

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

**TO OPERATE AIR EMISSIONS EQUIPMENT**

**THIS CERTIFIES THAT**

Toyota Motor Manufacturing Mississippi, Inc.  
1200 Magnolia Way  
Blue Springs, Union 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: April 20, 2021**

**Effective Date: As specified herein.**

**Modified Date: June 25, 2025**

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

*Becky Simonson*

**AUTHORIZED SIGNATURE  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Expires: March 31, 2026**

**Permit No.: 2700-00045**

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### **APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT**

### **APPENDIX B SITE-SPECIFIC CAM PLAN**

## SECTION 1. GENERAL CONDITIONS

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

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

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

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

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

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

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

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

- (1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of three (3) or more years. Such a reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.
- (2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
- (3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the 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 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 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 or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (d) As authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

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

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

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

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

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

- 1.14 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit

contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source.

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

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

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

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

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

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

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

- (1) A brief description of the change(s);
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change;

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

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

- 1.19 Should the Executive Director of the Mississippi Department of Environmental Quality (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 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 Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.

- (a) Open burning without a forced-draft air system must not occur within 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 noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
- (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in 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 DEQ 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 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 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 11 Miss. Admin. Code Pt. 2, R. 1.10.B.(2)(a) through (e).
  - (3) Where an upset as defined in Rule 1.2 occurs during start-up or shutdown, see the upset requirements above.

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

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

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

- 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 (Toyota Motor Manufacturing Mississippi, Inc.)
AA-100	Facility-Wide Natural Gas-Fired Combustion Equipment
AA-101 (Ref. S-1-1-1)	Stamping Press Shop Heating, Ventilation, and Air Conditioning (HVAC) [Total Heat Input Capacity: 4.4 MMBTU / Hour]
AA-102 (Ref. S-1-1-2)	E-Coat / Weld Shop HVAC [Total Heat Input Capacity: 38.85 MMBTU / Hour]
AA-103 (Ref. S-1-1-3)	Paint Shop HVAC [Total Heat Input Capacity: 38.98 MMBTU / Hour]
AA-104 (Ref. S-1-1-4)	Plastics Shop HVAC [Total Heat Input Capacity: 20.11 MMBTU / Hour Burner]
AA-105 (Ref. S-1-1-5)	Assembly Shop HVAC [Total Heat Input Capacity: 21.51 MMBTU / Hour]
AA-106 (Ref. S-1-1-6)	Utility Building HVAC [Total Heat Input Capacity: 0.15 MMBTU / Hour]
AA-107 (Ref. S-1-1-7)	Administration Area HVAC [Total Heat Input Capacity: 6.07 MMBTU / Hour]
AA-108 (Ref. S-1-2-1)	BWPS Primer Booth [Total Heat Input Capacity: 22.2 MMBTU / Hour]
AA-109 (Ref. S-1-2-2)	BWPS Basecoat Booth [Total Heat Input Capacity: 22.2 MMBTU / Hour]
AA-110 (Ref. S-1-2-3)	BWPS Clear Coat Booth [Total Heat Input Capacity: 18.3 MMBTU / Hour]
AA-124 (Ref. S-1-3-1)	E-Coat Oven [Total Heat Input Capacity: 13.214 MMBTU / Hour]
AA-125 (Ref. S-1-3-2)	Primer Preheater [Total Heat Input Capacity: 2.2 MMBTU / Hour]
AA-126 (Ref. S-1-3-3)	Top Coat Preheater [Total Heat Input Capacity: 2.2 MMBTU / Hour]
AA-127 (Ref. S-1-3-4)	Top Coat Curing Oven [Total Heat Input Capacity: 9.54 MMBTU / Hour]
AA-132 (Ref. S-1-4-1)	Electrodeposition (ED) Regenerative Thermal Oxidizer (RTO) [receives emissions from E-Coat Oven and PVC / Sealer Preheat Oven; Total Heat Input Capacity: 2.15 MMBTU / Hour]

EMISSION POINT	DESCRIPTION
AA-133 (Ref. S-1-4-2)	Topcoat Regenerative Thermal Oxidizer (RTO) [receives emissions from Topcoat / Clear Coat Booth (Automatic Zone) and Heated Flash (Primer / Basecoat Zones); Total Heat Input Capacity: 5.73 MMBTU / Hour]
AA-134	Oven Regenerative Thermal Oxidizer (RTO) [receives emissions from Top Coat Curing Oven; Total Heat Input Capacity: 1.95 MMBTU / Hour]
AA-135	Sealer Heater [Total Heat Input Capacity: 4.73 MMBTU / Hour]
AA-136	Sealer Preheat Oven [Total Heat Input Capacity: 5.278 MMBTU / Hour]
AA-137	Hot Water Boiler No. 1 [Total Heat Input Capacity: 4.2 MMBTU / Hour]
AA-138	Hot Water Boiler No. 2 [Total Heat Input Capacity: 4.2 MMBTU / Hour]
AA-139	MAU-604-1 Oil Store Air Make-Up Unit [Total Heat Input Capacity: 0.53 MMBTU / Hour]
AA-140	MAU-604-2 General Stores Air Make-Up Unit [Total Heat Input Capacity: 0.75 MMBTU / Hour]
AA-141	Office / Visitor Center HVAC [Total Heat Input Capacity: 10 MMBTU / Hour]
<b>AA-200 (Ref. S-2)</b>	<b>Facility-Wide Diesel Fuel-Fired Emergency Support Equipment</b>
AA-201 (Ref. S-2-1)	1,502 HP Emergency Generator Engine [Total Heat Input Capacity: 3.82 MMBTU / Hour; services the Facilities Building Area]
AA-202 (Ref. S-2-2)	375 HP Emergency Fire Water Pump Engine [Total Heat Input Capacity: 0.954 MMBTU / Hour; services the Water Tank Area]
AA-203	366 HP Emergency Generator Engine [Total Heat Input Capacity: 0.767 MMBTU / Hour; services the Assembly Area]
AA-204	324 HP Emergency Generator Engine [Total Heat Input Capacity: 0.824 MMBTU / Hour; services the Fire Bay Area]
AA-205	762 HP (500 kW) Emergency Generator Engine [Total Heat Input Capacity: 1.94 MMBTU / Hour; Manufactured Date: 2023; services the Child Care Center (CCC)]
<b>AA-300 (Ref. S-3)</b>	<b>Facility-Wide Bulk Liquid Storage Tanks</b>
AA-301	One (1) 5,000-Gallon Air Conditioning (A/C) Fluid Tank [located in the Tank Farm]
AA-302 (Ref. S-3-2)	One (1) 10,500-Gallon Long-Life Coolant Tank [located in the Tank Farm]

EMISSION POINT	DESCRIPTION
AA-304 (Ref. S-3-4)	One (1) 10,500-Gallon Transmission Fluid Tank [located in the Tank Farm]
AA-307 (Ref. S-3-7)	One (1) 9,500-Gallon Windshield Washer Fluid Tank [located in the Tank Farm]
AA-309 (Ref. S-3-9)	One (1) 15,000-Gallon Unleaded Gasoline Tank [located in the Tank Farm]
AA-312a	One (1) 1,000-Gallon Diesel Fuel Tank [located in the Tank Farm]
AA-312b	One (1) 550-Gallon Diesel Fuel Tank [located in the Tank Farm]
AA-312c	One (1) 550-Gallon Diesel Fuel Tank [located at the Steel Recycling Center]
AA-313	One (1) 6,565-Gallon 2,3,3,3-tetrafluoropropene (HFO-1234yf) Coolant Tank
<b>AA-400 (Ref. S-4)</b>	<b>Stamping Shop, Body-Weld Shop, and Steel Center</b>
AA-401	Drawing Oil Stamping Shop and Steel Center
AA-403	Metal Inert Gas (MIG) Welding and Brazing Operations [located in the Body Shop]
<b>AA-500 (Ref. S-5)</b>	<b>Primary Paint Shop Operations</b>
AA-501 (Ref. S-5-1)	Body E-Coat Dip Tank
AA-502 (Ref. S-5-2)	Primer-Surfacer Coating Booth [includes the application of anti-chip, hood-chip primer, specialty solventborne material, and waterborne primer]
AA-503 (Ref. S-5-3)	Topcoat Booth [includes the application of water-borne base coat and solvent-borne clear coat]
AA-504 (Ref. S-5-4)	Paint System Curing Oven for Primer-Surfacer and Top Coat Materials
<b>AA-600</b>	<b>Slush Molding Operations</b>
AA-650	Slush Molding Operations [includes plastic injection-molding and foam fabrication]
<b>AA-700 (Ref. S-7)</b>	<b>Miscellaneous Metal Coating Process Operations</b>



EMISSION POINT	DESCRIPTION
AA-701 (Ref. S-7-1)	Black-Out Application Booth [Air-Dried]
<b>AA-800 (Ref. S-8)</b>	<b>Miscellaneous Body Coating Operations</b>
AA-801 (Ref. S-8-2)	Sealer and Sound Dampener Application [located in the Body Shop]
AA-802 (Ref. S-8-1)	Sealers and Adhesives [located in the Body Shop]
AA-803 (Ref. S-8-4)	Cavity Wax Booth [includes the application of wax to the hinges and various cavities; located in the Paint Shop]
AA-804 (Ref. S-8-2)	PVC Underbody Coating System [located in the Body Shop]
AA-805 (Ref. S-8-2)	PVC U-Coat Sealer
AA-806 (Ref. S-8-3)	Wax Application [located in the Assembly Shop]
<b>AA-900 (Ref. S-9)</b>	<b>Miscellaneous Process Cleaning Operations</b>
AA-901 (Ref. S-9-1)	Booth and Application Clean-Up Materials
AA-902 (Ref. S-9-2)	Paint Line Cleaning Materials
AA-903 (Ref. S-9-3)	Wiping Solvents
<b>AA-1000 (Ref. S-10)</b>	<b>Paint Repair Operations</b>
AA-1001 (Ref. S-10-1)	Paint Repair Booth
AA-1002 (Ref. S-10-3)	Underbody Touch-Up Booth
AA-1003 (Ref. S-10-4)	Repair Polish Booth
<b>AA-1100 (Ref. S-11)</b>	<b>Assembly Final Line Operations</b>
AA-1101 (Ref. S-11-1)	Vehicle Fluid Fills

<b>EMISSION POINT</b>	<b>DESCRIPTION</b>
AA-1102 (Ref. S-11-2)	Windshield Installation
AA-1103 (Ref. S-11-3a)	Vehicle Start-Up and Roll Test
<b>AA-1200</b>	<b>Marshalling Yard</b>
<b>AA-1300</b>	<b>Facility-Wide Fugitive Emissions [includes Paved Roads and Vehicle Test Track]</b>
<b>AA-1400</b>	<b>Waste Water Treatment Plant [includes Associated Storage Tanks]</b>
<b>AA-1500</b>	<b>Miscellaneous Support Activities / Operations</b>

### **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 or industrial process, which exceeds forty percent (40%) opacity subject to the exceptions provided in Parts (a) and (b) 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 (i.e. ash removal) shall be permitted provided such emissions do not exceed sixty percent (60%) opacity, and provided that the aggregate duration of such emissions during any 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 forty percent (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.)

**B. EMISSION POINT SPECIFIC EMISSION LIMITATIONS & STANDARDS**

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant(s) / Parameter(s)	Limit(s) / Standard(s)
AA-000	40 CFR Part 60, Subpart MM – Standards of Performance for Automobile and Light Duty Trucks Surface Coating Operations  40 CFR 60.390(a) and (c); Subpart MM	3.B.1	VOCs	Applicability
	40 CFR Part 63, Subpart IIII – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light Duty Trucks  40 CFR 63.3081(a) and (b); Subpart IIII  40 CFR Part 63, Subpart M MMMM – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products  40 CFR 63.3881(d); Subpart M MMMM	3.B.2	HAPs	Applicability
	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued June 5, 2007	3.B.3	Opacity	≤ 10%
	11 Miss. Admin. Code Pt. 2, R. 1.3.D.(1).	3.B.4	PM	0.6 Pounds / MMBTU per Hour; $E = 0.8808 (I^{-0.1667})$ ; or $E = 4.1 (p^{0.67})$ (As Applicable)
AA-100	11 Miss. Admin. Code Pt. 2, R. 1.4.A.(1).	3.B.5	SO <sub>2</sub>	4.8 Pounds / MMBTU (As Applicable)
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007  <b>(PSD BACT Standards)</b>	3.B.6	PM / PM <sub>10</sub> (filterable)  VOCs  CO  NO <sub>x</sub>	Combust Only Natural Gas  Good Combustion Practice Standards

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant(s) / Parameter(s)	Limit(s) / Standard(s)
AA-100	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007  11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued April 20, 2021  <b>(PSD BACT Limits)</b>	3.B.7	(a) PM / PM <sub>10</sub> (filterable)	8.7 tpy (Rolling 12-Month Total)
			(b) VOCs	6.3 tpy (Rolling 12-Month Total)
			(c) NO <sub>x</sub>	114.2 tpy (Rolling 12-Month Total)
			(d) CO	95.9 tpy (Rolling 12-Month Total)
			(e) SO <sub>2</sub>	0.7 tpy (Rolling 12-Month Total)
AA-124 AA-136	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007  <b>(PSD BACT Standard)</b>	3.B.8	VOCs	Emissions Control Requirement
AA-127 AA-502 AA-503 AA-504	40 CFR Part 64 – Compliance Assurance Monitoring  40 CFR 64.2(a), CAM	3.B.9	PM VOCs	Applicability
AA-127 AA-504	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007  <b>(PSD BACT Standard)</b>	3.B.10	VOCs	Emissions Control Requirement
AA-132 AA-133 AA-134	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007  <b>(PSD BACT Limit)</b>	3.B.11	VOCs	95% Destruction / Removal Efficiency
AA-137 AA-138	40 CFR Part 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters  40 CFR 63.7490(a)(1); Subpart DDDDD	3.B.12	HAPs	General Applicability

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant(s) / Parameter(s)	Limit(s) / Standard(s)
AA-200	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007  11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued April 20, 2021 <b>(PSD BACT Limits)</b>	3.B.13	(a) PM / PM <sub>10</sub> (filterable)	0.1 tpy (Rolling 12-Month Total)
			(b) VOCs	0.3 tpy (Rolling 12-Month Total)
			(c) NO <sub>x</sub>	1.1 tpy (Rolling 12-Month Total)
			(d) CO	0.7 tpy (Rolling 12-Month Total)
			(e) SO <sub>2</sub>	0.3 tpy (Rolling 12-Month Total)
	40 CFR Part 60, Subpart III – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines 40 CFR 60.4200(a)(2); Subpart III  40 CFR Part 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines 40 CFR 63.6590(c)(6); Subpart ZZZZ	3.B.14	HAPs	General Applicability
	40 CFR 60.4207(b); Subpart III 40 CFR 80.510(b); Subpart I	3.B.15	Fuel Requirement	15 ppm Sulfur Content (Max.); and 40 Cetane Index (Min.) or 35% Aromatic Content (Max. – by volume)
	40 CFR 60.4211(f)(1) – (3); Subpart III	3.B.16	Operational Requirements	100 Hours / Calendar Year for Maintenance and Readiness Testing; 50 Hours / Calendar Year for Non-Emergency Situations
AA-201 AA-203 AA-204 AA-205	40 CFR 60.4205(b), 60.4202(a)(2), and 60.4206; Subpart III	3.B.17	NMHC + NO <sub>x</sub>  CO PM  Opacity	Applicable Emission Standards
AA-202	40 CFR 60.4205(c) – Table 4 and 60.4206; Subpart III	3.B.18	NMHC + NO <sub>x</sub>	3.0 Grams / Horsepower-Hour
			PM	0.15 Grams / Horsepower-Hour

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant(s) / Parameter(s)	Limit(s) / Standard(s)
AA-300	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 <b>(PSD BACT Limit)</b>	3.B.19	VOCs	4.2 tpy (Rolling 12-Month Total)
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 <b>(PSD BACT Standard)</b>	3.B.20		Operate / Maintain Submerged Fill Pipes and Conservation Vents
AA-302 AA-307	40 CFR Part 63, Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline) 40 CFR 63.2334(a); Subpart EEEE	3.B.21	HAPs	General Applicability
AA-309	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 <b>(PSD BACT Standard)</b>	3.B.22	VOCs	Operate / Maintain Stage 1 Vapor Recovery Controls
AA-400 AA-500 AA-800 AA-1000 AA-1100	40 CFR 63.3090(c); Subpart III	3.B.23	HAPs (organic)	0.010 Pounds / Pound of Adhesive and Sealer Material (Monthly)
AA-400	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007	3.B.24	(a) PM / PM <sub>10</sub> (filterable)	1.8 tpy (Rolling 12-Month Total)
	11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued April 20, 2021 <b>(PSD BACT Limits)</b>		(b) VOCs	58.0 tpy (Rolling 12-Month Total)
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 <b>(PSD BACT Standards)</b>	3.B.25	PM / PM <sub>10</sub>	Operate / Maintain a Dry Filtration System Good Operating / Work Practice and Maintenance Standards
	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued June 5, 2007	3.B.26		Utilize Resistance Welding and Filtration on MIG Welding Operations

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant(s) / Parameter(s)	Limit(s) / Standard(s)
AA-401	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007  <b>(PSD BACT Limit)</b>	3.B.27	VOCs	Use Low-VOC Content Materials (When Technically Feasible)
AA-500 AA-700 AA-800 AA-1000 AA-1100	40 CFR 63.3090(a) and (b); Subpart III	3.B.28	HAPs (organic)	0.30 Pounds / GACS (Monthly); or 0.50 Pounds / GACS (Monthly)
	40 CFR 63.3093; Subpart III	3.B.29		Operating Limit Requirements (As Applicable)
	40 CFR 63.3092; Subpart III	3.B.30	HAPs (organic)	Emissions Control Requirements (As Applicable)
AA-500	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007	3.B.31	(a) PM / PM <sub>10</sub> (filterable)	10.7 tpy (Rolling 12-Month Total)
	11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued April 20, 2021 <b>(PSD BACT Limits)</b>		(b) VOCs	319.7 tpy (Rolling 12-Month Total)
	40 CFR 60.392; Subpart MM	3.B.32	VOCs	Coating Operation Emission Limitations
AA-501	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 <b>(PSD BACT Standard)</b>	3.B.33	PM / PM <sub>10</sub>	Operate / Maintain the Dip Tank Coating Application
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 40 CFR 60.392(a); Subpart MM <b>(PSD BACT Limit)</b> <b>(PSD BACT Standard)</b>	3.B.34	VOCs	0.13 Pounds / GACS Utilize Waterborne Materials and Dip Tank Coating Application



Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant(s) / Parameter(s)	Limit(s) / Standard(s)
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 and modified April 12, 2013 <b>(PSD BACT Standard)</b>	3.B.35	PM / PM <sub>10</sub>	Operate and Maintain Wet Scrubbers in Spray Application Areas
AA-502 AA-503	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 <b>(PSD BACT Limit)</b>	3.B.36	VOCs	4.8 Pounds / GACS
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 and modified March 11, 2011 <b>(PSD BACT Standard)</b>	3.B.37		Emissions Control Requirement
AA-600	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 <b>(PSD BACT Limit)</b>	3.B.38	VOCs	3.3 tpy (Rolling 12-Month Total)
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007	3.B.39	(a) PM / PM <sub>10</sub> (filterable)	0.1 tpy (Rolling 12-Month Total)
	11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued April 20, 2021 <b>(PSD BACT Limits)</b>		(b) VOCs	6.0 tpy (Rolling 12-Month Total)
AA-700	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 <b>(PSD BACT Standard)</b>	3.B.40	PM / PM <sub>10</sub>	Operate / Maintain Dry Filtration Systems
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007	3.B.41	VOCs	Use Low-VOC Content Materials (When Technically Feasible)
	11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued April 20, 2021 <b>(PSD BACT Limit)</b> <b>(PSD BACT Standard)</b>			Good Operating / Work Practice Standards

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant(s) / Parameter(s)	Limit(s) / Standard(s)
AA-800	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007	3.B.42	(a) PM / PM <sub>10</sub> (filterable)	2.8 tpy (Rolling 12-Month Total)
	11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued April 20, 2021 and modified on June 25, 2025 <b>(PSD BACT Limits)</b>		(b) VOCs	68.89 tpy (Rolling 12-Month Total)
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 <b>(PSD BACT Standard)</b>	3.B.43	PM / PM <sub>10</sub>	Operate / Maintain Dry Filtration System
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 <b>(PSD BACT Limit)</b>	3.B.44		0.3 Pounds / Gallon
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007  11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued April 20, 2021 <b>(PSD BACT Limit)</b> <b>(PSD BACT Standard)</b>	3.B.45	VOCs	Use Low-VOC Content Materials (When Technically Feasible)  Good Operating / Work Practice Standards
AA-801	40 CFR 63.3090(d); Subpart IIII	3.B.46	HAPs (organic)	0.010 Pounds / Pound of Deadener Material (Monthly)
AA-900	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007  11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued April 20, 2021 <b>(PSD BACT Limit)</b>	3.B.47	VOCs	243.6 tpy (Rolling 12-Month Total)

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant(s) / Parameter(s)	Limit(s) / Standard(s)
AA-900	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 <b>(PSD BACT Limit)</b>	3.B.48	VOCs	Use Low-VOC Content Materials (When Technically Feasible)
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007  11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued April 20, 2021 <b>(PSD BACT Standards)</b>	3.B.49		Good Work Practice Standards Operate / Maintain Purge Solvent Recovery System on the Body Clear Coat System
AA-1000	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007	3.B.50	(a) PM / PM <sub>10</sub> (filterable)	0.1 tpy (Rolling 12-Month Total)
	11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued April 20, 2021 <b>(PSD BACT Limits)</b>		(b) VOCs	3.3 tpy (Rolling 12-Month Total)
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 <b>(PSD BACT Standard)</b>	3.B.51	PM / PM <sub>10</sub>	Operate / Maintain Particulate Filtration System
AA-1100	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007  11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued April 20, 2021 <b>(PSD BACT Limits)</b>	3.B.52	(a) PM / PM <sub>10</sub> (filterable)	0.1 tpy (Rolling 12-Month Total)
			(b) VOCs	41.7 tpy (Rolling 12-Month Total)
			(c) NO <sub>x</sub>	1.5 tpy (Rolling 12-Month Total)
			(d) CO	6.7 tpy (Rolling 12-Month Total)
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 <b>(PSD BACT Limit)</b>	3.B.53	VOCs	Use Low-VOC Content Materials (When Technically Feasible)

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant(s) / Parameter(s)	Limit(s) / Standard(s)
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 <b>(PSD BACT Standard)</b>	3.B.54	PM / PM <sub>10</sub> CO NO <sub>x</sub> VOCs	Good Work Practice Standards
AA-1100	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued June 5, 2007 11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued April 20, 2021	3.B.55	No On-Board Vapor Recovery System	25,000 Vehicles / Year (Rolling 12-Month Total)

3.B.1 For Emission Point AA-000 (Facility-Wide), the permittee is subject to and shall comply with applicable requirements found in 40 CFR Part 60, Subpart MM – Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations.

(Ref.: 40 CFR 60.390(a) and (c); Subpart MM)

3.B.2 For Emission Point AA-000 (Facility-Wide), the permittee is subject to and shall comply with applicable requirements found in 40 CFR Part 63, Subpart IIII – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks.

By complying with the applicable requirements in Subpart IIII, the permittee is not required to comply with applicable requirements found in 40 CFR Part 63, Subpart MMMM – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.

(Ref.: 40 CFR 63.3081(a) and (b), Subpart IIII; 40 CFR 63.3881(d), Subpart MMMM)

3.B.3 For Emission Point AA-000 (Facility-Wide), the permittee shall not cause or allow emissions from a point source any contaminant into the ambient air of such capacity as to obscure an observer’s view to a degree in excess of ten percent (10%) opacity. This shall not apply to vision obscuration caused by uncombined water droplets.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued June 5, 2007)

3.B.4 For Emission Point AA-000 (Facility-Wide), except as otherwise specified herein, the permittee shall comply with one of the following ash / particulate matter (PM) emission limitations (as applicable):

- (a) For any process equipment that combusts fossil fuel and has a heat input of less than ten (10) million BTU (MMBTU) per hour, the permittee shall not exceed 0.6 pounds per MMBTU per hour heat input;
- (b) For any process equipment that combusts fossil fuel and has a heat input equal to / greater than 10 MMBTU per hour but less than 10,000 MMBTU per hour, the permittee shall not exceed an emission rate as determined by the following relationship:

$$E = 0.8808 (I^{-0.1667})$$

Where “*E*” is the emission rate in pounds per MMBTU per hour heat input and “*I*” is the heat input in MMBTU per hour;

- (c) From any manufacturing process (which includes any associated stacks, vents, outlets, or combination thereof), the permittee shall not exceed an emission rate determined by the following relationship in total quantities in any one (1) hour:

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

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

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

- 3.B.5 For Emission Point AA-100 (Facility-Wide Natural Gas-Fired Combustion Equipment), as applicable, the maximum discharge of sulfur dioxide (SO<sub>2</sub>) 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 per million BTU (MMBTU) heat input.

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

- 3.B.6 For Emission Point AA-100 (Facility-Wide Natural Gas-Fired Combustion Equipment), the permittee shall only combust natural gas as a fuel source for the process equipment within this emission group.

Additionally, the permittee shall implement good combustion practice standards [which shall include periodic burner maintenance] on the process equipment within this emission group to minimize the total respective emission of particulate matter / particulate matter less than 10 microns (µm) in diameter combined (PM / PM<sub>10</sub> – filterable), volatile organic compounds (VOCs), nitrogen oxides (NO<sub>x</sub>), and carbon monoxide (CO).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 – PSD BACT Standards)

- 3.B.7 For Emission Point AA-100 (Facility-Wide Natural Gas-Fired Combustion Equipment),

the permittee shall limit the total emission of the following pollutants from all process equipment within this emission group in tons per year (tpy) based on a rolling 12-month total:

Pollutant	Tons per Year
(a) PM / PM <sub>10</sub> Combined (filterable)	8.7
(b) Volatile Organic Compounds (VOCs)	6.3
(c) Nitrogen Oxides (NO <sub>x</sub> )	114.2
(d) Carbon Monoxide (CO)	95.9
(e) Sulfur Dioxide (SO <sub>2</sub> )	0.7

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007; 11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued April 20, 2021 – PSD BACT Limits)

- 3.B.8 For Emission Points AA-124 (E-Coat Curing Oven) and AA-136 (Sealer Preheat Oven), the permittee shall route emissions generated by each oven to the Electrodeposition RTO (i.e. Emission Point AA-132a).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 – PSD BACT Standard)

- 3.B.9 For Emission Points AA-127 (Topcoat Curing Oven), AA-502 (Primer-Surfacer Coating Booth), AA-503 (Topcoat Booth), and AA-504a (Paint System Curing Oven for Primer-Surfacer and Topcoat Materials), the permittee is subject to and shall comply with all applicable requirements 40 CFR Part 64 – Compliance Assurance Monitoring (CAM).

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

- 3.B.10 For Emission Points AA-127 (Topcoat Curing Oven) and AA-504 (Paint System Curing Oven for Primer-Surfacer and Topcoat Materials), the permittee shall route emissions generated by the curing oven to the Oven RTO (i.e. Emission Point AA-142a).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 – PSD BACT Standard)

- 3.B.11 For Emission Points AA-132 (Electrodeposition RTO), AA-133 (Topcoat RTO) and AA-134 (Oven RTO), the permittee shall operate each regenerative thermal oxidizer (RTO)

in such a manner as to achieve (at a minimum) ninety-five percent (95%) destruction / removal efficiency of volatile organic compounds (VOCs).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 – PSD BACT Limit)

- 3.B.12 For Emission Points AA-137 (Hot Water Boiler No. 1) and AA-138 (Hot Water Boiler No. 2), the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.

(Ref.: 40 CFR 63.7490(a)(1); Subpart DDDDD)

- 3.B.13 For Emission Point AA-200 (Facility-Wide Diesel Fuel-Fired Emergency Support Equipment), the permittee shall limit the total emission of the following pollutants from all process equipment within this emission group in tons per year (tpy) based on a rolling 12-month total:

<b>Pollutant</b>	<b>Tons per Year</b>
(a) PM / PM <sub>10</sub> Combined (filterable)	0.1
(b) Volatile Organic Compounds (VOCs)	0.3
(c) Nitrogen Oxides (NO <sub>x</sub> )	1.1
(d) Carbon Monoxide (CO)	0.7
(e) Sulfur Dioxide (SO <sub>2</sub> )	0.3

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007; 11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued April 20, 2021 – PSD BACT Limits)

- 3.B.14 For Emission Point AA-200 (Facility-Wide Diesel Fuel-Fired Emergency Support Equipment), the permittee is subject to and shall comply with applicable requirements found in 40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.

By complying with the applicable requirements of Subpart IIII, Emission Points AA-202a through AA-204a shall also demonstrate compliance with 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary

Reciprocating Internal Combustion Engines.

(Ref.: 40 CFR 60.4200(a)(2); Subpart IIII and 40 CFR 63.6590(c)(6); Subpart ZZZZ)

3.B.15 For Emission Point AA-200 (Facility-Wide Diesel Fuel-Fired Emergency Support Equipment), the permittee shall only use diesel fuel in each emergency engine that meets the following requirements (on a per-gallon basis):

- (a) A maximum sulfur content of fifteen (15) parts per million (ppm); and
- (b) A minimum cetane index of forty (40) or a maximum aromatic content of thirty-five (35) volume percent (vol.%).

(Ref.: 40 CFR 60.4207(b); Subpart IIII and 40 CFR 80.510(b); Subpart I)

3.B.16 For Emission Point AA-200 (Facility-Wide Diesel Fuel-Fired Emergency Support Equipment), any operation of an engine for any reason other than emergency operation, maintenance and testing, and operation in non-emergency situations for fifty (50) hours per year is prohibited. If an engine is not operated in accordance with Parts (a) through (c) of this condition, the engine will not be considered an emergency engine under the referenced regulation and shall meet all requirements for a corresponding non-emergency engine:

- (a) There is no time limit on the use of an engine in emergency situations.
- (b) The permittee may operate an engine for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, or the insurance company accompanied with the engine. Maintenance checks and readiness testing of an engine is limited to a maximum of one hundred (100) hours per calendar year. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing. However, a petition is not required if the permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of the engine beyond 100 hours per calendar year.
- (c) The permittee may operate an engine for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(Ref.: 40 CFR 60.4211(f)(1) – (3); Subpart IIII)

3.B.17 For Emission Points AA-201, AA-203, AA-204, and AA-205 (Emergency Generator



Engines), the permittee shall comply with the applicable emission standards (in grams per horsepower-hour) in the following table for each emergency engine:

Rated Power (HP)	Tier	Model Year <sup>1</sup>	NMHC + NO <sub>x</sub>	CO	PM
300 ≤ HP < 600	Tier 3	2006	3.0	2.6	0.15
HP > 750	Tier 2	2006	4.8	2.6	0.15

<sup>1</sup>The model years listed indicate the model years for which the specified tier of standards take effect.

Additionally, the permittee shall not discharge into the atmosphere any smoke exhaust from each emergency engine that exceeds the following opacity standards:

- (a) Twenty percent (20%) during the acceleration mode;
- (b) Fifteen percent (15%) during the lugging mode; and
- (c) Fifty percent (50%) during the peaks in either the acceleration or lugging modes.

The permittee shall operate and maintain each emergency generator engine in such a manner to achieve the referenced emission standards over the entire life of the engine.

(Ref.: 40 CFR 60.4205(b), 40 CFR 60.4202(a)(2), and 40 CFR 60.4206; Subpart IIII)

3.B.18 For Emission Point AA-202 (Emergency Fire Water Pump Engine), the permittee shall not discharge into the atmosphere any gases that contain the following pollutants in excess of the corresponding emission standards:

- (a) Non-Methane Hydrocarbons + Nitrogen Oxides (NMHC + NO<sub>x</sub>): 3.0 grams per horsepower-hour; and
- (b) Particulate Matter (PM): 0.15 grams per horsepower-hour.

The permittee shall operate / maintain the emergency fire pump engine in such a manner to achieve the referenced emission standards over the entire life of the engine.

(Ref.: 40 CFR 60.4205(c) – Table 4 and 40 CFR 60.4206; Subpart IIII)

3.B.19 For Emission Point AA-300 (Facility-Wide Bulk Liquid Storage Tanks), the permittee shall limit the total emission of volatile organic compounds (VOCs) from all liquid storage tanks to no more than 4.2 tons per year (tpy) based on a rolling 12-month total.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD

Permit to Construct issued June 5, 2007 – PSD BACT Limit)

- 3.B.20 For Emission Point AA-300 (Facility-Wide Bulk Liquid Storage Tanks), the permittee shall operate and maintain submerged fill pipes and conservation vents on each storage tank to minimize the emission of volatile organic compounds (VOCs).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 – PSD BACT Standard)

- 3.B.21 For Emission Points AA-302 (Long-Life Coolant Storage Tank) and AA-307 (Windshield Washer Fluid Storage Tank), the permittee is subject to and shall comply with applicable requirements found in 40 CFR Part 63, Subpart EEEE –National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline).

(Ref.: 40 CFR 63.2234(a); Subpart EEEE)

- 3.B.22 For Emission Point AA-309 (Unleaded Gasoline Storage Tank), the permittee shall operate and maintain a Stage 1 vapor recovery controls on the storage tank to minimize the emission of volatile organic compounds (VOCs).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 – PSD BACT Standard)

- 3.B.23 For Emission Points AA-400 (Stamping Shop, Body-Weld Shop, and Steel Center), AA-500 (Primary Paint Shop Operations), AA-800 (Miscellaneous Body Coating Operations), AA-1000 (Paint Repair Operations), and AA-1100 (Assembly Final Line Operations), the permittee shall limit the average emission of organic hazardous air pollutants (HAPs) from all adhesive and sealer materials used [excluding materials used as components of glass bonding systems] to no more than 0.010 pounds per pound of adhesive / sealer material during each month.

(Ref.: 40 CFR 63.3090(c); Subpart IIII)

- 3.B.24 For Emission Point AA-400 (Stamping Shop, Body-Weld Shop, and Steel Center), the permittee shall limit the total emission of the following pollutants from all process equipment within this emission group in tons per year (tpy) based on a rolling 12-month total:

<b>Pollutant</b>	<b>Tons per Year</b>
(a) PM / PM <sub>10</sub> Combined (filterable)	1.8
(b) Volatile Organic Compounds (VOCs)	58.0

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007; 11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued April 20, 2021 – PSD BACT Limits)

- 3.B.25 For Emission Point AA-400 (Stamping Shop, Body-Weld Shop, and Steel Center), the permittee shall operate and maintain a dry filtration system **and** utilize good operating / work practice and maintenance standards to minimize the emission of particulate matter (PM) and particulate matter less than 10 µm in diameter (PM<sub>10</sub>).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 – PSD BACT Standards)

- 3.B.26 For Emission Point AA-400 (Stamping Shop, Body-Weld Shop, and Steel Center), the permittee shall utilize resistance welding and filtration on the metal inert gas (MIG) welding operations to minimize the emission of particulate matter (PM) and particulate matter less than 10 µm in diameter (PM<sub>10</sub>).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued June 5, 2007)

- 3.B.27 For Emission Point AA-401 (Drawing Oil Stamping Shop and Steel Center), the permittee shall use low-VOC content materials when technically feasible for minimizing volatile organic compound (VOC) emissions.

The permittee may use materials with alternative VOC contents when technically feasible, but this shall not exempt the permittee from complying with Condition 3.B.24.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 – PSD BACT Limit)

- 3.B.28 For Emission Points AA-500 (Primary Paint Shop Operations), AA-700 (Miscellaneous Metal Coating Process Operations), AA-800 (Miscellaneous Body Coating Operations), AA-1000 (Paint Repair Operations), and AA-1100 (Assembly Final Line Operations), the permittee shall comply with one of the following organic hazardous air pollutant (HAP) emission limitations (**contingent** upon the requirements outlined in Condition 3.B.30):

- (a) The permittee shall limit the combined organic HAPs emitted to the atmosphere from electrodeposition primer application, primer-surfacer application, topcoat application, final repair operations, glass bonding primer application, glass bonding adhesive operation, and any other miscellaneous coating and thinner application [excluding the application of deadener materials and adhesive / sealer materials that are not components of glass bonding operations] to no more than 0.30 pounds per gallon of applied coating solids (GACS) during each month; or

- (b) The permittee shall limit the combined organic HAPs emitted to the atmosphere from primer-surfurcer application, topcoat application, final repair operations glass bonding primer application, glass bonding adhesive operation, and any other miscellaneous coating and thinner application [excluding the application of deadener materials and adhesive / sealer materials that are not components of glass bonding operations] to no more than 0.50 pounds per gallon of applied coating solids (GACS) during each month.

(Ref.: 40 CFR 63.3090(a) and (b); Subpart III)

3.B.29 For Emission Points AA-500 (Primary Paint Shop Operations), AA-700 (Miscellaneous Metal Coating Process Operations), AA-800 (Miscellaneous Body Coating Operations), AA-1000 (Paint Repair Operations), and AA-1100 (Assembly Final Line Operations), the permittee shall comply with the following operating limitations (as applicable)::

- (a) The permittee is not required to meet any operating limitations specified herein for any coating operation(s) without add-on controls nor any operating limitations specified herein for any coating operation(s) that do not utilize emission capture systems and add-on controls to comply with emission limitations specified in Condition 3.B.28.
- (b) For any controlled coating operation(s), the permittee shall adhere to the following operating limitations at all times (as applicable):
  - (1) *Regenerative thermal oxidizer (RTO)*: The average combustion temperature in any 3-hour period must not fall below the combustion temperature limitation established in accordance with Condition 5.B.19.
  - (2) *Emission capture system that is a permanent total enclosure (PTE)*: The direction of the air flow at all times must be into the enclosure, and either:
    - (i) The average facial velocity of air through all natural draft openings in the enclosure must be at least two hundred (200) feet per minute; or
    - (ii) The pressure drop across the enclosure must be at least 0.007 inches water, as established by EPA Test Method 204 in Appendix M of 40 CFR Part 51.
  - (3) *Emission capture system that is not a PTE*: The average gas volumetric flow rate or duct static pressure in each duct between a capture device and the RTO inlet in any 3-hour period must not fall below the average volumetric flow rate or the duct static pressure limitation established in accordance with Condition 5.B.9.
- (c) If the permittee chooses to simultaneously meet the emission limitations outlined in Condition 3.B.28(b) and 3.B.30(b), the permittee shall adhere to the operating

limitations outlined in Part (b) of this condition (as applicable).

- (d) If the permittee uses an add-on control device that is not listed in Table 1 of 40 CFR Part 63 – Subpart IIII or wishes to monitor an alternative parameter and comply with a different operating limit, the permittee shall apply to the MDEQ for approval of alternative monitoring under 40 CFR 63.8(f); Subpart A.

(Ref.: 40 CFR 63.3100(b) and 63.3093; Subpart IIII)

3.B.30 For Emission Points AA-500 (Primary Paint Shop Operations), if the electrodeposition primer system meets one of the following requirements, the permittee may choose to comply with the organic hazardous air pollutant (HAP) emission limitation specified in Condition 3.B.28(b) in lieu of the emission limitation specified in Condition 3.B.28(a):

- (a) Each individual material added to the electrodeposition primer system contains no more than the following organic HAP concentrations:
  - (1) 1.0 percent by weight of any organic HAP; and
  - (2) 0.10 percent by weight of any organic HAP that is listed on Table 5 of 40 CFR Part 63 – Subpart IIII.
- (b) Emissions from all bake ovens used to cure electrodeposition primers shall be captured and ducted to a control device that has a destruction efficiency of at least ninety-five percent (95%).

(Ref.: 40 CFR 63.3092; Subpart IIII)

3.B.31 For Emission Point AA-500 (Primary Paint Shop Operations), the permittee shall limit the total emission of the following pollutants from all process equipment within this emission group in tons per year (tpy) based on a rolling 12-month total:

Pollutant	Tons per Year
(a) PM / PM <sub>10</sub> Combined (filterable)	10.7
(b) Volatile Organic Compounds (VOCs)	319.7

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007; 11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued April 20, 2021 – PSD BACT Limits)

3.B.32 For Emission Point AA-500 (Primary Paint Shop Operations), the permittee shall not discharge into the atmosphere from any coating operation listed below volatile organic

compound (VOC) emissions in excess of the specified limitation:

- (a) *Electrodeposition (EDP) prime coat operation*: 0.17 kilograms of VOC per liter of applied coating solids (or 1.42 pounds per gallon);
- (b) *Non-EDP prime coat operation*: 0.17 kilograms of VOC per liter of applied coating solids (or 1.42 pounds per gallon);
- (c) *Guide coat operation*: 1.40 kilograms of VOC per liter of applied coating solids (or 11.68 pounds per gallon); and
- (d) *Top coat Operation*: 1.47 kilograms of VOC per liter of applied coating solids (or 12.27 pounds per gallon).

(Ref.: 40 CFR 60.392; Subpart MM)

- 3.B.33 For Emission Point AA-501 (Body E-Coat Dip Tank), the permittee shall utilize the dip tank coating application method to minimize the emission of particulate matter (PM) and particulate matter less than 10  $\mu\text{m}$  in diameter ( $\text{PM}_{10}$ ).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 – PSD BACT Standard)

- 3.B.34 For Emission Point AA-501 (Body E-Coat Dip Tank), the permittee shall limit the emission of volatile organic compounds (VOCs) from the dip tank to no more than 0.13 pounds per gallon of applied coating solids (GACS).

Additionally, the permittee shall use “*waterborne materials*” [i.e. a material that contains more than five (5) weight percent (wt.%) water in the volatile fraction] and the dip tank coating application method to minimize the emission of VOCs.

(Ref.: 40 CFR 60.391(a); Subpart MM – “*Waterborne*”)

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 – PSD BACT Limit and PSD BACT Standard)

- 3.B.35 For Emission Points AA-502 (Primer-Surfacer Coating Booth) and AA-503 (Top Coating Booth), the permittee shall operate and maintain wet scrubbers in the spray application areas to minimize the emission of particulate matter (PM) and particulate matter less than 10  $\mu\text{m}$  in diameter ( $\text{PM}_{10}$ ).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 and modified April 12, 2013 – PSD BACT Standard)

- 3.B.36 For Emission Points AA-502 (Primer-Surfacer Coating Booth) and AA-503 (Topcoat Booth), the permittee shall limit the overall emission of volatile organic compounds

(VOCs) from the coating operations to no more than 4.8 pounds per gallon of applied coating solids (GACS).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 – PSD BACT Limit)

- 3.B.37 For Emission Points AA-502 (Primer-Surfacer Coating Booth) and AA-503 (Top Coat Booth), the permittee shall route the exhaust from the primer-surfacer / base coat-heated flash zones and clear coat exterior spray application zone to the Topcoat RTO (i.e. Emission Point AA-133a).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 and modified March 11, 2011 – PSD BACT Standard)

- 3.B.38 For Emission Point AA-600 (Slush Molding Operations), the permittee shall limit the total emission of volatile organic compounds (VOCs) to no more than 3.3 tons per year (tpy) based on a rolling 12-month total.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 – PSD BACT Limit)

- 3.B.39 For Emission Point AA-700 (Miscellaneous Metal Coating Process Operations), the permittee shall limit the total emission of the following pollutants from all process equipment within this emission group in tons per year (tpy) based on a rolling 12-month total:

Pollutant	Tons per Year
(a) PM / PM <sub>10</sub> Combined (filterable)	0.1
(b) Volatile Organic Compounds (VOCs)	6.0

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007; 11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued April 20, 2021 – PSD BACT Limits)

- 3.B.40 For Emission Point AA-700 (Miscellaneous Metal Coating Process Operations), the permittee shall operate and maintain dry filtration systems to minimize the emission of particulate matter (PM) and particulate matter less than 10 µm in diameter (PM<sub>10</sub>).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 – PSD BACT Standard)

- 3.B.41 For Emission Point AA-700 (Miscellaneous Metal Coating Process Operations), the permittee shall use low-VOC content materials when technically feasible for minimizing volatile organic compound (VOC) emissions.

The permittee may use materials that contain alternative VOC contents when technically feasible, but this shall not exempt the permittee from complying with Condition 3.B.39(b).

Additionally, the permittee shall use good operating / work practice standards [which shall include complying with the work practice standards specified in Condition 3.D.4] to minimize the emission of VOCs.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007; 11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued April 20, 2021 – PSD BACT Limit and PSD BACT Standard)

- 3.B.42 For Emission Point AA-800 (Miscellaneous Body Coating Operations), the permittee shall limit the total emission of the following pollutants from the process equipment within this emission group in tons per year (tpy) based on a rolling 12-month total:

Pollutant	Tons per Year
(a) PM / PM <sub>10</sub> Combined (filterable)	2.8
(b) Volatile Organic Compounds (VOCs)	68.89

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007; 11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued April 20, 2021 and modified June 25, 2025 – PSD BACT Limits)

- 3.B.43 For Emission Point AA-800 (Miscellaneous Body Coating Operations), the permittee shall operate and maintain dry filtration system to minimize the emission of particulate matter (PM) and particulate matter less than 10 µm in diameter (PM<sub>10</sub>).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 – PSD BACT Standard)

- 3.B.44 For Emission Point AA-800 (Miscellaneous Body Coating Operations), the permittee shall limit the total emission of volatile organic compounds (VOCs) from all sealers, adhesives, and undercoat materials applied to no more than 0.3 pounds per gallon.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD



Permit to Construct issued June 5, 2007 – PSD BACT Limit)

- 3.B.45 For Emission Point AA-800 (Miscellaneous Body Coating Operations), the permittee shall use low-VOC content materials when technically feasible for minimizing volatile organic compound (VOC) emissions.

The permittee may use materials that contain alternative VOC content materials when technically feasible, but this shall not exempt the permittee from complying with Condition 3.B.42(b).

Additionally, the permittee shall use good operating / work practice standards [which shall include complying with the work practice standards specified in Condition 3.D.4] to minimize the emission of VOCs.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007; 11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued April 20, 2021 – PSD BACT Limit and PSD BACT Standard)

- 3.B.46 For Emission Point AA-801 (Sealer and Sound Dampener Application), the permittee shall limit the emission of organic hazardous air pollutants (HAPs) from all deadener materials applied to no more than 0.010 pounds per pound of deadener material during each month.

(Ref.: 40 CFR 63.3090(d); Subpart IIII)

- 3.B.47 For Emission Point AA-900 (Miscellaneous Process Cleaning Operations), the permittee shall limit the emission of volatile organic compounds (VOCs) to no more than 243.6 tons per year (tpy) based on a rolling 12-month total.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007; 11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued April 20, 2021 – PSD BACT Limit)

- 3.B.48 For Emission Point AA-900 (Miscellaneous Process Cleaning Operations), the permittee shall use low-VOC content cleaners when technically feasible for minimizing volatile organic compound (VOC) emissions.

The permittee may use cleaners that contain alternative VOC contents when technically feasible, but this shall not exempt the permittee from complying with Condition 3.B.47.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 – PSD BACT Limit)

- 3.B.49 For Emission Point AA-900 (Miscellaneous Process Cleaning Operations), the permittee shall utilize good work practice standards [which shall include complying with the work

practice standards specified in Condition 3.D.5] **and** operate / maintain a purge solvent recovery system on the body clear-coat system to minimize the emission of volatile organic compounds (VOCs).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007; 11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued April 20, 2021 – PSD BACT Standards)

- 3.B.50 For Emission Point AA-1000 (Paint Repair Operations), the permittee shall limit the total emission of the following pollutants from all process equipment within this emission group in tons per year (tpy) based on a rolling 12-month total:

Pollutant	Tons per Year
(a) PM / PM <sub>10</sub> Combined (filterable)	0.1
(b) Volatile Organic Compounds (VOCs)	3.3

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007; 11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued April 20, 2021 – PSD BACT Limits)

- 3.B.51 For Emission Point AA-1000 (Paint Repair Operations), the permittee shall utilize a particulate filtration system to minimize the emission of particulate matter (PM) and particulate matter less than 10 µm in diameter (PM<sub>10</sub>).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 – PSD BACT Standard)

- 3.B.52 For Emission Point AA-1100 (Assembly Final Line Operations), the permittee shall limit the total emission of the following pollutants from all process equipment within this emission group in tons per year (tpy) based on a rolling 12-month total:

Pollutant	Tons per Year
(a) PM / PM <sub>10</sub> Combined (filterable)	0.1
(b) Volatile Organic Compounds (VOCs)	41.7
(c) Nitrogen Oxides (NO <sub>x</sub> )	1.5

(d) Carbon Monoxide (CO)	6.7
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(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007; 11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued April 20, 2021 – PSD BACT Limits)

- 3.B.53 For Emission Point AA-1100 (Assembly Final Line Operations), the permittee shall use low-VOC content materials when technically feasible for minimizing volatile organic compound (VOC) emissions.

The permittee may use materials that contain alternative VOC contents when technically feasible, but this shall not exempt the permittee from complying with Condition 3.B.52(b).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 – PSD BACT Limit)

- 3.B.54 For Emission Point AA-1100 (Assembly Final Line Operations), the permittee shall utilize good work practice standards to minimize the respective emission of volatile organic compounds (VOCs), particulate matter (PM), particulate matter less than 10  $\mu\text{m}$  in diameter ( $\text{PM}_{10}$ ), nitrogen oxides ( $\text{NO}_x$ ), and carbon monoxide (CO).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007 – PSD BACT Standard)

- 3.B.55 For Emission Point AA-1100 (Assembly Final Line Operations), the permittee shall limit the quantity of manufactured vehicles not equipped with an on-board vapor recovery system to no more than 25,000 per year based on a rolling 12-month total.

However, adherence to the aforementioned vehicle limitation shall not exempt the permittee from complying with the VOC limitation specified in Condition 3.B.52(b).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued June 5, 2007; 11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued April 20, 2021)

C. INSIGNIFICANT AND TRIVIAL ACTIVITY EMISSION LIMITATIONS & STANDARDS

Applicable Requirement(s)	Condition Number	Pollutant(s) / Parameter(s)	Limit(s) / Standard(s)
11 Miss. Admin. Code Pt. 2, R. 1.3.D.(1)(a).	3.C.1	PM	0.6 Pounds / MMBTU
11 Miss. Admin. Code Pt. 2, R. 1.3.D.(1)(b).	3.C.2		$E = 0.8808 (I^{-0.1667})$
11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.C.3	SO <sub>2</sub>	4.8 Pounds / MMBTU

- 3.C.1 The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU (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.3 The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations equal to or greater than 10 million BTU (MMBTU) per hour heat input but less than 10,000 MMBTU per hour heat input shall not exceed an emission rate as determined by the following relationship:

$$E = 0.8808 (I^{-0.1667})$$

Where “*E*” is the emission rate in pounds per MMBTU per hour heat input and “*I*” is the heat input in MMBTU per hour.

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

- 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 or SO<sub>2</sub>) per million BTU heat input.

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

**D. WORK PRACTICE STANDARDS**

<b>Emission Point(s)</b>	<b>Applicable Requirement(s)</b>	<b>Condition Number</b>	<b>Pollutant(s) / Parameter(s)</b>	<b>Work Practice Standard(s)</b>
AA-000	40 CFR 63.3100(d); Subpart IIII	3.D.1	HAPs (organic)	General Duty Clause
AA-137 AA-138	40 CFR 63.7540(a)(10), (12), and (13); Subpart DDDDD	3.D.2	HAPs CO	Conduct Routine Tune-Ups
AA-200	40 CFR 60.4211(a); Subpart IIII	3.D.3	NMHC + NO <sub>x</sub> CO PM	Best Management Practices
AA-500 AA-700 AA-800 AA-1000 AA-1100	40 CFR 63.3094(b), (e), and (f); Subpart IIII	3.D.4	HAPs (organic)	Minimize Emissions from the Storage, Mixing, and Conveying of Coatings, Thinners, and Cleaning Materials
AA-900	40 CFR 63.3094(c), (e), and (f); Subpart IIII	3.D.5		Minimize Emissions from the Cleaning and Purging of Equipment Associated with Coating Operations
AA-1000	Federally Enforceable PSD Construction Permit Issued on June 5, 2007  11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued April 20, 2021	3.D.6	VOCs	Good Application Techniques

3.D.1 For Emission Point AA-000 (Facility-Wide), the permittee shall operate and maintain any applicable emission source (including associated air pollution control equipment and monitoring equipment) in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times.

The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. The determination of whether an emission source 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 affected source.

(Ref.: 40 CFR 63.3100(d); Subpart IIII)

3.D.2 For Emission Points AA-137 (Hot Water Boiler No. 1) and AA-138 (Hot Water Boiler No. 2), the permittee shall conduct a tune-up of each boiler once every five (5) years in accordance with the following specifications:

- (a) Inspect the burner (as applicable) and clean or replace any components of the burner as necessary. The permittee may delay the burner inspection specified until the next scheduled or unscheduled unit shutdown, but the permittee must inspect each burner at least once every seventy-two (72) months.

At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspection, inspections are required only during planned entries into the storage vessel or process equipment.

- (b) Inspect the flame pattern (as applicable) and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications (if available).
- (c) Inspect the system controlling the air-to-fuel ratio (as applicable) and ensure that it is correctly calibrated and functioning properly. The permittee may delay the inspection until the next scheduled unit shutdown.
- (d) Optimize the total emission of carbon monoxide (CO). This optimization should be consistent with the manufacturer's specifications (if available) and with any nitrogen oxides (NO<sub>x</sub>) requirement to which the unit is subject.
- (e) Measure the concentrations in the effluent stream of CO in parts per million (by volume) and oxygen in volume percent before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.

Additionally, the permittee shall maintain the following information for each boiler tune-up conducted:

- (f) The concentrations of CO in the effluent stream in parts per million by volume and oxygen in volume percent, measured at high fire or the typical operating load, before and after the tune-up of a boiler;
- (g) A description of any corrective actions taken as a part of the tune-up; and
- (h) The type and amount of fuel used over the twelve (12) months prior to the tune-up, but only if the boiler was physically and legally capable of using more than one (1) type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each boiler.

If a boiler is not operating on the required date for a tune-up, the tune-up shall be conducted within thirty (30) calendar days of start-up.

(Ref.: 40 CFR 63.7540(a)(10), (12), and (13); Subpart DDDDD)

3.D.3 For Emission Point AA-200 (Facility-Wide Diesel Fuel-Fired Emergency Support Equipment), the permittee shall adhere to the following practices:

- (a) Operate and maintain each engine and control device (if any) according to the manufacturer's emission-related written instructions;
- (b) Change only those emission-related settings that are permitted by the manufacturer; and
- (c) Meet the requirements of 40 CFR Parts 89, 94, and/or 1068 (as applicable).

(Ref.: 40 CFR 60.4211(a); Subpart IIII)

3.D.4 For Emission Points AA-500 (Primary Paint Shop Operations), AA-700 (Miscellaneous Metal Coating Process Operations), AA-800 (Miscellaneous Body Coating Operations), AA-1000 (Paint Repair Operations), and AA-1100 (Assembly Final Line Operations), the permittee shall implement a work practice plan to minimize the emission of organic hazardous air pollutants (HAPs) from the storage, mixing, and conveying of coatings, thinners, and cleaning materials used in all applicable coating operations (including all generated waste materials).

The plan shall specify practices and procedures to ensure that the following provisions (at a minimum) are implemented:

- (a) All organic-HAP-containing coatings, thinners, cleaning materials, and waste materials must be stored in closed containers.
- (b) The risk of spills of organic-HAP-containing coatings, thinners, cleaning materials, and waste materials must be minimized.
- (c) Organic-HAP-containing coatings, thinners, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.
- (d) Mixing vessels (other than day tanks equipped with continuous agitation systems) that contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.
- (e) The emission of organic HAPs must be minimized during cleaning of storage, mixing, and conveying equipment.

The permittee shall maintain the current work practice plan on-site as well any iteration of the plan developed within the preceding five (5) years. Additionally, the permittee shall make all iterations available to the MDEQ for inspection and copying. Any revisions to this work practice plan shall not necessitate a revision of this permit.

The permittee shall comply with the specified work practice standards at all times.

(Ref.: 40 CFR 63.3100(c) and 63.3094(b), (e) – (f); Subpart IIII)

- 3.D.5 For Emission Point AA-900 (Miscellaneous Process Cleaning Operations), the permittee shall implement a work practice plan to minimize the emission of organic HAPs from the cleaning and purging of equipment associated with all applicable coating operations.

The overall plan shall address each of the following operations (at a minimum) in which organic-HAP-containing materials are used or in which there is a potential for the emission of organic HAPs:

- (a) The plan shall address vehicle body wipe emissions through one or more of following the techniques (or an approved alternative):
  - (1) Use of solvent-moistened wipes;
  - (2) Keeping solvent containers closed when not in use;
  - (3) Keeping wipe disposal/recovery containers closed when not in use;
  - (4) Use of tack-wipes; or
  - (5) Use of solvents containing less than 1 percent (1%) organic HAP by weight.
- (b) The plan shall address coating line purging emissions through one or more of the following techniques (or an approved alternative):
  - (1) Air / solvent push-out;
  - (2) Capture and reclaim or recovery of purge materials (excluding applicator nozzles/tips);
  - (3) Block painting to the maximum extent feasible; or
  - (4) Use of low-HAP or no-HAP solvents for purge.
- (c) The plan shall address emissions from the flushing of coating systems through one or more of the following techniques (or an approved alternative):
  - (1) Keeping solvent tanks closed;



- (2) Recovering and recycling solvents;
  - (3) Keeping recovered / recycled solvent tanks closed; or
  - (4) Use of low-HAP or no-HAP solvents.
- (d) The plan shall address emissions from the cleaning of spray booth grates through one or more of the following techniques (or an approved alternative):
- (1) Controlled burn-off;
  - (2) Rinsing with high-pressure water (in place);
  - (3) Rinsing with high-pressure water (off-line);
  - (4) Use of spray-on masking or other type of liquid masking; or
  - (5) Use of low-HAP or no-HAP content cleaners.
- (e) The plan shall address emissions from the cleaning of spray booth walls through one or more of the following techniques (or an approved alternative):
- (1) Use of masking materials (contact paper, plastic sheet, or other similar type of material);
  - (2) Use of spray-on masking;
  - (3) Use of rags and manual wipes instead of spray application when cleaning walls;
  - (4) Use of low-HAP or no-HAP content cleaners; or
  - (5) Controlled access to cleaning solvents.
- (f) The plan shall address emissions from the cleaning of spray booth equipment through one or more of the following techniques:
- (1) Use of covers on equipment (disposable or reusable);
  - (2) Use of parts cleaners (off-line submersion cleaning);
  - (3) Use of spray-on masking or other protective coatings;
  - (4) Use of low-HAP or no-HAP content cleaners; or

- (5) Controlled access to cleaning solvents.
- (g) The plan shall address emissions from the cleaning of external spray booth areas through one or more of the following techniques (or an approved alternative):
  - (1) Use of removable floor coverings (paper, foil, plastic, or similar type of material);
  - (2) Use of manual and/or mechanical scrubbers, rags, or wipes instead of spray application;
  - (3) Use of shoe cleaners to eliminate coating track-out from spray booths;
  - (4) Use of booties or shoe wraps;
  - (5) Use of low-HAP or no-HAP content cleaners; or
  - (6) Controlled access to cleaning solvents.
- (h) The plan shall address emissions from any housekeeping measures not mentioned in Parts (a) through (g) of this condition through one or more of the following techniques (or an approved alternative):
  - (1) Keep solvent-laden articles (cloths, paper, plastic, rags, wipes, and similar items) in covered containers when not in use;
  - (2) Store new and used solvents in closed containers; or
  - (3) Transfer solvents in a manner to minimize the risk of spills.

The permittee shall maintain both a current iteration of the work practice plan on-site and any iteration developed within the preceding five (5) years. Additionally, the permittee shall make all iterations available to the MDEQ for inspection and copying. Any revisions to the overall work practice plan shall not necessitate a revision of this permit.

The permittee shall comply with the specified work practice standards at all times

(Ref.: 40 CFR 63.3100(c) and 63.3094(c), (e) – (f); Subpart IIII)

- 3.D.6 For Emission Point AA-1000 (Paint Repair Operations), the permittee shall utilize good application techniques to minimize the emission of volatile organic compounds (VOCs), which shall include (but is not limited to) one of the following practices:
- (a) The manual application of repair materials; or
  - (b) Minimize the excessive use or spillage of any final repair material.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued June 5, 2007; 11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued April 20, 2021)

## **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<sup>st</sup> for the preceding calendar year. Each compliance certification shall include the following:
- (a) The identification of each term or condition of the permit that is the basis of the certification;
  - (b) The compliance status;
  - (c) Whether compliance was continuous or intermittent;
  - (d) The method(s) used for determining the compliance status of the source, currently and over the applicable reporting period; and
  - (e) Such other facts as may be specified as pertinent in specific conditions elsewhere in this permit.

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

## **SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS**

### **A. GENERAL MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS**

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

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

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

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

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

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

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

5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31<sup>st</sup> and January 31<sup>st</sup> 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 6, Rule 6.2.E.

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

5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such

deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) days of the time the deviation began.

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

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

**B. SPECIFIC MONITORING AND RECORDKEEPING REQUIREMENTS**

<b>Emission Point(s)</b>	<b>Applicable Requirement(s)</b>	<b>Condition Number</b>	<b>Pollutant(s) / Parameter(s)</b>	<b>Monitoring / Recordkeeping Requirement(s)</b>
AA-000	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.1	Opacity	Perform and Record Weekly Visible Emission Observations
		5.B.2	PM / PM <sub>10</sub> VOCs	Perform and Record Monthly Inspections of Air Pollution Control Equipment
		5.B.3	PM / PM <sub>10</sub> VOCs CO NO <sub>x</sub>	Develop / Implement a Work Practices and Standards Plan
		5.B.4	Vehicle Throughput	Monitor and Record the Quantity of Vehicles Manufactured (Monthly and Rolling 12-Month Total)
		5.B.5	PM / PM <sub>10</sub> (filterable) SO <sub>2</sub>	Calculate and Record Emissions from All Process Equipment in Each Emission Group (Monthly and Rolling 12-Month Totals)
		5.B.6	NO <sub>x</sub> CO VOCs	Monitor and Record the Overall Volume of Natural Gas Combusted (Monthly)
AA-124 AA-127 AA-136 AA-500	40 CFR 63.3130(i) and (j); Subpart III	5.B.7	HAPs	Determine Efficiency of Emissions Capture System
	40 CFR 63.3168(g)(1)(ii – iv) and (2)(ii – vi); Subpart III	5.B.8	Volumetric Flow Rate Pressure Drop	Calibrate, Maintain, and Operate a Continuous Monitoring Device
	40 CFR 63.3167(f); Subpart III	5.B.9	HAPs (organic)	Establish an Average Minimum Gas Volumetric Flow Rate or Duct Static Pressure
	40 CFR 63.3093; Subpart III – Table 1, Items 6 and 7	5.B.10	Volumetric Flow Rate Pressure Drop	Monitor and Record Applicable Operating Parameter
	40 CFR 63.3168(b)(1) and (2); Subpart III	5.B.11	HAPs (organic)	Bypass Monitoring Requirements

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant(s) / Parameter(s)	Monitoring / Recordkeeping Requirement(s)
AA-127 AA-502 AA-503 AA-504	40 CFR 64.7(b) and (c), CAM	5.B.12	Operation & Maintenance	Operation and Maintenance Requirements for Monitoring System(s)
	40 CFR 64.7(d), CAM	5.B.13	Corrective Action	Perform Corrective Action Response to an Excursion / Exceedance of CAM Indicator
	40 CFR 64.8, CAM	5.B.14	QIP	Develop a Quality Improvement Plan (QIP) (Upon Request)
	40 CFR 64.9(b), CAM	5.B.15	CAM Records	Record and Maintain CAM Records (As Specified)
	40 CFR 64.3(a) and (b), 64.6(c), CAM	5.B.16	Combustion Chamber Temperature	CAM Requirements: Continuous Temperature Monitoring of RTO
AA-132 AA-133 AA-134	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). 40 CFR 63.3130(k)(2), 63.3160(c), 63.3164 and 63.3166; Subpart III	5.B.17	VOCs HAPs (organic)	Performance Test Requirements
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). 40 CFR 60.934; Subpart MM 40 CFR 63.3168(v) – (vii); Subpart III	5.B.18	Combustion Chamber Temperature	Calibrate, Maintain, and Operate a Continuous Monitoring System
	40 CFR 63.3167(a); Subpart III 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.19	VOCs HAPs (organic)	Establish a Minimum Combustion Chamber Temperature for Each RTO
	40 CFR 63.3093; Subpart III – Table 1, Item 1 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.20	Combustion Chamber Temperature	Monitor and Record the Combustion Chamber Temperature for Each RTO (3-Hour Block Average)
AA-200	40 CFR 60.4214(d)(vii); Subpart III 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.21	Hours of Operation	Record Hours of Emergency and Non-Emergency Service (Monthly)



Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant(s) / Parameter(s)	Monitoring / Recordkeeping Requirement(s)
AA-200	40 CFR 60.4211(c); Subpart III 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.22	NMHC + NO <sub>x</sub>  CO  PM  Opacity (Smoke)	Maintain Documentation Indicating Engine Certification
	40 CFR 60.4211(g)(2) and (3); Subpart III	5.B.23	Manufacturer Specifications	Compliance Demonstration Actions (if Engine is Not Installed, Operated, or Maintained According to Specifications)
AA-400 AA-700 AA-800 AA-900 AA-1000 AA-1100	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.24	VOCs  PM / PM <sub>10</sub>	Monitor and Record Usage Data / Specifications on Materials
AA-400 AA-500 AA-700 AA-800 AA-1000 AA-1100	40 CFR 63.3161, 63.3171(d), and 63.3173(a) – (b); Subpart III	5.B.25	HAPs (organic)	Calculate the Organic HAP Emission Rate of Each Applicable Material Group (Monthly)
AA-500	40 CFR 60.393(c); Subpart MM 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.26	VOCs	Calculate Pounds Emitted per GACS from Each Applicable Coating Operation (Monthly)
AA-501	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.27	Material Specifications	Maintain Documentation Indicating a Waterborne Material
AA-502 AA-503	40 CFR 64.3(a) and (b), 64.6(c), CAM	5.B.28	Liquid Flow Rate	CAM Requirements: Daily Monitoring of Wet Scrubbers
AA-1100	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.29	VOCs	Record the Quantity of Manufactured Vehicles with No On-Board Vapor Recovery System (Monthly and Rolling 12-Month Total)

5.B.1 For Emission Point AA-000 (Facility-Wide), the permittee shall have an individual certified in EPA Test Method 9 perform and record a weekly visible emission observation in accordance with EPA Test Method 22 at applicable stacks, vents, and/or exhaust points emitting to the atmosphere.

If visible emissions are detected during an observation, a visible emission evaluation (VEE) in accordance with Method 9 shall then be performed. In the event that a VEE

required but is not performed accordingly, the permittee shall document an explanation as to why it was not possible to perform the Method 9 testing.

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

- 5.B.2 For Emission Point AA-000 (Facility-Wide), the permittee shall perform and record a monthly inspection of any air pollution control equipment specified as a “PSD BACT Standard” within Section 3.B. of this permit. The inspection shall include (at a minimum) any preventative maintenance and/or calibrations performed as to maintain the proper operation of the equipment and any applicable monitoring devices.

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

- 5.B.3 For Emission Point AA-000 (Facility-Wide), the permittee shall develop, implement, and maintain a “Work Practices and Maintenance Standards Plan” that details the techniques, operating practices, work practice standards, and/or maintenance standards used to minimize the respective emission of particulate matter / particulate matter less than 10  $\mu\text{m}$  in diameter combined (PM / PM<sub>10</sub>), volatile organic compounds (VOCs), carbon monoxide (CO), and nitrogen oxides (NO<sub>x</sub>) from applicable process equipment within corresponding emission groups.

The permittee may incorporate the work practice plans required by Conditions 3.D.3 through 3.D.6 to outline any techniques, practices, and/or standards used within an emission group (as applicable).

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

- 5.B.4 For Emission Point AA-000 (Facility-Wide), the permittee shall monitor and record the quantity of vehicles manufactured both on a monthly basis and on a rolling 12-month total basis.

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

- 5.B.5 For Emission Point AA-000 (Facility-Wide), the permittee shall demonstrate compliance with the limitations specified in Conditions 3.B.7, 3.B.13, 3.B.19, 3.B.24, 3.B.31, 3.B.38, 3.B.39, 3.B.42, 3.B.47, 3.B.50, and 3.B.52 by calculating and recording the total respective emission of particulate matter / particulate matter less than 10  $\mu\text{m}$  in diameter combined (PM / PM<sub>10</sub> – filterable), volatile organic compounds (VOCs), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), and/or sulfur dioxide (SO<sub>2</sub>) from all process equipment within each corresponding emission group in tons both on a monthly basis and on a rolling 12-month total basis.

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

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

- 5.B.6 For Emission Points AA-000 (Facility-Wide Natural Gas-Fired Combustion Equipment), the permittee shall monitor and record the overall volume (in cubic feet) of natural gas combusted within all process equipment within the emission group monthly.

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

- 5.B.7 For Emission Points AA-124 (E-Coat Curing Oven), AA-127 (Topcoat Curing Oven), AA-136 (Sealer Preheat Oven), and AA-500 (Primary Paint Shop Operations), the permittee shall determine the efficiency of an emissions capture system in accordance with the provisions below (as applicable).

The permittee may use lightweight strips of fabric or paper, or smoke tubes to make such demonstrations as part of showing that your capture system is a PTE or conducting a capture efficiency test using a temporary total enclosure. However, the permittee cannot count air flowing from a spray booth air seal into a spray booth as air flowing through a natural draft opening into a PTE or into a temporary total enclosure unless you elect to treat that spray booth air seal as a natural draft opening. The permittee cannot count air flowing from a bake oven air seal into a bake oven as air flowing through a natural draft opening into a PTE or into a temporary total enclosure unless you elect to treat that bake oven air seal as a natural draft opening.

- (a) The permittee may assume that the emissions capture system efficiency is one hundred percent (100%) if both of the following criteria are met:
- (1) The capture system meets the criteria specified in EPA Test Method 204 (in Appendix M of 40 CFR Part 51) for a permanent total enclosure and directs all the exhaust gases from the enclosure to the regenerative thermal oxidizer (RTO); and
  - (2) All coatings and thinners used in the coating operation, the coating solvent flash-off, the coating curing, and the drying are applied / occurs within the capture system. This specific criterion is **not** met if (for example) parts enter the open shop environment when being moved between a spray booth and a curing oven.

The permittee shall maintain the data and documentation used to support the determination that the capture system meets the criteria outlined in EPA Test Method 204 for a PTE and has a 100% capture efficiency.

- (b) If the emissions capture system does not meet all of the criteria found in Part (a) of this condition, the permittee must use the specifications and one of five procedures specified in 40 CFR 63.3165(b) – (g); Subpart IIII to measure the capture efficiency.

The permittee shall maintain the data and documentation used to determine the capture efficiency in accordance with the specified procedures. Additionally, the permittee shall maintain applicable records as specified by 40 CFR 63.3130(j)(1) – (4); Subpart III.

(Ref.: 40 CFR 63.3130(i) – (j) and 63.3165; Subpart III)

5.B.8 For Emission Points AA-124 (E-Coat Curing Oven), AA-127 (Topcoat Curing Oven), AA-136 (Sealer Preheat Oven), and AA-500 (Primary Paint Shop Operations), the permittee shall calibrate, maintain, and operate a continuous monitoring device for each emissions capture system in accordance with the following specifications (as applicable):

(a) For each flow measurement device:

- (1) Locate a flow sensor in a position that provides a representative flow measurement in the duct from each capture device in the emissions capture system to the regenerative thermal oxidizer (RTO);
- (2) Reduce swirling flow or abnormal velocity distributions due to upstream and downstream disturbances;
- (3) Conduct a flow sensor calibration check at least semi-annually; and
- (4) Inspect components for integrity, electrical connections for continuity, and mechanical connections for leakage at least monthly.

(b) For each pressure drop measurement device:

- (1) Locate the pressure tap(s) in a position that provides a representative measurement of the pressure drop across each opening being monitored;
- (2) Minimize or eliminate pulsating pressure, vibration, and internal and external corrosion;
- (3) Check the pressure tap pluggage daily;
- (4) Check the gauge calibration quarterly and the transducer calibration monthly (using an inclined manometer with a measurement sensitivity of 0.0002 inches water);
- (5) Conduct calibration checks any time the sensor exceeds the manufacturer's specified maximum operating pressure range or install a new pressure sensor; and
- (6) Inspect components for integrity, electrical connections for continuity, and mechanical connections for leakage at least monthly.

(Ref.: 40 CFR 63.3168(g)(1) and (2); Subpart IIII)

- 5.B.9 For Emission Points AA-124 (E-Coat Curing Oven), AA-127 (Topcoat Curing Oven), AA-136 (Sealer Preheat Oven), and AA-500 (Primary Paint Shop Operations), the permittee shall establish either a minimum average gas volumetric flow rate (in feet per minute) or a minimum average duct static pressure (in inches of water) for each separate capture device in the emission capture system that meets the criteria noted below at least once every fifteen (15) minutes during each of the three (3) test runs for a performance stack test required by Condition 5.B.17 at a point in the duct between the capture device and the regenerative thermal oxidizer (RTO) inlet:
- (a) The capture device is not part of a permanent total enclosure (PTE);
  - (b) The capture device meets the criteria outlined in Condition 5.B.7(a); and
  - (c) The device does not capture emissions from a downdraft spray booth, from a flash-off area, or a bake oven associated with a downdraft spray booth.

(Ref.: 40 CFR 63.3167(f); Subpart IIII)

- 5.B.10 For Emission Points AA-124 (E-Coat Curing Oven), AA-127 (Topcoat Curing Oven), AA-136 (Sealer Preheat Oven), and AA-500 (Primary Paint Shop Operations), the permittee shall demonstrate continuous compliance with either the minimum average gas volumetric flow rate or duct static pressure required by Condition 5.B.9 (as applicable) by monitoring and recording the following information for the specified emissions capture system:
- (a) For an emissions capture system that is a permanent total enclosure (PTE), the permittee shall monitor and record either the facial velocity of air flow through all natural draft openings (in feet per minute) or the pressure drop (in inches of water) in addition to the direction of air flow into the enclosure at all times.
  - (b) For an emissions capture system that is not a PTE, the permittee shall monitor and record either the gas volumetric flow rate or the duct static pressure based on a 3-hour block average.

(Ref.: 40 CFR 63.3093; Subpart IIII – Table 1, Items 6 and 7)

- 5.B.11 For Emission Points AA-124 (E-Coat Curing Oven), AA-127 (Topcoat Curing Oven), AA-136 (Sealer Preheat Oven), and AA-500 (Primary Paint Shop Operations), the permittee shall meet the following requirements for each emission capture system that contains a bypass line that could divert emissions away from the regenerative thermal oxidizer (RTO) to the atmosphere (as applicable):
- (a) The permittee shall monitor or secure the valve / closure mechanism controlling the

bypass line in a non-diverting position in such a way that the valve / closure mechanism cannot be opened without creating a record that the valve was opened in accordance with the following specifications:

- (1) *Flow control position indicator* – Install, calibrate, maintain, and operate according to the manufacturer's specifications a flow control position indicator that takes a reading at least once every fifteen (15) minutes and provides a record indicating whether the emissions are directed to the RTO or diverted from the RTO. The time of occurrence and flow control position must be recorded as well as every time the flow direction is changed.
  - (2) *Car-seal or lock-and-key valve closures* – Secure any bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. The permittee shall visually inspect the seal or closure mechanism at least once every month to ensure that the valve is maintained in the closed position, and the emissions are not diverted away from the RTO to the atmosphere.
  - (3) *Valve closure monitoring* – Ensure that any bypass line valve is in the closed (non-diverting) position through monitoring of valve position at least once every 15 minutes. The permittee must inspect the monitoring system at least once every month to verify that the monitor will indicate valve position.
  - (4) *Automatic shutdown system* – The permittee must inspect the automatic shutdown system at least once every month to verify that it will detect diversions of flow and shut down the coating operation.
- (b) If any bypass line is opened, the permittee shall record and include a description of why the bypass line was opened and the length of time it remained.

(Ref.: 40 CFR 63.3168(b)(1) and (2); Subpart IIII)

5.B.12 For Emission Points AA-127 (Topcoat Curing Oven), AA-502 (Primer-Surfacer Coating Booth), AA-503 (Topcoat Booth), and AA-504 (Paint System Curing Oven for Primer-Surfacer and Topcoat Materials), the permittee shall comply with the following requirements for the monitoring required by the approved CAM Plan:

- (a) *Proper maintenance*: At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- (b) *Continued operation*: Except for (as applicable) monitoring malfunctions, associated repairs, and required quality assurance or control activities [including, (as applicable) calibration checks and required zero and span adjustments], the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. 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.13 For Emission Points AA-127 (Topcoat Curing Oven), AA-502 (Primer-Surfacer Coating Booth), AA-503 (Topcoat Booth), and AA-504 (Paint System Curing Oven for Primer-Surfacer and Topcoat Materials), 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 startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard (as applicable).

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

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

- 5.B.14 For Emission Points AA-127 (Topcoat Curing Oven), AA-502 (Primer-Surfacer Coating Booth), AA-503 (Topcoat Booth), and AA-504 (Paint System Curing Oven for Primer-Surfacer and Topcoat Materials), the MDEQ may require the permittee to develop and implement a Quality Improvement Plan (QIP) that contains 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. The 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.15 For Emission Points AA-127 (Topcoat Curing Oven), AA-502 (Primer-Surfacer Coating Booth), AA-503 (Topcoat Booth), and AA-504 (Paint System Curing Oven for Primer-Surfacer and Topcoat Materials), the permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written QIP required pursuant to Condition 5.B.14 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, the records of monitoring data and monitoring performance data should include the 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)

- 5.B.16 For Emission Points AA-127 (Topcoat Curing Oven), AA-502 (Primer-Surfacer Coating Booth), AA-503 (Topcoat Booth), and AA-504 (Paint System Curing Oven for Primer-Surfacer and Topcoat Materials), the permittee shall monitor the chamber combustion temperature of each applicable regenerative thermal oxidizer (RTO) continuously in accordance with the CAM Plan found in Appendix B of this permit.

(Ref.: 40 CFR 64.3(a) and (b), 64.6(c), Compliance Assurance Monitoring)

- 5.B.17 For Emission Points AA-132 (Electrodeposition RTO), AA-133 (Topcoat RTO), and AA-134 (Oven RTO), the permittee shall demonstrate compliance with both the volatile organic compound (VOC) destruction efficiency limitation specified in Condition 3.B.11 and the organic hazardous air pollutant (HAP) destruction limitation specified in Condition 3.B.30(b) by conducting a performance test each regenerative thermal oxidizer (RTO) no later than July 23, 2023. Thereafter, the permittee shall conduct subsequent performance testing no later than five (5) years after the previously completed test.

All testing shall be conducted in accordance with the following specifications:

- (a) The permittee shall conduct the performance test only under representative conditions for the applicable coating operation, the emission capture system, and the RTO.



For the purpose of this permit, “*representative operating conditions*” shall be defined as operation of the respective coating operation / curing oven under conditions / rates that will be typical in the future, “*representative emission capture system operating conditions*” shall be defined as operation of the emission capture system at a representative flow rate, and “*representative RTO operating conditions*” shall be defined as operation of the RTO at a representative inlet concentration.

- (b) The permittee shall monitor and record corresponding coating operations during a performance test to demonstrate that testing was conducted under representative operating conditions.
- (c) The permittee shall conduct three separate test runs for the performance test in accordance with 40 CFR 63.7(e)(3); Subpart A. Each test run shall last at least one (1) hour.
- (d) The permittee shall use the following methods to determine the corresponding information (as appropriate):
  - (1) *Select the sampling sites and velocity traverse points* – Method 1 or 1A in Appendix A of 40 CFR Part 60;
  - (2) *Measure the volumetric flow-rate of stack gas* – Method 2, 2A, 2C, 2D, 2F, or 2G in Appendix A of 40 CFR Part 60;
  - (3) *Determine the dry molecular weight of stack gas* – Method 3, 3A, or 3B in Appendix A of 40 CFR Part 60 (the ANSI / ASME PTC 19.10-1981, “*Flue and Exhaust Gas Analyses [Part 10, Instruments and Apparatus]*” may be used as an alternative to Method 3B);
  - (4) *Determine the moisture content of the stack gas* – Method 4 in Appendix A of 40 CFR Part 60;
  - (5) *Measure the total gaseous organic mass emissions as carbon* – Method 25 or 25A in Appendix A of 40 CFR Part 60.

In measuring the total gaseous organic mass emissions as carbon, the permittee shall also adhere to the following requirements:

- (i) The emissions from the inlet and outlet of the RTO shall be measured simultaneously.
- (ii) The same test method (i.e. 25 or 25A) shall be utilized to measure both the inlet and outlet emissions.

(iii) Method 25 shall be used if the total gaseous organic concentration at the outlet of the RTO is expected to be more than fifty (50) parts per million by volume (ppm<sub>v</sub>). However, if the total gaseous organic concentration at the outlet is expected to be 50 ppm<sub>v</sub> or less, Method 25A shall be used.

(6) The permittee shall determine the total gaseous organic emissions mass flow rates for the inlet and the outlet of the RTO during each test run using the following equation:

$$M_f = Q_{std} (C_C) (12) (0.0416) (10^{-6}) (2.20462) \quad \text{[Eqn. 1]}$$

Where:

$M_f$  = the total gaseous organic emissions mass flow rate, pounds per hour;

$Q_{std}$  = the volumetric flow rate of gases either entering or exiting RTO as determined by EPA Test Method 2, 2A, 2C, 2D, 2F, or 2G, dry standard cubic meters per hour;

$C_C$  = the concentration of organic compounds as carbon in the vent gas as determined by EPA Test Method 25 or Method 25A, parts per million by volume – dry basis;

0.0416 = the conversion factor for molar volume, kilogram-moles per cubic meter [at 293 Kelvin (K) and 760 millimeters of mercury (mmHg)]; and

2.20462 = the conversion factor for kilogram to pound.

(7) The permittee shall determine the organic emissions destruction / removal efficiency across the RTO for each run using the following equation:

$$DRE = \left( \frac{M_{fi} - M_{fo}}{M_{fi}} \right) (100) \quad \text{[Eqn. 2]}$$

Where:

$DRE$  = the organic emissions destruction or removal efficiency of the RTO, percent;

$M_{fi}$  = the total gaseous organic emissions mass flow rate at the inlet to the RTO (using Equation 2), pounds per hour; and

$M_{fo}$  = the total gaseous organic emissions mass flow rate at the outlet to the RTO (using Equation 2), pounds per hour.

- (8) The permittee shall determine the destruction efficiency of the RTO as the average of the efficiencies determined in the three test runs and calculated in Equation 2.

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

(Ref.: 40 CFR 63.3130(k)(2), 63.3160(c), 63.3164, and 63.3166; Subpart IIII)

5.B.18 For Emission Points AA-132 (Electrodeposition RTO), AA-133 (Topcoat RTO), and AA-134 (Oven RTO), the permittee shall install, calibrate, maintain, and operate a continuous temperature monitoring system (CTMS) for each RTO in accordance with the following specifications:

- (a) The CTMS shall complete a minimum of one (1) cycle of operation for each successive 15-minute period. Additionally, the permittee shall have a minimum of four (4) equally-spaced successive cycles of the system's operation in 1 hour.
- (b) The permittee shall maintain the CTMS at all times and have available necessary part for routine repairs of the monitoring equipment.
- (c) The permittee shall operate the CTMS and collect temperature data at all times that a controlled coating operation is operating, except during monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, if applicable calibration checks and required zero and span adjustments).

For the purpose of this permit, a “*monitoring malfunction*” shall be defined as any sudden, infrequent, not reasonably preventable failure of the CTMS to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. Any period for which the monitoring system is out of control and data are not available for required calculations is a deviation from the monitoring requirements.

- (d) The permittee shall perform and record an electronic calibration at least semi-annually according to the procedures in the manufacturer's manual. Following the electronic calibration, the permittee shall conduct and record a temperature sensor validation check in which a second or redundant temperature sensor placed nearby the process temperature sensor must yield a reading within 30°F of the process temperature sensor reading.
- (e) The permittee shall conduct and record calibration and validation checks any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor.
- (f) The permittee shall inspect and record components for integrity and electrical

connections for continuity, oxidation, and galvanic corrosion at least monthly.

- (g) The permittee shall calibrate and maintain each temperature measurement device for a RTO in accordance with accepted practice and the manufacturer's specifications. Additionally, the device shall have an accuracy of the greater of plus / minus five percent ( $\pm 5\%$ ) of the temperature being measured expressed in degrees Celsius or  $\pm 2.5^{\circ}\text{C}$ .

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

(Ref.: 40 CFR 60.934; Subpart MM and 40 CFR 63.3168(c)(3)(v) – (vii); Subpart III)

- 5.B.19 For Emission Points AA-132 (Electrodeposition RTO), AA-133 (Topcoat RTO), and AA-134 (Oven RTO), the permittee shall establish a minimum average combustion chamber temperature for each RTO (in degrees Fahrenheit) during a performance test that corresponds to the volatile organic compound (VOC) destruction efficiency limitation specified in Condition 3.B.11 and the organic hazardous air pollutant (HAP) destruction efficiency limitation specified in Condition 3.B.30(b) (as applicable).

During the performance test, the permittee must monitor and record the combustion temperature at least once every fifteen (15) minutes during each of the three test runs in the firebox of the RTO or immediately downstream of the firebox before any substantial heat exchange occurs.

Additionally, the permittee shall utilize all valid data collected during a performance test to calculate and record the average combustion temperature maintained. This average combustion temperature shall be the minimum 3-hour average operating limit for the RTO.

The permittee may establish a different minimum average combustion chamber temperature that satisfies the applicable standards by conducting a repeat performance test in accordance with Condition 5.B.17.

(Ref.: 40 CFR 63.3167(a); Subpart III)

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

- 5.B.20 For Emission Points AA-132 (Electrodeposition RTO), AA-133 (Topcoat RTO), and AA-134 (Oven RTO), the permittee shall demonstrate continuous compliance with the minimum average combustion chamber temperature established by Condition 5.B.19 by monitoring and recording the combustion chamber temperature of each RTO (in degrees Fahrenheit) based on a 3-hour block average.

(Ref.: 40 CFR 63.3093; Subpart III – Table 1, Item 1)

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

- 5.B.21 For Emission Point AA-200 (Facility-Wide Diesel Fuel-Fired Emergency Support Equipment), the permittee shall monitor and record (via a non-resettable hour meter) the

hours of operation monthly for each emergency engine during occasions of emergency and non-emergency service. Additionally, the permittee shall detail what classified each operational occasion either as an emergency or a non-emergency.

(Ref.: 40 CFR 60.4214(d)(vii); Subpart III)

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

- 5.B.22 For Emission Point AA-200 (Facility-Wide Diesel Fuel-Fired Emergency Support Equipment), the permittee shall maintain documentation that identifies each emergency engine as certified for the applicable emission standards referenced in Conditions 3.B.17 and 3.B.18.

(Ref.: 40 CFR 60.4211(c); Subpart III)

- 5.B.23 For Emission Point AA-200 (Facility-Wide Diesel Fuel-Fired Emergency Support Equipment), if the permittee does not operate and maintain each engine according to the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee shall demonstrate compliance through the following actions:

- (a) Keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions;
- (b) For Emission Points AA-202 through AA-204, the permittee shall conduct an initial performance test to demonstrate compliance with the applicable emission standards within one (1) year of start-up, or within 1 year after an engine is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after the permittee changes emission-related settings in a way that is not permitted by the manufacturer;
- (c) For Emission Point AA-201, the permittee shall adhere to the requirements specified in Part (b) of this condition and conduct a subsequent performance test every 8,760 hours of operation or three (3) years (whichever comes first) thereafter to demonstrate compliance with the applicable emission standards.

(Ref.: 40 CFR 60.4211(g)(2) and (3); Subpart III)

- 5.B.24 For Emission Points AA-400 (Stamping Shop, Body-Weld Shop, and Steel Center), AA-700 (Miscellaneous Metal Coating Process Operations), AA-800 (Miscellaneous Body Coating Operations), AA-900 (Miscellaneous Process Cleaning Operations), AA-1000 (Paint Repair Operations), and AA-1100 (Assembly Final Line Operations), the permittee shall monitor and record the monthly usage (in gallons) of any applicable material used within a corresponding emission group.

Additionally, the permittee shall maintain documentation for any applicable material that

includes (at a minimum) the following information:

- (a) The product name and identification;
- (b) The density (in pounds per gallon);
- (c) The weight percentage (wt.%) of the VOC content; and
- (d) The wt.% of the solids content (as applicable).

The permittee shall use the information required to demonstrate continuous compliance with the density limitation specified in Condition 3.B.44.

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

5.B.25 For Emission Points AA-400 (Stamping Shop, Body-Weld Shop, and Steel Center), AA-500 (Primary Paint Shop Operations), AA-700 (Miscellaneous Metal Coating Process Operations), AA-800 (Miscellaneous Body Coating Operations), AA-1000 (Paint Repair Operations), and AA-1100 (Assembly Final Line Operations), the permittee shall demonstrate continuous compliance with the respective organic hazardous air pollutant (HAP) emission limitations specified in Conditions 3.B.23, 3.B.28, and 3.B.46 by calculating and recording the emission rate of each applicable material group monthly in accordance with the following provisions:

(a) FOR ALL MATERIAL GROUPS:

Except as otherwise specified or limited within this condition, the permittee shall determine the following information for each applicable material in accordance with the outlined procedures:

- (1) *Determine the mass fraction of organic HAP for each applicable material:*  
The permittee shall determine and record the organic HAP mass fraction for each applicable material used during a month by using one of the following methods:
  - (i) *EPA Test Method 311 (Appendix A in 40 CFR Part 63)* in accordance with the following specifications:
    - (A) The permittee shall count each organic HAP that is measured to be present at 0.1 percent (0.1%) by mass or more for those listed in Table 5 of Subpart IIII, and at 1.0 percent (1.0%) by mass or more for other applicable compounds. Additionally, the permittee shall express the mass fraction of each organic HAP present as a value truncated to four decimal points.
    - (B) The permittee shall calculate the total mass fraction of organic

HAPs in the applicable material by adding up the individual organic HAP mass fractions and truncating the result to three decimal points.

- (ii) *EPA Test Method 24 (Appendix A in 40 CFR Part 60)* – the permittee may use this method for coatings to determine the mass fraction of non-aqueous volatile matter and using that value as a substitute for the mass fraction of organic HAPs.
- (iii) *Alternative method* – the permittee may use an alternative test method for determining the mass fraction of organic HAPs once the MDEQ has approved it [which shall be submitted in accordance with 40 CFR 63.7(f); Subpart A].
- (iv) *Information from the supplier or manufacturer of the material* – the permittee may rely on information other than that generated by the test methods specified in Parts (i) through (iii) of this section (such as manufacturer's formulation data) if it represents each organic HAP that is present at 0.1% by mass or more for those listed in Table 5 of Subpart III and at 1.0% by mass or more for other applicable compounds.

If there is a disagreement between such information and results of a test conducted according to Parts (a)(1) through (3) of this condition, the test method results will take precedence unless (after consultation) the permittee demonstrates to the satisfaction of the MDEQ that the data are correct.

- (v) *Solvent blends* – solvent blends may be listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAPs, which must be counted toward the total organic HAP mass fraction of the materials. When neither test data nor the manufacturer's data for solvent blends are available, the permittee may use the default values for the mass fraction of organic HAPs in the solvent blends listed in Table 3 or 4 of 40 CFR Part 63, Subpart III.

If the permittee uses the table(s), the permittee shall use the values in Table 3 for all solvent blends that match Table 3 entries. The permittee may only use Table 4 if the solvent blends in the materials the permittee uses do not match any of the solvent blends in Table 3 and it is only known whether the blend is aliphatic or aromatic. However, if the results of EPA Test Method 311 test indicate higher values than those listed on Table 3 or 4, the test method results will take precedence unless (after consultation) the permittee demonstrates to the satisfaction of the MDEQ that the data from Table 3 or 4 are correct.

- (2) *Determine the density of each applicable material used:* The permittee shall determine and record the density of each applicable material used during any month from test results using ASTM Method D1475-98 (Reapproved 2003), “Standard Test Method for Density of Liquid Coatings, Inks, and Related Products”, or for powder coatings, Test Method A or Test Method B of ASTM Method D5965-02, “Standard Test Methods for Specific Gravity of Coating Powders”, or information from the supplier or manufacturer of the applicable material.

If there is disagreement between the results using either ASTM Method D1475-98 (Reapproved 2003) or ASTM Method D5965-02 (Test Method A or Test Method B) and the information provided by supplier / manufacturer, the test results will take precedence unless (after consultation) the permittee demonstrates to the satisfaction of the MDEQ that the data are correct.

- (3) *Determine the volume of each material used:* The permittee shall determine and record the volume (in gallons) of each applicable material used during a month either by direct measurement or usage records.

(b) FOR ADHESIVE AND SEALER MATERIALS:

The permittee shall determine and record the average organic HAP mass content of adhesive and sealer materials (other than components of the glass bonding system) used during a month by using the following equation in conjunction with the procedures outlined in Part (a) of this condition:

$$C_{avg,as} = \frac{\sum_{j=1}^r (Vol_{as,j}) (D_{as,j}) (W_{as,j})}{\sum_{j=1}^r (Vol_{as,j}) (D_{as,j})} \quad [\text{Eqn. 3}]$$

Where:

$C_{avg,as}$  = the average organic HAP mass content of adhesive and sealer materials used, pounds of organic HAPs per pound of adhesive and sealer materials used;

$Vol_{as,j}$  = the volume of an applicable adhesive or sealer material,  $j$ , used, gallons;

$D_{as,j}$  = the density of an applicable adhesive or sealer material,  $j$ , pounds per gallon;

$W_{as,j}$  = the mass fraction of organic HAPs in an adhesive or sealer material,  $j$ , pounds of organic HAPs per pound of adhesive or sealer material;

$r$  = the number of adhesive and sealer materials used.



The average organic HAP mass content for the adhesive / sealer material group for each month [as determined by Equation 3] must be less than or equal to the limitation specified in Condition 3.B.23.

If the average organic HAP mass emission content for any month exceeds the specified limitation, this exceedance shall be classified as a deviation and subject to the reporting requirement outlined in Condition 5.C.12(c).

(c) FOR DEADENER MATERIALS:

The permittee shall determine and record the average organic HAP mass content of deadener materials used during a month by using the following equation in conjunction with the procedures outlined in Part (a) of this condition:

$$C_{avg,d} = \frac{\sum_{m=1}^s (Vol_{d,m}) (D_{d,m}) (W_{d,m})}{\sum_{m=1}^s (Vol_{d,m}) (D_{d,m})} \quad \text{[Eqn. 4]}$$

$C_{avg,d}$  = the average organic HAP mass content of deadener materials used, pounds of organic HAPs per pound of deadeners used;

$Vol_{d,m}$  = the volume of a deadener material,  $m$ , used, gallons;

$D_{d,m}$  = the density of a deadener material,  $m$ , pounds per gallon;

$W_{d,m}$  = the mass fraction of organic HAPs in a deadener material,  $m$ , pounds of organic HAPs per pound of deadener material; and

$s$  = the number of deadener materials used.

The average organic HAP mass content for the deadener material group for each month [as determined by Equation 4] must be less than or equal to the limitation specified in Condition 3.B.46.

If the average organic HAP emission content for any month exceeds the specified limitation, this exceedance shall be classified as a deviation and subject to the reporting requirement outlined in Condition 5.C.12(c).

(d) FOR COMBINED ELECTRODEPOSITION PRIMER, PRIMER-SURFACER, TOPCOAT, FINAL REPAIR, GLASS BONDING PRIMER, GLASS ADHESIVE AND ANY APPLICABLE COATING / THINNER:

If the permittee chooses to comply with the organic HAP emission limitation specified in Condition 3.B.28(a), the permittee shall use the procedures outlined in Part (a) of this condition and the following additional procedures:

- (1) *Determine the volume fraction of coating solids for each coating:* The permittee shall determine and record the volume fraction of coating solids (i.e. gallon of coating solids per gallon of coating) for each coating used during a month by using one of the methods noted below [for electrodeposition primer operations, the volume fraction of solids shall be determined for each material added to the tank or system during each month]:
  - (i) *ASTM Method D2697-86 (Reapproved 1998) or ASTM Method D6093-97 (Reapproved 2003)* – the permittee may use ASTM Method D2697-86 (Reapproved 1998), “*Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings*”, or ASTM Method D6093-97 (Reapproved 2003), “*Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer*”, to determine the volume fraction of coating solids for each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids.
  - (ii) *Information from the supplier / manufacturer of the material* – the permittee may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer.

If test results obtained by Part (i) of this section do not agree with the information obtained by the supplier / manufacturer of a coating, the test results will take precedence unless (after consultation) the permittee demonstrates to the satisfaction of the MDEQ that the data are correct.

- (2) *Determine the transfer efficiency for each coating:* The permittee shall determine and record the transfer efficiency for each electrodeposition primer, primer-surfacer, topcoat, and all coatings used in coating operations [except for any deadener material and for any adhesive / sealer material that are not components of glass bonding systems] by using the assumptions presented in one of the following guidance documents:
  - (i) *ASTM Method D5066-91 (Reapproved 2001), “Standard Test Method for Determination of the Transfer Efficiency Under Production Conditions for Spray Application of Automotive Paints-Weight Basis”;*  
or
  - (ii) *“Protocol for Determining Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations”.*

The permittee shall conduct transfer efficiency testing on representative coatings and for representative spray booths as described in “*Protocol for Determining Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations*”.

However, the permittee may assume the specified transfer efficiencies for the following coating / primer / adhesive operations:

- (iii) *For electrodeposition primer coatings, glass bonding primers, and glass bonding adhesives* – 100% transfer efficiency;
- (iv) *For final repair coatings* – 40% transfer efficiency for air atomized spray and 55% transfer efficiency for electrostatic spray and high volume, low pressure spray;
- (v) *For black-out, chip resistant edge primer, interior color, in-line repair, lower body anti-chip coatings, or underbody anti-chip coatings* – 40% transfer efficiency for air atomized spray, 55% transfer efficiency for electrostatic spray and high volume-low pressure spray, and 80% transfer efficiency for airless spray.

- (3) The permittee shall calculate and record the organic HAP emission rate for the coating / thinner material group by using the following equation:

$$H_{rate} = \frac{H_{HAP}}{V_{sdep}} \quad \text{[Eqn. 5]}$$

Where:

$H_{rate}$  = the total organic HAP emission rate for a month, pounds of organic HAPs per gallon of coating solids deposited;

$H_{HAP}$  = the total mass of organic HAP emissions for a month, pounds [as determined by Equation 6];

$V_{sdep}$  = the total volume of coating solids deposited during a month, gallons [as determined by Equation 22].

- (i) To calculate the mass of organic HAP emissions for a month ( $H_{HAP}$ ), the permittee shall use the following procedure:

$$H_{HAP} = H_{BC} - \sum_{i=1}^q (H_{Cn,i}) - \sum_{j=1}^r (H_{CSR,j}) - \sum_{k=1}^q \sum_{m=1}^{Sk} (H_{DEV,k,m}) \quad \text{[Eqn. 6]}$$

Where:

$H_{BC}$  = the total mass of organic HAP emissions before the RTO from all the coatings and thinners used during a month, pounds [as determined by Equation 7];

$H_{Cn,i}$  = the total mass of organic HAP emission reduction for a controlled coating operation,  $i$ , during a month [as determined by Equation 10] (as applicable);

$H_{CSR,j}$  = the total mass of organic HAP emission reduction for a coating operation,  $j$ , controlled by a solvent recovery system during a month, pounds [as determined by Equation 15] (as applicable);

$H_{DEV,k,m}$  = the mass of organic HAP emission reduction based on both the capture system and RTO efficiency for a period of deviation,  $m$ , for a controlled coating operation,  $k$ , pounds [as determined by Equation 19] (as applicable);

$q$  = the number of controlled coating operations not using a liquid-liquid material balance (as applicable);

$S_k$  = the number of periods of deviation in a month for which non-zero emission capture system efficiencies and/or RTO efficiencies have been approved under Condition 5.C.3 for a controlled coating operation,  $k$  (as applicable).

(A) To calculate the total mass of organic HAP emissions before the RTO from all coatings and thinners ( $H_{BC}$ ), the permittee shall use the following equation:

$$H_{BC} = A + B \quad \text{[Eqn. 7]}$$

Where:

$A$  = the total mass of organic HAPs in the coatings used during a month, pounds;

$B$  = the total mass of organic HAPs in the thinners used during a month, pounds.

(I) For the mass of organic HAPs in the coatings used during a month ( $A$ ):

$$A = \sum_{i=1}^m (Vol_{c,i}) (D_{c,i}) (W_{c,i}) \quad \text{[Eqn. 8]}$$

Where:

$Vol_{c,i}$  = the volume of a coating,  $i$ , used during a month,

gallons;

$D_{c,i}$  = the density of a coating,  $i$ , pounds per gallon;

$W_{c,i}$  = the mass fraction of organic HAPs in a coating,  $i$ ,  
pounds of organic HAPs per pound of coating;

$m$  = the number of different coatings used.

(II) For the mass of organic HAPs in the thinners used during a month ( $B$ ):

$$B = \sum_{j=1}^n (Vol_{t,j}) (D_{t,j}) (W_{t,j}) \quad \text{[Eqn. 9]}$$

Where:

$Vol_{t,j}$  = the volume of a thinner,  $j$ , used during a month,  
gallons;

$D_{t,j}$  = the density of a thinner,  $j$ , pounds per gallon;

$W_{t,j}$  = the mass fraction of organic HAPs in a thinner,  $j$ ,  
pounds of organic HAPs per pound of thinner;

$n$  = the number of different thinners used.

(B) To calculate the mass of organic HAP emission reduction for the controlled coating operation during a month ( $H_{Cn}$ ):

$$H_{Cn} = (A_C + B_C - A_{unc} - B_{unc}) \left(\frac{CE}{100}\right) \left(\frac{DRE}{100}\right) \text{[Eqn. 10]}$$

Where:

$A_C$  = the total mass of organic HAP in the coatings used in a controlled coating operation during a month, pounds [as determined by Equation 11];

$B_C$  = the total mass of organic HAP in the thinners used in a controlled coating operation during a month, pounds [as determined by Equation 12];

$A_{unc}$  = the total mass of organic HAP in the coatings used during all periods of time in which a deviation [including a

deviation during a start-up, shutdown, or malfunction] from an applicable operating limit / requirement occurred during a month for the emission capture system or the RTO serving the controlled coating operation, pounds [as determined by Equation 13];

$B_{unc}$  = the total mass of organic HAP in the thinners used during all periods of time in which a deviation [including a deviation during a start-up, shutdown, or malfunction] from an applicable operating limit / requirement occurred during a month for the emission capture system or the RTO serving a controlled coating operation, pounds [as determined by Equation 14];

$CE$  = the efficiency of the emission capture system vented to the RTO, percent [as determined by Condition 5.B.7];

$DRE$  = the destruction / removal efficiency of the RTO, percent [as determined by Condition 5.B.17].

(I) For the mass of organic HAPs in the coatings used in a controlled coating operation ( $A_C$ ):

$$A_C = \sum_{i=1}^m (Vol_{c,i}) (D_{c,i}) (W_{c,i}) \quad \text{[Eqn. 11]}$$

Where:

$Vol_{c,i}$  = the volume of a coating,  $i$ , used during a month, gallons;

$D_{c,i}$  = the density of a coating,  $i$ , pounds per gallon;

$W_{c,i}$  = the mass fraction of organic HAPs in a coating,  $i$ , pounds of organic HAPs per pound of coating;

$m$  = the number of different coatings used.

(II) For the total mass of organic HAP in the thinners used in a controlled coating operation ( $B_C$ ):

$$B_C = \sum_{j=1}^n (Vol_{t,j}) (D_{t,j}) (W_{t,j}) \quad \text{[Eqn. 12]}$$

Where:

$Vol_{t,j}$  = the volume of a thinner,  $j$ , used during a month, gallons;

$D_{t,j}$  = the density of a thinner,  $j$ , pounds per gallon;

$W_{t,j}$  = the mass fraction of organic HAPs in a thinner,  $j$ , pounds of organic HAPs per pound of thinner;

$n$  = the number of different thinners used.

- (III) For the total mass of organic HAPs in the coatings used during all periods of time in which a deviation from an applicable operating limit / requirement for the emission capture system or the RTO serving a controlled coating operation occurred during a month ( $A_{unc}$ ):

$$A_{unc} = \sum_{i=1}^m (VolD_i) (D_i) (W_i) \quad \text{[Eqn. 13]}$$

Where:

$VolD_i$  = the volume of a coating,  $i$ , used in the controlled coating operation during deviations, gallons;

$D_i$  = the density of a coating,  $i$ , pounds per gallon;

$W_i$  = the mass fraction of organic HAPs in a coating,  $i$ , pounds of organic HAPs per pound of coating;

$m$  = the number of different coatings used.

- (IV) For the total mass of organic HAPs in the thinners used during all periods of time in which a deviation from an applicable operating limit / requirement for the emission capture system or the RTO serving a controlled coating operation occurred during a month ( $B_{unc}$ ):

$$B_{unc} = \sum_{j=1}^n (VolD_j) (D_j) (W_j) \quad \text{[Eqn. 14]}$$

Where:

$VolD_j$  = the volume of a thinner,  $j$ , used in the controlled coating operation during deviations, gallons;

$D_{t,j}$  = the density of a thinner,  $j$ , pounds per gallon;

$W_{t,j}$  = the mass fraction of organic HAPs in a thinner,  $j$ , pounds of organic HAPs per pound of thinner;

$n$  = the number of different thinners used.

- (C) To calculate the organic HAP emission reduction for each controlled coating operation using a solvent recovery system ( $H_{CSR}$ ), the permittee shall use the following equation:

$$H_{CSR} = (A_{CSR} + B_{CSR}) \left( \frac{R_V}{100} \right) \quad \text{[Eqn. 15]}$$

Where:

$A_{CSR}$  = the total mass of organic HAP in the coatings used in a coating operation controlled by a solvent recovery system, pounds [as determined by Equation 16];

$B_{CSR}$  = the total mass of organic HAP in the thinners used in a coating operation controlled by a solvent recovery system, pounds [as determined by Equation 17];

$R_V$  = the volatile organic matter collection and recovery efficiency of the solvent recovery system, percent [as determined by Equation 18].

- (I) For the total mass of organic HAP in the coatings used in a coating operation controlled by a solvent recovery system ( $A_{CSR}$ ):

$$A_{CSR} = \sum_{i=1}^m (Vol_{c,i}) (D_{c,i}) (W_{c,i}) \quad \text{[Eqn. 16]}$$

Where:

$Vol_{c,i}$  = the total volume of a coating,  $i$ , used during a month in the coating operation controlled by the solvent recovery system, gallons;

$D_{c,i}$  = the density of a coating,  $i$ , pounds per gallon;



$W_{c,i}$  = the mass fraction of organic HAPs in a coating,  $i$ ,  
pounds of organic HAPs per pound of coating;

$m$  = the number of different coatings used.

- (II) For the total mass of organic HAP in the thinners used in a coating operation controlled by a solvent recovery system ( $B_{CSR}$ ):

$$B_{CSR} = \sum_{j=1}^n (Vol_{t,j}) (D_{t,j}) (W_{t,j}) \quad \text{[Eqn. 17]}$$

Where:

$Vol_{t,j}$  = the total volume of a thinner,  $i$ , used during a month in the coating operation controlled by the solvent recovery system, gallons;

$D_{t,j}$  = the density of a thinner,  $j$ , pounds per gallon;

$W_{t,j}$  = the mass fraction of organic HAPs in a thinner,  $j$ ,  
pounds of organic HAPs per pound of thinner;

$n$  = the number of different thinners used.

- (III) For the volatile organic matter collection and recovery efficiency of a solvent recovery system for a controlled coating operation ( $R_V$ ):

$$R_V = (100) \frac{M_{VR}}{\sum_{i=1}^m (Vol_i)(D_i)(WV_{c,i}) + \sum_{j=1}^n (Vol_j)(D_j)(WV_{t,j})} \quad \text{[Eqn. 18]}$$

Where:

$Vol_i$  = the volume of a coating,  $i$ , used in a coating operation controlled by the solvent recovery system during a month, gallons;

$D_i$  = the density of a coating,  $i$ , pounds per gallon;

$WV_{c,i}$  = the mass fraction of volatile organic matter for a coating,  $i$ , pounds of volatile organic matter per pounds of coating;

The permittee may determine the volatile organic matter mass fraction using either EPA Test Method 24, an EPA-approved alternative method, or information provided by the manufacturer / supplier of the coating.

In the event of any inconsistency between information provided by the manufacturer / supplier and the results of EPA Test Method 24 [or an EPA-approved alternative method], the test method results will govern unless (after consultation) the facility demonstrates to the satisfaction of the MDEQ that the data are correct.

$Vol_j$  = the volume of a thinner,  $j$ , used in a coating operation controlled by the solvent recovery system during a month, gallons;

$D_j$  = the density of a thinner,  $i$ , pounds per gallon;

$WV_{t,j}$  = the mass fraction of volatile organic matter for a thinner,  $j$ , pounds of volatile organic matter per pounds of thinner;

The permittee may determine the volatile organic matter mass fraction using either EPA Test Method 24, an EPA-approved alternative method, or information provided by the manufacturer / supplier of the thinner.

In the event of any inconsistency between information provided by the manufacturer / supplier and the results of EPA Test Method 24 (or an EPA-approved alternative method), the test method results will govern unless (after consultation) the facility demonstrates to the satisfaction of the MDEQ that the data are correct.

$m$  = the number of different coatings used in a coating operation controlled by the solvent recovery system during a month;

$n$  = the number of different thinners used.

$M_{VR}$  = the mass of volatile organic matter recovered by the solvent recovery system during a month, pounds.

- (D) To calculate the mass of organic HAP emission reduction achieved during a period of deviation for a controlled coating operation ( $H_{DEV}$ ), the permittee shall use the following equation:

$$H_{DEV} = (A_{DEV} + B_{DEV}) \left( \frac{CE_{DEV}}{100} \right) \left( \frac{DRE_{DEV}}{100} \right) \text{ [Eqn. 19]}$$

Where:

$A_{DEV}$  = the total mass of organic HAP in the coatings used in a controlled coating operation during the period of deviation, pounds [as determined by Equation 20];

$B_{DEV}$  = the total mass of organic HAP in the thinners used in a controlled coating operation during the period of deviation, pounds [as determined by Equation 21];

$CE_{DEV}$  = the efficiency of the emission capture system vented to the RTO during a period of deviation approved under Condition 5.C.3, percent;

$DRE_{DEV}$  = the organic HAP destruction / removal efficiency of the RTO during a period of deviation approved under Condition 5.C.3, percent.

- (I) For the total mass of organic HAP in the coatings used in the controlled coating operation during a period of deviation ( $A_{DEV}$ ):

$$A_{DEV} = \sum_{i=1}^m (Vol_{CDEV,i}) (D_{c,i}) (W_{c,i}) \text{ [Eqn. 20]}$$

Where:

$Vol_{CDEV,i}$  = the total volume of a coating,  $i$ , used in the controlled coating operation during a period of deviation, gallons;

$D_{c,i}$  = the density of a coating,  $i$ , pounds per gallon;

$W_{c,i}$  = the mass fraction of organic HAPs in a

coating,  $i$ , pounds of organic HAPs per pound of coating; and

$m$  = the number of different coatings used.

- (II) For the total mass of organic HAP in the thinners used in the controlled coating operation during a period of deviation ( $B_{DEV}$ ):

$$B_{DEV} = \sum_{j=1}^n (Vol_{TDEV,j}) (D_{t,j}) (W_{t,j}) \quad \text{[Eqn. 21]}$$

Where:

$Vol_{TDEV,j}$  = the total volume of a thinner,  $j$ , used in the controlled coating operation during a period of deviation, gallons;

$D_{t,j}$  = the density of a thinner,  $j$ , pounds per gallon;

$W_{t,j}$  = the mass fraction of organic HAPs in a thinner,  $j$ , pounds of organic HAPs per pound of thinner; and

$n$  = the number of different thinners used.

- (ii) To calculate the total volume of coating solids deposited from the combined operations for electrodeposition primer, primer-surfacer coatings, top coatings, final repair coatings, glass bonding primers, and glass bonding adhesives, and any coatings / thinners [except for deadener materials and adhesive / sealer materials that are not components of glass bonding systems] ( $V_{sdep}$ ), the permittee shall use the following equation:

$$V_{sdep} = \sum_{i=1}^m (Vol_{c,i})(V_{s,i})(TE_{c,i}) \quad \text{[Eqn. 22]}$$

Where:

$Vol_{c,i}$  = the total volume of a coating,  $i$ , used during a month, gallons;

$V_{s,i}$  = the volume fraction of coating solids for a coating,  $i$ , gallon solids per gallon coating as determined by Part (d)(1) of

this condition;

$TE_{c,i}$  = the transfer efficiency of a coating,  $i$ , as determined by Part (d)(2) of this condition;

$m$  = the number of coatings used during a month.

The total organic HAP emission rate of this combined material group for each month [as determined by Equation 5] must be less than or equal to the limitation specified in Condition 3.B.28(a).

If the total organic HAP emission rate for any month exceeds the specified limitation, this exceedance shall be classified as a deviation and subject to the reporting requirement outlined in Condition 5.C.12(d).

- (e) FOR COMBINED PRIMER-SURFACER, TOPCOAT, FINAL REPAIR, GLASS BONDING PRIMER, GLASS BONDING ADHESVIVE, AND ANY APPLICABLE COATING / THINNER (WITH SEPARATE ELECTRODEPOSITION PRIMER):

If the permittee chooses to comply with the organic HAP emission limitation specified in Condition 3.B.28(b), the permittee shall use the following procedures to demonstrate continuous compliance:

- (1) The permittee shall determine and record the total organic HAP emission rate from all applicable materials (excluding materials used in the electrodeposition primer system) by using the procedures outlined in Parts (a) and (d) of this condition.

The total organic HAP emission rate of this combined material group for each month [as determined by Equation 5] must be less than or equal to the limitation specified in Condition 3.B.28(b).

If the total organic HAP emission rate for any month exceeds the specified limitation, this exceedance shall be classified as a deviation and subject to the reporting requirement outlined in Condition 5.C.12(d).

- (2) If the permittee chooses to comply with the requirement outlined in Condition 3.B.30(a) for the electrodeposition primer system, the permittee shall demonstrate compliance by using one of the following methods:
  - (i) EPA Test Method 311 (found in Appendix A of 40 CFR Part 63);
  - (ii) *Alternative method* – the permittee may use an alternative test method for determining the mass fraction of organic HAPs once the MDEQ has approved it [which shall be submitted in accordance with 40 CFR

63.7(f); Subpart A]; or

- (iii) *Information from the supplier or manufacturer of the material* – the permittee may rely on information other than that generated by the test methods specified in Parts (i) and (ii) of this section (such as manufacturer's formulation data) if it represents each organic HAP that is present at 0.1% by mass or more for those listed in Table 5 of Subpart III, and at 1.0% by mass or more for other compounds.

If there is a disagreement between such information and results of a test conducted according to Parts (i) and (ii) of this section, the test method results will take precedence unless (after consultation) the permittee demonstrates to the satisfaction of the MDEQ that the data are correct.

- (3) If the permittee chooses to comply with the requirement outlined in Condition 3.B.30(b) for the electrodeposition primer system, the permittee shall demonstrate compliance by using the following methods:
  - (i) *Capture of electrodeposition bake oven emissions* – The permittee shall show that the electrodeposition bake oven meets the criteria in Sections 5.3 through 5.5 of EPA Test Method 204 and directs all of the exhaust gases from the bake oven to the add-on control device.

For purposes of this showing, an electrodeposition bake oven air seal is not considered a natural draft opening provided the permittee demonstrate that the direction of air movement across the interface between the bake oven air seal and the bake oven is into the bake oven. The permittee may use lightweight strips of fabric or paper, or smoke tubes to make such demonstrations. However, the permittee cannot count air flowing from an electrodeposition bake oven air seal into an electrodeposition bake oven as air flowing through a natural draft opening unless the permittee elects to treat that electrodeposition bake oven air seal as a natural draft opening.

- (ii) *Control of electrodeposition bake oven emissions* – The permittee shall determine the efficiency of the control device on the electrodeposition bake oven using the procedures outlined in Condition 5.B.17.

(Ref.: 40 CFR 63.3151, 63.3152, 63.3161, 63.3163(a) – (b), 63.3171(d) – (g), and 63.3173(a) – (b); Subpart III)

- 5.B.26 For Emission Point AA-500 (Primary Paint Shop Operations), the permittee shall demonstrate compliance with the emission limitations specified in Conditions 3.B.32, 3.B.34, and 3.B.36 by calculating and recording the pounds of volatile organic compounds (VOCs) emitted per gallon of applied coating solids from each respective coating operation in accordance with the following procedures:

- (a) *Determine the composition of the coatings used in an operation:* The permittee shall determine and record the VOC content of a coating from either data provided by the manufacturer / supplier, data resulting from the usage of EPA Test Method 24, or data resulting from the usage of an equivalent EPA-approved alternative method.

The permittee may be required by the MDEQ to use data resulting from EPA Test Method 24 [or an equivalent EPA-approved alternative] in lieu of manufacturer- / supplier-provided data if deemed necessary.

- (b) The permittee shall calculate and record the volume-weighted average pounds of VOCs emitted per gallon of applied coating solids in a calendar month by using one of following equations (as applicable):

- (1) For a coating operation that does not use a solvent recovery system and/or divert emissions to a regenerative thermal oxidizer (RTO):

$$G = \frac{M_o + M_d}{(L_s)(T)} \quad \text{[Eqn. 23]}$$

Where:

$G$  = the volume-weighted average mass of VOC emitted per volume of applied solids, pounds per gallon;

$M_o + M_d$  = the combined total mass of VOCs in all used dilution solvents and coatings [as determined by Equation 24], pounds;

$L_s$  = the volume of solids in all coatings consumed [as determined by Equation 25], gallons;

$T$  = the overall transfer efficiency of the applicable application method as determined by the following tables:

Application Method	Transfer Efficiency <sup>1</sup>
Air-Atomized Spray (waterborne coating)	0.39
Air-Atomized Spray (solvent-borne coating)	0.50
Manual Electrostatic Spray	0.75
Automatic Electrostatic Spray	0.95
Electrodeposition	1.00

<sup>1</sup>The transfer efficiencies in this table represent an overall system that includes a total capture of purge.

Application Method	Transfer Efficiency <sup>2</sup>
Air-Atomized Spray (waterborne coating)	0.30
Air-Atomized Spray (solvent-borne coating)	0.40
Manual Electrostatic Spray	0.62
Automatic Electrostatic Spray	0.75

<sup>2</sup>The transfer efficiencies in this table represent systems that perform line purging after each vehicle and purge material is not collected.

- (i) To calculate the combined total mass of VOCs in all used dilutions, solvents, and coatings ( $M_o + M_d$ ) emitted in a month, the permittee shall use following equation:

$$M_o + M_d = \sum_{i=1}^n (L_{ci} D_{ci} W_{oi}) + \sum_{j=1}^m (L_{dj} D_{dj}) \quad \text{[Eqn. 24]}$$

Where:

$L_{ci}$  = the volume of a coating,  $i$ , consumed in a month, gallons;

$D_{ci}$  = the density of a coating,  $i$ , as received, pounds per gallon;

$W_{oi}$  = the proportion of VOCs by weight in a coating,  $i$ , as received, pounds of VOC per pound of coating;

$L_{dj}$  = the volume of a VOC dilution solvent,  $j$ , added to the coatings in a month, gallons;

$D_{dj}$  = the density of a VOC dilution solvent,  $j$ , added to the coatings, pounds per gallon.

- (ii) To calculate the volume of solids in a coating that is consumed in a month ( $L_s$ ), the permittee shall use the following equation:

$$L_s = \sum_{i=1}^n (L_{ci} V_{si}) \quad \text{[Eqn. 25]}$$

Where:



$L_{ci}$  = the volume of a coating,  $i$ , consumed in a month, gallons;

$V_{si}$  = the proportion of solids by volume in a coating,  $i$ , as received, gallon of solids per gallon of coating.

- (2) For a coating operation that diverts emissions to a RTO:

$$N = (G)[1 - (F)(E)] \quad \text{[Eqn. 26]}$$

Where:

$N$  = the volume-weighted average mass of VOC emitted per volume of applied solids after the RTO, pounds per gallon;

$G$  = the volume-weighted average mass of VOC emitted per volume of applied solids [as determined by Equation 23], pounds per gallon;

$F$  = the fraction of total VOCs emitted by a coating operation that enters the RTO;

$E$  = the VOC destruction / removal efficiency of the RTO [as determined by Condition 5.B.17].

- (3) For a coating operation that uses a capture system and a control device that recovers volatile organic compounds (e.g. a carbon adsorber or solvent recovery system):

$$N = \frac{M_o + M_d - M_r}{(L_s)(T)} \quad \text{[Eqn. 27]}$$

Where:

$M_o + M_d$  = the combined total mass of VOCs in all used dilution solvents and coatings [as determined by Equation 24], pounds;

$M_r$  = the total mass of VOCs recovered from an operation [as determined by Equation 28], pounds;

$L_s$  = the volume of solids in all coatings consumed [as determined by Equation 25], gallons;

$T$  = the overall transfer efficiency of the applicable application method as determined by the tables outlined in Part (b)(1) of this condition.

- (i) To calculate the mass of VOCs recovered by an applicable system in a month ( $M_r$ ), the permittee shall use the following equation:

$$M_r = (L_r)(D_r) \quad \text{[Eqn. 28]}$$

Where:

$L_r$  = the volume of VOCs recovered from an operation (liters), gallons;

$D_r$  = the density of VOCs recovered from an operation, pounds per gallon.

If the volume-weighted mass average VOC emission rate for any month exceeds a specified limitation, this exceedance shall be classified as a deviation and subject to the reporting requirement outlined in Condition 5.C.13.

(Ref.: 40 CFR 60.393(c); Subpart MM)

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

- 5.B.27 For Emission Point AA-501 (Body E-Coat Dip Tank), the permittee shall maintain applicable documentation that demonstrates any coating or solvent used for dip tank application method meets the definition of a “waterborne material” as specified by Condition 3.B.34.

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

- 5.B.28 For Emission Points AA-502 (Primer-Surfacer Coating Booth), AA-503 (Topcoat Booth), the permittee shall monitor and record the liquid flow rate of each wet scrubber once per day in accordance with the CAM Plan found in Appendix B of this permit.

(Ref.: 40 CFR 64.3(a) and (b), 64.6(c); Compliance Assurance Monitoring)

- 5.B.29 For Emission Point AA-1100 (Assembly Final Line Operations), the permittee shall record and maintain the quantity of manufactured vehicles in which no on-board vapor recovery system is installed and operated both a monthly basis and on a rolling 12-month total basis.

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

C. SPECIFIC REPORTING REQUIREMENTS

<b>Emission Point(s)</b>	<b>Applicable Requirement(s)</b>	<b>Condition Number</b>	<b>Pollutant(s) / Parameter(s) Monitored</b>	<b>Reporting Requirement(s)</b>
AA-000	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.C.1	PM / PM <sub>10</sub> VOCs CO NO <sub>x</sub>	Submit Work Practices and Maintenance Standards Plan
	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(1).	5.C.2	PM / PM <sub>10</sub> (filterable) VOCs CO NO <sub>x</sub> SO <sub>2</sub>	Submit Semi-Annual Monitoring Report on Emissions and Operational Data
	40 CFR 63.3161(p); Subpart III	5.C.3	HAPs (organic)	Submit Written Request for Using Non-Zero Efficiencies
AA-124 AA-127 AA-136 AA-500	40 CFR 63.3168(b)(2); Subpart III	5.C.4	HAPs (organic)	Submit Semi-Annual Summary of Bypass-Related Information
AA-127 AA-502 AA-503 AA-504	40 CFR 64.9(a), CAM	5.C.5	CAM Reporting	Submit Semi-Annual Monitoring Reports
	40 CFR 64.7(e), CAM	5.C.6	CAM Modification	Promptly Notify the MDEQ of Failure to Achieve Limit / Standard (Though No Excursion or Exceedance was Indicated by Approved Monitoring)
AA-132 AA-133 AA-134	11 Miss. Admin. Code Pt. 2, R. 2.6.B.(5).	5.C.7	VOCs	Submit Performance Testing Protocol Submit 10-Day Notification of Performance Testing Event
	11 Miss. Admin. Code Pt. 2, R. 2.6.B.(6).	5.C.8		Submit Performance Test Results
	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(1).	5.C.9	Combustion Chamber Temperature	Submit Semi-Annual Report of Operational Data
	40 CFR 60.395(c)(1); Subpart MM	5.C.10		Submit Semi-Annual Report of Temperature Deviations

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant(s) / Parameter(s) Monitored	Reporting Requirement(s)
AA-200	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(1).	5.C.11	Hours of Operation	Submit Annual Summary on Hours of Operation (Non-Emergency and Emergency)
AA-400 AA-500 AA-700 AA-800 AA-900 AA-1000 AA-1100	40 CFR 63.3120(a)(3)(iv) – (9); Subpart III	5.C.12	HAPs (organic)	Submit Semi-Annual Report on Organic HAP Emission Rate Deviations
AA-500	40 CFR 60.395(b); Subpart MM 40 CFR 60.19(d); Subpart A 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(1).	5.C.13	VOCs	Submit Quarterly Report of VOC Emission Rate Deviations
AA-1100	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(1).	5.C.14	VOCs	Submit Semi-Annual Report of Vehicles Not Equipped with On-Board Vapor Recovery System

5.C.1 For Emission Point AA-000 (Facility-Wide), the permittee shall submit the initial “Work Practices and Maintenance Standards Plan” required by Condition 5.B.3 no later than one hundred eighty (180) days after the issuance of this permit.

Thereafter, the permittee shall submit a semi-annual notification in accordance with Condition 5.A.4 that summarizes any revision(s) made to the aforementioned plan. If an amendment is made to the plan in any six-month period, the permittee shall include the revision(s) within the corresponding semi-annual monitoring report.

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

5.C.2 For Emission Point AA-000 (Facility-Wide), the permittee shall submit a semi-annual monitoring report in accordance with Condition 5.A.4 that contains the following information:

- (a) The quantity of vehicles manufactured both monthly and on a rolling 12-month total;
- (b) The total respective emission of particulate matter / particulate matter less than 10 µm in diameter combined (PM / PM<sub>10</sub> – filterable), volatile organic compounds (VOCs), carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), and/or sulfur dioxide (SO<sub>2</sub>) from each emission group in tons both on a monthly basis and on a rolling 12-month total basis;

- (c) Any occurrence (and its corresponding duration) of air pollution control equipment specified as a “PSD BACT Standard” malfunctioning and/or becoming non-operational [including any maintenance action(s) performed to restore control equipment to its usual manner of operation];
- (d) The volume (in gallons or cubic feet) of each fuel source combusted on a monthly basis.

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

- 5.C.3 For Emission Point AA-000 (Facility-Wide), as applicable, the permittee may submit a written request to the MDEQ for approval to use non-zero emission capture efficiencies and/or non-zero RTO destruction efficiencies during any period of time in which a deviation from an applicable operating limit specified in Condition 3.B.29 [including a deviation during periods of start-up, shutdown, or malfunction] occurred for a emission capture system or a RTO serving a controlled coating operation.

Additional information in accordance with 40 CFR 63.3161(p)(1) – (2); Subpart IIII may be used to support the written request.

(Ref.: 40 CFR 63.3161(p); Subpart IIII)

- 5.C.4 For Emission Points AA-124a (E-Coat Curing Oven), AA-127a (Topcoat Curing Oven), AA-136a (Sealer Preheat Oven) and AA-500 (Primary Paint Shop Operations), the permittee shall submit a semi-annual monitoring report in accordance with Condition 5.A.4 that describes why each bypass line was opened and the length of time it remained open.

(Ref.: 40 CFR 63.3168(b)(2); Subpart IIII)

- 5.C.5 For Emission Points AA-127 (Topcoat Curing Oven), AA-502 (Primer-Surfacer Coating Booth), AA-503 (Topcoat Booth), and AA-504 (Paint System Curing Oven for Primer-Surfacer and Topcoat Materials), the permittee shall submit a semi-annual monitoring report in accordance with Condition 5.A.4 with the following information (as applicable):

- (a) Summary information on the number, duration, and cause [including an unknown cause, if applicable] of excursions or exceedances (as applicable) and the corrective actions taken;
- (b) Summary information on the number, duration, and cause [including unknown cause (if applicable)] for monitor downtime incidents [other than downtime associated with zero and span or other daily calibration checks (if applicable)]; and
- (c) A description of the actions taken to implement a QIP during the reporting period as specified in Condition 5.B.14. 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.6 For Emission Points AA-127 (Topcoat Curing Oven), AA-502 (Primer-Surfacer Coating Booth), AA-503 (Topcoat Booth), and AA-504 (Paint System Curing Oven for Primer-Surfacer and Topcoat Materials), 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)

- 5.C.7 For Emission Points AA-127 (Topcoat Curing Oven), AA-502 (Primer-Surfacer Coating Booth), AA-503 (Topcoat Booth), and AA-504a (Paint System Curing Oven for Primer-Surfacer and Topcoat Materials), 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)

- 5.C.8 For Emission Points AA-132 (Electrodeposition RTO ), AA-133 (Topcoat RTO ), and AA-134 (Oven RTO ), the permittee shall submit a written protocol for the performance testing required by Condition 5.B.17 that details the procedures and test methods to be implemented during the actual testing event no later than thirty (30) days prior to the intended testing date.

The permittee shall notify the MDEQ in writing at least ten (10) days prior to the intended testing date so that a representative from the MDEQ may be afforded the opportunity to

observe the stack testing.

If deemed necessary by the MDEQ, a conference may be required prior to the intended testing date to discuss the proposed test methods and procedures outlined in the performance testing protocol.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B.(5).)

- 5.C.9 For Emission Points AA-132 (Electrodeposition RTO), AA-133 (Topcoat RTO), and AA-134 (Oven RTO), the permittee shall submit a report of the results for any conducted performance test no later than sixty (60) days after completing the testing event. The report (at a minimum) shall include the information specified in Condition 1.27.

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

- 5.C.10 For Emission Points AA-132 (Electrodeposition RTO), AA-133 (Topcoat RTO), and AA-134a (Oven RTO), the permittee shall submit a semi-annual monitoring report in accordance with Condition 5.A.4 that details every 3-hour period of a regenerative thermal oxidizer operation (RTO) in which the average combustion chamber temperature is more than 82°F below the average temperature limitation as determined by Condition 5.B.17.

(Ref.: 40 CFR 60.395(c)(1); Subpart MM)

- 5.C.11 For AA-200 (Facility-Wide Diesel Fuel-Fired Emergency Support Equipment), the permittee shall submit a summary within the semi-annual monitoring report (SMR) postmarked by January 31<sup>st</sup> that details the hours of operation for an engine during the preceding calendar year. The report shall include how many hours are spent for emergency operation, what classified the operation as an emergency, how many hours are spent for non-emergency operation, and the reason for the non-emergency operation.

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

- 5.C.12 For Emission Points AA-400 (Stamping Shop, Body-Weld Shop, and Steel Center), AA-500 (Primary Paint Shop Operations), AA-700 (Miscellaneous Metal Coating Process Operations), AA-800 (Miscellaneous Body Coating Operations), Emission Point AA-900 (Miscellaneous Process Cleaning Operations), AA-1000 (Paint Repair Operations), and AA-1100 (Assembly Final Line Operations), the permittee shall submit a semi-annual monitoring report in accordance with Condition 5.A.4 that contains the following information (as applicable):

- (a) Identification of the organic hazardous air pollutant (HAP) compliance option in Condition 3.B.28 used;
- (b) If there are no deviations from an applicable organic HAP emission limitation, operating limitation, or work practice standard, the permittee shall include a

statement that there were no deviations from the applicable limitations and/or standards during the reporting period.

Moreover, if the permittee used a RTO to comply with an emission limitation and there were no periods during which the continuous temperature monitoring system (CTMS) were out-of-control [as specified in 40 CFR 63.8(c)(7); Subpart A], the permittee shall include a statement that there were no period during which the CTMS were out-of-control during the reporting period.

- (c) *For Adhesives, Sealers, and Deadeners* – If there is a deviation of the applicable organic HAP emission limitations specified in Conditions 3.B.23 and 3.B.46, the following information shall be contained in the semi-annual monitoring report:
- (1) The beginning and ending dates of each month during which the monthly average organic HAP content exceeded the applicable emission limit;
  - (2) The volume (in gallons) and the organic HAP content of each material used that is subject to the applicable emission limit;
  - (3) The calculation used to determine the average monthly organic HAP content for the month in which the deviation occurred;
  - (4) The reason for the deviation (including an unknown cause, if applicable);
  - (5) The number of deviations; and
  - (6) A list of the affected emission source or process equipment, an estimate of the quantity of organic HAPs emitted over the applicable emission limitation, and a description of the method used to estimate the emissions.
- (d) *For Combined Electrodeposition Primer, Primer-Surfacer, Topcoat, Final Repair, Glass Bonding Primer, Glass Bonding Adhesive, and any Coating / Thinner* – If there is a deviation of the applicable organic HAP emission limitation specified in Condition 3.B.28, the following information shall be contained in the semi-annual monitoring report:
- (1) The beginning and ending dates of each month during which the monthly organic HAP emission rate from the noted material grouping exceeded the applicable emission limitation;
  - (2) The calculation used to determine the monthly organic HAP emission rate in accordance with Condition 5.B.25(a), (d), and (e) (as applicable). However, the permittee is not required to submit the background data supporting these calculations [e.g. information provided by material suppliers or manufacturers, or test reports].



- (3) The date and time that each malfunction of the emissions capture system or the regenerative thermal oxidizer (RTO) used to control emissions from a respective operation started and stopped;
- (4) A brief description of the applicable continuous parameter monitoring system (CPMS);
- (5) The date of the latest CPMS certification or audit;
- (6) The date, time, and duration that each applicable CPMS was inoperative [except for zero (low-level) and high-level checks];
- (7) The cause for an applicable CPMS being inoperative (including an unknown cause, if applicable) and a description of any corrective actions taken;
- (8) The date, time, and duration that each applicable CPMS was out of control, including the information specified in 40 CFR 63.8(c)(7); Subpart A;
- (9) The cause (including an unknown cause, if applicable) for the CPMS being out-of-control and the description of any corrective actions taken;
- (10) The date, time, and duration of each deviation from an applicable operating limit specified in Condition 3.B.29;
- (11) The date and time period of each bypass of a RTO;
- (12) A summary of the total duration and the percent of the total source operating time of the deviations from each applicable operating limit specified in Condition 3.B.29 and the bypasses of each RTO;
- (13) A breakdown of the total duration of the deviations from each applicable operating limit specified in Condition 3.B.29 and the bypasses of each RTO into those that were due to start-up, shutdown, control equipment problems, process problems, other known causes, and other unknown causes;
- (14) A summary of the total duration and the percent of the total source operating time of the downtime for each applicable CPMS;
- (15) A description of any changes in an applicable CPMS, coating operation, emission capture system, or RTO since the last semi-annual reporting period;
- (16) For each deviation from a work practice standard, the following information shall be reported:
  - (i) A description of the deviation;

- (ii) The date, time, and duration of the deviation;
  - (iii) The actions taken to minimize emissions in accordance with Condition 3.D.1;
  - (iv) A list of the affected emission source or process equipment for which a deviation occurred; and
  - (v) The cause of the deviation (including an unknown cause, if applicable) and any corrective actions taken to return the emission source(s) to its normal or usual manner of operation.
- (17) A list of the affected emission sources or process equipment for which a deviation occurred, an estimate of the quantity of organic HAPs emitted over the applicable limitation specified in Condition 3.B.28, and a description of the method used to estimate the emissions.
- (e) *For Separate Electrodeposition Primer System Organic HAP Content Limit* – If there is a deviation of an organic HAP limitation specified in Condition 3.B.30(a), the following information shall be contained in the semi-annual monitoring report:
- (1) Identification of each material used that deviated from the emission limitation along with the date, time, and duration each material was used;
  - (2) A determination of the mass fraction for each organic HAP for each material identified in Part (e)(1) of this condition. However, the permittee does not need to submit background data supporting this calculation [e.g. information provided by material suppliers or manufacturers, or test reports].
  - (3) A statement of the cause each deviation (including an unknown case, if applicable);
  - (4) The number of deviations; and
  - (5) A list of the emission source(s) or process equipment, an estimate of the quantity of organic HAPs emitted over the applicable limitation in Condition 3.B.30(b), and a description of the method used to estimate the emissions.
- (f) *For Separate Electrodeposition Primer Bake Oven Capture and Control Limitations* – If there is a deviation of the bake oven capture and control limitation specified in Condition 3.B.30(b), the following information shall be contained in the semi-annual monitoring report:
- (1) The beginning and ending dates of each month during which there was a deviation from the bake oven capture and control limitation;

- (2) The date and time that each malfunction of the capture systems or the RTOs used to control emissions from the electrodeposition primer bake oven started and stopped;
  - (3) A brief description of the applicable CPMS;
  - (4) The date of the latest CPMS certification or audit;
  - (5) The date, time, and duration that each applicable CPMS was inoperative [except for zero (low-level) and high-level checks];
  - (6) The cause (including an unknown cause, if applicable) for the CPMS being inoperative and the description of any corrective actions taken;
  - (7) The date, time, and duration that each applicable CPMS was out of control, including the information specified in 40 CFR 63.8(c)(7), Subpart A;
  - (8) The cause (including an unknown cause, if applicable) for the CPMS being out-of-control and the description of any corrective actions taken;
  - (9) The date, time, and duration of each deviation from an applicable operating limit specified in Condition 3.B.29,
  - (10) The date and time period of each bypass of a RTO;
  - (11) A summary of the total duration and the percent of the total source operating time of the deviations from each applicable operating limit specified in Condition 3.B.29 and the bypasses of each RTO;
  - (12) A breakdown of the total duration of the deviations from each applicable operating limit specified in Condition 3.B.29 and the bypasses of each RTO into those that were due to start-up, shutdown, control equipment problems, process problems, other known causes, and other unknown causes;
  - (13) A summary of the total duration and the percent of the total source operating time of the downtime for each applicable CPMS;
  - (11) A description of any changes in an applicable CPMS, coating operation, emission capture system, or add-on control devices since the last semi-annual reporting period; and
  - (12) A statement on the cause of each deviation (including an unknown cause, if applicable).
- (g) *Work Practice Plans* – If there is a deviation from a work practice standard specified in Conditions 3.D.3 and 3.D.4, the following information shall be

contained in the semi-annual monitoring report:

- (1) The date, time, and duration of each deviation;
- (2) The nature of each deviation [including a list of the affected emission source and process equipment for which deviation occurred] and the cause of each deviation (including an unknown cause, if applicable); and
- (3) The corrective action(s) taken to bring the applicable work practices into compliance with the work practice plan.

(Ref.: 40 CFR 63.3120(a)(3)(iv) – (9); Subpart IIII)

- 5.C.13 For Emission Point AA-500 (Primary Paint Shop Operations), the permittee submit a semi-annual monitoring report (SMR) in accordance with Condition 5.A.4 that details each deviation from the volume-weighted mass average volatile organic compound (VOC) emission rates specified in Conditions 3.B.32, 3.B.34, and 3.B.36.

If no such instances have occurred during a specific 6-month period, the permittee shall submit a SMR in accordance with the denoted deadlines that states there were no deviations. However, if compliance with a specified emission limitation was achieved through usage of an emission capture system and a regenerative thermal oxidizer (RTO), the report shall also include the respective volume-weighted mass average VOC emission rate after the RTO.

(Ref.: 40 CFR 60.395(b); Subpart MM and 40 CFR 60.19(d); Subpart A)

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

- 5.C.14 For Emission Point AA-1100 (Assembly Final Line Operations), the permittee shall submit a semi-annual monitoring report in accordance with Condition 5.A.4 that details the quantity of vehicles manufactured with no installed on-board vapor recovery system both on a monthly basis and on a rolling 12-month total basis.

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

**SECTION 6. ALTERNATIVE OPERATING SCENARIOS**

NO ALTERNATIVE OPERATING SCENARIOS HAVE BEEN 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**



Title V Operating Permit No. 2700-00045

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
lbs/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
NM VOC	Non-Methane Volatile Organic Compounds
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM <sub>10</sub>	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 <sub>2</sub>	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**

**SITE-SPECIFIC COMPLIANCE ASSURANCE  
MONITORING (CAM) PLAN**

**Compliance Assurance Monitoring Approach for the Wet Scrubber Controlling PM / PM<sub>10</sub> / PM<sub>2.5</sub>**

<b>Indicator Parameter</b>
<p><b>Indicator:</b> Flow or water through the water pan of the water wash system</p> <p><b>Measurement Approach:</b></p> <ul style="list-style-type: none"> <li>- Water wash system will be operated and maintained in accordance with manufacturer’s specifications.</li> <li>- Weekly visual checks of booth flood pans and water circulation.</li> </ul>
<b>Indicator Range</b>
<p><b>Indicator Range:</b> N/A</p>
<b>Performance Criteria</b>
<p><b>Data Representativeness:</b> A minimum level water flow indicates sufficient liquid input to the water wash booth consistent with its design. Operation of the circulation pump confirms that the liquid present is being circulated through the scrubber and achieving vapor-liquid contact.</p> <p><b>Verification of Operational Status:</b> N/A</p> <p><b>QA / QC Practices and Criteria:</b> The monitoring device shall be calibrated at a frequency in accordance with the manufacturer’s specifications, other written procedures that provide an adequate assurance the device is calibrated accurately, or at least annually (whichever is more frequent) and shall be accurate to within one of the following:</p> <ul style="list-style-type: none"> <li>▪ ± 2% of span; or</li> <li>▪ ± 5% of design liquid flow rate.</li> </ul> <p><b>Monitoring Frequency:</b> Daily</p> <p><b>Data Collection Procedures:</b> The daily visual inspections will be recorded.</p> <p><b>Averaging Period:</b> N/A</p> <p><b>Procedures Corrective Action:</b> N/A</p>
<b>Rationale for Selection of Performance Indicator(s)</b>
<p>Water wash scrubbers remove particulate matter from the booth air stream by collecting the particulate matter from the booth air phase to the liquid phase. For the scrubber to remove particulate matter, adequate water flow must be present in the booth, and it must be circulated through the equipment to ensure booth air-liquid contact. A constant minimum water flow indicates correct operation with adequate liquid scrubbant. Operation of the circulating pump is necessary whenever spray equipment is in operation to achieve liquid-vapor contact.</p> <p>A numeric range of acceptable water flow rates is not appropriate for this process, because the appropriate liquid flow rate varies with gas flow rate through the system, which varies significantly depending on plant operation.</p>
<b>Rationale for Selection of Indicator Range(s)</b>
<p>Facility personnel have consulted water wash design criteria and historic performance data to determine the appropriate minimum liquid flow to be maintained in the water wash system during operation.</p> <p>Circulating pump must be operating whenever the spray equipment is in operation.</p>

**Compliance Assurance Monitoring Approach for the Regenerative Thermal Oxidizer Controlling VOCs**

<b>Indicator Parameter</b>
<p><b>Indicator:</b> Combustion Chamber Temperature</p> <p><b>Measurement Approach:</b> The procedures specified in 40 CFR Part 63, Subpart IIII shall be followed.</p>
<b>Indicator Range</b>
<p><b>Indicator Range:</b> The procedures specified in 40 CFR Part 63, Subpart IIII shall be followed.</p>
<b>Performance Criteria</b>
<p><b>Data Representativeness:</b> The procedures specified in 40 CFR Part 63, Subpart IIII shall be followed.</p> <p><b>Verification of Operational Status:</b> The procedures specified in 40 CFR Part 63, Subpart IIII shall be followed.</p> <p><b>QA / QC Practices and Criteria:</b> The procedures specified in 40 CFR Part 63, Subpart IIII shall be followed.</p> <p><b>Monitoring Frequency:</b> The procedures specified in 40 CFR Part 63, Subpart IIII shall be followed.</p> <p><b>Data Collection Procedures:</b> The procedures specified in 40 CFR Part 63, Subpart IIII shall be followed.</p> <p><b>Averaging Period:</b> The procedures specified in 40 CFR Part 63, Subpart IIII shall be followed.</p> <p><b>Procedures Corrective Action:</b> The procedures specified in 40 CFR Part 63, Subpart IIII shall be followed.</p>