(Ref.: 40 CFR 63.5140(a), Subpart SSSS)

3.B.11 For Emission Point AA-001, the permittee is subject to and shall comply with all applicable requirements in 40 CFR 64, Compliance Assurance Monitoring (CAM).

(Ref.: 40 CFR 64.2(a), CAM)

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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-001	40 CFR 63, Subpart SSSS (National Emission Standards for Hazardous Air Pollutant: Surface Coating of Metal Coil) 40 CFR 63.5140(b), Subpart SSSS	3.D.1	HAP	Minimize emissions

3.D.1 For Emission Point AA-001, the permittee must operate and maintain the affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by 40 CFR 63, Subpart SSSS, have been achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements will be based on information available to DEQ 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 affected source.

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

SECTION 4. COMPLIANCE SCHEDULE

4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.

4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with 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-001	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.1	VOC	Monitoring of VOC-containing material
		5.B.2		Recordkeeping of VOC-containing material
		5.B.3	Solvent Recovery	Recordkeeping on clean-up solvents
		5.B.4	Capture Efficiency	EPA Reference Method 204
	40 CFR 60, Subpart TT (Standards of Performance for Metal Coil Surface Coating) 40 CFR 60.463(b), (c)(2), and 60.465(c), Subpart TT	5.B.5	VOC	Determine monthly volume-weighted average emissions
	40 CFR 60.464(a), Subpart TT	5.B.6		Determine the average VOC content of coatings used monthly
	40 CFR 60.464(c), Subpart TT	5.B.7	Temperature	Continuously monitor combustion temperature of thermal oxidizer
	40 CFR 60.465(e), Subpart TT	5.B.8	VOC	Records of data and calculations
	40 CFR 63, Subpart SSSS (National Emission Standards for Hazardous Air Pollutant: Surface Coating of Metal Coil) 40 CFR 63.5160(b) – (e), Subpart SSSS	5.B.9	HAP	Conduct performance testing every five (5) years
	40 CFR 63.5150(a)(3) and (4), Subpart SSSS	5.B.10		Monitoring operating parameters
	40 CFR 63.5150(b), Subpart SSSS	5.B.11		Definition of deviation
	40 CFR 63.5170(d)(2) and (f), Subpart SSSS	5.B.12		Demonstration of continuous compliance with organic HAP limit
	40 CFR 63.5190(a)(1), (2), and (5), Subpart SSSS	5.B.13		Recordkeeping requirements
	40 CFR 64 (Compliance Assurance Monitoring)	5.B.14	Pressure Drop	Continuous pressure drop monitoring of coater rooms
	40 CFR 64.3(a), (b), and 64.6(c), CAM	5.B.15	Temperature	Continuous temperature monitoring of thermal oxidizer
	40 CFR 64.7(b) and (c), CAM	5.B.16	Operation & Maintenance	Requirements for monitoring system
	40 CFR 64.7(d), CAM	5.B.17	Corrective Action	Corrective action response to an excursion/exceedance of a CAM indicator

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Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/ Parameter Monitored	Monitoring/Recordkeeping Requirement
	40 CFR 64.8, CAM	5.B.18	QIP	Develop a Quality Improvement Plan (QIP) upon request by MDEQ
	40 CFR 64.9(b), CAM	5.B.19	Recordkeeping	Maintain CAM records as specified

5.B.1 For Emission Point AA-001, the permittee shall determine for each coating, adhesive, solvent, or other VOC and/or HAP containing material used:

(a) The identification of each coating, adhesive, solvent, or other VOC and/or HAP containing material and the total gallons of each coating, adhesive, solvent, or other VOC and/or HAP containing material used on a monthly basis and for each consecutive 12-month period on a rolling basis.

(b) The VOC and/or HAP content of each coating, adhesive, solvent, or other VOC and/or HAP containing material used. A description of the method used to determine the VOC and/or HAP content shall accompany this data. The permittee may utilize data supplied by the manufacturer, or analysis of VOC content by EPA Test Method 24 and/or EPA Test Method 24A, or analysis of HAP content by EPA Test Method 311.

(c) The density of each coating, adhesive, solvent, or other VOC and/or HAP containing material.

The permittee shall calculate the VOC emissions for the use of these materials each month and shall determine the consecutive 12-month total VOC emissions on a rolling basis. VOC emissions may be reduced using the following equation to account for operation of the thermal oxidizer and recovery of spent solvent:

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

Where "E_a" is the actual VOC mass emission rate (in tons per year) based on a rolling 12-month total, "VOC_u" is the actual VOC usage rate (in tons per year) based on a rolling 12-month average, "ORE" is the most recently demonstrated VOC destruction/reduction efficiency (in percent), and "VOC_r" is the VOC recovered in spent solvent as determined by Condition 5.B.3.

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

5.B.2 For Emission Point AA-001, the permittee shall maintain sufficient records to document the following information:

(a) The identification of each coating, adhesive, solvent, or other VOC containing material and the total gallons of each coating, adhesive, solvent, or other VOC containing material used on a monthly basis and in each consecutive 12-month period.

(b) The VOC content of each coating, adhesive, solvent, or other VOC containing material used with a description of the method used to determine the VOC content.

(c) The density of each coating, adhesive, solvent, or other VOC containing material used.

(d) The total VOC emission rate in tons per year on a monthly basis and for each consecutive 12-month period on a rolling basis.

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

5.B.3 For Emission Point AA-001, if waste cleanup solvent is collected for off-site disposal and/or recovery, the following records shall be maintained if credit is to be applied to the monthly VOC emissions:

(a) The amount of waste solvent recovered during the month for off-site disposal and/or recovery, in gallons (or pounds, if records of recovered solvent is maintained by weight and VOC content in percent by weight). The monthly total volume or weight of the collected waste solvent may be calculated using a prorated method by averaging the volume or weight of the waste solvent recovered and shipped off-site over the number of operating days since the previous shipment.

(b) The VOC content of the recovered waste solvent, which shall be based upon an independent laboratory analyses performed for waste stream characterization within the previous 12 months or a laboratory analysis by the facility to which the waste solvent is shipped.

(c) The date the recovered waste solvent was shipped, the amount shipped (minus the container weight), and the name and address of the receiving, disposal, and/or recovery facility.

The usage of recycled cleanup solvent generated from the coating line and returned to the facility for re-use is not required to be included in subsequent VOC records if a credit was not applied to the monthly VOC emissions during the initial usage and all VOC was assumed to be emitted.

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

5.B.4 For Emission Point AA-001, the permittee shall demonstrate compliance with the capture efficiency standards (mass of total VOC captured and sent to the oxidizer) in accordance with EPA Reference Method 204 – Criteria for and Verification of a Permanent or Temporary Total Enclosure, 40 CFR 51, Appendix M, and shall comply with the specific recordkeeping as described in Condition 5.C.5 during each shift.

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

5.B.5 For Emission Point AA-001, the permittee shall conduct a performance test for each calendar month for determining monthly volume-weighted average emissions of VOCs in kilogram per liter (kg/L) of coating solids applied according to the following procedures:

(a) Determine the overall reduction efficiency (R) for the capture system and control device. The permittee may use the most recently determined overall reduction efficiency (R) for the performance test, providing control device and capture system operating conditions have not changed. The procedures in 40 CFR

63.463(c)(2)(i)(A), (B), and (C), Subpart TT, shall be repeated when directed by DEQ or when the permittee elects to operate the control device or capture system at conditions different from the initial performance test.

If the overall reduction efficiency (R) is equal to or greater than 0.90, the affected facility is in compliance no further computations are necessary. If the overall reduction efficiency (R) is less than 0.90, the average total VOC emissions to the atmosphere per unit volume of coating solids applied (N) shall be computed as described in paragraphs (b) through (d).

(b) Calculate the volume-weighted average of the total mass of VOC's per unit volume of coating solids applied (G) during each calendar month for each affected facility using equations in 40 CFR 63.463(c)(1)(i)(A), (B), and (C), Subpart TT.

(c) Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during each calendar month by the following equation:

$N = G (1 – R)$

(d) If the volume-weighted average mass of VOC's emitted to the atmosphere for each calendar month (N) is less than or equal to 0.14 kg/L of coating solids applied, the affected facility is in compliance. Each monthly calculation is a performance test.

The permittee shall identify and record every calendar quarter of each instance in which the volume-weighted average of the local mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified in Condition 3.B.6.

(Ref.: 40 CFR 60.463(b), (c)(2), and 60.465(c), Subpart TT)

5.B.6 For Emission Point AA-001, if the overall reduction efficiency (R) is less than 0.90, as determined by Condition 5.B.5, the permittee shall compute and record the average VOC content of coatings applied during each calendar month, according to the equations provided in 40 CFR 40.463, Subpart TT.

(Ref.: 40 CFR 60.464(a), Subpart TT)

5.B.7 For Emission Point AA-001, the permittee shall install, calibrate, operate, and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with Condition 3.B.6. This device shall have an accuracy of ±2.5°C. or ±0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater. The permittee shall also record all periods (during actual coating operations) in excess of three (3) hours during which the average temperature in any thermal incinerator used to control emissions from an affected facility remains more than 28°C (50°F) below the temperature at which compliance with Condition 3.B.6 was demonstrated during the most recent measurement of incinerator efficiency. The records shall identify each such occurrence and its duration in accordance with the requirement of 40 CFR 60.7(c), Subpart A.

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

5.B.8 For Emission Point AA-001, in accordance with Condition 5.A.3, the permittee shall maintain records of all data and calculations used to determine monthly VOC emissions

and to determine the monthly emission limit (where applicable). Where compliance is achieved through the use of thermal incineration, the permittee shall maintain, at the source, daily records of the incinerator combustion temperature.

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

5.B.9 For Emission Point AA-001, the permittee shall comply with the following performance test requirements to demonstrate compliance with Condition 3.B.8:

(a) The permittee shall determine the organic HAP weight fraction of each coating material applied by following one of the procedures in 40 CFR 63.5160(b)(1) through (4).

(b) The permittee shall determine the solids content and the density of each coating material applied. The permittee may determine the volume solids content using ASTM D2697-03(2014), ASTM D6093-97 (2016), or an EPA approved alternative method. The permittee must determine the density of each coating using ASTM D1475-13 or ASTM D2111-10 (2015). The solids and the density determination may be performed by the manufacturer of the material and the results provided to the permittee. Alternatively, the permittee may rely on formulation data provided by material providers to determine the volume solids. In the event of any inconsistency between test data obtained with the ASTM test methods specified in this section and formulation data, the test data will govern.

(c) The permittee must conduct performance tests no later than five (5) years following the previous performance test to establish the destruction or removal efficiency of the thermal oxidizer.

For each performance test, the permittee shall determine the destruction or removal efficiency of the thermal oxidizer according to the procedures in 40 CFR 63.5160(d), Subpart SSSS, and the capture efficiency of each capture system according to 40 CFR 63.5160(e), Subpart SSSS. The permittee shall also confirm or re-establish the operating limits required by Condition 3.B.9.

(Ref.: 40 CFR 63.5160(b) – (e), Subpart SSSS)

5.B.10 For Emission Point AA-001, the permittee must monitor and inspect each capture system and each control device. The permittee must install and operate the monitoring equipment as specified below. The permittee must also maintain the monitoring equipment at all times in accordance with Condition 3.D.1 and keep the necessary parts readily available for routine repairs of the monitoring equipment.

(a) The permittee shall comply with the following for the thermal oxidizers:

(1) Install, calibrate, maintain, and operate temperature monitoring equipment according to manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every three (3) months; or the chart recorder, data logger, or temperature indicator must be replaced. The permittee must replace the equipment either if the permittee chooses not to perform the calibration, or if the equipment cannot be calibrated properly. Each temperature monitoring device must be equipped with a

continuous recorder. The device must have an accuracy of ±1 percent of the temperature being monitored in degrees Celsius, or ±1 °Celsius, whichever is greater.

(2) To demonstrate continuous compliance with the operating limit established according to 40 CFR 63.5160(d)(3)(i), the permittee must install the thermocouple or temperature sensor in the combustion chamber at a location in the combustion zone.

(b) The permittee must develop a capture system monitoring plan containing the information in paragraphs (1) through (3) below. The permittee must make the monitoring plan available for inspection by DEQ upon request.

(1) The monitoring plan must identify the operating parameter to be monitored to ensure that the capture efficiency measured during compliance tests is maintained, explain why this parameter is appropriate for demonstrating ongoing compliance, and identify the specific monitoring procedures.

(2) The plan also must specify operating limits at the capture system operating parameter value, or range of values, that demonstrates compliance with the standards in Condition 3.B.8. The operating limits must represent the conditions indicative of proper operation and maintenance of the capture system.

(3) The permittee must conduct monitoring in accordance with the plan.

(Ref.: 40 CFR 63.5150(a)(3) and (4), Subpart SSSS)

5.B.11 For Emission Point AA-001, if an operating parameter monitored in accordance with Condition 5.B.10 is out of the allowed range specified in Condition 3.B.9 it will be considered a deviation from the operating limit.

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

5.B.12 For Emission Point AA-001, the permittee must include all coating materials used in the affected source when determining compliance with the limit in Condition 3.B.8. The permittee shall demonstrate compliance with paragraph (a) or (b) of the following:

(a) Continuous monitoring of capture system and control device operating parameters. The permittee shall demonstrate compliance through performance tests of capture efficiency and control device efficiency and continuous monitoring of capture system and control device operating parameters as specified in paragraphs (1) through (11) below.

(1) Determine the oxidizer destruction or removal efficiency, DRE, using the procedure in 40 CFR 63.5160(d), Subpart SSSS.

(2) Whenever a work station is operated, continuously monitor the operating parameter established in accordance with Condition 5.B.10.

(3) Determine the capture system capture efficiency, CE, for each work station in accordance with 40 CFR 63.5160(e), Subpart SSSS.

(4) Whenever a work station is operated, continuously monitor the operating parameter established in accordance with Condition 5.B.10.

(5) Calculate the overall organic HAP control efficiency, R, achieved using Equation 7 of 40 CFR 63.5170, Subpart SSSS.

(6) If demonstrating compliance with the organic HAP emission rate based on solids applied, measure the mass of each coating material applied on each work station during the month.

(7) If demonstrating compliance with the organic HAP emission rate based on solids applied, determine the organic HAP content of each coating material applied during the month following the procedure in 40 CFR 63.5160(b), Subpart SSSS.

(8) If demonstrating compliance with the organic HAP emission rate based on solids applied, determine the solids content of each coating material applied during the month following the procedure in 40 CFR 63.5160(c), Subpart SSSS.

(9) Calculate the organic HAP emitted during the month, He, for each month:

(i) For each work station and its associated oxidizer, use Equation 8 of 40 CFR 63.5170, Subpart SSSS.

(ii) For periods when the oxidizer has not operated within its established operating limit, the control device efficiency is determined to be zero.

(10) If demonstrating compliance with the organic HAP emission rate based on solids applied for the 12-month compliance period, calculate the organic HAP emission rate based on solids applied, L_{ANNUAL}, for the 12-month compliance period using Equation 6 of 40 CFR 63.5170, Subpart SSSS.

(11) The affected source is in compliance with Condition 3.B.8 if each oxidizer is operated such that the average operating parameter value is greater than the operating parameter value established in Condition 5.B.10 for each 3-hour period, and each capture system operating parameter average value is greater than or less than (as appropriate) the operating parameter value established in Condition 5.B.10 for each 3-hour period; and the requirement in either of the following is met:

(i) The overall organic HAP control efficiency, R, is 98 percent or greater for each; or

(ii) The organic HAP emission rate based on solids applied L_{ANNUAL}, is 0.046 kg organic HAP per liter solids applied or less for the 12-month compliance period.

(b) Continuous emission monitoring of control device performance. Use continuous emission monitors, conduct performance tests of capture efficiency, and continuously monitor a site-specific operating parameter to ensure that capture

efficiency is maintained. Compliance must be demonstrated in accordance with 40 CFR 63.5170(e)(2), Subpart SSSS.

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

5.B.13 For Emission Point AA-001, the permittee shall maintain the following records in accordance with 40 CFR 63.10(b)(1), Subpart A:

(a) Records of the compliance option used and the time periods (beginning and ending dates and times) the permittee used each option.

(b) Records specified in 40 CFR 63.10(b)(2), Subpart A, of all measurements needed to demonstrate compliance including:

(1) Control device and capture system operating parameter data in accordance with Condition 5.B.10;

(2) Organic HAP content data for the purpose of demonstrating compliance in accordance with 40 CFR 63.5160(b), Subpart SSSS;

(3) Volatile matter and solids content data for the purpose of demonstrating compliance in accordance with 40 CFR 63.5160(c), Subpart SSSS;

(4) Overall control efficiency determination or alternative outlet HAP concentration using capture efficiency tests and control device destruction or removal efficiency tests in accordance with 40 CFR 63.5160(d), (e), and (f), Subpart SSSS; and

(5) Material usage, HAP usage, volatile matter usage, and solids usage and compliance demonstrations using these data in accordance with 40 CFR 63.5170(a), (b), and (d), Subpart SSSS.

(c) For each deviation from an emission limit reported under paragraph (d) of Condition 5.C.4, a record of the information specified below.

(1) The date, time, and duration of the of the deviation.

(2) A list of the affected sources or equipment for which the deviation occurred and the cause of the deviation.

(3) An estimate of the quantity of each regulated pollutant emitted over any applicable emission limit in Condition 3.B.8 or any applicable operating limit established in Condition 3.B.9, and a description of the method used to calculate the estimate.

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

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

5.B.14 For Emission Point AA-001, the permittee shall monitor the pressure drop in the coater rooms in accordance with the CAM plan found in Appendix C of this permit.

(Ref.: 40 CFR 64.3(a), (b), and 64.6(c), CAM)

5.B.15 For Emission Point AA-001, the permittee shall monitor the temperature of the thermal oxidizer continuously in accordance with the CAM plan found in Appendix C of the permit.

(Ref.: 40 CFR 64.3(a), (d), and 64.4(c), CAM)

5.B.16 For Emission Point AA-001, the permittee shall comply with the following requirements for the monitoring required by the approved CAM plan:

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

(b) Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), 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. 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), CAM)

5.B.17 For Emission Point AA-001, 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 startup, 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.

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), CAM)

5.B.18 For Emission Point AA-001, based on the results of a determination made under Condition 5.B.17, 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 180 days of written notification from DEQ 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, CAM)

5.B.19 For Emission Point AA-001, the permittee shall maintain records of monitoring data, monitoring performance data, corrective actions taken, any written QIP required pursuant to Condition 5.B.18 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), CAM)

C. SPECIFIC REPORTING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/ Parameter Monitored	Reporting Requirement
AA-001	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.1	VOC	Monthly recordkeeping and semiannual reporting
	40 CFR 60, Subpart TT (Standards of Performance for Metal Coil Surface Coating) 40 CFR 60.465(c), Subpart TT	5.C.2		Report any exceedances of the VOC emission standard
	40 CFR 60.465(d), Subpart TT	5.C.3	Temperature	Report incinerator temperature drops
	40 CFR 63, Subpart SSSS (National Emission Standards for Hazardous Air Pollutant: Surface Coating of Metal Coil) 40 CFR 63.5180(c) – (f), (g)(2), and (h), Subpart SSSS	5.C.4	HAP	Reporting requirements
	11 Miss. Admin. Code Pt.2, R. 6.3.A(3)(c)(1). 40 CFR 63.5181(a), Subpart SSSS	5.C.5		Electronic reporting of performance testing
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1). 40 CFR 63.5181(c), Subpart SSSS	5.C.6		Electronic reporting of semiannual compliance reports
	40 CFR 64 (Compliance Assurance Monitoring) 40 CFR 64.9(a), CAM	5.C.7	CAM	Semiannual reporting requirements
	40 CFR 64.7(e), CAM	5.C.8		Promptly notify MDEQ of failure to achieve limit/standard though no excursion or exceedance was indicated by approved monitoring

5.C.1 For Emission Point AA-001, in accordance with Condition 5.A.4, the permittee shall submit a report summarizing the monthly and 12-month rolling total VOC emissions calculated in accordance with 5.B.1, including any VOC emissions credits determined under Condition 5.B.3.

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

5.C.2 For Emission Point AA-001, in accordance with Condition 5.A.4, the permittee shall identify, record, and submit a written report the MDEQ semiannually of each instance in which the volume-weighted average of the local mass of VOCs emitted to the atmosphere

per volume of applied coating solids (N) is greater than the limit specified under Condition 3.B.6. If no such instances have occurred, a report stating this shall be submitted to the MDEQ semiannually.

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

5.C.3 For Emission Point AA-001, the permittee shall also submit reports semiannually of each instance the incinerator temperature dropped below the minimum temperature as set forth under Condition 5.B.9. If no such periods occur, the permittee shall state this in the report.

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

5.C.4 For Emission Point AA-001, the permittee shall submit the following reports:

(a) The permittee shall submit a Notification of Performance Test at least sixty (60) calendar days before the performance test is scheduled to begin. This notification and the site-specific test plan required under 40 CFR 63.7(c)(2) must identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. The permittee may consider the operating parameter identified in the site-specific test plan to be approved unless explicitly disapproved, or unless comments received from the MDEQ require monitoring of an alternate parameter.

(b) The permittee shall submit performance test reports before the close of business on the 60th day following the completion of the performance test.

(c) In accordance with Condition 5.A.4, the permittee shall submit semiannual compliance reports containing the information specified below.

(1) Company name and address.

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

(3) Date of report and beginning and ending dates of the reporting period. The reporting period is the six-month period ending 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 12 months of data prior to the date of each monthly calculation.

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

(5) A statement that there were no deviations from the applicable emission limit in Condition 3.B.8 or the applicable operating limit established according to Condition 3.B.9 during the reporting period.

(d) For each deviation, the semiannual compliance report shall contain the following information:

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

(2) The permittee must provide information on the number, date, time, duration, and cause of deviation from an emission limit in Condition 3.B.8 or any applicable operating limit established according to Condition 3.B.9 (including unknown cause, if applicable) as applicable, and corrective action taken.

(3) The permittee must provide the information specified in paragraphs (i) and (ii) below.

(i) Number, date, time, duration, cause (including unknown cause), and descriptions of corrective actions taken for continuous parameter monitoring systems that are inoperative.

(ii) Number, date, time, duration, cause (including unknown cause), and descriptions of corrective actions taken for continuous parameter monitoring systems that are out of control as specified in 40 CFR 63.8(c)(7).

(4) For each deviation from an emission limit in Condition 3.B.8 or any applicable operating limit established according to Condition 3.B.9, the permittee must provide a list of the affected source or equipment, an estimate of the quantity of each regulated pollutant emitted over the emission limit, a description of the method used to estimate the emissions, and the actions taken to minimize emissions in accordance with Condition 3.D.1.

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

5.C.5 For Emission Point AA-001, the permittee must submit the results of each performance test required in Condition 5.B.9, following the procedures in 40 CFR 63.5181(a)(1) – (3), Subpart SSSS, as it relates to electronic submittal of reports through EPA's Electronic Reporting Tool (ERT). In addition to electronic submittal of test reports, the permittee shall also submit a hard copy of the test report to the MDEQ.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)., and 40 CFR 63.5181(a), Subpart SSSS)

5.C.6 For Emission Point AA-001, the permittee shall submit the semiannual compliance report required in Condition 5.C.4 to the EPA via CEDRI. CEDRI can be accessed through the EPA's CDX (https://cdx.epa.gov). The permittee must use the appropriate electronic template on the CEDRI website for Subpart SSSS (https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri). The reports must be submitted by the deadlines specified in Subpart SSSS, regardless of the method in which the reports are submitted. Permittees who claim that some of the information required to be submitted via CEDRI is CBI shall submit a complete report generated using the appropriate form in CEDRI, including information claimed to be CBI, on a compact disc, flash drive, or other commonly used electronic storage medium to the EPA. The electronic medium shall be clearly marked as CBI and mailed to U.S. EPA/OAQPS/CORE CBI Office, Attention: Group Leader, Measurement Policy Group, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same file with the CBI

omitted shall be submitted to the EPA via the EPA's CDX as described earlier in this paragraph. Regardless of the requirement to submit electronic copies of reports, a hard copy of the required reports shall be submitted to the MDEQ in accordance with Condition 5.A.4.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1)., and 40 CFR 63.5181(c), Subpart SSSS)

5.C.7 For Emission Point AA-001, 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 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 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.18. 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), CAM)

5.C.8 For Emission Point AA-001, 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), CAM)

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

Compliance Assurance Monitoring Plan for Emission Point AA-001

	Indicator No. 1
Indicator	Thermal Oxidizer Chamber Temperature
Measurement Approach	A thermocouple or temperature sensor used to monitor the chamber temperature.
Monitoring Method and Location	Continuous monitoring (i.e., every second) clearly displayed, and temperature sensors placed in the combustion chamber at a location in the combustion zone.
Indicator Range (including the corrective action taken for an excursion)	An excursion is defined as any 3-hour rolling temperature average 50ºF below the minimum temperature established in Permit Condition 5.B.7.
Monitoring Frequency	Continuously monitored.
Data Collection/Recordkeeping Procedures	Continuously monitor combustion chamber temperature, calculate and record each one-hour average and the three-hour rolling average.
Averaging Period	Continuously monitor combustion chamber temperature, calculate and record each one-hour average and the three-hour rolling average.
QA/QC Practices	The thermocouples shall be maintained according to the manufacturer's specifications, which shall be kept on site.