

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

PERMIT

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

THIS CERTIFIES THAT

Calvert Company Inc, The
120 Aztec Drive
Richland, Mississippi
Rankin County

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

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: _____

Permit No.: 2380-00064

Effective Date: As specified herein.

Expires: **[No more than 5 years from the issue date.]**

Draft/Proposed – June 4, 2025

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 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 Regulation 11 Miss. Admin. Code Pt. 2, Ch.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 "Any 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 Regulation, 11 Miss. Admin. Code Pt. 2, "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 11 Miss. Admin. Code Pt. 2, R. 1.10., "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants."

(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, startups, 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 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 by 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 this

regulation, 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 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 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).)

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 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).)

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

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

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

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

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

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

SECTION 2
EMISSION POINT DESCRIPTION

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

Emission Point	Description
AA-000	Facility-Wide [The Calvert Company, Inc.]
AA-001	Facility-Wide Surface Coating Operations <ul style="list-style-type: none">• Spray Paint Booth [equipped with dry filter]
AA-004	86 Natural Gas-fired Space Heaters [Total = 2.1 MMBTU / hr]
AA-005	Facility-Wide Metal Fabrication Operations
AA-006	Facility-Wide Welding Operations
AA-008	Facility-Wide Powder Coating Operations
AA-009	0.75 MMBTU / hr Natural Gas-fired Oven

**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% (from smoke)
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2		≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.3	PM (filterable)	0.6 lbs. / MMBTU
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.4	PM (filterable)	$E = 4.1 \cdot (p^{0.67})$
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.5	VOCs	95.0 tpy (Rolling 12-Month Total)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). (Major Source Avoidance Limits)	3.6	HAPs	9.0 tpy (Individual) 24.0 tpy (Total) (Rolling 12-Month Totals)
	40 CFR Part 63, Subpart HHHHHH – NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources 40 CFR 63.11170(a)(3) and (b); Subpart HHHHHH	3.7	HAPs	General Applicability
AA-004 AA-009	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.8	SO ₂	4.8 lbs. / MMBTU

- 3.1 For Emission Point AA-000 (Facility-Wide), except as otherwise specified herein, the permittee shall not cause or allow the emission of smoke into the open air from a point source or from any manufacturing / industrial process on-site that exceeds forty (40) percent opacity subject to the following exceptions:
- (a) Start-up operations may produce emissions that exceed 40% opacity for up to fifteen (15) minutes per start-up in any one (1) hour and not to exceed three (3) start-ups per stack in any twenty-four (24) hour period.
 - (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed sixty (60) percent opacity and provided further that the aggregation 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 (1) one hour.

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

- 3.2 For Emission Point AA-000 (Facility-Wide), except as otherwise specified 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 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 Point AA-000 (Facility-Wide), the maximum permissible emission of ash and/or particulate matter (PM) from any fossil fuel burning installation less than ten (10) 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).)

- 3.4 For Emission Point AA-000 (Facility-Wide), except as otherwise specified herein, the permittee shall not cause or allow the emission of particulate matter (PM) in total quantities in any one (1) hour from any manufacturing process (which includes any associated stacks, vents, outlets, or combinations 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. Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs.

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

- 3.5 For Emission Point AA-000 (Facility-Wide), the permittee shall limit the total emission of volatile organic compounds (VOC) from all applicable emission sources to no more than 95.0 tons per year (tpy) based on a rolling 12-month total.

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

- 3.6 For Emission Points AA-000 (Facility-Wide), the permittee shall limit the emission of hazardous air pollutants (HAPs) to no more than 9.0 tpy for each individual HAP and no more than 24.0 tpy for all combined HAPs based on rolling 12-month totals.

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

- 3.7 For Emission Point AA-000 (Facility-Wide), the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 63, Subpart HHHHHH – National

Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations and 40 CFR Part 63, Subpart A – General Provisions (as required in Table 1 of Subpart HHHHHH).

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

- 3.8 For Emission Points AA-004 and AA-009, the maximum discharge of sulfur dioxide from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU 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)	Pollutant/Parameter	Work Practice
AA-001	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

4.1 For Emission Point AA-001, 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 requirements specified in paragraph (b)(1) of this condition and one (1) of the requirements specified in paragraph (b)(2), (b)(3), or (b)(4) of this condition:

- (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 Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1 – “Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992” (incorporated by reference – see 40 CFR 63.14, Subpart).

The test coating for measuring filter efficiency shall be a high-solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional [i.e. non-high volume low pressure (HVLP)] air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure, and the air flow rate across the filter shall be 150 feet per minute. However, the permittee may use published filter efficiency data provided by filter vendors to satisfy this requirement and are not required to perform this measurement.

This requirement does not apply to waterwash spray booths that are operated and maintained in accordance with the manufacturer's specifications.

- (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).

This requirements does 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 Point AA-001, 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 of 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.
 - (4) 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 [as defined in 40 CFR 63.11180, Subpart A] must be trained by the date specified as follows:
 - (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.

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)

**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 Five (5) Years
AA-001	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2	VOCs HAPs	Recordkeeping of VOC- and HAP-containing Material
	40 CFR 63.11177(a) – (d) and (g); Subpart HHHHHH	5.3	HAPs	Recordkeeping Requirement

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 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 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 Emission Points AA-001, the permittee shall maintain sufficient records to document the following information:

- (a) Identification of each coating, adhesive, solvent, or other VOC- or HAP-containing material used, and the total gallons of each coating, adhesive, and solvent used on a monthly basis.
- (b) The VOC and HAP content(s) of each coating, adhesive, solvent, or other VOC- or HAP-containing material used. A description of the method used to determine the VOC and HAP content shall accompany this data.
- (c) The density of each coating, adhesive, solvent, or other VOC- or HAP-containing material.
- (d) The total VOC emission rate, the emission rate of each individual HAP, and the total HAP emission rate in tons for each month and rolling 12-month period.

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

- 5.3 For Emission Point AA-001, 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)

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	Report Permit Deviations Within Five (5) Working Days
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.2	Submit A Certified Annual Monitoring Report
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.3	All Documents Submitted to the MDEQ Shall be Certified by a Responsible Official
AA-001	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.4	Submit Calculations of VOC and HAP Emissions (Monthly and Rolling 12-Month Totals)
	40 CFR 63.11176(a); Subpart HHHHHH	6.5	Submit an Annual Notification of Changes Report (As Applicable)

6.1 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. 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).)

6.2 Except as otherwise specified herein, the permittee shall submit a certified annual synthetic minor monitoring report postmarked no later than 31st of January for the preceding calendar year. This report shall address any required monitoring specified in 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.

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

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

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

6.4 For Emission Points AA-001, the permittee must submit a report in accordance with Condition 6.2 that includes the following information for each coating, adhesive, solvent, or other VOC- or HAP-containing material:

- a) The volume used (in gallons) monthly;
- b) The percentage of VOC by weight;
- c) The percentage of HAP by weight;
- d) The density (in pounds per gallon); and
- e) The monthly and 12-month rolling total VOCs, individual HAPs, and total HAPs.

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

6.5 For Emission Point AA-001, the permittee shall submit an Annual Notification of Changes Report no later than March 1 of each for the preceding calendar year if the information submitted in the previous “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 (i.e. the 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, an explanation of any non-compliance, and a description of corrective actions being taken to achieve compliance (if applicable).

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.

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