# STATE OF MISSISSIPPI AIR POLLUTION CONTROL TITLE V PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT

## THIS CERTIFIES THAT

Howard Industries 3225 Pendorff Road Laurel, Mississippi Jones 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) 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: November 3, 2020

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHØRIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: October 31, 2025 Permit No.: 1360-00057

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#### SECTION 1. GENERAL CONDITIONS

1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

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

1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

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

1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

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

- 1.4 Prior to its expiration, this permit may be reopened in accordance with the provisions listed below.
  - (a) This permit shall be reopened and revised under any of the following circumstances:
    - (1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of 3 or more years. Such a reopening shall be completed no later than 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 emission standards or other terms or conditions of the permit.
    - (4) The Administrator or the Permit Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

- (b) Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.
- (c) Reopenings shall not be initiated before a notice of such intent is provided to the Title V source by the DEQ at least 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 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 This permit does not convey any property rights of any sort, or any exclusive privilege.

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

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

#### (Ref: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(5).)

- 1.8 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.
  - (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published

emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission.

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

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

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

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

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

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

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

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

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

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

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

1.10 Any document required by this permit to be submitted to the 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 where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source.

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

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

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

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

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

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

1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application.

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

- 1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:
  - (a) the changes are not modifications under any provision of Title I of the Act;
  - (b) the changes do not exceed the emissions allowable under this permit;
  - (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:
    - (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 the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in 11 Miss. Admin. Code Pt. 2, Ch. 3., "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared.

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

- 1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 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 Regulations 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 "[a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:
  - (a) routine maintenance, repair, and replacement;
  - (b) use of an alternative fuel or raw material by reason of an order under Sections 2
    (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
  - (c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
  - (d) use of an alternative fuel or raw material by a stationary source which:
    - (1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51, Subpart I, or 40 CFR 51.166; or
    - (2) the source is approved to use under any permit issued under 40 CFR 52.21 or

under regulations approved pursuant to 40 CFR Part 51, Subpart I, or 40 CFR 51.166:

- (e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or
- (f) any change in ownership of the stationary source.

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

1.21 Any change in ownership or operational control must be approved by the Permit Board.

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

1.22 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission.

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

- 1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, 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 Emergency Air Pollution Episode Alert imposed by the Executive Director 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 50 yards of an occupied dwelling.
  - (c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator.

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

- 1.24 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies:
  - (a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
  - (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.
  - (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
    - (1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
    - (2) the permitted facility was at the time being properly operated;
    - (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
    - (4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
  - (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

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

- 1.25 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, 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 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
  - (v) That as soon as practicable but no later than 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) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
  - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the

Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups 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 startup or shutdown, see the upset requirements above.

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

1.26 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in 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 Fuel Burning Operations
AA-100	Fuel Burning Operations for Division 1 utilizing natural gas only
AA-101	8.8 MMBTU/hr natural gas fired burner for the 5-Stage Alkaline and Phosphate Washer (Ref. 125-101)
AA-103	2.0 MMBTU/hr natural gas fired burner for the Cover and Ring Powder Oven (Ref. 121-001)
AA-104	3.9 MMBTU/hr natural gas fired burner for the 5-Stage Alkaline and Phosphate Washer (Ref. 121-101)
AA-105	1.2 MMBTU/hr natural gas fired burner for the Dry Off Oven (Ref. 121-102)
AA-106	2.0 MMBTU/hr natural gas fired burner for the Pallet Oven (Ref. 121-104)
AA-107	2.4 MMBTU/hr natural gas fired burner for the Powder Cure (Ref. 121-107)
AA-108	3.5 MMBTU/hr natural gas fired burner for the Dry Off Oven (Ref. 125-102)
AA-109	4.0 MMBTU/hr natural gas fired burner for the Powder Cure Oven (Ref. 125-107)
AA-110	2.0 MMBTU/hr natural gas fired burner for the Oven #3 Medium Line C/C Oven (Ref. 131-001)
AA-111	2.1 MMBTU/hr natural gas fired burner for the Flame Curtain Core (Ref. 141-001)
AA-112	2.1 MMBTU/hr natural gas fired burner for the Flame Curtain Core (Ref. 141-002)
AA-113	3.5 MMBTU/hr natural gas fired burner for the Final Assembly Rinse and Alkaline Washer (Ref. 151-003)
AA-114	2.0 MMBTU/hr natural gas fired burner for the C/C #1 Oven Burner #1 (Ref. 151-101)
AA-115	7.0 MMBTU/hr natural gas fired burner for the C/C #1 Oven Burners #2 & #3 (Ref. 153-101)
AA-116	3.8 MMBTU/hr natural gas fired burner for the Final Assembly Rinse and Alkaline Washer (Ref. 153-103)
AA-117	1.2 MMBTU/hr natural gas fired burner for the C/C Oven Three Phase Oven #5 (Ref. 155-001)
AA-118	2.5 MMBTU/hr natural gas fired burner for the Large Final Assembly Rinse and Alkaline Washer (Ref. 155-002)
AA-119	0.6 MMBTU/hr natural gas fired burner for the C/C #4 Batch Oven (Ref. 155-011)
AA-120	1.5 MMBTU/hr natural gas fired burner for the C/C #2 Oven (Ref. 155-101)
AA-121	3.1 MMBTU/hr natural gas fired burner for the Bell Furnace #1 (Ref. 241-001)

<b>Emission Point</b>	Description
AA-122	3.1 MMBTU/hr natural gas fired burner for the Bell Furnace #2 (Ref. 241-002)
AA-123	0.66 MMBTU/hr natural gas fired hot water heater for the pressure wash system
AA-167	3.2 MMBTU/hr natural gas fired Square D Primer Cure Oven (Ref. 358-901)
AA-1900	3.5 MMBTU/hr natural gas fired CB Oven – Delphi (Ref. 131-900)
AA-1920	0.8 MMBTU/hr natural gas fired Burn Off Oven (Ref. 121-900)
AA-1921	0.9 MMBTU/hr natural gas fired Repair Oven (Ref. 153-901)
AA-1922	1.6 MMBTU/hr natural gas fired burner for the Core Coil Assembly Oven (Oven #9) (Ref. 336-101)
AA-200	Fuel Burning Operations for Division 2 utilizing natural gas only
AA-223	3.225 MMBTU/hr natural gas fired burner for the 7-Stage Alkaline Washer (Ref. 225-001)
AA-224	2.5 MMBTU/hr natural gas fired burner for the Primer Cure Oven (Ref. 225-002)
AA-225	2.4 MMBTU/hr natural gas fired burner for the Powder Cure Oven (Ref. 225-005)
AA-226	1.2 MMBTU/hr natural gas fired burner for the Comp. Bond Oven (Ref. 231-001)
AA-228	1.2 MMBTU/hr natural gas fired burner for the C/C Oven #2 (Ref. 251-002)
AA-229	1.2 MMBTU/hr natural gas fired burner for the C/C Oven #3 (Ref. 251-003)
AA-230	2.5 MMBTU/hr natural gas fired burner for the 2-Stage Rinse and Alkaline Washer (Ref. 253-001)
AA-231	4.0 MMBTU/hr natural gas fired burner for the 6-Stage Phosphate Washer (Ref. 253-002)
AA-232	3.5 MMBTU/hr natural gas fired burner for the Powder Cure Oven (Ref. 255-001)
AA-261	2.5 MMBTU/hr natural gas fired New Tank Shop Dry Off Oven (Ref. 225-906)
AA-262	3.5 MMBTU/hr natural gas fired Delphi CB Oven (Ref. 231-902)
AA-263A	0.9 MMBTU/hr natural gas fired Core Coil Oven for East Unit #4 (Ref. 251-904A)
AA-263B	0.9 MMBTU/hr natural gas fired Core Coil Oven for West Unit #4 (Ref. 251-904B)
AA-265	2.5 MMBTU/hr natural gas fired New UG Coal Tar Cure Oven (Ref. 255-905)

Emission Point	Description
AA-266	1.2 MMBTU/hr natural gas fired New Paint Burn-Off Oven (Ref. 267-902)
AA-300	Fuel Burning Operations for Division 3 utilizing natural gas only
AA-334	4.3 MMBTU/hr natural gas fired burner for the 5-Stage Alkaline Washer A/C (Ref. 325-001)
AA-335	2.0 MMBTU/hr natural gas fired burner for the Dry Off Oven A/C (Ref. 325-002)
AA-336	5.0 MMBTU/hr natural gas fired burner for the Powder Cure Oven A/C (Ref. 325-003)
AA-337	3.2 MMBTU/hr natural gas fired burner for the Primer Cure Oven (Ref. 325-004)
AA-338	3.2 MMBTU/hr natural gas fired burner for the Dry Off Oven (Ref. 325-007)
AA-339	12.0 MMBTU/hr natural gas fired burner for the 5-Stage Alkaline and Phosphate Washer (Ref. 325-010)
AA-340	3.2 MMBTU/hr natural gas fired burner for the Dry Off Oven (Ref. 325-011)
AA-341	5.2 MMBTU/hr natural gas fired burner for the Powder Cure Oven (Ref. 325-013)
AA-342	2.1 MMBTU/hr natural gas fired burner for the Flame Curtain #3 (Ref. 341-001)
AA-343	2.1 MMBTU/hr natural gas fired burner for the Flame Curtain #4 (Ref. 341-002)
AA-344	1.6 MMBTU/hr natural gas fired burner for the C/C Oven (small) (Ref. 345-001)
AA-345	1.6 MMBTU/hr natural gas fired burner for the C/C Oven (large) (Ref. 345-002)
AA-346	0.7 MMBTU/hr natural gas fired burner for the C/C Oven (re-run) (Ref. 345-003)
AA-347	2.5 MMBTU/hr natural gas fired burner for the 2-Stage Neutral Cleaner Washer Leak Test (Ref. 353-001)
AA-348	2.5 MMBTU/hr natural gas fired burner for the 2-Stage Neutral Cleaner Washer Leak Test (Ref. 353-002)
AA-349	4.0 MMBTU/hr natural gas fired burner for the 3-Stage Phosphate Washer (Ref. 355-001)
AA-351	1.525 MMBTU/hr natural gas fired burner for the Top-Coat Cure Oven (Ref. 355-005)
AA-352	4.641 MMBTU/hr natural gas fired burner for the 4-Stage Phosphate Washer (Ref. 356-002)

Emission Point	Description			
AA-353	3.965 MMBTU/hr natural gas fired burner for the 2-Stage Neutral Cleaner Washer (Ref. 356-003)			
AA-354	3.965 MMBTU/hr natural gas fired burner for the 2-Stage Neutral Cleaner Washer (Ref. 356-004)			
AA-355	3.0 MMBTU/hr natural gas fired burner for the Dry Off Oven (large) (Ref. 356-006)			
AA-356	3.0 MMBTU/hr natural gas fired burner for the Top-Coat Cure (large) (Ref. 356-007)			
AA-357	2.5 MMBTU/hr natural gas fired burner for the Top-Coat and Dry Off Sq-D (Ref. 358-001)			
AA-358	0.75 MMBTU/hr natural gas fired burner for the Walk-In Oven			
AA-359	Two (2) 2.0 MMBTU/hr natural gas fired burners for the electric-fired annealing process			
AB-000	Facility Wide Surface Coating Operations			
AB-100	Surface Coating Operations for Division 1			
AB-1900	Repair Paint Booth (Ref. 153-900 and AB-900)			
AB-116	Square D Tk Primer Booth (Ref. 358-003)			
AB-200	Surface Coating Operation for Division 2			
AB-202	Primer Coat Booth (Ref. 225-003)			
AB-203	Primer Coat Booth (Ref. 225-004)			
AB-204	Coal Tar Booth (Ref. 225-004B)			
AB-205	Robotic Top Coat Booth 1 (Ref. 255-001)			
AB-206	Robotic Top Coat Booth 2 (Ref. 255-002)			
AB-218	Robotic Final Assembly Top-Coat 3 (Ref. 255-003)			
AB-219	Manual Coal Tar Booth (Ref. 255-904)			
AB-300	Surface Coating Operations for Division 3			

Emission Point	Description			
AB-307	Touch-up Booth (Ref. 325-008)			
AB-308	Touch-up Booth (Ref. 325-009)			
AB-309	Tank Shop Coal Tar Booth (Ref. 325-012)			
AB-310	Large Line Coal Tar Booth (Ref. 356-010)			
AB-311	Small Line Primer Booth (Ref. 355-002)			
AB-312	Small Line Top Coat Booth (Ref. 355-003)			
AB-314	Large Line Primer Booth (Ref. 355-005)			
AB-315	Large Line Top Coat Booth (Ref. 356-008)			
AB-317	10MVA Paint Booth (Ref. 358-004)			
AB-318	Small Line Top Coat Robotic Booth			
AB-319	Liquid Primer Robotic Booth			
AC-000	Facility Wide Metal Working Operation including sanding, cutting, welding, and grinding			
AE-000	Oil Evaporating Units			
AE-268	One (1) 0.9 MMBTU/Hr natural gas fired New Drop-Off Late Core-Coil Oven for Division 2 (Ref. 251-906)			
AE-269	One (1) Electric Fired Old Underground Core-Coil Oven for Division 2 (Ref. 255-906)			
AE-370	One (1) Electric Fired Large Line Oily Oven for Division 3 (Ref. 346-001)			
AG-001	235 Horsepower (HP) Caterpillar Model No. D342 diesel-fired compression ignition (CI) emergency engine for generating backup power			

#### 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) & (b).
  - (a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups 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 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 Except as otherwise specified or limited herein, 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) No person shall cause or permit the handling or 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 this regulation, the Commission may order such corrected in a way that all air and gases or air and gasborne 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. <u>Emission Point Specific Emission Limitations & Standards</u>

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
Facility- Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10), as established in the Title V Operating Permit issued July 6, 2004	3.B.1	VOC	249.0 tpy (12-month rolling total)
	11 Miss. Admin Code Pt. 2, R. 1.3.F(1).	3.B.2	PM (filterable only)	$E = 4.1 p^{0.67}$
AB-000	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10), as established in the Title V Operating Permit issued herein	3.B.3	PM (filterable only)	Operate and maintain dry filters on the paint booths
AB-000	40 CFR Part 63, Subpart MMMM  NESHAP for Surface Coating of Miscellaneous Parts and Products  40 CFR 63.3880, 63.3881(b), 63.3882(e), 63.3883(b), 63.3901, and Table 2 to Subpart MMMM	3.B.4	HAPs	Applicability
	40 CFR 63.3890(b)(1) and (c)(3), Subpart MMMM	3.B.5	Organic HAP	2.6 lb organic HAP/gal of coating solids
			Coating Usage	Exemption for coatings used under specified volume
AA-339	11 Miss. Admin Code Pt. 2, R. 1.3.D.(1)(b).	3.B.6	PM (filterable only)	$E = 0.8808 * I^{-0.1667}$
AA-100, AA-200, AA-300 (except AA-339), and AE-268	11 Miss. Admin Code Pt. 2, R. 1.3.D.(1)(a).	3.B.7	PM (filterable only)	0.6 lbs/MMBTU/HR
AG-001	40 CFR Part 63, Subpart ZZZZ  NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE)  40 CFR Part 63.6580, 63.6585(a) and (b), 63.6590(a)(1)(ii), 63.6665, and Table 8 to Subpart ZZZZ	3.B.9	HAPs	Applicability
	40 CFR Part 63.6605, 63.6640(a), and Item 9 of Table 6 to Subpart ZZZZ	3.B.10	Operating Restriction	Minimize emissions and maintain continuous compliance

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
	40 CFR 63.6625(f), Subpart ZZZZ	3.B.11	Hours of operation	Install a non-resettable hour meter
	40 CFR 63.6640(f) and 63.6675, Subpart ZZZZ	3.B.12	Operating Restriction	Restrictions on non-emergency use
AA-101, AA-104,	11 Miss. Admin Code Pt. 2, R. 1.4.A.(1).	3.B.8	$SO_2$	4.8 lbs/MMBTU/hr
AA-113, AA-116, AA-118, AA-223, AA-230, AA-231, AA-334, AA-347, AA-348, AA-349, AA-352,	40 CFR Part 63, Subpart DDDDD  NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters  40 CFR Part 63.7480, 63.7485, 63.7490(a)(1) and (d), 63.7499(l), 63.7500(a)(1), 63.7565, and Table 10 to Subpart DDDDD	3.B.13	HAPs	Applicability
AA-352, AA-353, AA-354	40 CFR Part 63.7500(a)(3)	3.B.14	HAPs	Good air pollution control practices

3.B.1 For the entire facility, the permittee shall limit emissions of Volatile Organic Compounds (VOCs) to no more than 249.0 tons per year (tpy) as determined on a 12-month rolling total basis.

(Ref.: 11 Miss. Admin Code Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permit issued July 6, 2004)

3.B.2 For the entire facility, except as otherwise specified, the permittee shall not cause, permit, or allow the emission of particulate matter in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship:

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

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

Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs.

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

3.B.3 For Emission Point AB-000, the permittee shall capture overspray emissions from each paint booth and vent emissions through a dry filter.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10), as established in the Title V Operating Permit issued herein)

3.B.4 For Emission Point AB-000, the permittee is subject to and shall comply with the applicable standards of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63, Subpart MMMM) and the applicable General Provisions (40 CFR 63, Subpart A), as required in 40 CFR 63.3910 and Table 2 to Subpart MMMM. Emission Point AB-000 is considered an existing affected source under Subpart MMMM.

(Ref: 40 CFR 63.3880, 63.3881(b), 63.3882(e), 63.3883(b), 63.3901, and Table 2 to Subpart MMMM)

3.B.5 For Emission Point AB-000, the permittee shall limit organic HAP emissions to no more than 2.6 pounds (lb) organic HAP per gallon (gal) of coating solids used during each 12-month compliance period. Subpart MMMM does not apply to coatings used in volumes of less than 50 gallons per year, provided that the total volume of coating exempted does not exceed 250 gallons per year at the facility.

(Ref.: 40 CFR 63.3890(b)(1) and (c)(3), Subpart MMMM)

3.B.6 For Emission Point AA-339, emissions shall not exceed an emission rate as determined by the relationship  $E = 0.8808 * I^{-0.1667}$  where E is the emission rate in pounds per million BTU 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.7 For Emission Points AA-100, AA-200, AA-300 (except AA-339), and AE-268, the maximum permissible emission of ash and/or particulate matter shall not exceed 0.6 pounds per million BTU per hour heat input.

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

3.B.8 For Emission Points AA-101, AA-104, AA-113, AA-116, AA-118, AA-223, AA-230, AA-231, AA-334, AA-339, AA-347, AA-348, AA-349, AA-352, AA-353, and AA-354, the maximum discharge of sulfur oxides shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.

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

3.B.9 For Emission AG-001, the permittee is subject to the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE) (40 CFR Part 63, Subpart ZZZZ) and the applicable requirements of the General Provisions (40 CFR 63, Subpart A), as noted in Table 8 to Subpart ZZZZ.

Emission Point AG-001 is an existing emergency compression ignition (CI) stationary RICE with a site rating of less than 500 brake HP located at a major source of HAP emissions that does not operate or is not contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in 40 CFR 63.6640(f)(2)(ii) and (iii), and as such must only meet the applicable emergency operational requirements of 40 CFR Part 63, Subpart ZZZZ.

(Ref.: 40 CFR Part 63.6580, 63.6585(a) and (b), 63.6590(a)(1)(ii), 63.6665, and Table 8 to Subpart ZZZZ)

3.B.10 For Emission Point AG-001, the permittee shall be in compliance with the applicable emission limitations, operating limitations, and other requirements in 40 CFR 63, Subpart ZZZZ at all times. At all times, the engine shall be operated and maintained, 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 any further efforts to reduce emissions if levels required by Subpart ZZZZ have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the DEQ which 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 source.

(Ref.: 40 CFR Part 63.6605, 63.6640(a), and Item 9 of Table 6 to Subpart ZZZZ Subpart ZZZZ)

3.B.11 For Emission Point AG-001, the permittee shall install and operate a non-resettable hour meter on the emergency engine if one is not already installed.

(Ref.: 40 CFR 63.6625(f), Subpart ZZZZ)

- 3.B.12 For Emission Point AG-001, the permittee shall operate the emergency stationary engine according to the requirements cited below. In order for the engine to be considered an emergency stationary engine, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described below, is prohibited. If the engine is not operated according to these requirements, the engine will not be considered an emergency engine under Subpart ZZZZ and shall meet all requirements for non-emergency engines.
  - (a) There is no time limit on the use of the emergency engine in emergency situations.
  - (b) The engine may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition DEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local

- standards require maintenance and testing of engine beyond 100 hours per calendar year.
- (c) The engine may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing.

(Ref.: 40 CFR Part 63.6640(f) and 63.6675, Subpart ZZZZ)

3.B.13 For Emission Points AA-101, AA-104, AA-113, AA-116, AA-118, AA-223, AA-230, AA-231, AA-334, AA-339, AA-347, AA-348, AA-349, AA-352, AA-353, and AA-354, the permittee is subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) and the applicable requirements of the General Provisions (40 CFR Part 63, Subpart A), as noted in Table 10 to Subpart DDDDD.

Emission Points AA-101, AA-104, AA-113, AA-116, AA-118, AA-223, AA-230, AA-231, AA-334, AA-339, AA-347, AA-348, AA-349, AA-352, AA-353, and AA-354 each qualify as a process heater in the "units designed to burn gas 1 fuel" subcategory, and as such, are only required to comply with the work practice standards in Condition 3.D.1.

(Ref: 40 CFR Part 63.7480, 63.7485, 63.7490(a)(1) and (d), 63.7499(l), 63.7500(a)(1), 63.7570, and Table 10 to Subpart DDDDD)

3.B.14 For Emission Points AA-101, AA-104, AA-113, AA-116, AA-118, AA-223, AA-230, AA-231, AA-334, AA-339, AA-347, AA-348, AA-349, AA-352, AA-353, and AA-354, the permittee shall, at all times, operate and maintain the process heater, including any monitoring equipment, in a manner consistent with safe and good air pollution control practices for minimizing emissions.

(Ref.: 40 CFR Part 63.7500(a)(3), Subpart DDDDD)

#### C. Insignificant and Trivial Activity Emission Limitations & Standards

Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard	
11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.C.1	PM	0.6 lbs/MMBTU	
11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.C.2	$SO_2$	4.8 lbs/MMBTU	

3.C.1 The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU 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 million BTU 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(s)	Pollutant/ Parameter	Limit/Standard
AA-101, AA-104, AA-113, AA-116, AA-118, AA-223, AA-230, AA-231, AA-334, AA-334, AA-349, AA-349, AA-352, AA-353, and AA-354	40 CFR Part 63.7500(a)(1) and (e), 63.7510(e), 63.7515(d), 63.7540(a)(10) – (13), and Table 3 to Subpart DDDDD	3.D.1	НАР	Perform Tune-ups annually, biennially, or every five years as specified in the permit condition
	40 CFR Part 63.6602, 63.6625(i), and Item 1 and Footnotes 1 and 2 of Table 2c to Subpart ZZZZ	3.D.2	Maintenance	Scheduled maintenance activities
AG-001	40 CFR 63.6625(e)(2), Subpart ZZZZ	3.D.3	Operating & Maintenance	Operating and maintenance requirements
	40 CFR 63.6625(h), Subpart ZZZZ	3.D.4	Operating Restriction	Minimize time spent in idle mode

- 3.D.1 For Emission Points AA-101, AA-104, AA-113, AA-116, AA-118, AA-223, AA-230, AA-231, AA-334, AA-339, AA-347, AA-348, AA-349, AA-352, AA-353, and AA-354, the permittee shall complete a tune-up according to the following schedules.
  - For Emission Point AA-339, the permittee shall complete a tune-up no more than 13 months after the previous one.
  - For Emission Point AA-101, the permittee shall complete a tune-up no more than 25 months after the previous one.
  - For Emission Points AA-104, AA-113, AA-116, AA-118, AA-223, AA-230, AA-231, AA-334, AA-347, AA-348, AA-349, AA-352, AA-353, and AA-354, the permittee shall complete a tune-up no more than 61 months after the previous one.

If the unit is not operating on the required date of the tune-up, the tune-up shall be conducted within 30 calendar days of startup. The tune-up on the process heater shall be completed in accordance with (a) through (f) below:

(a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the burner inspection may be delayed until the next scheduled unit shutdown). At units where entry into a piece of process equipment or into a

- storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;
- (b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;
- (c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the inspection may be delayed until the next scheduled unit shutdown);
- (d) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NOx requirement to which the unit is subject;
- (e) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and
- (f) Maintain on-site and submit, if requested by DEQ, an annual report containing the following information:
  - (1) The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up;
  - (2) A description of any corrective actions taken as a part of the tune-up.

(Ref.: 40 CFR Part 63.7500(a)(1) and (e); 63.7510(e); 63.7515(d); 63.7540(a)(10) - (13); and Table 3 to Subpart DDDDD)

- 3.D.2 For Emission Point AG-001, the permittee shall comply with the following requirements:
  - (a) Change oil and filter every 500 hours of operation or annually, whichever comes first, or perform an oil analysis in accordance with 40 CFR 63.6625(i);
  - (b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
  - (c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

If the engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practices according to the schedule listed in (a)–(c) above, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the work practice can be delayed

until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated.

(Ref.: 40 CFR Part 63.6602; 63.6625(i); and Item 6 and Footnotes 1 and 2 of Table 2c to Subpart ZZZZ)

3.D.3 For Emission Point AG-001, the permittee shall operate and maintain the emergency engine and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop the permittee's own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

(Ref.: 40 CFR 63.6625(e)(2), Subpart ZZZZ)

3.D.4 For Emission Point AG-001, the permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards are applicable at all times other than startup as required in Table 2c to 40 CFR 63, Subpart ZZZZ.

(Ref.: 40 CFR 63.6625(h), Subpart ZZZZ)

#### SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:
  - (a) the identification of each term or condition of the permit that is the basis of the certification;
  - (b) the compliance status;
  - (c) whether compliance was continuous or intermittent;
  - (d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
  - (e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit.

(Ref: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(5)(a), (c), & (d).)

# SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

- A. <u>General Monitoring, Recordkeeping and Reporting Requirements</u>
- 5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.

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

- 5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:
  - (a) the date, place as defined in the permit, and time of sampling or measurements;
  - (b) the date(s) analyses were performed;
  - (c) the company or entity that performed the analyses;
  - (d) the analytical techniques or methods used;
  - (e) the results of such analyses; and
  - (f) the operating conditions existing at the time of sampling or measurement.

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

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

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

5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 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 11 Miss. Admin. Code Pt. 2, R. 6.2.E.

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

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

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

5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the DEQ and the EPA.

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

5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

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

## B. <u>Specific Monitoring and Recordkeeping Requirements</u>

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant /Parameter Monitored	Monitoring/Recordkeeping Requirement
		5.B.1	VOC	Monitoring and recordkeeping requirements
Facility- Wide	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.2	Fuel	Monitoring and recordkeeping requirements
		5.B.3	VOC	Record VOC emissions on a monthly and 12-month rolling total basis
	40 CFR 63.3891(a) and (b), Subpart MMMM	5.B.4		Monitoring and recordkeeping requirements
	40 CFR 63.3900(a)(1), Subpart MMMM	5.B.5		Continuous compliance
AB-000	40 CFR 63.3900(b), Subpart MMMM	5.B.6	Organic HAPs	Good air pollution control practices
AD-000	40 CFR 63.3930(a) through (j), Subpart MMMM	5.B.7	Organic IIAI s	Recordkeeping requirements
	40 CFR 63.3931, Subpart MMMM	5.B.8		Recordkeeping requirements
	40 CFR 63.3942 and 63.3952, Subpart MMMM	5.B.9		Compliance options
	40 CFR 63.6655(a)(1), (2), and (5) and (e), Subpart ZZZZ	5.B.10	General Recordkeeping	Recordkeeping requirements
AG-001	40 CFR 63.6655(f), Subpart ZZZZ	5.B.11	Hours of operation	Record hours of operation and reason for operation (emergency or non-emergency)
AA-101, AA-104, AA-113, AA-116, AA-223, AA-230, AA-231,	40 CFR 63.7555(a)(1), Subpart DDDDD	5.B.12	Notifications and Reports	Recordkeeping
AA-334, AA-347, AA-348, AA-349, AA-352, AA-353, AA-354	40 CFR 63.7560, Subpart DDDDD	5.B.13	Records	Recordkeeping
AB-000	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.14	Operation and Maintenance	Operate and maintain filters according to manufacturer's recommendations or a site-specific maintenance plan

- 5.B.1 For the entire facility, the permittee shall determine and maintain sufficient records to document for each coating, adhesive, solvent or other VOC-containing material used:
  - (a) Identification and total quantity (gal or lb) of each coating, adhesive, solvent, or other VOC-containing material used on a monthly basis.
  - (b) The VOC content of each coating, adhesive, solvent or other VOC-containing material used. A description of the method used to determine the VOC content shall accompany this data.
  - (c) The density (lb/gal), unless material usages are measured in lb.
  - (d) The permittee shall calculate the VOC emissions from the use of these materials each month and calculate the annual VOC emissions on 12-month rolling basis.
  - (e) When determining VOC content, the permittee may utilize data supplied by the manufacturer, or analysis of VOC content by EPA Test Method 24, 40 CFR 60, Appendix A.

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

5.B.2 For the entire facility, the permittee shall determine and maintain sufficient records to document the amount of natural gas used each month. VOC emissions from natural gas combustion shall be determined on a monthly basis and 12-month rolling total basis using the appropriate EPA AP-42 emission factor(s).

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

5.B.3 For the entire facility, the permittee shall determine the VOC emissions for each month and on a 12-month rolling total basis using the emissions calculated in Conditions 5.B.1 and 5.B.2. Additionally, VOC emissions from insignificant activities, including tanks and oil evaporating units, shall be accounted for in the total VOC emissions. These emissions may be provided as actual emissions, provided sufficient records are maintained which document the basis for the monthly VOC emissions, or the emissions may be the potential emissions from these sources, provided the potential-to-emit calculations are maintained on site and readily available for review upon request by DEQ personnel.

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

5.B.4 For Emission Point AB-000, the permittee shall include all coatings (as defined in 40 63.3981), thinners and/or other additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in Condition 3.B.5. To make this determination, the permittee shall use at least one of the compliance options listed in Condition 5.B.4(a) or (b). The permittee may apply any of the compliance options to an individual coating operation, or to multiple coating operations as a group, or to the entire affected source. The permittee may 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.7(c), and the permittee shall report it in the next semiannual compliance report required in Condition 5.C.4. The permittee shall utilize either of the following options to demonstrate compliance with the emission limitation of Condition 3.B.5:

- (a) Compliant material option. Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in Condition 3.B.5, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. The permittee shall meet all the requirements of Condition 5.B.9 to demonstrate compliance with the applicable emission limit using this option.
- (b) *Emission rate without add-on controls option*. 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 applicable emission limit in Condition 3.B.5, calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee shall meet all the requirements of Condition 5.B.9 to demonstrate compliance with the emission limit using this option.

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

5.B.5 For Emission Point AB-000, the permittee shall be in compliance with the emission limitation specified in Condition 3.B.5 at all times.

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

5.B.6 For Emission Point AB-000, before January 5, 2021, the permittee must always operate and maintain the affected source, including all air pollution control and monitoring equipment used for purposes of complying with this subpart, according to the provisions in 40 CFR 63.6(e)(1)(i). On and after January 5, 2021, at all times, the permittee must operate and maintain any 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 the applicable standard have been achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements will be based on information available to the 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 63.3900(b), Subpart MMMM)

- 5.B.7 For Emission Point AB-000, the permittee shall collect and keep records of the data and information as specified below. Failure to collect and keep these records is a deviation from 40 CFR 63, Subpart MMMM.
  - (a) A copy of each notification and report that the permittee submitted to comply with this subpart, and the documentation supporting each notification and report. The permittee shall also keep records of any data used in the calculation of the facility specific emission limit for each 12-month compliance period included in the semiannual compliance reports.
  - (b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP 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 conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, the permittee shall keep a copy of the complete test report. If the permittee uses information provided to the permittee by the manufacturer or supplier of the material that was based on testing, the permittee shall keep the summary sheet of results provided to the permittee by the manufacturer or supplier. The permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier.
  - (c) For each compliance period, the records specified below:
    - (1) A record of the coating operations on which the permittee used each compliance option and the time periods (beginning and ending dates and times) for each option the permittee used.
    - (2) For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 2 of 40 CFR 63.3941.
    - (3) For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of 40 CFR 63.3951; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR 63.3951(e)(4); the calculation of the total volume of coating solids used each month using Equation 2 of 40 CFR 63.3951; and the calculation of each 12-month organic HAP emission rate using Equation 3 of 40 CFR 63.3951.
  - (d) A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the permittee is using the compliant material option for all coatings at the source, the permittee may maintain purchase records for each material used rather than a record of the volume used.

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- (e) A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight.
- (f) A record of the volume fraction of coating solids for each coating used during each compliance period.
- (g) If the emission rate without add-on controls option is used, the density for each coating, thinner, and/or other additive, and cleaning material used during each compliance period.
- (h) If the permittee uses an allowance in Equation 1 of 40 CFR 63.3951 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to 40 CFR 63.3951(e)(4), the permittee shall keep records of the information specified below.
  - (1) The name and address of each TSDF to which the permittee sent waste materials for which the permittee uses an allowance in Equation 1 of 40 CFR 63.3951; a statement of which subparts under 40 CFR parts 262, 264, 265, and 266 apply to the permittee; and the date of each shipment.
  - (2) Identification of the coating operations producing waste materials included in each shipment and the month or months in which the permittee used the allowance for these materials in Equation 1 of 40 CFR 63.3951.
  - (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; and the methodology to determine the mass of organic HAP contained in these waste materials. This 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.
- (i) Before January 5, 2021, the permittee shall keep records of the date, time, and duration of each deviation. On and after January 5, 2021, for each deviation from an emission limitation reported under Condition 5.C.4, a record of the information specified in paragraphs (1) through (4) below, as applicable.
  - (1) The date, time, and duration of the deviation, as reported under Condition 5.C.4.
  - (2) A list of the affected sources or equipment for which the deviation occurred and the cause of the deviation, as reported under Condition 5.C.4.
  - (3) An estimate of the quantity of each regulated pollutant emitted over any applicable emission limit in Condition 3.B.5, and a description of the method used to calculate the estimate, as reported under Condition 5.C.4.

(4) A record of actions taken to minimize emissions in accordance with Condition 5.B.6 and any corrective actions taken to return the affected unit to its normal or usual manner of operation.

#### (Ref.: 40 CFR 63.3930(a) through (j), Subpart MMMM)

5.B.8 For Emission Point AB-000, records shall be maintained in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. On and after January 5, 2021, any records required to be maintained by this subpart that are in reports that were submitted electronically via the EPA's CEDRI may be maintained in electronic format. This ability to maintain electronic copies does not affect the requirement for facilities to make records, data, and reports available upon request to DEQ or the EPA as part of an on-site compliance evaluation. Each record shall be kept for five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Each record shall be kept on-site for at least two (2) years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to 40 CFR 63.10(b)(1). The permittee may keep the records off-site for the remaining three (3) years.

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

- 5.B.9 For Emission Point AB-000, the permittee shall utilize either of the following options to demonstrate continuous compliance with the emission limitation of Condition 3.B.5 and shall maintain records as specified in Condition 5.B.7:
  - (a) Compliant material option.
    - (1) For each compliance period to demonstrate continuous compliance, the permittee shall use no coating for which the organic HAP content (determined using Equation 2 of 40 CFR 63.3941) exceeds the applicable emission limit in Condition 3.B.5, and use no thinner and/or other additive, or cleaning material that contains organic HAP, determined according to 40 CFR 63.3941(a). A compliance period consists of 12 months. Each month, after the end of the initial compliance period described in 40 CFR 63.3940, is the end of a compliance period consisting of that month and the preceding 11 months.
    - (2) If the permittee chooses to comply with the emission limitations by using the compliant material option, the use of any coating, thinner and/or other additive, or cleaning material that does not meet the criteria specified in paragraph (1) above is a deviation from the emission limitations that must be reported as specified in Condition 5.C.4.
    - (3) As part of each semiannual compliance report required by Condition 5.C.4, the permittee shall identify the coating operation(s) for which the permittee used the compliant material option. If there were no deviations from the applicable emission limit in Condition 3.B.5, submit a statement that the

coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the permittee used no coatings for which the organic HAP content exceeded the applicable emission limit in Condition 3.B.5, and the permittee used no thinner and/or other additive, or cleaning material that contained organic HAP, determined according to 40 CFR 63.3941(a).

- (b) Emission rate without add-on controls option.
  - (1) To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, determined according to 40 CFR 63.3951 must be less than or equal to the applicable emission limit in Condition 3.B.5. A compliance period consists of 12 months. Each month, after the end of the initial compliance period described in 40 CFR 63.3950, is the end of a compliance period consisting of that month and the preceding 11 months. The permittee shall perform the calculations in 40 CFR 63.3951 on a monthly basis using data from the previous 12 months of operation.
  - (2) If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in Condition 3.B.5, this is a deviation from the emission limitation for that compliance period and shall be reported as specified in Condition 5.C.4(e) or (f).
  - (3) As part of each semiannual compliance report required by Condition 5.C.4, the permittee shall identify the coating operation(s) for which the permittee used the emission rate without add-on controls option. If there were no deviations from the emission limitations, the permittee shall submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in Condition 3.B.5, determined according to 40 CFR 63.3951.

## (Ref.: 40 CFR 63.3942 and 63.3952, Subpart MMMM)

- 5.B.10 For Emission Point AG-001, the permittee shall keep the following records:
  - (a) A copy of each notification and report submitted to comply with 40 CFR 63, Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, according to the requirement in 40 CFR 63.10(b)(2)(xiv).
  - (b) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.
  - (c) Records of actions taken during periods of malfunction to minimize emissions in accordance with Condition 3.B.10, including corrective actions to restore

- malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
- (d) Records of the maintenance conducted on the stationary RICE in order to demonstrate that the engine and after-treatment control device (if any) was operated and maintained according to the maintenance plan required in Condition 3.D.3.

(Ref.: 40 CFR 63.6655(a)(1), (2), and (5), and (e), Subpart ZZZZ)

5.B.11 For Emission Point AG-001, the permittee shall monitor and record the hours of operation of the engine using the non-resettable hour meter required in Condition 3.B.11. These records must indicate how many hours are spent in emergency operation, including what classified the operation as an emergency, and how many hours are spent in non-emergency operation. Records should also include any time spent operating for the purposes identified in Condition 3.B.12(b) and (c), and should contain an explanation of the emergency situation, date, and start and end time of engine operation for this purpose.

(Ref.: 40 CFR 63.6655(f), Subpart ZZZZ)

5.B.12 For Emission Points AA-101, AA-104, AA-113, AA-116, AA-118, AA-223, AA-230, AA-231, AA-334, AA-339, AA-347, AA-348, AA-349, AA-352, AA-353, and AA-354, the permittee shall keep a copy of each notification and report submitted to comply with 40 CFR 63, Subpart DDDDD.

(Ref.: 40 CFR 63.7555(a)(1), Subpart DDDDD)

5.B.13 For Emission Points AA-101, AA-104, AA-113, AA-116, AA-118, AA-223, AA-230, AA-231, AA-334, AA-339, AA-347, AA-348, AA-349, AA-352, AA-353, and AA-354, the permittee shall keep records in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1). Records must be kept for five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Records must be kept on site, or they must be accessible from onsite (for example, through a computer network), for at least two (2) years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). Records may be kept off site for the remaining three (3) years.

(Ref.: 40 CFR 63.7560, Subpart DDDDD)

5.B.14 For Emission Point AB-000, the permittee shall operate and maintain the dry filter(s) on each paint booth in accordance with the manufacturer's recommendations or in accordance with a site-specific maintenance plan. The permittee shall also document all maintenance conducted on the filters, including replacement of the filters. This documentation shall include at a minimum the date of the maintenance activity, nature of the maintenance (e.g., filter replacement, cleaning, etc.), and person conducting the maintenance. A copy of the manufacturer's recommendations or the site-specific

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maintenance plan and the maintenance log shall be kept on site and made readily available for review upon request by DEQ personnel.

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

# C. Specific Reporting Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/ Parameter Monitored	Reporting Requirement
Facility- Wide	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.1	VOC	Submit semiannual reports of VOC-containing materials
		5.C.2		Submit semiannual reports of monthly natural gas usage and VOC emissions
		5.C.3		Submit semiannual reports of monthly and 12-month rolling total VOC emissions
AB-000	40 CFR 63.3920(a)(1) through (6), (f), (g), and (h), Subpart MMMM	5.C.4	Organic HAPs	Submit semiannual compliance reports
AG-001	40 CFR 63.6640(b) and 63.6650(a)- (d), Subpart ZZZZ	5.C.5	Operation and Maintenance	Submit semiannual reports of deviations
AA-339				Submit annual compliance reports
AA-101				Submit biennial compliance reports
AA-104, AA-113, AA-116, AA-118, AA-223, AA-230, AA-231, AA-344, AA-347, AA-348, AA-349, AA-352, AA-353, AA-354	40 CFR 63.7550(a), (b) and (c)(1), and Table 9 to Subpart DDDDD	5.C.6	Tune-Ups	Submit 5-year compliance reports

5.C.1 For the entire facility, the permittee shall submit a semiannual report in accordance with Condition 5.A.4 containing a summary of the information required by Condition 5.B.1.

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

5.C.2 For the entire facility, the permittee shall the submit semiannual reports in accordance with Condition 5.A.4 providing the amount of natural gas (and any other fuel) used each month and the monthly VOC emissions from fuel combustion.

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

5.C.3 For the entire facility, the permittee shall submit the semiannual reports in accordance with Condition 5.A.4 of the monthly and 12-month rolling total VOC emissions for the entire facility. VOC emissions from insignificant activities, including tanks and oil evaporating units, shall be accounted for in the total VOC emissions and shall be denoted as either the potential-to-emit or the actual emissions, as allowed in Condition 5.B.3.

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

- 5.C.4 For Emission Point AB-000, the permittee shall submit the semiannual compliance reports for each affected source under 40 CFR 63, Subpart MMMM according to the requirements below:
  - (a) Dates: Semiannual compliance reports for each affected source shall be submitted in accordance with Condition 5.A.4.
  - (b) *Inclusion with Title V report*. The permittee must report all deviations from 40 CFR 63, Subpart MMMM, in the semiannual monitoring reports.
  - (c) General requirements. Each semiannual compliance report must contain 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 truth, accuracy, and completeness of the content of the report.
    - (3) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 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 specified in Condition 5.B.4 that the permittee used on each coating operation during the reporting period. If the permittee switched between compliance options during the reporting period, the permittee shall report the beginning and ending dates for each option the permittee used.
    - (5) If the permittee used the emission rate without add-on controls compliance option, the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period.
  - (d) *No deviations*. If there were no deviations from the emission limitations in Condition 3.B.5, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period.

- (e) Deviations: Compliant material option. If the permittee used the compliant material option and there was a deviation from the applicable organic HAP content requirements in Condition 3.B.5, the semiannual compliance report must contain the information specified below:
  - (1) Identification of each coating used that deviated from the applicable emission limit, and each thinner and/or other additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used
  - (2) The calculation of the organic HAP content (using Equation 2 of 40 CFR 63.3941) for each coating identified in paragraph (e)(1) above. The permittee does not need to submit background data supporting this calculation (e.g., information provided by coating suppliers or manufacturers, or test reports).
  - (3) The determination of mass fraction of organic HAP for each thinner and/or other additive, and cleaning material identified in (e)(1) above. The permittee does not need to submit background data supporting this calculation (e.g., information provided by material suppliers or manufacturers, or test reports).
  - (4) Before January 5, 2021, a statement of the cause of each deviation. On and after January 5, 2021, a statement of the cause of each deviation (including unknown cause, if applicable).
  - (5) On and after January 5, 2021, the number of deviations and, for each deviation, a list of the affected source or equipment, an estimate of the quantity of each regulated pollutant emitted over any applicable emission limit in Condition 3.B.5, a description of the method used to estimate the emissions, and the actions you took to minimize emissions in accordance with Condition 5.B.6.
- (f) Deviations: Emission rate without add-on controls option. If the permittee used the emission rate without add-on controls option and there was a deviation from the applicable emission limit in Condition 3.B.5, the semiannual compliance report must contain the information specified below.
  - (1) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in Condition 3.B.5.
  - (2) The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. The permittee shall submit the calculations for Equations 1, 1A through 1C, 2, and 3 of 40 CFR 63.3951; and if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR 63.3951(e)(4). The permittee does not need to submit background data supporting these calculations (e.g., information provided by materials suppliers or manufacturers, or test reports).

- (3) Before January 5, 2021, a statement of the cause of each deviation. On and after January 5, 2021, a statement of the cause of each deviation (including unknown cause, if applicable).
- (4) On and after January 5, 2021, the number of deviations and, for each deviation, the date, time, duration, a list of the affected source or equipment, an estimate of the quantity of each regulated pollutant emitted over any applicable emission limit in Condition 3.B.5, a description of the method used to estimate the emissions, and the actions you took to minimize emissions in accordance with Condition 5.B.6.
- (g) Semiannual compliance reports. On and after January 5, 2021, or once the reporting template has been available on the CEDRI website for one (1) year, whichever date is later, the permittee shall submit the semiannual compliance report required by Condition 5.C.4 to the EPA via the CEDRI website. Regarding submittals to EPA via the CEDRI website, the permittee shall comply with the requirements of 40 CFR 63.3920(f), (g), and (h), as applicable. In addition to submitting semiannual compliance reports to EPA via the CEDRI website, the permittee shall continue to submit semiannual compliance reports directly to DEQ in accordance with Condition 5.A.4.

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

- 5.C.5 For Emission Point AG-001, the permittee shall report each instance in which each applicable maintenance activity requirement in Condition 3.D.2 was not met in accordance with Condition 5.A.4. These deviations shall be reported according to the following requirements:
  - (a) If there were no deviations from any applicable emission limitations or operating limitations, a statement shall be included that there were no deviations from the emission limitations or operating limitations during the reporting period; or
  - (b) If there was a deviation from any emission limitation or operating limitation during the reporting period, then the compliance report shall contain the following information:
    - (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.
    - (4) The total operating time of the stationary RICE at which the deviation occurred during the reporting period.
    - (5) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

(c) If there was a malfunction during the reporting period, the compliance report shall include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report shall also include a description of actions taken by the permittee during a malfunction of an affected source to minimize emissions, including actions taken to correct a malfunction.

(Ref.: 40 CFR Part 63.6640(b) and 63.6650(a) through (d), Subpart ZZZZ)

- 5.C.6 For Emission Point AA-339, the permittee shall submit an annual compliance report no later than January 31 for the prior annual period from January 1 to December 31. For Emission Point AA-101, the permittee shall submit a biennial compliance report for the prior 2-year period from January 1 to December 31. For Emission Points AA-104, AA-113, AA-116, AA-118, AA-223, AA-230, AA-231, AA-334, AA-347, AA-348, AA-349, AA-352, AA-353, and AA-354, the permittee shall submit a 5-year compliance report for the prior 5-year period from January 1 to December 31. The compliance reports shall contain the information listed below:
  - (a) Company and Facility name and address.
  - (b) Process unit information, emissions limitations, and operating parameter limitations.
  - (c) Date of report and beginning and ending dates of the reporting period.
  - (d) The date of the most recent tune-up performed according to Condition 3.D.1., including the date of the most recent burner inspection if it was not done within the applicable compliance period (i.e., annual, biennially, or every five years) and was delayed until the next scheduled or unscheduled unit shutdown.
  - (e) 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.

(Ref.: 40 CFR 63.7550(a), (b), and (c)(1), and Table 9 to Subpart DDDDD)

# SECTION 6. ALTERNATIVE OPERATING SCENARIOS

None permitted.

#### SECTION 7. ALTERNATIVE OPERATING SCENARIOS

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 <a href="http://www.ecfr.gov/">http://www.ecfr.gov/</a> under Title 40, or DEQ shall provide a copy upon request from the permittee.

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

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

# **APPENDIX A**

# **List of Abbreviations Used In this Permit**

11 Miss. Admin. Code Pt. 2, Ch. 1. Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants Permit Regulations for the Construction and/or Operation of Air 11 Miss. Admin. Code Pt. 2, Ch. 2. **Emissions Equipment** 11 Miss. Admin. Code Pt. 2, Ch. 3. Regulations for the Prevention of Air Pollution Emergency **Episodes** 11 Miss. Admin. Code Pt. 2, Ch. 4. Ambient Air Quality Standards Regulations for the Prevention of Significant Deterioration of Air 11 Miss. Admin. Code Pt. 2, Ch. 5. **Ouality** 11 Miss. Admin. Code Pt. 2, Ch. 6. Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act 11 Miss. Admin. Code Pt. 2, Ch. 7. Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act **BACT** Best Available Control Technology **Continuous Emission Monitor** CEM Continuous Emission Monitoring System **CEMS** Code of Federal Regulations CFR Carbon Monoxide CO **COM** Continuous Opacity Monitor Continuous Opacity Monitoring System **COMS** DEQ Mississippi Department of Environmental Quality **EPA** United States Environmental Protection Agency gr/dscf Grains Per Dry Standard Cubic Foot ĤΡ Horsepower **HAP** Hazardous Air Pollutant Pounds per Hour lbs/hr M or K Thousand Maximum Achievable Control Technology **MACT** MM Million Million British Thermal Units per Hour **MMBTUH** Not Applicable NA National Ambient Air Quality Standards **NAAOS NESHAP** National Emissions Standards for Hazardous Air Pollutants, 40 CFR 61 or National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR 63 **NMVOC** Non-Methane Volatile Organic Compounds Nitrogen Oxides  $NO_x$ New Source Performance Standards, 40 CFR 60 **NSPS** O&M Operation and Maintenance PM Particulate Matter Particulate Matter less than 10 µm in diameter  $PM_{10}$ ppm Parts per Million Prevention of Significant Deterioration, 40 CFR 52 **PSD** SIP State Implementation Plan Sulfur Dioxide  $SO_2$ TPY Tons per Year Total Reduced Sulfur **TRS** Visible Emissions Evaluation VEE Volatile Hazardous Air Pollutant VHAP

Volatile Organic Compound

VOC

# APPENDIX B

#### LIST OF REGULATIONS REFERENCED IN PERMIT

The full text of the regulations referenced in this permit may be found on-line at http://www.deq.state.us.us and <a href="http://www.ecfr.gov">http://www.ecfr.gov</a>, or the Mississippi Department of Environmental Quality (MDEQ) will provide a copy upon request. A list of regulations referenced in this permit is shown below:

- 11 Miss. Admin. Code Pt. 2, Ch. 1, Mississippi Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants (Amended December 14, 2011)
- 11 Miss. Admin. Code Pt. 2, Ch. 6, Mississippi Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Air Emissions Operating Permit Regulations for the Purpose of Title V of the Federal Clean Air Act (Amended December 14, 2011)
- 40 CFR Part 82 Title VI of the Clean Air Act (Stratospheric Ozone Protection)
- 40 CFR Part 63, Subpart A General Provisions
- 40 CFR Part 63, Subpart MMMM National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products
- 40 CFR Part 63, Subpart ZZZZ National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)
- 40 CFR Part 63, Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters