

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

**TO OPERATE AIR EMISSIONS EQUIPMENT
THIS CERTIFIES THAT**

Tishomingo Acquisition, LLC (d.b.a. TBEI, Tishomingo)
1425 Highway 25 North
Tishomingo, Tishomingo County, Mississippi

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with Title V of the Federal Clean Air Act (42 U.S.C.A. § 7401 - 7671) 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: December 21, 2021

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

Krystal Rudolph

AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: November 30, 2026

Permit No.: 2640-00002

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SECTION 1. GENERAL CONDITIONS

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

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

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

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

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

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

1.4 Prior to its expiration, this permit may be reopened in accordance with the provisions listed below.

(a) This permit shall be reopened and revised under any of the following circumstances:

(1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of three (3) or more years. Such a reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.

(2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

(3) The Permit Board or the EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.

(4) The Administrator or the Permit Board determines that the permit must be

revised or revoked to assure compliance with the applicable requirements.

- (b) Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.
- (c) Re-openings shall not be initiated before a notice of such intent is provided to the Title V source by the Mississippi Department of Environmental Quality (MDEQ) at least thirty (30) days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

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

- 1.5 The permittee shall furnish to the MDEQ within a reasonable time any information the MDEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the MDEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to the MDEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

- 1.6 This permit does not convey any property rights of any sort, or any exclusive privilege.

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

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

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

- 1.8 The permittee shall pay to the MDEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order, which shall be issued in accordance with the procedure outlined in Mississippi Administrative Code, Title 11, Part 2, Chapter 6 – “Air Emissions Operating Permit Regulations for Purposes of Title V of the Federal Clean Air Act”.

- (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant

for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g. air emission factors); or other approaches such as engineering calculations (e.g. estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (a) Enter upon the permittee's premises where a Title V source is located, emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (d) As authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

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

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

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

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

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

- 1.14 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source.

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

- 1.15 Nothing in this permit shall alter or affect the following:
- (a) The provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
 - (b) The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - (c) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
 - (d) The ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act.

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

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

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

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

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

- 1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:

- (a) The changes are not modifications under any provision of Title I of the Act;
- (b) The changes do not exceed the emissions allowable under this permit;
- (c) The permittee provides the Administrator and the Department with written notification in advance of the proposed changes [at least seven (7) days, or such other timeframe as provided in other regulations for emergencies] and the notification includes the following:
 - (1) A brief description of the change(s);
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.
- (d) The permit shield shall not apply to any Section 502(b)(10) change.

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

- 1.19 Should the Executive Director of the MDEQ declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in Mississippi Administrative Code, Title 11, Part 2, Chapter 3 – “Regulations for the Prevention of Air Pollution Emergency Episodes” – for the level of emergency declared.

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

- 1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Mississippi Administrative Code, Title 11, Part 2, Chapter 2 – “Permit Regulations for the Construction and/or Operation of Air Emissions Equipment” – and may require modification of this permit in accordance with Mississippi Administrative Code, Title 11, Part 2, Chapter 6 – “Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act”.

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

- (a) Routine maintenance, repair, and replacement;
- (b) Use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
- (c) Use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
- (d) Use of an alternative fuel or raw material by a stationary source which:
 - (1) The source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51, Subpart I (or 40 CFR 51.166); or
 - (2) The source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I (or 40 CFR 51.166).
- (e) An increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I (or 40 CFR 51.166); or
- (f) Any change in ownership of the stationary source.

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

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

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

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

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

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

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

- (a) Open burning without a forced-draft air system must not occur within five hundred (500) yards of an occupied dwelling.
- (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within fifty (50) yards of an occupied dwelling.
- (c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator.

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

1.24 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies:

- (a) Except as otherwise specified herein, an “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include non-compliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
- (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in Part (c) following are met.
- (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
 - (1) An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of the emergency the permittee took all reasonable steps to

minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

- (4) The permittee submitted notice of the emergency to the MDEQ within two (2) working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

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

1.25 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, start-ups, and shutdowns.

- (a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
 - (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:
 - (i) An upset occurred and that the source can identify the cause(s) of the upset;
 - (ii) The source was at the time being properly operated;
 - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
 - (iv) That within five (5) working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other non-compliance, and the corrective actions taken and;
 - (v) That as soon as practicable but no later than twenty-four (24) hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or

caused a general nuisance to the public, the source provided notification to the Department.

- (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
 - (3) This provision is in addition to any upset provision contained in any applicable requirement.
 - (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- (b) Start-ups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) Start-ups and shutdowns are part of normal source operation. Emission limitations apply during start-ups and shutdowns unless source specific emission limitations or work practice standards for start-ups and shutdowns are defined by an applicable rule, regulation, or permit.
 - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this Mississippi Administrative Code, Title 11, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for start-ups and shutdowns. Source specific emission limitations or work practice standards established for start-ups and shutdowns are subject to the requirements prescribed in Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 1.10.B.(2)(a) through (e).
 - (3) Where an upset as defined in Rule 1.2 occurs during start-up or shutdown, see the upset requirements above.

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

- 1.26 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 1.8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

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

- 1.27 Regarding compliance testing (if applicable):

- (a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.

- (b) Compliance testing will be performed at the expense of the permittee.
- (c) Each emission sampling and analysis report shall include (but not be limited to) the following:
 - (1) Detailed description of testing procedures;
 - (2) Sample calculation(s);
 - (3) Results; and
 - (4) Comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B.(3), (4), and (6).)

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-000	Facility-Wide [Tishomingo Acquisition, LLC, (d.b.a. TBEI, Tishomingo)]
AA-009	Surface Coating Operations [consists of four (4) paint booths with filters for PM control]
AA-010a	Abrasive Blasting Booth [equipped with a dust collector for PM control]
AA-010b	Two (2) Plasma Arc Cutters [equipped with dust collectors for PM control]

SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. FACILITY-WIDE EMISSION LIMITATIONS & STANDARDS

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

- (a) Start-up operations may produce emissions, which exceed 40% opacity for up to fifteen (15) minutes per start-up in any one (1) hour and not to exceed three (3) start-ups per stack in any twenty-four (24) hour period.
- (b) Emissions resulting from soot blowing operations 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 (1) hour.

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

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

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

3.A.3 For the entire facility, the permittee shall not cause, permit, or allow the emission of particles or any contaminants in sufficient amounts or of such duration from any process as to be injurious to humans, animals, plants, or property, or to be a public nuisance, or create a condition of air pollution.

- (a) The permittee shall not cause or permit the handling, transporting, or storage of any material in a manner which allows or may allow unnecessary amounts of particulate matter to become airborne.
- (b) When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than that from which it originated or to violate any other provision of 11 Miss. Admin. Code Pt. 2, Ch. 1, the Commission may order such corrected in a way that all air and gases or air and 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. EMISSION POINT SPECIFIC EMISSION LIMITATIONS & STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.B.1	PM (filterable)	$E = 4.1 (p^{0.67})$
	11 Miss. Admin. Code, Pt. 2, R. 2.2.B(10), as established in the Title V Operating Permit issued October 28, 2002 (PSD Avoidance Limit)	3.B.2	VOCs	240.0 tpy (Rolling 12-Month Total)
AA-009 AA-010a AA-010b	11 Miss. Admin. Code, Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued December 21, 2021 (PSD Avoidance Limit)	3.B.3	PM / PM ₁₀ (filterable only)	No Bypass of Air Pollution Control Equipment
AA-009	40 CFR Part 63, Subpart Mmmm – NESHAP for Surface Coating of Miscellaneous Metal Parts and Products 40 CFR 63.3881(a)(1), (b), and 63.3901; Subpart Mmmm	3.B.4	HAPs	General Applicability
	40 CFR 63.3890(b)(1) and 63.3900(a)(1); Subpart Mmmm	3.B.5	Organic HAPs	2.6 Pounds per Gallon of Coating Solids (Each 12-Month Compliance Period)
AA-010a	40 CFR Part 64 – Compliance Assurance Monitoring (CAM) 40 CFR 64.2(a), CAM	3.B.6	PM / PM ₁₀	General Applicability

3.B.1 For Emission Point AA-000 (Facility-Wide), except as otherwise specified herein or limited herein, the permittee shall not cause or allow the emission of particulate matter (PM) in total quantities in any one (1) hour from any manufacturing process (which includes any associated stacks, vents, outlets, or combination thereof) to exceed the amount determined by the following relationship:

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

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

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

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

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

- 3.B.3 For Emission Points AA-009, AA-010a, and AA-010b, the permittee shall not allow emissions to bypass air pollution control equipment associated with a corresponding process unit. The permittee shall cease operations from any process unit during any period when the control equipment for that process unit is not operating.

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

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

(Ref.: 40 CFR 63.3881(a)(1), (b), and 63.3901; Subpart M)

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

(Ref.: 40 CFR 63.3890(b)(1) and 63.3900(a)(1); Subpart M)

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

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

C. INSIGNIFICANT AND TRIVIAL ACTIVITY EMISSION LIMITATIONS & STANDARDS

Applicable Requirement	Condition Number	Pollutant / Parameter	Limit/Standard
11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.C.1	PM	0.6 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 ten (10) million BTU (MMBTU) per hour heat input shall not exceed 0.6 pounds per MMBTU per hour heat input.

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

3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per MMBTU heat input.

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

D. WORK PRACTICE STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-009	40 CFR 63.3900(b); Subpart MMMM	3.D.1	HAPs	General Duty Clause

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

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

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

SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices by January 31 of each year for the preceding calendar year. If the permit was reissued or modified during the course of the preceding calendar year, the compliance certification shall address each version of the permit. Each compliance certification shall include the following:
- (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. GENERAL MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS

5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.

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

5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:

- (a) The date, place as defined in the permit, and time of sampling or measurements;
- (b) The date(s) analyses were performed;
- (c) The company or entity that performed the analyses;
- (d) The analytical techniques or methods used;
- (e) The results of such analyses; and
- (f) The operating conditions existing at the time of sampling or measurement.

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

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

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

5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by 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. For applicable periodic reporting requirements in 40 CFR Parts 60, 61, and 63, the permittee shall comply with the deadlines in this condition for reporting conducted on a semiannual basis. Additionally, any required quarterly reports shall be submitted by the end of the month following each calendar quarter (i.e., April 30th, July 31st, October 31st, and January 31st), and any required annual reports shall be submitted by January 31st following each calendar year.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1)., 40 CFR 60.19(c), 61.10(g), and

63.10(a)(5))

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

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

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

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

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

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

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

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

B. SPECIFIC MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Monitoring / Recordkeeping Requirement
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.1	VOCs	Calculate and Record Emissions (Monthly & Rolling 12-Month Totals)
AA-009 AA-010a AA-010b	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.2	PM / PM ₁₀	Perform and Record Routine Inspections on Air Pollution Control Devices
AA-009	40 CFR 63.3891(a) and (b); Subpart MMMM	5.B.3	HAPs	Compliance Options Requirements
	40 CFR 63.3930(a) – (c)(1) – (3), (d) – (h), and (j); Subpart MMMM	5.B.4		Recordkeeping Requirements
	40 CFR 63.3931(a); Subpart MMMM	5.B.5		Maintain Records in a Suitable Format
	40 CFR 63.3941(a) – (d), 63.3942(a) – (b); Subpart MMMM	5.B.6		“Compliant Material Option” Requirements
	40 CFR 63.3951(a) – (g) and 63.3952(a) – (c); Subpart MMMM	5.B.7		“Emission Rate without Add-on Controls Option” Requirements
AA-010a	40 CFR 64.7(b) and (c); CAM	5.B.8	Operation & Maintenance	Operation and Maintenance Requirements for Monitoring System(s)
	40 CFR 64.7(d); CAM	5.B.9	Corrective Action	Corrective Action Response to an Excursion / Exceedance of a CAM Indicator
	40 CFR 64.8; CAM	5.B.10	QIP	Upon Request by the MDEQ, Develop a Quality Improvement Plan (QIP)
	40 CFR 64.9(b); CAM	5.B.11	CAM Records	Maintain CAM Records as Specified

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

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

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

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

AA-010b (Dust Collectors), the permittee shall perform the inspection on a monthly basis. For Emission Point AA-010a (Dust Collector), the permittee shall perform the inspection on a weekly basis.

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

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

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

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

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

- (a) Compliant Material Option: The permittee shall demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the emission limit specified in Condition 3.B.5 and that each thinner, other additive, and cleaning material used contains no organic HAPs in accordance with the requirements specified in Condition 5.B.6.
- (b) Emission Rate without Add-on Controls Option: The permittee shall demonstrate that [based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s)] the organic HAP emission rate for the coating operation(s) is less than or equal to the emission limit specified in Condition 3.B.5 in accordance with the requirements of Condition 5.B.7 on a monthly basis.

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

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

- (a) A copy of each notification and report submitted to comply with Subpart M MMMM as well as the supporting documentation for each notification and report.
- (b) A current copy of information provided by each material supplier / manufacturer (such as the manufacturer's formulation data; test data used to determine the mass fraction of organic HAPs and density for each coating, thinner and/or other additive, and cleaning material; and the volume fraction of coating solids for each coating).

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

- (c) Records on the coating operations and the periods of time (i.e. the beginning / ending dates and times) for each compliance option used.
- (d) For the “*Compliant Material Option*” – records that detail the calculation of the organic HAP content for each coating using the equation specified in Condition 5.B.6(d).
- (e) For the “*Emission Rate without Add-on Controls Option*” – records that detail the calculation of the following values (as applicable):
 - (1) The total mass of organic HAPs for the coatings, thinners and/or other additives, and cleaning materials used each month in accordance with Equations 1, 1A through 1C, and 2 found in Condition 5.B.7;
 - (2) The mass of organic HAPs in waste materials in accordance with 40 CFR 63.3951(e)(4), Subpart M MMMM;
 - (3) The total volume of coating solids used each month in accordance with Equation 2 found in Condition 5.B.7; and
 - (4) The organic HAP emission rate for each rolling 12-month compliance period in accordance with Equation 3 found in Condition 5.B.7.
- (f) Records that detail the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the compliant material option is used for all coatings, the permittee may maintain purchase records for each material used rather than a record of the volume used.
- (g) Records that detail the mass fraction of organic HAP for each coating, thinner

and/or other additive, and cleaning material (unless the material is tracked by weight).

- (h) Records that detail the volume fraction of coating solids in each coating used.
- (i) For the “*Emission Rate without Add-on Controls Option*” – records that detail the density for each coating, thinner and/or other additive, and cleaning material used.
- (j) If the permittee uses an allowance in Equation 1 found in Condition 5.B.7 for organic HAPs contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) in accordance with 40 CFR 63.3951(e)(4) – Subpart MMMM, the permittee shall maintain the following information:
 - (1) The name and address of each TSDF; a statement on which subparts under 40 CFR Parts 262, 264, 265, and 266 are applicable; and the date of each shipment.
 - (2) Identification of the coating operations and the month(s) in which the allowance for the waste materials was used.
 - (3) The methodology used in accordance with 40 CFR 63.3951(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month as well as the methodology to determine the mass of organic HAPs contained in these waste materials.

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

- (k) Records that detail the following information for each deviation from an emission limit:
 - (1) The date, time, and duration of each deviation;
 - (2) A list of the affected equipment and the cause of the deviation;
 - (3) An estimate of the quantity of each regulated pollutant emitted over the emission limit specified in Condition 3.B.5 and a description of the method used to calculate the estimate;
 - (4) Records that detail any actions taken to minimize emissions in accordance with Condition 3.D.1 and any corrective actions taken to return the affected equipment to its normal or usual manner of operation.

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

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

(Ref.: 40 CFR 63.3931(a); Subpart M MMMM)

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

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

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

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

- (c) Determine the density of each coating: Determine the density of each coating used during the compliance period from test results using ASTM Method D1475–13,

(incorporated by reference – see 40 CFR 63.14), information from the supplier / manufacturer of the material, or specific gravity data for pure chemicals.

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

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

$$H_c = \frac{(D_c)(W_c)}{V_c}$$

Where:

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

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

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

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

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

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

(Ref.: 40 CFR 63.3941(a) – (d) and 63.3942(a) – (b); Subpart M) M M M M

- 5.B.7 For Emission Point AA-009, if the permittee may uses the “*Emission Rate without Add-on Controls Option*” for any individual coating operation, any group of coating operations, or all the coating operations, the permittee shall use the following procedures for any coating operation. When calculating the organic HAP emission rate in accordance with this condition, the permittee shall not include any coatings, thinners

and/or other additives, or cleaning materials used in coating operations for which the “*Compliant Material Option*” was used.

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

- (a) *Determine the mass fraction of organic HAP for each material:* Determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each month according to the requirements in Condition 5.B.6(a).
- (b) *Determine the volume fraction of coating solids:* Determine the volume fraction of coating solids (in gallons of coating solids per gallon of coating) for each coating used during each month in accordance with the requirements specified in Condition 5.B.6(b).
- (c) *Determine the density of each material:* Determine the density of each liquid coating, thinner and/or other additive, and cleaning material used during each month from test results using ASTM D1475-13 ASTM D2111-10 (Reapproved 2015) (both incorporated by reference – see 40 CFR 63.14), information from the supplier / manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If the permittee is including powder coatings in the compliance determination, determine the density of powder coatings using ASTM D5965-02 (Reapproved 2013), (incorporated by reference – see 40 CFR 63.14), or information from the supplier.

If there is disagreement between ASTM D1475-13 or ASTM D2111-10 (Reapproved 2015) test results and other such information sources, the test results will take precedence unless (after consultation) the permittee demonstrates to the satisfaction of the enforcement agency that the formulation data are correct.

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

- (d) *Determine the volume of each material used:* Determine the volume (in gallons) of each coating, thinner and/or other additive, and cleaning material used during each month by measurement or usage records. If the permittee purchases materials or monitors consumption by weight instead of volume, the permittee does not need to

determine the volume of each material used. Instead, the permittee may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, and 1C of this condition.

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

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

Where:

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

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

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

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

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

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

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

Where:

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

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

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

$W_{c,i}$ = The mass fraction of organic HAPs in coating, i , in pounds of organic HAPs per pound of coating. For reactive adhesives (as defined in 40 CFR 63.3981, Subpart MMM), use the mass fraction

of organic HAPs that is emitted as determined by using Appendix A in 40 CFR Part 63 – Subpart PPPP.

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

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

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

Where:

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

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

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

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

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

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

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

Where:

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

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

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

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

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

(4) If the permittee chooses to account for the mass of organic HAP contained in waste materials sent or designated for shipment to a hazardous waste TSDF in Equation 1 of this condition, the permittee shall determine the mass in accordance with 40 CFR 63.3951(e)(4), Subpart Mmmm.

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

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

Where:

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

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

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

m = The number of coatings used during the month.

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

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

Where:

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

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

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

y = The identifier for months.

n = The number of full or partial months in the compliance period (for the initial compliance period, “ n ” equals 12 if the compliance date falls on the first

day of a month – otherwise “n” equals 13; for all following compliance periods, “n” equals 12).

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

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

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

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

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

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

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

The response shall include minimizing the period of any start-up, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and

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

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

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

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

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

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

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

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

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

C. SPECIFIC REPORTING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Reporting Requirement
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.1	VOCs PM / PM ₁₀	Semi-Annual Reporting Requirements
AA-009	40 CFR 63.3920(a)(1) – (6) and (f); Subpart M	5.C.2	Organic HAPs	Semi-Annual Reporting Requirements
AA-010a	40 CFR 64.9(a); CAM	5.C.3	CAM Reporting	Semi-Annual Reporting Requirements
	40 CFR 64.7(e); CAM	5.C.4	CAM Modification	Promptly Notify the MDEQ of Failure to Achieve Limit/Standard though No Excursion or Exceedance Was Indicated by Approved Monitoring

5.C.1 For Emission Point AA-000 (Facility-Wide), the permittee shall submit a semi-annual monitoring report (SMR) in accordance with Condition 5.A.4 that contains the following information:

- (a) The total emission of volatile organic compounds (VOCs) in tons based on both a monthly basis and a rolling 12-month total basis.
- (b) A summary of any maintenance actions conducted on the air pollution control/monitoring equipment. The permittee shall include any period (in hours) in which air pollution control/monitoring equipment fails and/or malfunctions.

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

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

- (a) The company name and address.
- (b) A statement by a responsible official with the official's name, title, and signature certifying the truth, accuracy, and completeness of the content of the report.
- (c) The date of report and beginning / ending dates of the reporting period. The reporting period is the six-month period ending either on June 30 or December 31. Note that the information reported for each of the six (6) months in the reporting period will be based on the last twelve (12) months of data prior to the date of each monthly calculation.

- (d) Identification of the compliance option(s) specified in Condition 5.B.3 that the permittee used on each coating operation during the reporting period. If there was a switch between compliance options during the reporting period, the permittee shall report the beginning and ending dates for each option that was used.
- (e) If the permittee used the “*Emission Rate without Add-on Controls Option*”, the calculation results for each rolling 12-month organic HAP emission rate during each 6-month reporting period.
- (f) No deviations: If there were no deviations from the emission limit specified in Condition 3.B.5, the semi-annual compliance report shall include a statement that there were no deviations from the emission limit during the reporting period.
- (g) Deviations: If there was a deviation from the organic HAP limit in Condition 3.B.5, the semi-annual compliance report shall contain the following information:
 - (1) Compliant Material Option: If the permittee uses this option (as specified in Condition 5.B.6), the report shall contain the following information:
 - (i) An identification of each coating that deviated from the emission limit, and each thinner and/or other additive, and cleaning material used that contained organic HAP.
 - (ii) The dates, time, and duration that each coating, thinner and/or other additive, and cleaning material was used.
 - (iii) The calculation of the organic HAP content [as determined by Condition 5.B.6(d)] for each coating and the determination of the organic HAP mass fraction for each thinner and/or other additive and cleaning material.

The permittee does not need to submit background data supporting these calculations (e.g. information provided by each material supplier / manufacturer or test reports).
 - (2) Emission Rate without Add-on Controls Option: If the permittee uses this option (as specified in Condition 5.B.7), the report shall contain the following information:
 - (i) The beginning and ending dates during which the 12-month organic HAP emission rate exceeded the emission limit specified in Condition 3.B.5;
 - (ii) The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred;
 - (iii) The calculations from Equations 1, 1A through 1C, 2, and 3; and

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

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

- (3) A statement on the cause of each deviation (including any unknown cause – if applicable) and following information:
 - (i) The number of deviations;
 - (ii) For each deviation – the date, time, duration, and a list of the affected equipment;
 - (iii) An estimate of the quantity of each regulated pollutant emitted over the emission limit specified in Condition 3.B.5;
 - (iv) A description of the method used to estimate the emissions and the actions taken to minimize emissions in accordance with Condition 3.D.1.

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

(Ref.: 40 CFR 63.3920(a)(1) – (6) and (f); Subpart M MMM.)

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

- (a) Summary information on the number, duration, and cause (including any unknown cause, if applicable) of excursions or exceedances (as applicable) and the corrective actions taken;
- (b) Summary information on the number, duration, and cause (including any unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- (c) A description of the actions taken to implement a QIP during the reporting period as specified in Condition 5.B.10. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances.

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

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

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

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

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act – Stratospheric Ozone Protection. The full text of the referenced regulations may be found on-line at <http://www.ecfr.gov/> under Title 40, or DEQ shall provide a copy upon request from the permittee.

- 7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A – Production and Consumption Controls.
- 7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.
- 7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E – The Labeling of Products Using Ozone-Depleting Substances, for the following containers and products:
 - (a) All containers in which a class I or class II substance is stored or transported;
 - (b) All products containing a class I substance; and
 - (c) All products directly manufactured with a process that uses a class I substance, unless otherwise exempted by this subpart or, unless EPA determines for a particular product that there are no substitute products or manufacturing processes for such product that do not rely on the use of a class I substance, that reduce overall risk to human health and the environment, and that are currently or potentially available. If the EPA makes such a determination for a particular product, then the requirements of this subpart are effective for such product no later than January 1, 2015.
- 7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F – Recycling and Emissions Reduction:
 - (a) Servicing, maintaining, or repairing appliances;
 - (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
11 Miss. Admin. Code Pt. 2, Ch. 2.	Permit Regulations for the Construction and/or Operation of Air 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
11 Miss. Admin. Code Pt. 2, Ch. 5.	Regulations for the Prevention of Significant Deterioration of Air Quality
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
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lb/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards for Hazardous Air Pollutants, 40 CFR 61 or National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR 63
NMVOC	Non-Methane Volatile Organic Compounds
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM ₁₀	Particulate Matter less than 10 µm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound

APPENDIX B

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

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

COMPLIANCE ASSURANCE MONITORING

Abrasive Blasting Operations – Dust Collector (Emission Point AA-010)

I. Background

A. Emission Unit.

Description: The Abrasive Blasting Operations (i.e., sand blast booth) are controlled by a Hoffman 4-24 cartridge filter dust collector. The dust collector controls control particulate matter (PM) emissions from the blast booth which is associated with the metal working operations (AA-010).

Identification: AA-010, Abrasive Blasting Operations

Facility: Tishomingo Acquisition LLC, dba TBEI, Tishomingo
Tishomingo, Mississippi

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation No.: 40 CFR 64, CAM

Emission Limits: 11 Miss. Admin. Code Pt. 2, R.1.3.F(1), E= 4.1(p)^{0.67}

Monitoring Requirements: Visible Emissions Observations

C. Control Technology

Dust Collector

II. Monitoring Approach

The key elements of the monitoring approach are presented in Table A.

Table A.
Monitoring Approach for Emission Point AA-010, Abrasive Blasting Operations – Dust Collector
for controlling PM

	Indicator	Indicator No. 2
I. Indicator Measurement Approach	Visible Emissions Evaluation (VEE)	Control Equipment Inspections
	A visual observation of the dust collector exhaust will be performed daily while the process is operating. When any emissions are observed, an EPA Reference Method 9 will be performed. A copy of the visual observation log that will be used is attached.	The dust collector will be inspected on a weekly basis to ensure that the abrasive blasting operations are being properly controlled. A copy of the inspection and maintenance log that will be used is attached.
II. Indicator Range QIP Threshold	An excursion is defined as an opacity of greater than 20%. Not more than 6 excursions in any semi-annual reporting period.	An excursion is defined as control equipment malfunctions. Not more than 6 excursions in any semi-annual reporting period.
III. Performance Criteria A. Data Representativeness	Measurements are being made at the dust collector exhaust.	Inspections and maintenance are being conducted on the dust collector.
B. Verification of Operational Status	Recorded each day of operation.	N/A
C. QA/QC Practices and Criteria	Person performing the VEE in accordance with EPA Reference Method 9 will be properly certified twice per year.	Weekly inspections and any required maintenance are performed as necessary.
D. Monitoring Frequency	Visible observations will be performed each day. If emissions are visible, then an EPA Reference Method 9 will be performed.	Weekly
Data Collection Procedure	Opacity observations and/or EPA Reference Method 9 VEEs will be recorded daily and kept in log form.	Weekly inspections are performed and documented by the observer. Any required maintenance is logged.
Averaging Period	EPA Reference Method: 15 second intervals and averaging 24 consecutive readings (6 minutes)	N/A

JUSTIFICATION

I. Background

The pollutant-specific emission unit includes abrasive blasting operations associated with the metal working operations, Emission Point AA-010, which are controlled by a dust collector.

II. Rationale for Selection of Performance Indicators

Visible Emissions Evaluation:

Visible emissions were selected as a performance indicator because it is indicative of good operation and maintenance of the dust collector. When the dust collector is operating properly, there will be minimum visible emissions from the dust collector exhaust. Visible emissions from the dust collector may indicate reduced performance or efficiency of the particulate matter control device. Therefore, the presence of visible emissions is used as a performance indicator.

Control Equipment Inspection:

The dust collector is inspected on a weekly basis to ensure that the abrasive blasting operations associated with the metal working operations (AA-010) are properly controlled.

III. Rationale For Selecting Indicator Ranges

The indicator range chosen for visible emissions is an opacity of less than 20%. When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action plan required to correct the situation. All excursions will be documented and reported as necessary. An indicator range of 20% opacity was selected because: (1) an increase in visible emissions is indicative of an increase in particulate matter; and (2) it is a monitoring technique that has been approved and accepted by the US EPA and most State permitting authorities.

The indicator range for the weekly control equipment inspections is the discovery of a control equipment malfunction or necessary preventive maintenance. Weekly inspections and maintenance of the dust collector will ensure that the control equipment is being operated in accordance with manufacturer specifications, and emissions can be expected to be below allowable regulations and permitted limits. All excursions will be documented and reported, as necessary.

**TBEI Tishomingo
1425 Highway 25 North
Tishomingo, MS**

Method 22 Daily Inspection for Emission Point AA-010

Instructions: Observer should perform the observation during daylight hours and maintain a record of these results. If any visible emissions are detected, then a Visible Emissions Evaluation (VEE) should be performed using EPA Method 9, the source producing visual emissions shall be shut down and corrective actions should be taken.

Date: _____

Observer: _____
If Yes, call ECS at 662-840-5945 to complete VEE form for each applicable emission point.

	AA-010 (Blast Booth)
Visible Emissions Observed? (Yes/No)	
	Maintainence Work Conducted:
	Corrective Actions:

Date: _____

Observer: _____
If Yes, call ECS at 662-840-5945 to complete VEE form for each applicable emission point.

	AA-010 (Blast Booth)
Visible Emissions Observed? (Yes/No)	
	Maintainence Work Conducted:
	Corrective Actions:

Date: _____

Observer: _____
If Yes, call ECS at 662-840-5945 to complete VEE form for each applicable emission point.

	AA-010 (Blast Booth)
Visible Emissions Observed? (Yes/No)	
	Maintainence Work Conducted:
	Corrective Actions:

Date: _____

Observer: _____
If Yes, call ECS at 662-840-5945 to complete VEE form for each applicable emission point.

	AA-010 (Blast Booth)
Visible Emissions Observed? (Yes/No)	
	Maintainence Work Conducted:
	Corrective Actions:

Date: _____

Observer: _____
If Yes, call ECS at 662-840-5945 to complete VEE form for each applicable emission point.

	AA-010 (Blast Booth)
Visible Emissions Observed? (Yes/No)	
	Maintainence Work Conducted:
	Corrective Actions:

(1) It is the standard work practice of TBEI-Tishomingo to always operate Emission Point AA-010 while the associated dust collector is operating properly to achieve the desired control efficiency.

(2) These inspections should be performed in accordance with the facility's CAM Plan.

TBEI - Tishomingo
1425 Highway 25 North
Tishomingo, MS

Weekly log of inspections and maintenance on the dust collector controlling the abrasive blasting operations (associated with Emission Point AA-010).

Date	AA-010				Name of Inspector	Signature
	Operating Properly (Y/N)	Maintenance Conducted	Shutdown Period(s)	Time Operations Continued Without Controls (hrs)		

(1) It is the standard work practice of TBEI - Tishomingo to always operate the control technology associated with the abrasive blasting operations (i.e., Emission Point AA-010) while the associated operations are running to achieve the desired control efficiency.
(2) This log of visible emissions is kept in accordance with the facility's CAM Plan.