

**STATE OF MISSISSIPPI  
AND FEDERALLY ENFORCEABLE  
AIR POLLUTION CONTROL  
PERMIT**

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

**THIS CERTIFIES THAT**

Syntron Material Handling, LLC  
2730 Highway 145 North  
Saltillo, Lee 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 the Federal Clean Air Act and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), the regulations and standards adopted and promulgated thereunder, and the State Implementation Plan for operating permits for synthetic minor sources.

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

*Becky Simonson*

**AUTHORIZED SIGNATURE  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Issued: May 9, 2022**

**Modified: June 4, 2025**

**Permit No.: 1540-00099**

**Effective Date: As Specified Herein.**

**Expires: April 30, 2027**

## SECTION 1

### A. GENERAL CONDITIONS

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

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

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

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

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

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

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

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

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

- (a) Routine maintenance, repair, and replacement;
- (b) Use of an alternative fuel or raw material by reason of an order under Sections 2(a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
- (c) Use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
- (d) Use of an alternative fuel or raw material by a stationary source which:

- (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 Part 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).)

**B. GENERAL OPERATIONAL CONDITIONS**

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.10.)

- 2. Any diversion from or bypass of collection and control facilities is prohibited, except as provided for in Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 1.10 – “Provisions for Upsets, Startups, and Shutdowns”.

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

- 3. Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits.

(Ref.: Miss. Code Ann. 49-17-29 1.a(i and ii).)

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

- (a) Upsets

- (1) For an upset defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:
  - (i) An upset occurred and that the source can identify the cause(s) of the upset;
  - (ii) The source was at the time being properly operated;
  - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
  - (iv) That within five (5) working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
  - (v) That as soon as practicable but no later than twenty-four (24) hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
- (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
- (3) This provision is in addition to any upset provision contained in any applicable requirement.
- (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit the EPA or third party enforcement actions.
- (b) Start-ups and Shutdowns (as defined by 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

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 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.)

5. *Compliance Testing*: Regarding compliance testing:

- (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 of 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:
  - ◆ Detailed description of testing procedures;
  - ◆ Sample calculation(s);
  - ◆ Results; and
  - ◆ Comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

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

**C. GENERAL SUBMITTAL REQUIREMENTS**

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

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

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

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

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

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

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

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

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

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

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

## SECTION 2 EMISSION POINT DESCRIPTION

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

Emission Point	Description
AA-000	Facility-Wide [Syntron Material Handling, LLC]
AA-008	Foam-In-Place (INSTAPAK) System [utilizes a process in which a two-part polyurethane is blended and sprayed to prevent shock sensitive wares from being damaged in shipping; spraying / curing conducted in a spray booth]
AA-009	Rubber Bonding System [involves the manufacture of assemblies made up of rubber and metal castings; solvents (for cleaning) and epoxies (for bonding) are used on assemblies]
AA-011	One (1) Wet Spray Paint Booth [disposable filters equipped at the exhaust]
AA-012	One (1) Wet Spray Paint Booth [disposable filters equipped at the exhaust]
AA-015	General Fabrication Shot-Blasting System [equipped with a baghouse]
AA-016	Plasma Torch Cutting System [used to cut steel sheets to desired specifications; equipped with a dust collector]
AA-018	Welding Operations [consists of an automatic welder and portable welding units; automatic welder exhausts to a vented hood]
AA-019	Five (5) Natural Gas-Fired Direct Heating and Ventilation Units [total heat input: 13.9 MMBTU / hour]
AA-020	Six (6) Natural Gas-Fired In-Direct Heating and Ventilation Units [total heat input: 15.0 MMBTU / hour]
AA-021	One (1) 0.36 MMBTU / Hour Kerosene-Fired, Direct-Heated Steam Cleaner
AA-022	Two (2) 1,000-Gallon Propane Storage Tanks [horizontal and pressurized]
AA-023	One (1) 3,000-Gallon Used Coolant Storage Tank [horizontal and fixed roof]
AA-024	One (1) 1,300-Gallon Used Oil Storage Tank [vertical and fixed roof]
AA-025	One (1) 250-Gallon Gasoline Storage Tank [horizontal and fixed roof]
AA-027	One (1) Electrostatic Powder Coating Booth [equipped with a dust collector]
AA-030	Aerosol Can Depressurizing System [utilized to empty the residual contents of aerosol cans]
AA-031	Steel Shot-Blasting Cabinet System [equipped with a dust collector]

<b>Emission Point</b>	<b>Description</b>
AA-032	Laser Cutting System [used to cut steel sheets to desired specifications; equipped with a cartridge dust collector]
AA-033	Coil Encapsulating System [utilizes a process in which a two-part polyurethane is blended and pumped into a mold that also contains a metal coil; cured within an electric-powered oven]
AA-035	Glass Bead Shot-Blasting Operations [utilizes a sealed blast cabinet to clean discoloration on stainless steel weldments; equipped with a dust collector]
AA-036	Composite (Fiberglass) Tubing System [utilized to manufacture a “composite idler roll”; includes a “cut-off process” to cut tubing and an “ID preparation process” to scuff the inside of tubing; equipped with a dust collector]
AA-037	One (1) Lab Powder Booth [equipped with a dust collector]
AA-038	One (1) Spray Paint Booth [disposable filters equipped at the exhaust]
AA-039	One (1) 1.659 MMBTU / Hour Natural Gas-Fired Direct Heater [provides heat to Emission Point AA-038]
AA-040	One (1) 0.66 MMBTU / Hour Natural Gas-Fired Pyrolysis Burn-Off Oven [used to remove coating residue build-up]
AA-041	One (1) 5.5 MMBTU / Hour Natural Gas-Fired Curing Oven [part of the electrostatic powder coating process]

**SECTION 3  
EMISSION LIMITATIONS AND STANDARDS**

<b>Emission Point(s)</b>	<b>Applicable Requirement</b>	<b>Condition Number</b>	<b>Pollutant / Parameter</b>	<b>Limitation / Standard</b>
AA-000	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity (smoke)	≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2	Opacity	
	11 Miss. Admin. Code Pt. 2, R. 1.3.C.	3.3	All Pollutants	General Nuisance Clause
	11 Miss. Admin. Code Pt. 2, R. 1.3.F.(1).	3.4	PM (filterable)	$E = 4.1 \cdot (p^{0.67})$
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.5	PM <sub>10</sub> / PM <sub>2.5</sub> (filterable only)	Operational Requirements (Control Devices)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). <b>(Title V Avoidance Limits)</b>	3.6	PM <sub>10</sub> / PM <sub>2.5</sub> (filterable + condensable)	95.0 tpy (Rolling 12-Month Totals)
AA-008 AA-009 AA-011 AA-012	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). <b>(Title V Avoidance Limit)</b>	3.7	VOCs	95.0 tpy (Rolling 12-Month Total)
AA-030 AA-033 AA-038	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). <b>(Major Source Avoidance Limits)</b>	3.8	HAPs	9.0 tpy (Individual) 24.0 tpy (Total) (Rolling 12-Month Totals)
AA-019 AA-021 AA-039 AA-040 AA-041	11 Miss. Admin. Code Pt. 2, R. 1.3.D.(1)(a).	3.9	PM	0.6 Pounds / MMBTU per Hour Heat Input
AA-020	11 Miss. Admin. Code Pt. 2, R. 1.4.A.(1).	3.10	SO <sub>2</sub>	4.8 Pounds / MMBTU
AA-025	40 CFR Part 63, Subpart CCCCCC – NESHAP for Source Category: Gasoline Dispensing Facilities 40 CFR 63.11111(a) – (c), and (i); Subpart CCCCCC	3.11	HAPs	General Applicability

3.1 For Emission Point AA-000 (Facility-Wide), 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 (40) percent opacity subject to the exceptions provided below:

- (a) Start-up operations may produce emissions that 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 (i.e. ash removal) shall be permitted provided such emissions do not exceed sixty (60) percent opacity and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one (1) hour.

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

- 3.2 For Emission Point AA-000 (Facility-Wide), 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.)

- 3.3 For Emission Point AA-000 (Facility-Wide), the permittee shall not cause 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 gas-borne material leaving the building or equipment are controlled or removed prior to discharge to the open air.

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

- 3.4 For Emission Point AA-000 (Facility-Wide), except as otherwise specified 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 relationship:

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

Where “E” is the emission rate in pounds per hour and “p” is the process weight input 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).)

- 3.5 For Emission Point AA-000 (Facility-Wide), the permittee shall operate each air pollution control device at all times the corresponding process equipment is in active operation. During any period in which a control device is non-operational and/or fails, the permittee shall take actions as expeditiously as possible to bring the control device back to normal operation or cease operations from the process equipment that is directly associated with the corresponding control device.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).)

- 3.6 For Emission Point AA-000 (Facility-Wide), the permittee shall limit the respective emission of particulate matter less than 10 microns ( $\mu\text{m}$ ) in diameter ( $\text{PM}_{10}$  – filterable + condensable) and PM less than 2.5  $\mu\text{m}$  in diameter ( $\text{PM}_{2.5}$  – filterable + condensable) to no more than 95.0 tons per year based on a rolling 12-month total.

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

- 3.7 For Emission Points AA-008, AA-009, AA-011, AA-012, AA-030, AA-033, and AA-038, the permittee shall limit the emission of volatile organic compounds (VOCs) to no more than 95.0 tpy based on a rolling 12-month total.

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

- 3.8 For Emission Points AA-008, AA-009, AA-011, AA-012, AA-030, AA-033, and AA-038, the permittee shall limit the emission of hazardous air pollutants (HAPs) to no more than 9.0 tpy for each individual HAP and no more than 24.0 tpy of all HAPs combined based on a rolling 12-month total basis.

(Ref.: 11 Miss. Admin. Code. Pt. 2, R 2.2.B.(10). – Major Source Avoidance Limits)

- 3.9 For Emission Points AA-019, AA-021, AA-039, AA-040, and AA-041, the maximum permissible emission of ash and / or particulate matter (PM) from each fossil fuel-burning installation of less than ten (10) million BTU (MMBTU) per hour heat input shall not exceed 0.60 pounds per MMBTU per hour heat input.

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

- 3.10 For Emission Point AA-021, the maximum discharge of sulfur oxides from a fuel burning installation in which the fuel is primarily combusted 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).)

- 3.11 For Emission Point AA-025, the permittee is subject to and shall comply with the applicable requirements found in 40 CFR Part 63, Subpart CCCCCC – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Category: Gasoline Dispensing Facilities (GDFs) and 40 CFR Part 63, Subpart A – General Provisions (as required in Table 3 of Subpart CCCCCC).

For the purpose of this permit, and unless otherwise specified, the permittee has a monthly gasoline throughput of less than 10,000 gallons of gasoline. However, if the monthly throughput ever exceeds 10,000 gallons, the permittee shall be subject to the applicable requirements from that point forward even if the monthly throughput later falls below the newly applicable threshold.

(Ref.: 40 CFR 63.11111(a) – (c), and (i); Subpart CCCCCC)

**SECTION 4**  
**WORK PRACTICE STANDARDS**

<b>Emission Point(s)</b>	<b>Applicable Requirement</b>	<b>Condition Number</b>	<b>Pollutant / Parameter</b>	<b>Limitation / Standard</b>
AA-025	40 CFR 63.11116(a); Subpart CCCCCC	4.1	HAPs	Minimize Vapor Releases

4.1 For Emission Point AA-025, the permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. The measures to be taken include (but are not limited to) the following practices:

- (a) Minimize gasoline spills;
- (b) Clean up spills as expeditiously as possible;
- (c) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; and
- (d) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices (such as oil / water separators).

(Ref.: Ref.: 40 CFR 63.11116(a); Subpart CCCCCC)

**SECTION 5  
MONITORING AND RECORDKEEPING REQUIREMENTS**

<b>Emission Point(s)</b>	<b>Applicable Requirement</b>	<b>Condition Number</b>	<b>Pollutant / Parameter</b>	<b>Monitoring / Recordkeeping Requirement</b>
AA-000	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain Records for a Minimum of Five (5) Years
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2	PM <sub>10</sub> / PM <sub>2.5</sub> (filterable + condensable)	Calculate and Monitor Emissions (Monthly and Rolling 12-Month Total)
		5.3	PM <sub>10</sub> / PM <sub>2.5</sub> (filterable only)	Perform a Monthly Inspection on Each Control Device Monitor Periods of Control Device Non-Operation (Monthly)
AA-008 AA-009 AA-011 AA-012 AA-030 AA-033 AA-038	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.4	VOCs HAPs	Calculate and Monitor Emissions (Monthly and Rolling 12-Month Total) Maintain Documentations on VOC- / HAP-Containing Materials
AA-025	40 CFR 63.11111(e) and 63.11125(d); Subpart CCCCCC	5.5	HAPs	Recordkeeping Requirements

5.1 Except as otherwise specified or limited herein, the permittee shall retain all required records, monitoring data, supporting information, and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes all calibration and maintenance records, all original strip-chart recordings or other data from continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to the MDEQ as required by “Applicable Rules and Regulations” of this permit upon request.

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

5.2 For Emission Point AA-000 (Facility-Wide), the permittee shall demonstrate compliance with the emission limitations specified in Condition 3.6 by calculating and recording the total emission of PM<sub>10</sub> (filterable + condensable) and PM<sub>2.5</sub> (filterable + condensable) in tons from all applicable sources that can reasonably emit the pollutant(s) on both a monthly and rolling 12-month total basis.

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

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

- 5.3 For Emission Point AA-000 (Facility-Wide), the permittee shall perform and record an inspection that evaluates the performance capability of each air pollution control device on a monthly 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. Additionally, the permittee shall maintain on-site (to the extent practicable) sufficient components as is necessary to repair a control device.

The permittee shall maintain documentation that details the date / time each inspection is performed, any noted problem that is experienced, and any maintenance (either corrective or preventative) performed to return a control device to operation as originally designed. Additionally, the permittee shall monitor and record each period of time (including the date and duration) in which a control is non-operational during the active operation of the corresponding process unit / system on a monthly basis.

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

- 5.4 For Emission Points AA-008, AA-009, AA-011, AA-012, AA-030, AA-033, and AA-038, the permittee shall demonstrate compliance with the emission limitations specified in Conditions 3.7 and 3.8 by calculating and recording the total emission of VOCs, each individual HAP, and all combined HAPs in tons on both a monthly and rolling 12-month total basis.

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

Additionally, the permittee shall maintain documentation that details the following information for each coating, adhesive, solvent, spray material, or any other material that contains a VOC or HAP used on a monthly basis:

- (a) The identification or product name;
- (b) The total quantity (in either pounds or gallons) used;
- (c) The VOC content (in percent weight) as well as a description of the method used to determine the VOC content;
- (d) The individual HAP content (in weight percent) as well as a description of the method used to determine the HAP content;
- (e) The density (in pounds per gallon); and
- (f) The solids content (in percent weight) (as applicable).

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

- 5.5 For Emission Point AA-025, the permittee shall maintain documentation on the following information:

- (a) Records that document the monthly throughput of gasoline.
- (b) Records on the occurrence and duration of each malfunction of operation (i.e., process equipment) or monitoring equipment.
- (c) Records on any actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.11115(a), Subpart CCCCCC including corrective actions to restore malfunctioning process and monitoring equipment to its normal or usual manner of operation.

(Ref.: 40 CFR 63.11111(e) and 63.11125(d); Subpart CCCCCC)

## SECTION 6 REPORTING AND SUBMITTAL REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Reporting Requirement
AA-000	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	Report Permit Deviations Within Five (5) Working Days
		6.2	Submit a Certified Annual Monitoring Report
		6.3	All Documents Submitted to MDEQ Shall be Certified by a Responsible Official

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

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

- 6.2 Except as otherwise specified herein, the permittee shall submit a certified annual monitoring report (AMR) postmarked no later than 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 AMR shall address each version of the permit. All instances of deviations from permit requirements must be clearly identified in the report. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration.

Each AMR shall contain the following information (at a minimum):

- (a) The total emission of PM<sub>10</sub>, PM<sub>2.5</sub>, VOCs, each individual HAP, and all combined HAPs in tons both on a monthly and rolling 12-month total basis;
- (b) An outline of any maintenance action(s) performed on a control device and any periods of time (including the date and duration) in which a control device was not operational / not utilized during the active operation of the corresponding process unit / system;
- (c) For each for each coating, adhesive, solvent, spray material, or any other material that contains a VOC or HAP:
  - (1) The product name and identification;
  - (2) The total quantity (in pounds or gallons) used both on a monthly and rolling 12-month total basis;

- (3) The density (in pounds per gallon); and
- (4) The VOC and/or HAP content (in percent weight).

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

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

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