

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

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

THIS CERTIFIES THAT

Taylor Machine Works, Inc. – Plant 1, Plant 2, and Plant 3
(Plant 1 – 3690 North Church Avenue)
(Plant 2 – 107 Thompson Street)
(Plant 3 – 205 Giffin Industrial Drive)
Louisville, Winston County, Mississippi

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with the Federal Clean Air Act and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), the regulations and standards adopted and promulgated thereunder, and the State Implementation Plan for operating permits for synthetic minor sources.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

Becky Simonson

AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: October 25, 2024

Permit No.: 2980-00003

Effective Date: As Specified Herein.

Expires: September 30, 2029

SECTION 1

A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
2. This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.4.D.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.4.D.)
3. Any activities not identified in the application are not authorized by this permit.

(Ref.: Miss. Code Ann. 49-17-29 1.b)
4. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(5).)
5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(7).)
6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(15)(a).)
7. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(15)(c).)
8. The permittee shall allow the Mississippi Department of Environmental Quality (MDEQ) Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:

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

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

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

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

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

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

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

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

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

- (1) The source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51 – Subpart I, or 40 CFR 51.166; or
- (2) The source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51 – Subpart I, or 40 CFR 51.166;
- (e) An increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51 – Subpart I or 40 CFR 51.166; or
- (f) Any change in ownership of the stationary source.

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

B. GENERAL OPERATIONAL CONDITIONS

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

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

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

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

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

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

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

- (a) Upsets

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

will consider establishing source specific emission limitations or work practice standards for start-ups and shutdowns. Source specific emission limitations or work practice standards established for start-ups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).

- (3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

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

5. *Compliance Testing*: Regarding compliance testing:

- (a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations of this permit and in units of mass per time.
- (b) Compliance testing will be performed at the expense of the permittee.
- (c) Each emission sampling and analysis report shall include but not be limited to the following:
 - (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).)

C. PERMIT RENEWAL / MODIFICATION / TRANSFER / TERMINATION

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

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

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

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

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

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

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

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

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

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

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

SECTION 2 EMISSION POINT DESCRIPTION

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

Emission Point	Description
AA-000	Taylor Machine Works – Plant 1 (3690 North Church Avenue)
AA-100	Facility-Wide Fuel Burning Process Equipment [includes (but not limited to) cutting torches, metal preparation heaters, melt heaters, and bake ovens]
AA-200	Facility-Wide Metal Cutting Operations [includes (but is not limited to) oxy-fuel and plasma torches; emissions from the plasma cutting machines are controlled by a dust collector]
AA-300	Facility-Wide Abrasive Blasting Operations [includes (but is not limited to) sand blasting, shot blasting, and wheel-a-brating; emissions are controlled by baghouses]
AA-400	Facility-Wide Metal Working Operations [includes (but is not limited to) metal punching, pressing, drilling, grinding, and sawing]
AA-500	Facility-Wide Welding Operations [includes (but is not limited to) gas metal arc welding, shielded metal arc welding, submerged arc welding, flux core arc welding, and soldering]
AA-600	Facility-Wide Surface Coating Operations [includes (but is not limited to) spray painting, printing, and use of aerosolized lubricants, adhesives, preservatives, greases, and parts washers]
AA-700	Facility-Wide Storage Tanks [includes (but is not limited to) solvents, antifreeze, engine oil, hydraulic fluid, diesel, and gasoline]
AA-800	Facility-Wide Compression Ignition (CI) Diesel-Fired Emergency Generator Engines
AA-801	167 HP (125 kW) Emergency Generator Engine [max. heat input: 0.43 MMBTU / hour; manufactured in 2015]
AA-802	268 HP (200 kW) Emergency Generator Engine [max. heat input: 0.69 MMBTU / hour; manufactured in 2015]
AA-803	134 HP (100 kW) Emergency Generator Engine [max. heat input: 0.34 MMBTU / hour; manufactured in 2015]
AA-804	200 HP (150 kW) Emergency Generator Engine [max. heat input: 0.52 MMBTU / hour; manufactured in 2015]
AA-900	Facility-Wide Miscellaneous External Combustion Units [includes (but is not limited to) space heating equipment and any other external combustion units not otherwise categorized]

Emission Point	Description
AB-000	Taylor Defense Products – Plant 2 (107 Thompson Street)
AB-100	Facility-Wide Fuel Burning Process Equipment [includes (but is not limited to) metal preparation heaters, melt heaters, and bake ovens]
AB-200	Facility-Wide Metal Cutting Operations [includes (but is not limited to) oxy-fuel and plasma torches]
AB-300	Facility-Wide Abrasive Blasting Operations [includes (but is not limited to) sand blasting, shot blasting, and wheelabrating; emissions are controlled by baghouses]
AB-400	Facility-Wide Metal Working Operations [includes (but is not limited to) metal punching, pressing, drilling, grinding, and sawing]
AB-500	Facility-Wide Welding Operations [includes (but is not limited to) gas metal arc welding, shielded metal arc welding, submerged arc welding, flux core arc welding, and soldering]
AB-600	Facility-Wide Surface Coating Operations [includes (but is not limited to) spray painting, printing, and the use of aerosolized lubricants, adhesives, preservatives, greases, and parts washers]
AB-700	Facility-Wide Storage Tanks [includes (but is not limited to) solvents, antifreeze, engine oil, hydraulic fluid, diesel, and gasoline]
AB-800	Facility-Wide Miscellaneous External Combustion Units [includes (but is not limited to) space heating equipment and any other external combustion units not otherwise categorized]
AC-000	Taylor Machine Works – Plant 3 (205 Giffin Industrial Drive)
AC-100	Facility-Wide Fuel Burning Process Equipment [includes (but is not limited to) metal preparation heaters, melt heaters, and bake ovens]
AC-200	Facility-Wide Metal Cutting Operations [includes (but is not limited to) oxy-fuel and plasma torches]
AC-300	Facility-Wide Metal Working Operations [includes (but is not limited to) metal punching, pressing, drilling, grinding, and sawing]
AC-400	Facility-Wide Welding Operations [includes (but is not limited to) gas metal arc welding, shielded metal arc welding, submerged arc welding, flux core arc welding, and soldering]
AC-500	Facility-Wide Surface Coating Operations [includes (but is not limited to) spray painting, printing, and the use of aerosolized lubricants, adhesives, preservatives, greases, and parts washers]
AC-600	Facility-Wide Storage Tanks [includes (but is not limited to) solvents, antifreeze, engine oil, hydraulic fluid, diesel, and gasoline]
AC-700	Facility-Wide Miscellaneous External Combustion Units [includes (but is not limited to) space heating equipment and any other external combustion units not otherwise categorized]

SECTION 3
EMISSION LIMITATIONS AND STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limitation / Standard
AA-000 AB-000 AC-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity (Smoke)	≤ 40% (except during start-up)
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2	Opacity	≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.F.(1).	3.3	PM (filterable)	$E = 4.1 \cdot (p^{0.67})$
	11 Miss. Admin. Code Pt. 2, R. 1.3.C.	3.4	All Pollutants	General Nuisance Provisions
AA-100 AA-800 AA-900 AB-100 AB-800 AC-100 AC-700	11 Miss. Admin. Code Pt. 2, R. 1.3.D.(1)(a).	3.5	PM	0.6 lb. / MMBTU per Hour
AA-200 AA-300 AA-400 AA-500 AB-200 AB-300 AB-400 AB-500 AC-200 AC-300 AC-400	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). (PSD Avoidance Limit)	3.6	PM (filterable)	240.0 tpy (Rolling 12-Month Total)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). (Title V Avoidance Limits)	3.7	PM ₁₀ / PM _{2.5} (filterable only)	95.0 tpy (Rolling 12-Month Totals)
AA-200 AA-300 AB-300	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.8	PM / PM ₁₀ / PM _{2.5} (filterable only)	Operate the Baghouses / Dust Collector at All Times the Process Equipment is in Operation
AA-200 AA-400 AA-500 AA-600 AB-200 AB-400 AB-500 AB-600 AC-200 AC-300 AC-400 AC-500	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). (Major Source Avoidance Limits)	3.9	HAPs	9.0 tpy (Individual) 23.0 tpy (Total) (Rolling 12-Month Totals)

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limitation / Standard
AA-600 AB-600 AC-500	11 Miss. Admin. Code Pt.2, R. 2.2.B.(10). (Title V Avoidance Limit)	3.10	VOCs	95.0 tpy (Rolling 12-Month Totals)
	40 CFR Part 63, Subpart HHHHHH – NESHAP: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources 40 CFR 63.11169(b) and 63.11170(a)(2); Subpart HHHHHH	3.11	HAPs	General Applicability
AA-700 AB-700 AC-600	40 CFR Part 63, Subpart CCCCCC – NESHAP for Source Category: Gasoline Dispensing Facilities 40 CFR 63.11111(a) (b), (c), (i), 63.11130, and Table 3; Subpart CCCCCC	3.12	HAPs	General Applicability
AA-800	40 CFR Part 63, Subpart ZZZZ – NESHAP for Stationary Reciprocating Internal Combustion Engines 40 CFR 63.6580, 63.6585(a),(c), 63.6590(a)(2)(iii) and (c)(1); Subpart ZZZZ	3.13	HAPs	General Applicability
	40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines 40 CFR 60.4200(a)(2)(i); Subpart IIII	3.14	NMHC + NO _x CO PM	General Applicability
	40 CFR 60.4205(b), 60.4206 and 60.4211(c); Subpart IIII	3.15	NMHC + NO _x	4.0 Grams / Kilowatt-Hour (or 3.0 Grams / Horsepower-Hour)
			CO	3.5 Grams / Kilowatt-Hour (or 2.6 Grams / Horsepower-Hour)
			PM	0.20 Grams / Kilowatt-Hour (or 0.15 Grams / Horsepower-Hour)
40 CFR 60.4207(b); Subpart IIII	3.16	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 IIII	3.17	Operational Requirements	100 Hours / Calendar Year for Maintenance and Readiness Testing; 50 Hours / Calendar Year for Non-Emergency Situations	

- 3.1 For Emission Points AA-000, AB-000, and AC-000 (Facility-Wide), except as otherwise specified herein, the permittee shall not cause or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial, or waste disposal process that exceeds forty (40) percent opacity subject to the following exceptions:
- (a) Start-up operations may produce emissions, which exceed 40% opacity for up to fifteen (15) minutes per start-up in any one (1) hour and not to exceed three (3) start-ups per stack in any twenty-four (24) hour period.
 - (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed sixty percent (60%) opacity and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one (1) hour.

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

- 3.2 For Emission Points AA-000, AB-000, and AC-000 (Facility-Wide), except as otherwise specified herein, the permittee shall not discharge into the ambient air from a point source any contaminant of such opacity as to obscure an observer's view to a degree in excess of forty percent (40%) opacity. This shall not apply to vision obscuration caused by uncombined water droplets.

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

- 3.3 For Emission Points AA-000, AB-000, and AC-000 (Facility-Wide), the permittee shall not allow the emission of particulate matter (PM) in total quantities in any one (1) hour from any manufacturing process (which includes any associated stacks, vents, outlets, or combination thereof) to exceed the amount determined by the relationship:

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

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

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

- 3.4 For Emission Points AA-000, AB-000, and AC-000 (Facility-Wide), the permittee shall not cause or allow the emission of particles or any contaminants in sufficient amounts or of such duration from any process as to be injurious to humans, animals, plants, or property, or to be a public nuisance, or create a condition of air pollution.

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.

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 from which it originated or to violate any other provision of this regulation, the Commission may order such corrected in a way that all air and gases or air and 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.)

- 3.5 For Emission Points AA-100, AA-800, AA-900, AB-100, AB-800, AC-100 and AC-700, the maximum permissible emission of ash and/or PM from any fossil fuel burning installation of less than ten (10) million BTU (MMBTU) per hour heat input shall not exceed 0.6 pounds per MMBTU per hour heat input.

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

- 3.6 For Emission Points AA-200, AA-300, AA-400, AA-500, AB-200, AB-300, AB-400, AB-500, AC-200, AC-300, and AC-400, the permittee shall limit the total emission of particulate matter (PM; filterable) to no more than 240.0 tons per year (tpy) based on a rolling 12-month total basis.

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

- 3.7 For Emission Points AA-200, AA-300, AA-400, AA-500, AB-200, AB-300, AB-400, AB-500, AC-200, AC-300, and AC-400, the permittee shall limit the total emission of particulate matter less than 10 microns (μm) in diameter (PM_{10} ; filterable only) and particulate matter less than 2.5 microns (μm) in diameter ($\text{PM}_{2.5}$; filterable only) to no more than 95.0 tpy based on a rolling 12-month total basis.

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

- 3.8 For Emission Points AA-200, AA-300 and AB-300, the permittee shall operate each baghouse / dust collector at all times while the associated process equipment is in operation. In the event a baghouse / dust collector malfunctions or becomes non-operational, the permittee shall take actions as expeditiously as possible to bring a baghouse / dust collector back to normal operation or cease the operation of the associated process equipment.

For the purpose of this permit, “normal operation” shall be defined as operation of a baghouse / dust collector in which no visible emissions are detected from the exhaust point.

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

- 3.9 For Emission Points AA-200, AA-400, AA-500, AA-600, AB-200, AB-400, AB-500, AB-600, AC-200, AC-300, AC-400 and AC-500, the permittee shall limit the emission of

hazardous air pollutants (HAPs) to no more than 9.0 tpy for any individual HAP and no more than 23.0 tpy for all HAPs in total based on rolling 12-month totals.

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

- 3.10 For Emission Points AA-600, AB-600, and AC-500, the permittee shall limit the total emission of volatile organic compounds (VOCs) to no more than 95.0 tpy based on a rolling 12-month total basis.

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

- 3.11 For Emission Points AA-600, AB-600, and AC-500, the permittee is subject to and shall comply with the applicable requirements found in 40 CFR Part 63, Subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources and the applicable requirements of Subpart A – General Provisions (as required in Table 1 of Subpart HHHHHH).

For the purpose of this subpart, a “target HAP-containing coating” means any spray-applied coating that meets one of following criteria:

- (a) The coating contains cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by mass (of the metal); or
- (b) The coating contains manganese in amounts greater than or equal to 1.0 percent by mass (of the metal).

The permittee may at any time submit a notification to the MDEQ in accordance with Condition 6.3 that certifies the permittee does not apply any target HAP-containing coating. Upon submission of this certification, the permittee shall no longer be subject to and required to comply with the applicable requirements found in Subpart HHHHHH. However, the permittee shall retain records that describe the coatings that are spray applied and the MDEQ maintains the authority to verify such records (including whether the notification of exemption was sufficiently demonstrated).

(Ref.: 40 CFR 63.11169(b), 63.11170(a)(2) and 63.11180; Subpart HHHHHH)

- 3.12 For Emission Points AA-700, AB-700, and AC-600, the permittee is subject to and shall comply with 40 CFR Part 63, Subpart CCCCCC – NESHAP for Source Category: Gasoline Dispensing Facilities and the applicable requirements of Subpart A – General Provisions (as required in Table 3 of Subpart CCCCCC).

For the purpose of this permit, the maximum monthly throughput is less than 10,000 gallons of gasoline; therefore, the permittee shall comply with the applicable requirements as set forth in Section 4 herein.

If the maximum monthly gasoline throughput exceeds 10,000 gallons, the permittee shall comply with the applicable requirements specified in 40 CFR 63.11117, Subpart CCCCCC. Thereafter, the permittee shall remain subject to the requirements for monthly gasoline throughput above the 10,000-gallon threshold even if the throughput later returns below 10,000 gallons.

(Ref.: 40 CFR 63.11111(a), (b), (c), (i), 63.11130, and Table 3; Subpart CCCCCC)

- 3.13 For Emission Point AA-800, the permittee is subject to and shall comply with the applicable requirements found in 40 CFR Part 63, Subpart ZZZZ – NESHAP from Stationary Reciprocating Internal Combustion Engines (RICE) and 40 CFR Part 63, Subpart A – General Provisions (as required in Table 8 of Subpart ZZZZ).

Emission Points AA-801, AA-802, and AA-803 are considered “new” stationary RICE (i.e. construction commenced after June 12, 2006). Therefore, the permittee shall comply with Subpart ZZZZ by complying with the requirements found in 40 CFR Part 60, Subpart IIII. No further requirements apply for such engines under Subpart ZZZZ.

(Ref.: 40 CFR 63.6580, 63.6585(a), (c), 63.6590(a)(2)(iii) and (c)(1); Subpart ZZZZ)

- 3.14 For Emission Point AA-800, the permittee is subject to and shall comply with the applicable requirements found in 40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (CI ICE) and 40 CFR Part 60, Subpart A – General Provisions (as required in Table 8 of Subpart IIII).

(Ref.: 40 CFR 60.4200(a)(2)(i); Subpart IIII)

- 3.15 For Emission Point AA-800, the permittee shall purchase engines that comply with the following emission standards:

- (a) Non-Methane Hydrocarbons + Nitrogen Oxides (NMHC + NO_x): 4.0 grams per kilowatt-hour (or 3.0 grams per horsepower-hour); and
- (b) Carbon Monoxide (CO): 3.5 grams per kilowatt-hour (or 2.6 grams per horsepower-hour)
- (c) Particulate Matter (PM): 0.2 grams per kilowatt-hour (or 0.15 grams per horsepower-hour).

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

(Ref.: 40 CFR 60.4205(b), 60.4206, and 60.4211(c); Subpart IIII)

- 3.16 For Emission Point AA-800, the permittee shall only combust ultra-low-sulfur diesel (ULSD) fuel within each engine that meets the following requirements (on a per-gallon basis):
- (a) A maximum sulfur content of fifteen (15) ppm; and
 - (b) A minimum cetane index of forty (40) or a maximum aromatic content of thirty-five (35) volume percent.

(Ref.: 40 CFR 60.4207(b); Subpart III)

- 3.17 For Emission Point AA-800, any operation of each 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 III)

SECTION 4 WORK PRACTICE STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Work Practice
AA-600 AB-600 AC-500	40 CFR 63.11173(e); Subpart HHHHHH	4.1	HAPs	Spray Coating Application Requirements
	40 CFR 63.11173(f) and (g); Subpart HHHHHH	4.2		Personnel Training Requirements
AA-700 AB-700 AC-600	40 CFR 63.11115(a); Subpart CCCCCC	4.3	HAPs	General Duty Clause
	40 CFR 63.11116(a) and (d); Subpart CCCCCC	4.4		Minimize Extended Vapor Releases
AA-800	40 CFR 60.4211(a); Subpart IIII	4.5	NMHC + NO _x	Perform Best Management Practices
	40 CFR 60.4211(g)(2); Subpart IIII	4.6	CO PM	Compliance Requirements (As Applicable)

4.1 For Emission Points AA-600, AB-600, and AC-500, the permittee shall comply with the following requirements:

- (a) All painters must certify that they have completed training in the proper spray application of surface coatings and the proper set-up / maintenance of spray equipment. The minimum requirements for training and certification are described in Condition 4.2(a).

The spray application of surface coatings is prohibited by persons who are not certified as having completed the training described in Condition 4.2(a).

- (b) All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the following requirements:
 - (1) All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least ninety-eight (98) percent capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American National Standards Institute (ANSI) / American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Standard 52.2-2017 (incorporated by reference – see 40 CFR 63.14, Subpart A)

The filter efficiency shall be based on the difference between the quantity of dust injected and the quantity captured on the final filter with no test device in place. The filter will be challenged with one-hundred (100) grams of loading dust and the final filter weight will be to the nearest 0.1 gram. EPA Test Method

319 may be used as an alternative to ANSI / ASHRAE Standard 52.2-2017. The permittee may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement.

These requirements **do not** apply to water wash spray booths that are operated and maintained in accordance with the manufacturer's specifications.

Additionally, the permittee shall comply with one of the following requirements:

- (2) Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, have four (4) complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to (but not more than) 0.05 inches water gauge positive pressure.
 - (3) Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, have at least three (3) complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings (if needed) to allow for conveyors and parts to pass through the booth during the coating process.
 - (4) Mobile ventilated enclosures that are used to perform spot repairs must enclose and (if necessary) seal against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a filter to capture paint overspray.
- (c) All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the MDEQ.

The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of a HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's "*Spray Equipment Transfer Efficiency Test Procedure for Equipment User*" (May 24, 1989) and "*Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns*" (September 26, 2002) (incorporated by reference – see 40 CFR 63.14, Subpart A).

The requirement specified in this paragraph **do not** apply to painting performed by students and instructors at paint training centers. Additionally, the requirement **does not** apply to the following situations:

- (1) The surface coating of aerospace vehicles that involve the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces;
 - (2) The application of coatings on aerospace vehicles that contain fillers that adversely affect atomization with HVLP spray guns; or
 - (3) The application of coatings on aerospace vehicles that normally have a dried film thickness of less than 0.0013 centimeters (or 0.0005 inches).
- (d) All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used.
- (e) As provided in 40 CFR 63.6(g); Subpart A, the permittee may request approval from the U.S. Environmental Protection Agency (EPA) to use an alternative to the emission standards.

(Ref.: 40 CFR 63.11173(e); Subpart HHHHHH)

4.2 For Emission Points AA-600, AB-600, and AC-500, the permittee shall comply with the following personnel-related requirements:

- (a) The permittee must ensure and certify that all new and existing personnel (including contract personnel) who spray apply “*surface coatings*” [as defined in 40 CFR 63.11180, Subpart HHHHHH] are trained in the proper application of surface coatings as required by Condition 4.1(a). The training program must include (at a minimum) the following items:
- (1) A list of all current personnel by name and job description who are required to be trained;
 - (2) Hands-on and classroom instruction that addresses (at a minimum) initial and refresher training in the following topics:
 - (i) Spray gun equipment selection, set-up, and operation (including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate);
 - (ii) Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray (including maintaining the correct spray gun distance and angle to the part, using

proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke);

(iii) Routine spray booth and filter maintenance (including filter selection and installation); and

(iv) Environmental compliance with the requirements specified in Subpart HHHHHH.

(3) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training.

The permittee can show by documentation or certification that a painter's work experience and/or existing training has resulted in training equivalent to that required by paragraph (a)(2) of this condition and the permittee is not required to provide the required initial training for that painter.

(b) As required by paragraph (a)(1) of this condition, all new and existing personnel (including contract personnel) who spray apply surface coatings must be trained by the following specified deadlines:

(1) All personnel must be trained and certified no later than one hundred eighty (180) days after hiring. Painter training completed within five (5) years prior to the required training deadline that meets the requirements specified in paragraph (a)(2) of this condition shall satisfy this requirement and is valid for a period not to exceed five (5) years after the date the most recent training is completed.

(2) Training and certification will be valid for a period not to exceed five (5) years after the date the specific training is completed. Additionally, all personnel must receive refresher training that meets the requirements of (a)(2) and be re-certified every five (5) years.

(3) Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire.

(Ref.: 40 CFR 63.11173(f) and (g); Subpart HHHHHH)

4.3 For Emission Points AA-700, AB-700, and AC-600, the permittee shall operate and maintain the gasoline dispensing facility (GDF) (including associated air pollution control equipment and monitoring equipment) in a manner consistent with safety and good air pollution control practices for minimizing emissions.

The determination of whether such operation and maintenance procedures are being used will be based on information available to the MDEQ which may include (but is not limited

to) monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(Ref.: 40 CFR 63.11115(a); Subpart CCCCCC)

4.4 For Emission Points AA-700, AB-700, and AC-600, the permittee shall comply with the following requirements:

(a) The permittee shall not handle gasoline in a manner that would result in vapor releases to the atmosphere for extended periods of time. The measures to be taken include (but are not limited to) the following items:

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

(b) Portable gasoline containers that meet the requirements of 40 CFR Part 59, Subpart F are considered acceptable for compliance with paragraph (a)(3) of this condition.

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

4.5 For Emission Point AA-800, the permittee shall comply with the following practices to maintain compliance with the applicable emission standards specified in Condition 3.15:

- (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;
- (c) Meet the requirements of 40 CFR Part 1068 (as applicable).

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

4.6 For Emission Point AA-800, the permittee shall demonstrate compliance with the emission standards specified in Condition 3.15 through the following actions **if** the permittee does not operate and maintain the engine in accordance with the manufacturer's emission-related written instructions or the permittee changes emission-related settings in a way that is not permitted by the manufacturer:

- (a) Keep a maintenance plan;
- (b) Maintain records of conducted maintenance; and
- (c) Maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions (to the extent practicable).
- (d) For each engine , the permittee shall conduct a performance test in accordance with the procedures outlined in 40 CFR 60.4212(a) – (c); Subpart IIII to demonstrate compliance with the applicable emission standards in accordance with one of the following deadlines (as applicable):
 - (1) Within one (1) year of start-up;
 - (2) Within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions; or
 - (3) Within 1 year after the permittee changes emission-related settings in a way that is not permitted by the manufacturer.

(Ref.: 40 CFR 60.4211(g)(2); Subpart IIII)

SECTION 5
MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Monitoring / Recordkeeping Requirement
AA-000 AB-000 AC-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain Records for a Minimum of Five (5) Years
AA-200 AA-300 AB-300	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.2	PM / PM ₁₀ / PM _{2.5} (filterable only) MHAPs	Perform an Inspection on Each Baghouse / Dust Collector Monthly
AA-200 AB-200 AC-200	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.3	PM / PM ₁₀ / PM _{2.5} (filterable only) MHAPs	Monitor the Total Length of Metal Cut by Each Torch Type Monthly Calculate Emissions (Monthly and Rolling 12-Month Totals)
AA-300 AA-400 AA-500 AB-300 AB-400 AB-500 AC-300 AC-400	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.4	PM / PM ₁₀ / PM _{2.5} (filterable only) MHAPs	Monitor the Quantity of Each Abrasive Blast Medium, Welding Wire / Electrode, or Other Applicable Material Used Monthly Calculate Emissions (Monthly and Rolling 12-Month Totals)
AA-600 AB-600 AC-500	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.5	VOCs HAPs	Recordkeeping Requirements for Applicable Materials Calculate Emissions (Monthly and Rolling 12-Month Totals)
	40 CFR 63.11177(a) – (d) and (g); Subpart HHHHHH	5.6	HAPs	Recordkeeping Requirements
AA-700 AB-700 AC-600	40 CFR 63.11111(e) and 63.11125(d); Subpart CCCCCC	5.7	HAPs	Recordkeeping Requirements for Gasoline Dispensing Operations
AA-800	40 CFR 60.4214(b); Subpart III 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.8	NMHC + NO _x CO PM	Record the Hours of Operation (Emergency and Non-Emergency)
	40 CFR 60.4214(a)(2)(i) – (iv); Subpart III 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.9		Recordkeeping Requirements

- 5.1 For Emission Points AA-000, AB-000, and AC-000 (Facility-Wide), the permittee shall retain all required records, monitoring data, supporting information, and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes all calibration and maintenance records, all original strip-chart recordings or other data 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” of this permit upon request.

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

- 5.2 For Emission Points AA-200, AA-300, and AB-300, the permittee shall perform an inspection that evaluates the performance capability of each baghouse / dust collector on a monthly basis. If a problem is noted during an inspection, the permittee shall perform the necessary maintenance to ensure operation as originally designed. Additionally, the permittee shall maintain on-site (to the extent practicable) sufficient components as is necessary to repair the baghouse(s) / dust collector.

The permittee shall maintain documentation that details the date / time of each inspection, the results of each inspection, any problem that is experienced during an inspection, any maintenance (either corrective or preventative) performed to return a baghouse / dust collector to operation as originally designed, and any duration in which a baghouse / dust collector is non-operational due to malfunction.

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

- 5.3 For Emission Points AA-200, AB-200, and AC-200, the permittee shall monitor and record the total length (in feet or meters) of metal cut by each torch type (i.e. oxy-methane, oxy-acetylene, natural gas, and plasma) on a monthly basis.

Additionally, the permittee shall calculate and record the emission of PM, PM₁₀ (filterable only), PM_{2.5} (filterable only), and each metal HAP (“MHAP”) in tons on both a monthly and rolling 12-month total basis.

Unless otherwise specified herein, the permittee shall include all reference data to validate calculated emissions (e.g. operational data, applicable emission factors, manufacturer’s specifications, engineering judgement determinations, control device efficiency data, etc.).

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

- 5.4 For Emission Points AA-300, AA-400, AA-500, AB-300, AB-400, AB-500, AC-300, and AC-400, the permittee shall monitor and record the quantity of each abrasive blast medium, welding wire / electrode, or other applicable material used on a monthly basis.

Additionally, the permittee shall calculate and record the emission of PM, PM₁₀ (filterable only), PM_{2.5} (filterable only), and MHAPs in tons on both a monthly and rolling 12-month total basis.

Unless otherwise specified herein, the permittee shall include all reference data to validate calculated emissions (e.g. operational data, applicable emission factors, manufacturer's specifications, engineering judgement determinations, control device efficiency data, etc.).

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

- 5.5 For Emission Points AA-600, AB-600, and AC-500, the permittee shall maintain documentation that details the following information on each coating, adhesive, thinner, solvent, or other VOC- / HAP-containing material used on a monthly basis:
- (a) The identification or product name;
 - (b) The total quantity used (in gallons);
 - (c) The VOC and/or HAP content (in weight percent) as well as a description of the method used to determine the VOC and/or HAP content.

The permittee may utilize data supplied by either the manufacturer or an analysis of the VOC and/or HAP content by an applicable test method (i.e. EPA Test Method 24, EPA Test Method 311, and/or an alternative EPA-approved test method).

- (d) The density (in pounds per gallon); and
- (e) The solids content (in weight percent) (as applicable).

Additionally, the permittee shall calculate and record the emission of VOCs, each individual HAP, and all HAPs combined in tons on both a monthly and rolling 12-month total basis.

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

- 5.6 For Emission Points AA-600, AB-600 and AC-500, the permittee shall maintain documentation that details the following information:
- (a) Certification that each painter has completed the training specified in Condition 4.2(a) with the date the initial training and the most recent refresher training was completed;
 - (b) Documentation on the filter efficiency of any spray booth exhaust filter material, in accordance with the procedures outlined in Condition 4.1(b)(1);

- (c) Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to / greater than 3.0 fluid ounces (or 89 cubic centimeters) that does not meet the definition of a HVLP spray gun, an electrostatic application, an airless spray gun, or an air-assisted airless spray gun has been determined by the MDEQ to achieve a transfer efficiency equivalent to that of a HVLP spray gun, in accordance with the procedures specified in Condition 4.1(d);
- (d) Copies of any submitted “Notification of Compliance Status” and/or “Annual Notification of Changes Report”;
- (e) Records on any deviation from the specified in Condition 4.1 or 4.2. These records must include the date and time period of the deviation, a description that details the nature of the deviation, and the actions taken to correct the deviation.

(Ref.: 40 CFR 63.11177(a) – (d), and (g); Subpart HHHHHH)

5.7 For Emission Points AA-700, AB-700, and AC-600, the permittee shall maintain documentation that details the following information:

- (a) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.
- (b) Records on any actions taken during periods of malfunction to minimize emissions in accordance with Condition 4.1 (including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation).
- (c) The total gasoline throughput (in gallons) on a monthly basis.

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

5.8 For Emission Point AA-800, the permittee shall monitor and record (via a non-resettable hour meter) the hours of operation for each engine on a monthly basis for both emergency and non-emergency service. Additionally, the permittee shall maintain documentation that details what classified each occurrence as either an “emergency” or a “non-emergency”.

(Ref.: 40 CFR 60.4214(b); Subpart IIII and 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).)

5.9 For Emission Point AA-800, the permittee shall maintain documentation that details the following information:

- (a) All notifications submitted to comply with Subpart IIII;
- (b) Any maintenance conducted on an engine;

- (c) Documentation from the manufacturer that indicates the engine is certified to meet the emission standards specified in Conditions 3.15; and
- (d) If the engine is not certified or is certified but operating in a non-certified manner, documentation that indicates the engine meets the emission standards specified in Conditions 3.15.

(Ref.: 40 CFR 60.4214(a)(2)(i) – (iv); Subpart III)

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

SECTION 6 REPORTING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Reporting Requirement
AA-000 AB-000 AC-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.1	Report Permit Deviations Within Five (5) Working Days
		6.2	Submit a Certified Annual Monitoring Report
		6.3	All Documents Submitted to the MDEQ Shall be Certified by a Responsible Official
AA-600 AB-600 AC-500	40 CFR 63.11175(a) and (c); Subpart HHHHHH	6.4	Submit an Initial Notification
	40 CFR 63.11176(a) and (c); Subpart HHHHHH	6.5	Submit an Annual Notification of Changes Report (As Applicable)
AA-700 AB-700 AC-600	40 CFR 63.11126(b); Subpart CCCCCC	6.6	Submit an Annual Report of Tank Malfunctions (As Applicable)

6.1 For Emission Points AA-000, AB-000, and AC-000 (Facility-Wide), except as otherwise specified herein, the permittee shall report all deviations from permit requirements (including those attributable to upsets), the probable cause of such deviations, and any corrective actions or preventive measures taken. The report shall be made within five (5) working days of the time the deviation began.

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

6.2 For Emission Points AA-000, AB-000, and AC-000 (Facility-Wide), except as otherwise specified herein, the permittee shall submit a certified annual monitoring report (AMR) postmarked no later than January 31 of each calendar year for the preceding calendar year that addresses any required monitoring specified in this condition. If the permit was reissued or modified during the course of the preceding calendar year, the AMR shall address each version of the permit.

All instances of deviations from permit requirements must be clearly identified in the report. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration.

Each AMR shall include the following information:

- (a) The monitoring data required by Conditions 5.3, 5.4, 5.5, and 5.8; and
- (b) The duration of each period (i.e. the start and end time) in which active operations are conducted while a corresponding baghouse / dust collector is non-operational due to malfunction.

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

- 6.3 For Emission Points AA-000, AB-000, and AC-000 (Facility-Wide), 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).)

- 6.4 For Emission Points AA-600, AB-600, and AC-500, the permittee must submit an “Initial Notification” to the MDEQ no later than one-hundred twenty (120) days after the permittee becomes subject to Subpart HHHHHH.

The “Initial Notification” must contain the following information (as applicable):

- (a) The company name;
- (b) The name, title, street address, telephone number, e-mail address (if available), and signature of the responsible official (or other certifying company official) certifying the truth, accuracy, and completeness of the notification;
- (c) The street address (physical location) of the facility and the street address where compliance records are maintained (if different).
- (d) An identification of the relevant standard(s) specified in Subpart HHHHHH;
- (e) A brief description on the type of surface coating operation(s) conducted, the number of spray booths and preparation booths, and the number of painters usually employed at the operation.
- (f) A statement on whether the permittee is already in compliance with the requirements specified in Conditions 4.1 and 4.2.
- (g) A statement that certifies compliance with the relevant requirements of Subpart HHHHHH if the permittee is already in compliance prior to submission of the “Initial Notification”; and
- (h) A statement that indicates the permittee has complied with all relevant standards within Subpart HHHHHH and that the “Initial Notification” also serves as the “Notification of Compliance Status”.

Additionally, the permittee shall submit the “Initial Notification” to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). The CEDRI interface can be accessed through the EPA's CDX: <https://cdx.epa.gov>.

(Ref.: 40 CFR 63.11175(a) and (c); Subpart HHHHHH)

- 6.5 For Emission Points AA-600, AB-600 and AC-500, the permittee shall submit an “Annual Notification of Changes Report” to the MDEQ no later than March 1 of each year for the preceding calendar year **if** the information previously submitted in the “Notification of Compliance Status” or “Annual Notification of Changes Report” has changed. The report shall include the following information:
- (a) The company's name, the street address (physical location) of the facility, and the street address where compliance records are maintained (if different);
 - (b) The name, title, address, telephone, e-mail address (if available), and the signature of the Responsible Official (or other certifying company official) certifying the truth, accuracy, and completeness of the notification; and
 - (c) A statement of whether the source has complied with all the relevant standards and other requirements of Subpart HHHHHH, or an explanation of any non-compliance, and a description of corrective actions being taken to achieve compliance.

For the purpose of this permit, deviations from any relevant requirements specified in Condition 4.1 or 4.2 on the date of the report will be deemed to be a change.

Additionally, the permittee shall submit the “Notification of Compliance Status” or “Annual Notification of Changes Report” to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). The CEDRI interface can be accessed through the EPA's CDX: <https://cdx.epa.gov>

(Ref.: 40 CFR 63.11176(a) and (c); Subpart HHHHHH)

- 6.6 For Emission Points AA-700, AB-700, and AC-600, the permittee shall submit an annual monitoring report no later than March 15 of each calendar year that details the number, duration, and a brief description of each type of malfunction which occurred during the previous calendar year.

The report shall include a description of actions taken by the permittee during a malfunction to minimize emissions, including actions taken to correct a malfunction. No report is necessary for a calendar year in which no malfunctions occurred.

(Ref.: 40 CFR 63.11126(b); Subpart CCCCCC.)