

STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT

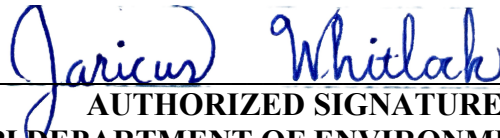
TO CONSTRUCT AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Mississippi Export Railroad Company, Mark B. Miller Railcar Repair Shop
11458 Saracennia Road
Moss Point, Mississippi
Jackson County

has been granted permission to construct air emissions equipment to comply with the emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with 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.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: June 24, 2026

Permit No.: 1280-00150

SECTION 1. GENERAL CONDITIONS

- 1.1 This permit is for air pollution control purposes only.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
- 1.1 Any activities not identified in the application are not authorized by this permit.
(Ref.: Miss. Code Ann. 49-17-29(1)(b))
- 1.2 The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for operating without a valid permit pursuant to State Law.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
- 1.3 It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(6).)
- 1.4 The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
- 1.5 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 the permit, unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)
- 1.6 The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).)
- 1.7 The permit does not convey any property rights of any sort, or any exclusive privilege.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)
- 1.8 The permittee shall furnish to the Department of Environmental Quality (DEQ) within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to

determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

- 1.9 *Design and Construction Requirements:* The stationary source shall be designed and constructed so as to operate without causing a violation of an Applicable Rules and Regulations, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards, and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A(1)-(3).)

- 1.10 The necessary facilities shall be constructed to prevent any wastes or other products or substances to be placed in a location where they are likely to cause pollution of the air or waters of the State without the proper environmental permits.

(Ref.: Miss. Code Ann. 49-17-29(1) and (2))

- 1.11 *Fugitive Dust Emissions from Construction Activities:* The construction of the stationary source shall be performed in such a manner so as to reduce fugitive dust emissions from construction activities to a minimum.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A(4).)

- 1.12 *General Nuisances:* The permittee shall not cause, permit, or allow the emission of particles or any contaminants in sufficient amounts or of such duration from any process as to be injurious to humans, animals, plants, or property, or to be a public nuisance, or create a condition of air pollution.

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

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

1.13 *Right of Entry:* The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives upon presentation of credentials:

- (a) To enter at reasonable times upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and
- (b) To have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air contaminants or waste waters, fuel, process material, or other material which affects or may affect emission of air contaminants from any source.

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

1.14 *Permit Modification or Revocation:* After notice and opportunity for a hearing, the Permit Board may modify the permit or revoke it in whole or in part for good cause shown including, but not limited to:

- (a) Persistent violation of any of the terms or conditions of this permit;
- (b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
- (c) A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

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

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

1.16 *Permit Transfer:* This permit shall not be transferred except upon approval of the Permit Board.

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

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

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

- 1.18 *Permit Expiration:* The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance, if construction is suspended for eighteen (18) months or more, or if construction is not completed within a reasonable time. The DEQ may extend the 18-month period upon a satisfactory showing that an extension is justified.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1)., R. 2.5.C(4)., and R. 5.2.)
- 1.19 *Certification of Construction:* A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(3).)
- 1.20 *Beginning Operation:* After certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by 11 Miss. Admin. Code Pt. 2, R. 2.13.G.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).)
- 1.21 *Application for a Permit to Operate:* The application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).)
- 1.22 *Operating Under a Permit to Construct:* Upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).)
- 1.23 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.
- (a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through

properly signed contemporaneous operating logs or other relevant evidence the following:

- (i) An upset occurred and that the source can identify the cause(s) of the upset;
 - (ii) The source was at the time being properly operated;
 - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
 - (iv) That within five (5) working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
 - (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
- (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
 - (3) This provision is in addition to any upset provision contained in any applicable requirement.
 - (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- (b) Startups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
 - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).

- (3) Where an upset, as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., occurs during startup or shutdown, see the upset requirements above.

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

1.24 *General Duty:* All air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants.

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

1.25 *Compliance Testing:* Regarding compliance testing:

- (a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations 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 POINT DESCRIPTION

The permittee is authorized to construct and operate, upon certification of construction, air emissions equipment, as described in the following table.

| Emission Point | Description |
|----------------|--|
| AA-000 | Facility-Wide (Mississippi Export Railroad Company, Mark B. Miller Railcar Repair Shop) |
| AA-001 | Abrasive Blast Booth equipped with one (1) dust collector |
| AA-002 | Welding/Cutting Operations |
| AA-003 | Paint Booth equipped with dry filters |
| AA-004 | Paint Kitchen (Paint Storage exhausted to ambient air) |
| AA-005 | Fuel-Burning Equipment <ul style="list-style-type: none"> • Three (3) 0.067 MMBtu/hr Natural Gas-Fired Unit Heaters • Six (6) 1.02 MMBtu/hr Natural Gas-Fired Infrared Space Heaters |
| AA-006 | One (1) 6.05 MMBtu/hr Roof-Mounted Air Make-Up Unit (Fuel Type: 1,050 Btu/scf Natural Gas, 94,986 Btu/gal Propane) |
| AA-007 | 18,000-gallon Liquid Propane Gas (LPG) Storage Tank |

SECTION 3. EMISSION LIMITATIONS AND STANDARDS

| Emission Point | Applicable Requirement | Condition Number(s) | Pollutant/Parameter | Limitation/Standard |
|----------------------------------|---|----------------------------------|---|---|
| AA-000 (Facility-Wide) | 11 Miss. Admin. Code Pt. 2, R. 1.3.A. | 3.1 | Opacity | ≤ 40% |
| | 11 Miss. Admin. Code Pt. 2, R. 1.3.B. | 3.2 | Equivalent Opacity | ≤ 40% |
| | 11 Miss. Admin. Code Pt. 2, R. 1.3.C. | 3.3 | PM/PM ₁₀ /PM _{2.5} VOC Organic HAPs | General Nuisance |
| | 11 Miss. Admin. Code Pt. 2, R. 1.3.F(1). | 3.4 | PM (Filterable Only) | $E = 4.1p^{0.67}$ |
| AA-001 AA-003 | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). | 3.5 | PM (Filterable Only) | Operational Requirement |
| AA-003 AA-004 | 40 CFR 63, Subpart M MMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) | 3.6 | HAPs | General Applicability |
| | 40 CFR 63.3881(a)(2), (b), 63.3882(a), (b), and (c), and 63.3883(a), Subpart M MMM | | | |
| | 40 CFR 63.3890(a)(1) and 63.3900(a)(1), Subpart M MMM | 3.7 | Organic HAPs | Shall not exceed 1.9 lbs/gal of coating solids. |
| 40 CFR 63.3900(b), Subpart M MMM | 3.8 | Minimizing Emissions Requirement | | |
| AA-003 | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). | 3.9 | PM/PM ₁₀ (Filterable Only) | Control Device Overspray Requirement |
| AA-005 AA-006 | 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a). | 3.10 | PM (Filterable Only) | Shall not exceed 0.6 lbs/MMBtu. |
| AA-006 | 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1). | 3.11 | SO ₂ | Shall not exceed 4.8 lbs/MMBtu |

- 3.1 For the entire facility, except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial, or waste disposal process, which exceeds forty (40) percent opacity subject to the exceptions provided in (a) and (b):
- (a) Start-up operation may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per start-up in any one hour and not to exceed three (3) start-ups per stack in any twenty-four (24) hour period.

- (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed sixty (60) percent opacity and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour.

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

- 3.2 For the entire facility, except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Condition 3.1. This shall not apply to vision obscuration caused by uncombined water droplets.

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

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

- (a) The permittee shall not cause, allow, or permit the handling, transporting, or storage of any material in a manner which allows or may allow unnecessary amounts of particulate matter to become airborne.

- (b) When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than that from which it originated or to violate any other provision of Regulation 11 Miss. Admin. Code Pt. 2, Ch. 1, the Commission may order such corrected in a way that all air and gases or air and gas-borne material leaving the building or equipment are controlled or removed prior to discharge to the open air.

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

- 3.4 For the entire facility, the permittee shall not cause, allow, or permit the emission of particulate matter in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship,

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

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

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

- 3.5 For Emission Points AA-001 and AA-003, the permittee shall operate each dust collector and exhaust fan with dry filters at all times when processing. Should the dust collector(s) and/or exhaust fan(s) with dry filters become non-operational, the respective process shall be shut down immediately, but not as to cause damage to the equipment or property or cause further environmental problems. The process shall not start up again until such time that the dust collector(s) and/or exhaust fan(s) with dry filters become operational and proper efficiency of the control equipment is restored. The permittee shall maintain at all times sufficient equipment on hand as it is necessary to repair and/or overhaul the dust collector(s) and exhaust fan(s) with dry filters. Maintenance and quality assurance/quality control measures shall be conducted in accordance with the manufacturer's specifications.

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

- 3.6 For Emission Points AA-003 and AA-004, the permittee is subject to and shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63, Subpart M) and General Provisions (40 CFR 60, Subpart A).

(Ref.: 40 CFR 63.3881(a)(2), (b), 63.3882(a), (b), and (c), and 63.3883(a), Subpart M)

- 3.7 For Emission Points AA-003 and AA-004, the permittee shall at all times limit the emission of organic Hazardous Air Pollutants (HAPs) to no more than 1.9 pounds per gallon of coating solids as determined on a monthly basis and for each consecutive 12-month period on a rolling basis.

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

- 3.8 For Emission Points AA-003 and AA-004, the permittee shall operate and maintain any affected source (including any 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 a source is operating in compliance with operation and maintenance requirements will be based on information available to the MDEQ that may include (but not limited to) monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the affected sources.

(Ref.: 40 CFR 63.3900(b), Subpart M)

- 3.9 For Emission Point AA-003, the permittee shall equip and maintain dry filters to effectively capture and control overspray solids from active spray finishing operations and minimize particulate matter (PM/PM₁₀ – Filterable Only) emissions.

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

- 3.10 For Emission Points AA-005 and AA-006, except as otherwise specified or limited herein, the maximum permissible emission of ash and/or particulate matter (PM) from any fossil fuel burning installations of less than ten (10) million BTU (MMBTU) per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input.

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

- 3.11 For Emission Point AA-006, except as otherwise specified or limited herein, 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 (SO₂)) per million BTU per hour heat input.

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

SECTION 4. WORK PRACTICES

| Emission Point | Applicable Requirement | Condition Number(s) | Work Practice |
|------------------|--|---------------------|---------------------------------|
| AA-003 AA-004 | 40 CFR 63.3893(b) and (c), Subpart MMMM 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). | 4.1 | Minimize Organic HAP Emissions. |

4.1 For Emission Points AA-003 and AA-004, the permittee shall develop and implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners and/or other additives, and cleaning materials used in, and waste materials generated by the controlled coating operation(s). The plan shall specify practices and procedures to ensure that, at a minimum, the following elements are implemented:

- (a) All organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be stored in closed containers;
- (b) Spills of organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be minimized;
- (c) Organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes;
- (d) Mixing vessels which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents; and
- (e) Emission of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment.

(Ref.: 40 CFR 63.3893(b) and (c), Subpart MMMM and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

SECTION 5. MONITORING AND RECORDKEEPING REQUIREMENTS

| Emission Point | Applicable Requirement | Condition Number(s) | Pollutant/Parameter | Monitoring/Recordkeeping Requirement |
|---------------------------|--|----------------------------|----------------------------|---|
| AA-000 (Facility-Wide) | 11 Miss. Admin. Code Pt. 2, R. 2.9. | 5.1 | Recordkeeping | Maintain records for a minimum of 5 years. |
| | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 5.2 | PM | Monitoring and Recordkeeping |
| | | 5.3 | Recordkeeping | Monthly Maintenance and Recordkeeping |
| | | 5.4 | Recordkeeping | Operational Status |
| | | 5.5 | Opacity | Conduct Weekly Method 22 (VEE) Readings |
| AA-003 AA-004 | 40 CFR 63.3941(a) – (d), 63.3942(a), 63.3951(a) – (g), and 63.3952(b), Subpart M MMM | 5.6 | Organic HAPs | Demonstrate Continuous Compliance with Emission Limitation |
| | 40 CFR 63.3930(b), (c)(1), (d), (e), and (f), Subpart M MMM | 5.7 | | Record and Maintain Applicable Material Data |
| | 40 CFR 63.3930(c)(2), Subpart M MMM | 5.8 | | Record and Maintain Calculations for the “ <i>Compliant Material</i> ” Option |
| | 40 CFR 63.3930(c)(3), (g), and (h), Subpart M MMM | 5.9 | | Record and Maintain Calculations/Data for the “ <i>Emission Rate without Add-On Controls</i> ” Option |
| | 40 CFR 63.3930(j), Subpart M MMM | 5.10 | | Record and Maintain Data for Deviations |

5.1 The permittee shall retain all required records, monitoring data, supporting information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to the MDEQ as required by Applicable Rules and Regulations or this permit upon request.

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

5.2 For the entire facility, the permittee shall monitor and record the total PM emissions generated by the blast booth, welding/cutting operations, and paint booth for each consecutive 12-month period on a rolling basis.

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

- 5.3 For Emission Point AA-001, the permittee shall perform monthly maintenance inspections on the control device(s) to ensure the units are operating in accordance with the manufacturer's specifications. A record documenting the date of the inspections, the name of the person who performs the inspections, and any maintenance conducted shall be kept at the facility. The record shall include information regarding shut down periods, corrective actions taken, and time the unit(s) were operated without controls. The records shall be made available to the MDEQ upon request.

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

- 5.4 For Emission Point AA-001, the permittee shall keep records of any events where the dust collector was non-operational, and the process was running or shutdown. These records should at a minimum include the following: duration of non-operational dust collector, reason for non-operational baghouse, recordkeeping of any corrective actions taken on the non-operational dust collector.

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

- 5.5 For Emission Point AA-001, the permittee shall conduct a visual emission evaluation using EPA Test Method 22 on a weekly basis while processing. Results shall be recorded in log form. If no processing has taken place within the weekly time frame, this shall be noted. If visible emissions are seen, then the permittee shall shut down the process and begin corrective action on the process. The permittee shall record any corrective actions taken as a result of the Method 22 Test.

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

- 5.6 For Emission Points AA-003 and AA-004, the permittee shall demonstrate initial and continuous compliance with the organic HAP limitation specified in Condition 3.7 by using at least one (1) of the compliance options outlined in Part (b) or (c) (in conjunction with Part (a)) of this condition for all coatings, thinners and/or other additives, and cleaning materials used in a coating operation on a 12-month rolling period. The permittee may apply either of the compliance options to the entire surface coating operation as a whole.

The permittee may use different compliance options at different times on the same coating operation. Additionally, the permittee may employ different compliance options when different coatings are applied to the same part or when the same coating is applied to different parts. However, the permittee may not use different compliance options at the same time on the same coating operation.

(a) **For All Compliance Options:**

The permittee shall determine the following information for each coating, thinner and/or other additive, and cleaning material in accordance with the outlined procedures:

(1) *Determine the mass fraction of organic HAP:* The permittee shall determine and maintain the organic HAP mass fraction for each material used during a 12-month rolling period 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 in Table 5 of Subpart MMMM that is measured to be present at 0.1% by mass or more and at 1.0% by mass or more for other 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 a material by adding up the individual organic HAP mass fractions and truncating the result to three (3) places after the decimal point.

(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.

For reactive adhesives in which some of the HAPs react to form solids and are not emitted to the atmosphere, the permittee may use the alternative method contained in Appendix A of 40 CFR Part 63 – Subpart PPPP rather than Method 24. The permittee may use the volatile fraction that is emitted, as measured by the alternative method in the aforementioned Appendix A, 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 condition (such as manufacturer's formulation data) if it represents each organic HAP in Table 5 of Subpart MMMM that is measured to be present at 0.1% by

mass or more 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 (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 is 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 Subpart MMMM.

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 volume fraction of coating solids:* The permittee shall determine and maintain the volume fraction of coating solids (i.e. gallon of coating solids per gallon of coating) for each coating used during a 12-month rolling period by using one of the methods noted below:
 - (i) *ASTM Method D2697-03 (Reapproved 2014) or ASTM Method D6093-97 (Reapproved 2016)* – the permittee may use either of the noted ASTM methods 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) *Alternative method* – The permittee may use an alternative test method for determining the volume fraction of a coating once the MDEQ has approved it (which shall be submitted in accordance with 40 CFR 63.7(f), Subpart A).
 - (iii) *Information from the supplier or manufacturer of the material* – The

permittee may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer.

- (iv) *Calculation of volume fraction of coating solids* – The permittee may determine the volume fraction of coating solids (V_s) (in gallon of coating solids per gallon of coating) using Equation 1:

$$V_s = 1 - \frac{m_{vol}}{D_{avg}} \quad \text{(Eqn. 1)}$$

Where:

m_{vol} = total volatile matter content of a coating (including any HAP, VOC) water, and exempt compounds determined in accordance with EPA Test Method 24), pounds of volatile matter per gallon of coating; and

D_{avg} = average density of volatile matter in a coating, pounds of volatile of matter per gallon of volatile matter.

- (3) *Determine the density of each material used:* The permittee shall determine and maintain the density of each liquid coating, thinner and/or other additive, and cleaning material (as applicable) used during a 12-month rolling period from test results using ASTM Method D1475-13 or Method D2111-10 (Reapproved 2015), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials.

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

If the permittee purchases a material or monitor consumption by weight instead of volume, the permittee does not need to determine material density. Instead, the permittee may use the material weight in place of the combined terms for density and volume in Equation 5.

- (b) **For Compliant Material Option:**

To demonstrate compliance with this option, the permittee shall determine and maintain the organic HAP content of each coating in a coating operation or group of coating operations in accordance with the following procedures and those outlined in Part (a) of this condition (as applicable). Additionally, the permittee shall not use a thinner and/or other additive or cleaning material that contains

organic HAPs in the corresponding coating operation or group of coating operations as determined by Part (a)(1):

- (1) *Determine the organic HAP content:* The permittee shall calculate and maintain the organic HAP content (H_C) (in pounds organic HAP per gallon of coating solids) for each coating used during a month by using Equation 2:

$$H_C = \frac{(D_C)(W_C)}{V_C} \quad \text{(Eqn. 2)}$$

Where:

D_C = density of a coating (in pounds per gallon) as determined by Part (a)(3) of this condition;

W_C = mass fraction of organic HAPs in a coating (in pounds of organic HAP per pound of coating) as determined by Part (a)(1) of this condition; and

V_C = volume fraction of coating solids (in gallons of coating solids per gallon of coating) as determined by Part (a)(2).

If the permittee chooses to comply with the emission limitation outlined in Condition 3.7 using the compliant material option, the use of any coating, thinner and/or other additive, or cleaning material that does not meet the specified criteria shall be considered a deviation from the stated emission limitation and subject the reporting requirements outlined in Condition 6.2(g).

(c) **For Emission Rate Without Add-On Controls Option:**

To demonstrate compliance with this option, the permittee shall determine and maintain the organic HAP emission rate for coatings, thinners and/or other additives, and cleaning materials used in a coating operation or group of coating operations in accordance with the following procedures and those outlined in Part (a) of this condition (as applicable).

The permittee does not need to re-determine the mass of organic HAPs in coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site (or reclaimed off-site if the permittee has documentation showing that you received back the exact same materials that were sent off-site) and reused in the coating operation for which the emission rate without add-on controls option is used. If the permittee uses coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site, the amount of each used in a month may be reduced by the amount of each that is reclaimed (i.e. the amount used may be calculated as the amount consumed to account for materials that are reclaimed):

- (1) *Determine the volume of each material used:* The permittee monitor and maintain the volume (in gallons) of each coating, thinner and/or other additive, and cleaning material used during each month by measurement or usage records. If the permittee purchases materials or monitor consumption by weight instead of volume, the permittee does not need to determine the volume of each material used. Instead, the permittee may use the material weight in place of the combined terms for density and volume in Equation 5 for the applicable coating / thinner and/or other additive / cleaning material.
- (2) *Calculate the total volume of coating solids used:* The permittee shall calculate and maintain the combined volume (in gallons) of coatings solids for all coatings used (V_{st}) during a month by using Equation 3:

$$V_{st} = \sum_{i=1}^m (Vol_{c,i})(V_{s,i}) \quad \text{(Eqn. 3)}$$

Where:

$Vol_{c,i}$ = total volume (in gallons) of each coating, i , used during a month;

$V_{s,i}$ = volume fraction of coating solids in each coating, i , used during a month as determined by Part (a)(2) of this condition; and

m = number of coatings used during a month.

- (3) *Calculate the combined mass of organic HAP emissions:* The permittee shall calculate and maintain the combined total mass (in pounds) of organic HAPs contained in all coatings, thinners and/or other additives, and cleaning materials used (H_e) during each month (minus the organic HAPs in certain waste materials) using Equation 4:

$$H_e = A + B + C - R_w \quad \text{(Eqn. 4)}$$

Where:

A = total mass (in pounds) of organic HAPs of all coatings used during a month as calculated by Equation 5;

B = total mass (in pounds) of organic HAPs of all thinners used during a month as calculated in Equation 5;

C = total mass (in pounds) of organic HAPs of all cleaning materials used during a month as calculated in Equation 5; and

R_w = total mass (in pounds) of organic HAPs in waste materials sent or designated for shipment to a hazardous waste treatment, storage, and disposal facility (TSDF) during a month as determined by Part (c)(3)(ii) of this condition (the permittee may assign a value of zero to " R_w " if the permittee does not wish to use this allowance)

- (i) *Calculate the mass of organic HAPs in coatings/thinners and/or other additives/cleaning materials:* The permittee shall calculate and maintain the mass (in pounds) of organic HAPs in each category (i.e. coatings (A), thinners and/or other additives (B), and cleaning materials (C)) used during a month using Equation 5:

$$A / B / C = \sum_{i=1}^m (Vol_i)(D_i)(W_i) \quad \text{(Eqn. 5)}$$

Where:

Vol_i = total volume (in gallons) of each coating/thinner and/or other additive/cleaning material, i , used during a month;

D_i = density (in pounds per gallon) of each coating/thinner and/or other additive/cleaning material, i , used during a month;

W_i = mass fraction of organic HAPs in each coating/thinner and/or other additive/cleaning material, i , used during a month (for reactive adhesives, use the mass fraction of organic HAPs that are emitted as determined using Appendix A of Subpart PPPP); and

m = number of different coatings/thinners and/or other additives/cleaning materials used during a month.

- (ii) *Determine the total mass of organic HAPs in waste materials sent or designated for shipment to a hazardous waste TSDF:* If the permittee chooses to account for the mass of organic HAPs contained in waste materials sent or designated for shipment to a hazardous waste TSDF, the permittee shall determine the mass in accordance with the following specifications:

(A) The permittee may only include waste materials in the determination that are generated by coating operations for which the permittee uses Equation 1 and will be treated or disposed of by a facility that is regulated as a TSDF under 40 CFR Part 262, 264, 265, or 266. The TSDF may be either off-site or on-

site. However, the permittee may not include organic HAPs contained in wastewater.

- (B) The permittee shall determine and record either the amount of waste materials sent to a TSDF during a month or the amount collected and stored during a month and designated for future transport to a TSDF. The permittee shall not include in the determination any waste materials sent to a TSDF during a month if the permittee has already included them in the amount collected and stored during a month or a previous month.
 - (C) The permittee shall determine and record the total mass of organic HAPs contained in the waste materials specified in Part (c)(3)(ii)(B) of this condition.
 - (D) The permittee shall document and maintain the methodology used to determine both the amount of waste materials and the total mass of organic HAPs the materials contain. If waste manifests include this information, they may be used as part of the documentation of the amount of waste materials and the mass of organic HAPs contained in them.
- (4) *Calculate the organic HAP emission rate:* The permittee shall calculate and maintain the organic HAP emission rate (H_{yr}) (in pounds of organic HAPs emitted per gallon of coating solids used) for each 12-month rolling period:

$$H_{yr} = \frac{\sum_{y=1}^n H_e}{\sum_{y=1}^n V_{st}} \quad \text{(Eqn. 6)}$$

Where:

H_e = total mass (in pounds) of organic HAP emissions from all materials used during month, y , as calculated by Equation 4;

V_{st} = total volume (in gallons) of coating solids used during month, y , as calculated by Equation 3;

y = identifier for months; and

n = the number of full or partial months in the compliance period (i.e. “ n ” = 12).

If the organic HAP emission rate for any 12-month rolling period exceeds the emission rate outlined in Condition 3.7, the emission rate shall be considered a deviation from the

stated emission limitation and subject the reporting requirements outlined in Condition 6.2(h)

(Ref.: 40 CFR 63.3941(a) – (d), 63.3942(a), 63.3951(a) – (g), and 63.3952(b); Subpart M MMM)

5.7 For Emission Points AA-003 and AA-004, the permittee shall record and maintain the following information as applicable:

- (a) A copy of each notification and report that the permittee submitted to comply with 40 CFR 63, Subpart M MMM, and the documentation supporting each notification and report. The permittee shall keep records of any data used in each annual predominant activity determination and in the calculation of the facility-specific emission limit of Condition 3.7 for each 12-month compliance period included in the semi-annual compliance reports.
- (b) A current copy of information provided by material suppliers or manufacturers (such as manufacturer's formulation data) or test data used to determine the mass fraction of organic HAPs and the density for each coating, thinner and/or other additive, and cleaning material as well as the volume fraction of coating solids for each coating.

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

- (b) A record of the coating operations on which the permittee used each compliance option and the time periods (beginning and ending dates and times) for each option the permittee used during each 12-month rolling period.
- (c) The product name/identification and the volume of each coating, thinner and/or other additive, and cleaning material used during each 12-month rolling period. If the permittee is using the compliant material option for all coatings used in an operation or group of operations, the permittee may maintain purchase records for each material used rather than a record of the volume used.
- (d) The mass fraction of organic HAPs for each coating, thinner and/or other additive, and cleaning material used during each 12-month rolling period unless the material is tracked by weight.
- (f) The volume fraction of coating solids for each coating used during each 12-month rolling period.

(Ref.: 40 CFR 63.3930(a), (b), (c)(1), (d), (e), and (f); Subpart M MMM)

- 5.8 For Emission Points AA-003 and AA-004, the permittee shall record and maintain the calculation of the organic HAP content for each coating (as determined by Equation 2) when the permittee uses the “*compliant material*” option to demonstrate compliance with the organic HAP emission limitation specified in Condition 3.7.

(Ref.: 40 CFR 63.3930(c)(2); Subpart M MMM)

- 5.9 For Emission Points AA-003 and AA-004, the permittee shall maintain the following information when the permittee uses the “*emission rate without add-on controls*” option to demonstrate compliance with the organic HAP emission limitation in Condition 3.7:

- (a) The calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used in a month as determined by Equations 4 and 5;
- (b) The calculation of the total volume of coating solids used in a month as determined by Equation 3;
- (c) The calculation of the organic HAP emission rate for each 12-month rolling period as determined by Equation 6;
- (d) The density for each coating, thinner and/or other additive, and cleaning material used during each 12-month rolling period;
- (e) If the permittee uses the allowance in Equation 4 for organic HAPs contained in waste materials sent to or designated for shipment to a hazardous waste TSDF (i.e. “ R_w ”), the permittee shall maintain the following information:
 - (1) The name and address of each hazardous waste TSDF to which the permittee sent waste materials;
 - (2) A statement of which subparts under 40 CFR Parts 262, 264, 265, and 266 apply to the hazardous waste TSDF;
 - (3) The date of each shipment;
 - (4) The identification of the coating operations producing waste materials included in each shipment and the month or months in which the permittee used the allowance for these materials in Equation 4;
 - (5) The methodology used in accordance with Condition 5.6(c)(3)(ii)(B) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a hazardous waste TSDF each month; and

- (6) The methodology used to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, the methods used to generate the data, the frequency of testing or monitoring, and supporting calculations and documentation (including waste manifest for each shipment).

(Ref.: 40 CFR 63.3930(c)(3), (g), and (h); Subpart M MMM)

5.10 For Emission Points AA-003 and AA-004, on and after January 5, 2021, the permittee shall maintain the following records for each deviation from the emission limitation specified in Condition 3.7:

- (a) The date, time, and duration of the deviation, as reported under Condition 6.2;
- (b) A list of the affected sources or equipment for which the deviation occurred and the cause of the deviation, as reported under Condition 6.2;
- (c) An estimate of the quantity of the organic HAPs emitted over the emission limitation specified in Condition 3.7 and a description of the method used to calculate the estimate, as reported under Condition 6.2; and
- (d) A record of actions taken to minimize emissions in accordance with Condition 3.7 and any corrective actions taken to return the affected unit to its normal or usual manner of operation.

(Ref.: 40 CFR 63.3930(j); Subpart M MMM)

SECTION 6. REPORTING REQUIREMENTS

| Emission Point | Applicable Requirement | Condition Number(s) | Reporting Requirement |
|---------------------------|---|---------------------|--|
| AA-000 (Facility-Wide) | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 6.1(a) | Report deviations within five (5) working days |
| | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 6.1(b) | Semiannual reporting |
| | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 6.1(c) | Certification by responsible official |
| | 11 Miss. Admin. Code Pt. 2, R. 2.5.C(2). | 6.1(d) | Notification of beginning actual construction within 15 days |
| | 11 Miss. Admin. Code Pt. 2, R. 2.5.C(3). | 6.1(e) | Notification when construction does not begin or is suspended |
| | 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3). | 6.1(f) | Certification of completion of construction prior to operation |
| | 11 Miss. Admin. Code Pt. 2, R. 2.5.D(2). | 6.1(g) | Notification of changes in construction |
| AA-003 AA-004 | 40 CFR 63.3920(a)(3)(i – v), (4) – (6) and 63.3942(c); Subpart MMMM | 6.2 | Submit a Semi-Annual Monitoring Report |

6.1 General Reporting Requirements:

- (a) 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) working days of the time the deviation began.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- (b) Beginning upon issuance of this permit and lasting until issuance or modification of the applicable operating permit, the permittee shall submit reports of any required monitoring by July 31st and January 31st for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 2.1.C. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration. For any air emissions equipment not yet constructed and/or operating the report shall so note and include an estimated date of commencement of construction and/or startup, whichever is applicable.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- (c) Any document required by this permit to be submitted to the MDEQ shall contain a certification signed by a responsible official stating that, based on information

and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

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

- (d) Within fifteen (15) days of beginning actual construction, the permittee must notify the MDEQ in writing that construction has begun.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).)

- (e) The permittee must notify the MDEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).)

- (f) Upon the completion of construction or installation of an approved stationary source or modification, and prior to commencing operation, the applicant shall notify the Permit Board that construction or installation was performed in accordance with the approved plans and specifications on file with the Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).)

- (g) The Permit Board shall be promptly notified in writing of any change in construction from the previously approved plans and specifications or permit. If the Permit Board determines the changes are substantial, it may require the submission of a new application to construct with “as built” plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an “as built” application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).)

6.2 For Emission Points AA-003 and AA-004, the permittee shall submit a semi-annual monitoring report (SMR) in accordance with Condition 6.1(b) that contains the following information (as applicable):

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

- (d) Identification of the compliance option or options specified in Condition 5.6 that the permittee used on each coating operation/group of operations during each reporting period. If the permittee switched between compliance options during a reporting period, the permittee shall report the beginning and ending dates for each option the permittee used.
- (e) If the permittee uses the “emission rate without add-on controls” compliance option (as outlined in Condition 5.6(c)), the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period.
- (f) No deviations: If there were no deviations from the organic HAP emission limitation specified in Condition 3.7 using the “compliant material” option and/or the “emission rate without add-on controls” option, the SMR must include a statement that there were no deviations from the emission limitation during the reporting period. Additionally, if the “compliant material” option was used during a reporting period, the statement must include the following declarations:
 - (1) No coatings were used that had an organic HAP content in excess of the noted emission limitation; and
 - (2) No thinner and/or other additive, or cleaning material that contained organic HAPs (as determined by Condition 5.6(a)(1)).
- (g) Deviations – Compliant Material Option: If the permittee used the compliant material option and there was a deviation from the organic HAP emission limitation in Condition 3.7, the SMR must contain the following information (as applicable):
 - (1) Identification of each coating used that deviated from the emission limitation;
 - (2) Each thinner and/or other additive and cleaning material used that contained organic HAPs;
 - (3) The dates and time periods each was used;
 - (4) The calculation of the organic HAP content (as determined by Equation 2) for each coating identified. The permittee does not need to submit background data supporting this calculation (e.g. information provided by coating suppliers or manufacturers, or test reports);
 - (5) The determination of the organic HAP mass fraction for each thinner and/or other additive and cleaning material. The permittee does not need to submit background data supporting this calculation (e.g. information provided by material suppliers or manufacturers, or test reports);

- (6) On or after January 5, 2021, a statement that details the cause of each deviation (even if it is an unknown cause) and the following additional information:
 - (i) The number of deviations;
 - (ii) For each deviations, a list of the affected source or equipment;
 - (iii) An estimate of the organic HAP quantity (in pounds) emitted over the emission limitation specified in Condition 3.7 and a description of the method used to estimate the emissions; and
 - (iv) The actions taken to minimize emissions in accordance with Condition 3.7.

- (h) Deviations – Emission Rate Without Add-On Controls Option: If the permittee used the “emission rate without add-on controls” compliance option and there was a deviation from the emission limitation specified in Condition 3.7, the SMR must include the following information (as applicable):
 - (1) The beginning and end dates of each compliance period during which the 12-month organic HAP emission rate exceeded the emission limit;
 - (2) The calculations used to determine the rolling 12-month organic HAP emission rate for the compliance period in which the deviation occurred (including the calculations for Equations 3 through 6 and (if applicable) the calculation used to determine mass of organic HAPs in waste materials in accordance with Condition 5.6(c)(3)(ii)). The permittee does not need to submit background data supporting these calculations (e.g. information provided by materials suppliers or manufacturers, or test reports);
 - (3) On and after January 5, 2021, a statement that details the cause of each deviation (even if it is an unknown cause) and the following additional information:
 - (i) The number of deviations;
 - (ii) For each deviation, a list of the affected source or equipment;
 - (iii) An estimate of the organic HAP quantity (in pounds) emitted over the emission limitation specified in Condition 3.7 and a description of the method used to estimate the emissions; and
 - (iv) The actions took to minimize emissions in accordance with Condition 3.7.

(Ref.: 40 CFR 63.3920(a)(3)(i – v), (4) – (6) and 63.3942(c); Subpart M MMM)