STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
TITLE V PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Huntington Ingalls, Inc., Ingalls Shipbuilding Division, Pascagoula Operations
1000 Jerry Saint Pe' Highway
Pascagoula, Mississippi
(Jackson 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 Title V of the Federal Clean Air Act (42 U.S.C.A. § 7401 - 7671) and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

Permit Issued: NOV 2 5 2019

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

Krystal Rudolph

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: October 31, 2024 **Permit No.: 1280-00041**

1670 PER20150001.1

TABLE OF CONTENTS

SECTION 1. GENERAL CONDITIONS

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

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

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

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

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

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

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

(1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of 3 or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.

(2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

(3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.

(4) The Administrator or the Permit Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(b) Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.

(c) Reopenings shall not be initiated before a notice of such intent is provided to the Title V source by the DEQ at least 30 days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

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

1.5 The permittee shall furnish to the 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 permittee or, for information to be confidential, the permittee shall furnish such records to 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. 6.3.A(6)(e).)

1.6 This permit does not convey any property rights of any sort, or any exclusive privilege.

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

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(5).)

1.8 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.

(a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgments where such

judgments are derived from process and/or emission data which supports the estimates of maximum actual emission.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).)

(b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D(2).)

(c) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.)

(d) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.C.)

1.9 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(8).)

1.10 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true,

accurate, and complete.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)

1.11 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:

(a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;

(b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

(d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

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

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

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

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

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

1.14 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source.

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

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

(a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;

(b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

(c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.

(d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act.

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

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

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

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C(2)., R. 6.4.B., and R. 6.2.A(1)(c).)

1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:

(a) the changes are not modifications under any provision of Title I of the Act;

(b) the changes do not exceed the emissions allowable under this permit;

(c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:

(1) a brief description of the change(s),

(2) the date on which the change will occur,

(3) any change in emissions, and

(4) any permit term or condition that is no longer applicable as a result of the change;

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

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

1.19 Should the Executive Director of the Mississippi Department of Environmental Quality 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 11 Miss. Admin. Code Pt. 2, Ch. 3., "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)

1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 11 Miss. Admin. Code Pt. 2, Ch. 2., "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations 11 Miss. Admin. Code Pt. 2, Ch. 6., "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

(a) routine maintenance, repair, and replacement;

(b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;

(c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;

(d) use of an alternative fuel or raw material by a stationary source which:

(1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition

which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; 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 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 Subpart I or 40 CFR 51.166; or

(f) any change in ownership of the stationary source."

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

1.21 Any change in ownership or operational control must be approved by the Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.D(4).)

1.22 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission.

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

1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.

(a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.

(b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.

(c) Burning must not occur within 500 yards of commercial airport property, private air

fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator.

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

1.24 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies.

(a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

(b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.

(c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:

(1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;

(2) the permitted facility was at the time being properly operated;

(3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

(e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

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

1.25 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, shutdowns and maintenance.

(a) Upsets (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.)

(1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:

(i) an upset occurred and that the permittee can identify the cause(s) of the upset;

(ii) the source was at the time being properly operated;

(iii) during the upset the permittee 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 notice 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 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. Emissions 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.)

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

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

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-001	Plate Line Abrasive Blasting (equipped with a dust collector)
AA-002	Shape Line Abrasive Blasting (equipped with a dust collector)
AA-003	Plate Line Primer Application (equipped with a dust collector and a regenerative thermal oxidizer)
AA-004	Shape Line Primer Application and Drying Oven (equipped with a dust collector and a regenerative thermal oxidizer)
AA-011	40-Wheel Wheelabrator (Ref. 95-48) (equipped with dust collectors)
AA-012	Outdoor Blasting (Ref. 95-49)
AA-013	Welding (Ref. 95-51)
AA-014	Oil/Water Separator (Ref. 95-55)
AA-015	Carpentry Shop (Ref. 95-105) (equipped with a cyclone venting to a baghouse)
AA-020	Indoor Paint Shop (Bldg. 2108; Ref. 95-60) (equipped with a filter system for particulate matter control in the north paint booth)
AA-023	Facility-wide Fugitives from Adhesives, Solvents, and other VOHAP Containing Chemicals (Ref. 95-52)
AA-025	Intermediate Outdoor Painting
AA-026	Final Interior Painting
AA-027	Final Exterior Painting
AB-001	24 MMBTUH Metal Processing Annealing Furnace (Ref. 3123-035)
AB-002	Sulfuric Acid (H_2SO_4) Pickling (equipped with a scrubber followed by a mist eliminator)
AB-003	Plastisol Operation
AB-004	Indoor Painting Operation in Metal Processing Area
AD-002	Blast and Paint Hall (painting operations only) (equipped with dust collector systems and a catalytic thermal oxidizer)
AD-003	Blast and Paint Hall (blasting operations only) (equipped with dust collectors)
AD-008	Miscellaneous Natural Gas-fired Units (Ref. FB-2) (including boilers and process heaters)
AD-009	Temporary Portable Boiler/Process Heater (natural gas and/or diesel-fired; <10 MMBTU/hr maximum design heat input capacity)

Emission Point	Description
AD-011	Southwest Wheelabrator Blast Booths (each equipped with a baghouse)
AD-012	Oxyfuel Cutting Robots (equipped with dust collectors) (Ref. MP4)
AD-014	Manual Oxyfuel Cutting (Ref. MP6)
AD-015	One (1) 12,000 Gallon Bulk Gasoline Storage Tank
AD-016	47 HP Emergency Generator (Ref. 3801-142)
AD-017	40 HP Emergency Generator (Ref. 3801-096)
AD-018	1341 HP Emergency Generator (Ref. 3801-138)
AD-019	80 HP Backup Fire Pump (Ref. 3151-027)
AD-020	80 HP Backup Fire Pump (Ref. 3151-028)
AD-022	275 HP Emergency Generator (Ref. 3801-092)
AD-023	275 HP Emergency Generator (Ref. 3801-093)
AD-025	1341 HP Emergency Generator (Ref. 3801-139)
AD-026	1341 HP Emergency Generator (Ref. 3801-140)
AD-027	1505 HP Emergency Generator (Ref. 3801-115)
AD-028	125 HP Fire Pump (Ref. 3159-146)
AD-029	220 HP Emergency Pump (Ref. 1502-034)
AD-031	1502 HP Emergency Generator (Ref. 3801-157)
AD-032	670 HP Emergency Generator (Ref. 3801-146)
AD-033	332 HP Backup Fire Pump (Ref. 3159-212)
AD-034	670 HP Emergency Generator (Ref. 3801-156)
AD-035	250 HP Fire Pump (Ref. 1502-030)
AD-036	350 HP Fire Pump (Ref. 3159-142)
AD-037	275 HP Fire Pump
AD-038	West Panel Line Plasma Cutter (equipped with a fume exhaust system venting to a dust collector)
AD-039	Component Packaging Area (CPA) Shop Plasma Cutter (equipped with a fume exhaust system venting to a dust collector)
AD-040	107 HP Emergency Generator (East Bank Comm. Building)

Emission Point	Description
AD-041	247 HP Emergency Generator (East Bank Main Station)
AD-042	168 HP Emergency Generator (East Bank Entry Gate Turnstile)
AD-043	1,341 HP Emergency Generator (CSA III)

SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. Facility-Wide Emission Limitations & Standards

3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).

(a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups 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 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour.

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

3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Paragraph 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets.

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

3.A.3 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission from any manufacturing process, in any one hour from any point source, particulate matter in total quantities in excess of the amount determined by the relationship $E = 4.1p^{0.67}$, where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour.

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

B. Emission Point Specific Emission Limitations & Standards

Emission Point	Pollutant/ Parameter	Applicable Requirement	Condition Number	Limit/Standard
AA-003 & AA-004	VOC	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).; Title V Operating Permit issued February 17, 2006	3.B.1	Not to exceed 39.0 tons per year (TPY).
AA-003, AA-004, AA-020, AA-023, AA-025, AA-026, AA-027, AB-003, AB-004 & AD-002	VOHAP	40 CFR 63, Subpart II NESHAP for Shipbuilding and Ship Repair (Surface Coating) 40 CFR 63.781(a), 63.783(a) and 63.781(b) and (c), Subpart II	3.B.2, 3.B.3, & 3.B.4	An as-applied VOHAP content limit dependent on the type of coating *(with exemptions for low-use coatings and coatings applied with hand-held, non-refillable aerosol containers)*.
AD-008, AD-009, AD-016 through AD-020, AD-022, AD-023, AD-025 through AD-029, AD-031 through AD-037 & AD-040 through AD-043	PM (filterable only)	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.C.1	0.6 lb/MMBTUH
AB-001	PM (filterable only)	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.B.5	$E = 0.8808 * I^{-0.1667}$
AB-001 AD-008 AD-009 AD-016	SO_2	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.C.2	4.8 lbs/MMBTU
AA-015	Operating Restrictions	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.B.6	Control device(s) shall be utilized when Carpentry Shop is operational.
AA-020, AA-025 & AD-002	VOC	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).; Permit to Construct issued June 26, 2003	3.B.7	Not to exceed 84.40 TPY.
AD-011	Operating Restrictions	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.B.8	Control device(s) shall be utilized when blast booths are operational.

Emission Point	Pollutant/ Parameter	Applicable Requirement	Condition Number	Limit/Standard
Entire Facility	PM/PM_{10} (filterable + condensable)	11 Miss. Admin. Code Pt. 2, R. 6.3.A(1); Permit to Construct issued June 26, 2003 and modified via the Title V Operating Permit issued February 17, 2006.	3.B.9	Not to exceed 319.26 TPY.
	NO_x		3.B.10	Not to exceed 84.02 TPY.
	VOC		3.B.11	Not to exceed 338.31 TPY.
AD-016 through AD-020, AD-022, AD-023, AD-025 through AD-029, AD-031 through AD-037 & AD-040 through AD-043	HAP	40 CFR 63, Subpart ZZZZ NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE) 40 CFR 63.6585(a) and (b); 63.6590(a)(1)(i) and (ii), 63.6590(a)(2)(i) and (ii), 63.6590(b)(1)(i), 63.6590(c)(6), and 63.6600(c), Subpart ZZZZ	3.B.12	Applicability
AD-016, AD-018, AD-025, AD-026, AD-028, AD-029 & AD-035		40 CFR 63.6640(f)(1)-(3), Subpart ZZZZ	3.B.13	Operating Requirements
AD-017, AD-019, AD-020, AD-022, AD-023, AD-027, AD-031 through AD-034, AD-036, AD-037 & AD-040 through AD-043	NMHC+NOx, PM (filterable only), SO_2, and CO	40 CFR 60, Subpart IIII Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (CI ICE)) 40 CFR 60.4200(a)(2)(i) and (ii), Subpart IIII	3.B.14	Applicability
	SO_2	40 CFR 60.4207(b), Subpart IIII and 40 CFR 80.510(b), Subpart I	3.B.15	Maximum sulfur content of diesel fuel ≤15 ppm. Minimum cetane index of 40 or max aromatic content of 35 volume percent.
	NMHC+NOx, PM (filterable only), SO_2, and CO	40 CFR 60.4211(f)(1)-(3), Subpart IIII	3.B.16	Operating Requirements

Emission Point	Pollutant/ Parameter	Applicable Requirement	Condition Number	Limit/Standard
AD-017, AD-022, AD-023, AD-027, AD-031, AD-032, AD-034 & AD-040 through AD-043	NMHC+NOx, PM (filterable only), SO_2, and CO	40 CFR 60.4205(b), 60.4202(a)(1) and (2), 60.4206, and 60.4211(a)(1)-(3) and (c), Subpart IIII and 40 CFR 89.112(a) and 89.113(a), Subpart B	3.B.17	Emission standards vary for engine size.
AD-019, AD-020, AD-033, AD-036 & AD-037		40 CFR 60.4205(c),60.4206, 60.4211(a)(1)-(3) and (c), and Table 4, Subpart IIII	3.B.18	Emission standards vary for engine size and model year.
AB-001 AD-008	HAP	40 CFR 63, Subpart DDDDD NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters 40 CFR 63.7485 and 63.7490(d), Subpart DDDDD	3.B.19	Applicability
AD-009	Operating Restrictions	Title V Operating Permit issued herein and 40 CFR 6363.7491(j) and 63.7575, Subpart DDDDD	3.B.20	<10 MMBTU/hr maximum design heat input capacity and <12 consecutive months at a location within the facility.
AD-038	Operating Restrictions	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). and 11 Miss. Admin. Code Pt. 2, R. 2.15.C.	3.B.21	Control device(s) shall be utilized when West Panel Line Plasma Cutter is operational.
AD-039	Operating Restrictions	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). and 11 Miss. Admin. Code Pt. 2, R. 2.15.C.	3.B.22	Control device(s) shall be utilized when CPA Shop Plasma Cutter is operational.

3.B.1 For Emission Points AA-003 and AA-004 (combined), the permittee shall limit volatile organic compound emissions to no more than 39.0 tons per year for any consecutive 12-month period.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).; Title V Operating Permit issued February 17, 2006)

3.B.2 Emission Points AA-003, AA-004, AA-020, AA-023, AA-025, AA-026, AA-027, AB-003, AB-004, and AD-002 are surface coating operations that are affected by and shall comply with 40 CFR 63, Subpart II – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Shipbuilding and Ship Repair and 40 CFR Part 63, Subpart A – General Provisions.

(Ref.: 40 CFR 63.781(a), Subpart II; 40 CFR 63.780)

3.B.3 For Emission Points AA-003, AA-004, AA-020, AA-023, AA-025, AA-026, AA-027, AB-003, AB-004, and AD-002, the permittee shall not cause or allow the application of any coating to a ship with an **as-applied** volatile organic hazardous air pollutant (VOHAP) content exceeding the applicable limit given in Table 2 of Subpart II (located in Appendix B of the federally enforceable permit herein). The **as-applied** VOHAP content shall be determined by using the procedures described in Condition 5.B.6 of the federally enforceable permit herein.

(Ref.: 40 CFR 63.783(a), Subpart II)

3.B.4 For Emission Points AA-003, AA-004, AA-020, AA-023, AA-025, AA-026, AA-027, AB-003, AB-004, and AD-002, the provisions of Subpart II do not apply to any coating used in a volume less than 52.8 gallons per year provided the total volume of all exempted coatings used at the facility does not exceed 264 gallons per year. Each exempt coating used shall be labeled as "low-usage exempt" and the records concerning the usage of each shall be maintained in accordance with Condition 5.B.9 of the federally enforceable permit herein. (The provisions of Subpart II do not apply to coatings applied with hand-held, non-refillable aerosol containers.)

(Ref.: 40 CFR 63.781(b) and (c), Subpart II)

3.B.5 The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of greater than 10 million BTU per hour heat input shall not exceed an emission rate as determined by the relationship $E = 0.8808 * I^{-0.1667}$, where E is the emission rate in pounds per million BTU per hour heat input and I is the heat input in million BTU per hour.

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

3.B.6 For Emission Point AA-015, the permittee shall not operate the Carpentry Shop without existing control devices in operation.

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

3.B.7 For Emission Points AA-020, AA-025, and AD-002, the permittee shall limit volatile organic compound emissions to no more than 84.40 tons per year for any consecutive 12-month period.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).; Permit to Construct issued June 26, 2003)

3.B.8 For Emission Point AD-011, the permittee shall not operate the blast booths without existing control devices in operation. The control devices shall be operated in accordance with 11 Miss. Admin. Code Pt. 2, R. 1.10.

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

3.B.9 For the entire facility, the permittee shall limit emissions of particulate matter (PM)/particulate matter less than 10 microns(PM_{10}) to no more than 319.26 tons per year for any consecutive 12-month period. Compliance with this limit shall be determined using both filterable and condensable particulate emissions.

(Ref.: Permit to Construct issued June 26, 2003, and modified via the Title V Operating Permit issued February 17, 2006)

3.B.10 For the entire facility, the permittee shall limit nitrogen oxide emissions to no more than 84.02 tons per year for any consecutive 12-month period.

(Ref.: Permit to Construct issued on June 26, 2003, and modified via the Title V Operating Permit issued on February 17, 2006)

3.B.11 For the entire facility, the permittee shall limit volatile organic compound emissions to no more than 338.31 tons per year for any consecutive 12-month period.

(Ref.: Permit to Construct issued on June 26, 2003, and modified via the Title V Operating Permit issued on February 17, 2006)

3.B.12 For Emission Points AD-016 through AD-020, AD-022, AD-023, AD-025 through AD-037, and AD-040 through AD-043, the permittee is subject to and shall comply with the applicable requirements of the NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR 63, Subpart ZZZZ.

For purposes of this subpart, applicable requirements of Subpart ZZZZ shall be determined for the engines in the following categories:

(a) Emission Points AD-018, AD-025, and AD-026 are considered existing, emergency, compression ignition (CI) stationary RICE with a site rating greater than 500 horsepower (HP) located at a major source of HAP emissions. Per 63.6600(c), these engines are not required to meet any emission or operating limits in Subpart ZZZZ.

(b) Emission Points AD-016, AD-028, AD-029, and AD-035 are considered existing, emergency, CI stationary RICE with a site rating less than 500 HP located at a major source of HAP emissions.

(c) Emission Points AD-027, AD-031, AD-032, AD-034, and AD-043 are considered new, emergency CI stationary RICE with a site rating greater than 500 HP located at a major source of HAP emissions. Per 63.6590(b)(1)(i), these engines do not have to meet any other requirements of Subpart ZZZZ (initial notification requirements have already been met).

(d) Emission Points AD-017, AD-019, AD-020, AD-022, AD-023, AD-033, AD-036, AD-037, AD-040, AD-041, and AD-042 are considered new, emergency CI stationary RICE with a site rating less than 500 HP located at a major source of HAP emissions. Per 63.6590(c)(6), these engines shall comply with Subpart ZZZZ by complying with the applicable requirements of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart IIII.

(Ref.: 40 CFR 63.6585(a) and (b); 63.6590(a)(1)(i) and (ii); 63.6590(a)(2)(i) and (ii); 63.6590 (b)(1)(i); 63.6590(c)(6) and 63.6600(c), Subpart ZZZZ).

3.B.13 Emission Points AD-016, AD-018, AD-025, AD-026, AD-028, AD-029, and AD-035 shall be considered emergency stationary RICE under Subpart ZZZZ provided the engines only operate in an emergency, during maintenance and testing, and during non-emergency situations for 50 hours per year as described in (c) below. If the permittee does not operate an engine according to the requirements in (a)-(c) below, the engine will not be considered an emergency engine under Subpart ZZZZ and must meet all requirements for non-emergency engines.

(a) There is no limit on the use of an engine during an emergency situation.

(b) The permittee may operate an engine for maintenance checks and readiness testing for a maximum of 100 hours per calendar year provided the tests are recommended by federal, state, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or insurance company associated with an engine. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating the federal, state, or local standards require maintenance testing of an engine beyond 100 hours per calendar year.

(c) Emergency engines may be operated 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 provided in paragraph (b). Except as provided in 63.6640(f)(4)(i) and (ii), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-

emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(Ref.: 40 CFR 63.6640(f)(1)-(3), Subpart ZZZZ)

3.B.14 For Emission Points AD-017, AD-019, AD-020, AD-022, AD-023, AD-027, AD-031 through AD-034, AD-036, AD-037, and AD-040 through AD-043, the permittee is subject to and shall comply with 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.

Emission Points AD-017, AD-022, AD-023, AD-027, AD-031, AD-032, AD-034, and AD-040 through AD-043 are considered stationary CI ICE that are not fire pump engines. Emission Points AD-019, AD-020, AD-033, AD-036, and AD-037 are fire pump engines.

(Ref.: 40 CFR 60.4200(a)(2)(i) and (ii), Subpart IIII; 40 CFR 60.4218)

3.B.15 For Emission Points AD-017, AD-019, AD-020, AD-022, AD-023, AD-027, AD-031 through AD-034, AD-036, AD-037, and AD-040 through AD-043, the permittee shall use diesel fuel that meets the following per gallon standards:

(a) Maximum sulfur content of ≤ 15 ppm, and

(b) Minimum cetane index of 40 or a maximum aromatic content of 35 volume percent

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

3.B.16 For Emission Points AD-017, AD-019, AD-020, AD-022, AD-023, AD-027, AD-031 through AD-034, AD-036, AD-037, and AD-040 through AD-043, the engines shall be considered emergency stationary engines under Subpart IIII provided the engines only operate in an emergency, during maintenance and testing, and during non-emergency situations for 50 hours per year as described in (c) below. If the permittee does not operate any engine according to the requirements in (a)-(c) below, the engine will not be considered an emergency engine under Subpart IIII and must meet all requirements for non-emergency engines.

(a) There is no limit on the use of the engine during an emergency situation.

(b) The permittee may operate the engine for maintenance checks and readiness testing for a maximum of 100 hours per calendar year provided the tests are recommended by federal, state, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or insurance company associated with an engine. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator

maintains records indicating the federal, state, or local standards require maintenance testing of an engine beyond 100 hours per calendar year.

(c) The emergency engine may be operated 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 provided in paragraph (b). Except as provided in 60.4211(f)(3)(i), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(Ref.: 40 CFR 60.4211(f)(1)-(3), Subpart IIII)

3.B.17 For Emission Points AD-017, AD-022, AD-023, AD-027, AD-031, AD-032, AD-034, and AD-040 through AD-043, the permittee shall operate and maintain the engines such that they achieve the applicable emission standards for the model year engines identified in Table 1 of 40 CFR 89.112 and the opacity requirements from 40 CFR 89.113.

The permittee shall comply with the emission standards in 40 CFR 89.112 and 89.113 by purchasing, installing, operating, and maintaining an engine certified to meet these requirements. The permittee shall operate and maintain the engine in accordance with the manufacturer's emission-related written instructions and can only change the emission-related settings that are permitted by the manufacturer.

(Ref.: 40 CFR 60.4205(b), 60.4202(a)(1) and (2), 60.4206, and 60.4211(a)(1)-(3) and (c), Subpart IIII and 40 CFR 89.112(a) and 89.113(a))

3.B.18 For Emission Points AD-019, AD-020, AD-033, AD-036, and AD-037, the permittee shall operate and maintain the engines such that they achieve the applicable emission standards for the size and model year from Table 4 of Subpart IIII. The permittee shall comply with the applicable emission standards by purchasing, installing, operating, and maintaining an engine certified to meet these requirements. The permittee shall operate and maintain the engine in accordance with the manufacturer's emission-related written instructions and can only change the emission-related settings that are permitted by the manufacturer.

(Ref.: 40 CFR 60.4205(c), 60.4206, 60.4211(a)(1)-(3) and (c), and Table 4, Subpart IIII)

3.B.19 For Emission Points AB-001 and AD-008, the permittee is subject to and shall comply with 40 CFR 63, Subpart DDDDD – NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, and 40 CFR 63, Subpart A – General Provisions.

(Ref.: 40 CFR 63.7485 and 63.7490(d), Subpart DDDDD; 40 CFR 63.7565)

3.B.20 For Emission Point AD-009, the permittee may bring on site temporary boilers as needed to support operations. The permittee shall ensure the boiler(s) (or steam generating unit(s)) has a maximum design heat capacity of less than 10 MMBTU/hr and meets the definition of a "temporary boiler" in accordance with 40 CFR 63.7575. The unit(s) shall meet the following conditions:

(a) be designed and capable of being carried or moved from one location to another;

(b) shall not be attached to a foundation;

(c) shall not remain at a location within the facility performing the same or similar function for more than 12 consecutive months, including any replacement unit at a location that performs the same or similar function;

(d) shall not be moved from one location to another in an attempt to circumvent the residence time requirements (i.e., 12 consecutive months); and,

(e) shall only burn natural gas or diesel fuel.

(Ref.: Title V Operating Permit issued herein, 40 CFR 63.7491(j) and 63.7575)

3.B.21 For Emission Point AD-038, the permittee shall not operate the West Panel Line Plasma Cutter without existing control device(s) in operation.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). and 11 Miss. Admin. Code Pt. 2, R. 2.15.C.)

3.B.22 For Emission Point AD-039, the permittee shall not operate the CPA Shop Plasma Cutter without existing control device(s) in operation.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). and 11 Miss. Admin. Code Pt. 2, R. 2.15.C.)

C. Insignificant and Trivial Activity Emission Limitations & Standards

Applicable Requirement	Pollutant/ Parameter	Condition Number(s)	Limit/Standard
11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	PM (filterable only)	3.C.1	0.6 lbs/MMBTU
11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	SO_2	3.C.2	4.8 lbs/MMBTU

3.C.1 The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input.

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

3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.

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

D. Work Practice Standards

Emission Point	Pollutant/ Parameter	Applicable Requirement	Condition Number	Limit/Standard
AA-003, AA-004, AA-020, AA-023, AA-025, AA-026, AA-027, AB-003, AB-004 & AD-002	VOHAP	40 CFR 63.783(b)(1) – (3), Subpart II	3.D.1	Handling and transfer procedures for VOHAP containing coatings, and inspection of equipment.
AB-001 & AD-008	HAP	40 CFR 63.7500(a), 63.7515(d), 63.7540(a)(10)-(12), and Table 3, Subpart DDDDD	3.D.2	Routine tune-ups as specified in Appendix D.
	Continuous Compliance Requirements	40 CFR 63.7540(a)(10)(i) – (vi), (a)(13), and Table 3, Subpart DDDDD	3.D.3	Continuous Compliance Demonstration
AD-016, AD-028, AD-029 & AD-035	HAP	40 CFR 63.6602 and Table 2c, Subpart ZZZZ	3.D.4	Maintenance Requirements
AD-016, AD-018, AD-025, AD-026, AD-028, AD-029 & AD-035		40 CFR 63.6605, Subpart ZZZZ	3.D.5	General Compliance Requirements
		40 CFR 63.6625(e) and (h), 63.6640(a), and Table 6, Subpart ZZZZ	3.D.6	Operating Requirements

3.D.1 For Emission Points AA-003, AA-004, AA-020, AA-023, AA-025, AA-026, AA-027, AB-003, AB-004, and AD-002, the permittee shall ensure that:

(a) At all times, the owner or operator shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operations 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.

(b) All handling and transfer of VOHAP-containing materials to and from containers, tanks, vats, drums, and piping systems is conducted in a manner that minimizes spills.

(c) All containers, tanks, vats, drums, and piping systems are free of cracks, holes, and other defects and remain closed unless materials are being added to or removed from them.

(Ref.: 40 CFR 63.783(b)(1) – (3), Subpart II)

3.D.2 For Emission Points AB-001 and AD-008, the permittee shall conduct a tune-up for each boiler and process heater at the frequency designated in Appendix D of the federally enforceable permit herein as specified in 40 CFR 63.7540(a)(10)(i) through (vi).

(Ref.: 40 CFR 63.7500(a), 63.7515(d), 63.7540(a)(10)-(12), and Table 3 to Subpart DDDDD)

3.D.3 For Emission Points AB-001 and AD-008, the permittee shall demonstrate continuous compliance (with the requirement to conduct a tune-up as specified in 40 CFR 63.7540) in accordance with the following requirements:

(a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;

(b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;

(c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection;

(d) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_x requirement to which the unit is subject;

(e) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and

(f) Maintain on-site and submit, if requested by the MDEQ, an annual report containing the following information:

(1) The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater;

(2) A description of any corrective actions taken as a part of the tune-up; and

(3) The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.

If the unit is not operating on the required date for a tune-up, the tune-up shall be conducted within 30 calendar days of startup.

(Ref.: 40 CFR 63.7540(a)(10)(i) – (vi), (a)(13), and Table 3, Subpart DDDDD)

3.D.4 For Emission Points AD-016, AD-028, AD-029, and AD-035, the permittee shall comply with the following requirements:

(a) Change oil and filter every 500 hours of operation or annually, whichever comes first, or perform an oil analysis at the same frequency in order to extend the oil change requirement in accordance with 63.6625(i).

(b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.

(c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

If an engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practices according to the schedule in (a)-(c) above, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated.

(Ref.: 40 CFR 63.6602 and Table 2c, Subpart ZZZZ)

3.D.5 For Emission Points AD-016, AD-018, AD-025, AD-026, AA-028, AA-029, and AA-035, the permittee shall, at all times, be in compliance with the applicable emission and operating limitations of Subpart ZZZZ and operate and maintain the engines, including associated air pollution control and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by Subpart ZZZZ have been achieved. 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 63.6605(a) and (b), Subpart ZZZZ)

3.D.6 For Emission Points AD-016, AD-018, AD-025, AD-026, AA-028, AA-029, and AA-035, the permittee shall operate and maintain the engines according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engines in a manner consistent with good air pollution control practices for minimizing emissions. The permittee shall minimize each engine's time spent at idle during startup and minimize each engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

(Ref.: 40 CFR 63.6625(e) and (h), 63.6640(a), and Table 6, Subpart ZZZZ)

SECTION 4. COMPLIANCE SCHEDULE

4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.

4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:

(a) the identification of each term or condition of the permit that is the basis of the certification;

(b) the compliance status;

(c) whether compliance was continuous or intermittent;

(d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;

(e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(5)(a), (c), & (d).)

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. General Monitoring, Recordkeeping and Reporting Requirements

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

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

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

(a) the date, place as defined in the permit, and time of sampling or measurements;

(b) the date(s) analyses were performed;

(c) the company or entity that performed the analyses;

(d) the analytical techniques or methods used;

(e) the results of such analyses; and

(f) the operating conditions existing at the time of sampling or measurement.

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

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

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

5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 6.2.E.

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

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

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

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

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

5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

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

B. Specific Monitoring and Recordkeeping Requirements

Emission Point	Pollutant/ Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-001, AA-002, AA-011, AD-003 & AD-011	PM/PM_{10}	Daily observation for the presence of any visible emissions.	5.B.1	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).; 40 CFR 64.3(a) and (b), 64.6, 64.7, and 64.8
	Opacity			
AA-003 & AA-004	VOC	Monthly inventory of paint usage.	5.B.2	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).
AA-003 & AA-004	VOC	Utilization of established site-specific stack test data.	5.B.3 & 5.B.4	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).; 40 CFR 64.3(a) and (b), 64.6, 64.7, and 64.8
		Continuously monitor and maintain records of the combustion chamber temperature.		
AA-003, AA-004, AA-020, AA-023, AA-025, AA-026, AA-027, AB-003, AB-004 & AD-002	VOHAP	Determination of VOHAP limit and certification of compliance.	5.B.5, 5.B.6	40 CFR 63.785, Subpart II
AA-003, AA-004, AA-020, AA-023, AA-025, AA-026, AA-027, AB-003, AB-004 & AD-002	VOHAP	Test Methods and Procedures	5.B.7	40 CFR 63.786(a), (b), and (c), Subpart II
AA-003, AA-004, AA-020, AA-023, AA-025, AA-026, AA-027, AB-003, AB-004 & AD-002	VOHAP	Use of forms and procedures.	5.B.8	40 CFR 63.786(d), Subpart II
AA-003, AA-004, AA-020, AA-023, AA-025, AA-026, AA-027, AB-003, AB-004 & AD-002	VOHAP	General Provisions - recordkeeping requirements and standard specific recordkeeping.	5.B.9	40 CFR 63.788(a) and (b), Subpart II
AA-003, AA-004, AA-020, AA-023, AA-025, AA-026, AA-027, AB-003, AB-004 & AD-002	VOHAP	"Low usage exempt" recordkeeping requirements.	5.B.10	40 CFR 63.781(b) and 63.788 (b)(4), Subpart II
AA-020, AA-025 & AD-002	VOC	Monthly inventory of paint usage.	5.B.11	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).

Emission Point	Pollutant/ Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
Entire Facility	PM/PM_{10}	Monthly blasting material, paint, welding rod, and fuel usage records.	5.B.12	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).
	NO_x	Monthly fuel usage records.	5.B.13	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).
	VOC	Monthly inventory of paint usage.	5.B.14	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).
AD-002	VOC	Utilization of established site-specific stack test data.	5.B.15	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).
		Continuously monitor and maintain records of the catalytic inlet temperature.		
AD-016, AD-028, AD-029 & AD-035	HAP	Monitoring Requirements	5.B.16	40 CFR 63.6625 (f) and 63.6655(f)(1), Subpart ZZZZ
AD-016, AD-018, AD-025, AD-026, AD-028, AD-029 & AD-035	HAP	Recordkeeping Requirements	5.B.17	40 CFR 63.6655(a)(1), (2), and (5) and and (e)(2); 40 CFR 63.6660
AD-017, AD-019, AD-020, AD-022, AD-023, AD-027, AD-031 through AD-034, AD-036, AD-037, AD-040 through AD-043	$NMHC + NO_x$, PM (filterable only), CO	Monitoring Requirements	5.B.18	40 CFR 60.4209 and 60.4214(b), Subpart IIII
AB-001 & AD-008	HAP	Records of Compliance Demonstration	5.B.19	40 CFR 63.7555(a)(1) and (2) and (h), Subpart DDDDD
		Form and Duration of Records	5.B.20	40 CFR 63.7560, Subpart DDDDD
AD-038 & AD-039	Visible Emissions	Weekly observation for the presence of any visible emissions.	5.B.21	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).
Entire Facility (SYoF Project)	$PM_{10}/PM_{2.5}$	Calculate and maintain records of annual emissions for PM_{10} and $PM_{2.5}$ for modifications taking place under the Shipyard of the Future (SYoF) project.	5.B.22	40 CFR 52.21(r)(6)(iii) and (v)

5.B.1 For Emission Points AA-001, AA-002, AA-011, AD-003, and AD-011, the permittee shall perform a daily observation for the presence of any visible emissions.

(1) The operator shall conduct an observation/EPA Reference Method 22 test for the presence of visible emissions from all stacks and other emission points of this

equipment on a daily basis. Observations shall be conducted during daylight hours and while the equipment is in operation. If visible emissions (not including condensed water vapor) are observed, the operator shall:

(a) Within 24 hours, take corrective action that eliminates the visible emissions or verify that the unit causing the emissions and any associated air pollution control equipment are operating normally, in accordance with design and standard procedures, and under the same conditions in which compliance was achieved in the past, and

(b) If visible emissions are not eliminated, have a certified visual emissions observer determine compliance with the opacity standard using EPA Reference Method 9 within three business days, and

(c) Report the visible emissions as a potential deviation (or as a violation if demonstrated by EPA Reference Method 9) according to the reporting requirements of this permit.

(2) The operator shall keep records of the following items for a minimum of five years:

(a) Identification of stack or emission point;

(b) Results of all required daily visual observations;

(c) Description of corrective actions or statement of verification under (1)(a) above and record of testing under (1)(b) above; and

(d) Date and time any visible emissions were abated.

This shall serve as compliance for complying with 40 CFR Part 64.3(a) and (b), and the specific Compliance Assurance Monitoring Plan established in the permittee's application for which the permit has been based upon.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).; 40 CFR 64.3(a) and (b), 64.6, 64.7, and 64.8)

5.B.2 For Emission Points AA-003 and AA-004 (combined), the permittee shall assure compliance with the volatile organic compound emission limitation by keeping a monthly inventory of paint usage. The paint usage will be converted to monthly volatile organic compound emissions using certified SDS and EPA Reference Method 24, 40 CFR 60, Appendix A test results, and the tested VOC destruction efficiencies (Conditions 5.B.3 and 5.B.4 of the federally enforceable permit herein) for these points. A 12-month consecutive total of volatile organic compound emissions will be calculated each month.

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

5.B.3 For Emission Point AA-003, the permittee shall utilize the site-specific stack test data established in the Title V permit to operate issued February 17, 2006, performed in accordance with EPA Reference Method 25A, 40 CFR 60, Appendix A. The stack test was performed, at the maximum production rate of Emission Point AA-003, to establish a volatile organic compound destruction efficiency. Testing occurred after the completion of repair activities to the Plate Line painting operation. The combustion chamber temperature readings recorded during the stack test established a minimum combustion chamber temperature.

The permittee is also required to continuously monitor and maintain sufficient records of the combustion chamber temperature to demonstrate compliance. The permittee shall maintain copies of all inspections or calibrations. Maintenance inspections shall be performed monthly. Calibrations shall be performed annually. This shall serve as compliance for complying with 40 CFR 64.3(a) and (b), and the specific Compliance Assurance Monitoring Plan established in the permittee's application for which this permit is based upon. All of this information shall be made readily available to MDEQ personnel upon request.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).; 40 CFR 64.3(a) and (b), 64.6, 64.7, and 64.8)

5.B.4 For Emission Point AA-004, the permittee is required to utilize the source specific volatile organic compound destruction efficiency, established in a performance test conducted in October 2008 in accordance with EPA Reference Method 25A, 40 CFR 60, Appendix A. The permittee is also required to continuously monitor and maintain sufficient records of the combustion chamber temperature. The permittee shall maintain copies of all inspections or calibrations. Maintenance inspections shall be performed monthly. Calibrations shall be performed annually. This shall serve as compliance for complying with 40 CFR 64.3(a) and (b), and the specific Compliance Assurance Monitoring Plan established in the permittee's application for which this permit is based upon. All of this information shall be made readily available to MDEQ personnel upon request.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).; 40 CFR 64.3(a) and (b), 64.6, 64.7, and 64.8)

5.B.5 For each batch of coating received for use in Emission Points AA-003, AA-004, AA-020, AA-023, AA-025, AA-026, AB-003, AB-004, and AD-002, the permittee shall:

(a) determine the coating category and applicable VOHAP limit, as specified in Condition 3.B.3 of the federally enforceable permit herein; and

(b) certify the **as-supplied** VOC content of the batch of coating using a certification supplied by the manufacturer or by performing certification testing personally.

(Ref.: 40 CFR 63.785(a)(1) and (2), Subpart II)

5.B.6 For Emission Points AA-003, AA-004, AA-020, AA-023, AA-025, AA-026, AB-003, AB-004, and AD-002, as an alternative to testing each batch of coating, ***as-applied***, the permittee may determine compliance with the applicable limits determined in Condition 5.B.5(a) of the federally enforceable permit herein using any combination of the following procedures. The procedure used for each coating shall be determined and documented prior to application.

(a) For coatings to which thinning solvent (or any other material) will not be added under any circumstance or to which only water is added, the permittee shall:

(1) Certify the **as-applied** VOC content of each batch of coating.

(2) Notify the persons responsible for applying the coating that no thinning solvent may be added to the coating by affixing a label to each container of coating in the batch or through another means described in the implementation plan required in Condition 5.C.4 of the federally enforceable permit herein.

(3) If the certified **as-applied** VOC content of each batch of coating used during a calendar month is less than or equal to the applicable VOHAP limit in Condition 5.B.5(a) of the federally enforceable permit herein, then compliance is demonstrated for that calendar month, unless a violation is revealed using Method 24 of Appendix A to 40 CFR Part 60.

(b) For a coating to which thinning solvent is routinely or sometimes added, the permittee shall:

(1) Prior to the first application of each batch, designate a single thinner for the coating and calculate the maximum allowable thinning ratio (or ratios) using the equation and procedures specified in 40 CFR 63.785(c)(2)(i).

(2) Prior to the first application of each batch, notify painters and other persons, as necessary, of the designated thinner and maximum allowable thinning ratio(s) for each batch of the coating by affixing a label to each container of coating or through another means described in the implementation plan required in Condition 5.C.4 of the federally enforceable permit herein.

(3) By the 15th day of each calendar month, determine the volume of each batch of the coating used, **as-supplied** during the previous month.

(4) By the 15th day of each calendar month, determine the total allowable volume of thinner for the coating used during the previous month using Equation 3 specified in 40 CFR 63.785(c)(2)(iv).

(5) By the 15th day of each calendar month, determine the volume of thinner actually used with the coating during the previous month.

(6) If the volume of thinner actually used with the coating is less than or equal to the total allowable volume of thinner for the coating, then compliance is demonstrated.

(c) For coatings to which the same thinning solvent (or other material) is routinely or sometimes added, the permittee shall:

(1) Designate a single thinner to be added to each coating during the month and "group" coatings according to their designated thinner.

(2) Prior to the first application of each batch, calculate the maximum allowable thinning ratio for each batch of coating in the group using the equations in 40 CFR 63.785(c)(2)(i).

(3) Prior to the first application of each "batch," notify painters and other persons, as necessary, of the designated thinner and maximum allowable thinning ratio(s) for each batch in the group by affixing a label to each container of coating or through another means described in the implementation plan required in Condition 5.C.4 of the federally enforceable permit herein.

(4) By the 15th day of each calendar month, determine the volume of each batch of the group used, **as-supplied**, during the previous month.

(5) By the 15th day of each calendar month, determine the total allowable volume of thinner for the group for the previous month using Equation 3 specified in 40 CFR 63.785(c)(2)(iv).

(6) By the 15th day of each calendar month, determine the volume of thinner actually used with the group during the previous month.

(7) If the volume of thinner actually used with the group is less than or equal to the total allowable volume of thinner for the group, then compliance is demonstrated.

(d) For demonstrating compliance through alternative test methods, the permittee shall follow the requirements of 40 CFR 63.785(c)(4).

(e) A violation revealed through any approved test method shall result in a 1-day violation for enforcement purposes. A violation revealed through the recordkeeping procedures shall result in a 30-day violation for enforcement purposes, unless the owner or operator provides sufficient data to demonstrate the specific days during which noncompliant coatings were applied.

(Ref.: 40 CFR 63.785(b) and (c)(1) through (4), (c)(2)(vi), (c)(3)(vii), and 63.785(d), Subpart II)

5.B.7 For Emission Points AA-003, AA-004, AA-020, AA-023, AA-025, AA-026, AB-003, AB-004, and AD-002, the permittee shall use the following test methods and procedures as applicable:

(a) When using the compliance procedures described in Condition 5.B.6(a) through (c) of the federally enforceable permit herein, the permittee shall use Method 24 of 40 CFR Part 60, Appendix A to determine the VOC content of coatings **as-supplied** or **as-applied**.

(b) When using the compliance procedure described in Condition 5.B.6(d) of the federally enforceable permit herein, the permittee shall use a MDEQ approved test method that meets the specified accuracy limits in 40 CFR 63.786(b).

(c) The permittee may use batch formulation data as a test method in lieu of Method 24 to certify the **as-supplied** VOC content of a coating if it has been determined that the batch formulation data have a consistent and quantitatively known relationship to Method 24 results.

(Ref.: 40 CFR 63.786(a) through (c), Subpart II)

5.B.8 For Emission Points AA-003, AA-004, AA-020, AA-023, AA-025, AA-026, AB-003, AB-004, and AD-002, the permittee shall use the form and procedures in Appendix A of Subpart II to determine the values for the thinner and coating parameters to be used in Equation 1 and 2 of 40 CFR 63.785(c).

(Ref.: 40 CFR 63.786(d), Subpart II)

5.B.9 For Emission Points AA-003, AA-004, AA-020, AA-023, AA-025, AA-026, AA-027, AB-003, AB-004, and AD-002, the permittee shall keep the following records on a monthly basis and retain them in accordance with Condition 5.A.3 of the federally enforceable permit herein:

(a) A copy of the approved implementation plan;

(b) The volume of each low-usage exempt coating applied;

(c) Identification of the coatings used, their appropriate coating categories, and the applicable VOHAP limit;

(d) Certification of the **as-supplied** VOC content of each batch coating;

(e) A determination of whether the containers are free of cracks, holes, and other defects, and remain closed unless materials are being added or removed from them; and

(f) The results of any Method 24 or approved VOHAP measurement test conducted on individual containers or coating, **as-applied**.

In addition to the records in (a) through (f) above, the permittee shall also include the additional records required in 40 CFR 63.788(b)(3)(i) through (iv) that corresponds to the chosen compliance procedures(s) that were followed from Condition 5.B.6 of the federally enforceable permit herein.

(Ref.: 40 CFR 63.788(a) and (b)(2) and (3), Subpart II)

5.B.10 For Emission Points AA-003, AA-004, AA-020, AA-023, AA-025, AA-026, AA-027, AB-003, AB-004, and AD-002, if the permittee determines a coating has been used that exceeds a limit established in Condition 3.B.3 of the federally enforceable permit herein, the permittee shall keep additional records for the rest of the reporting period that contain the following:

(a) A summary of the number and duration of deviations during the reporting period and a reason for each deviation;

(b) A summary of the number and total duration of incidents that the monitoring protocol failed to perform in accordance with the design of the protocol or produced data that did not meet minimum data accuracy and precision requirements and a reason for each;

(c) Identification of the compliance status as of the last day of the reporting period and whether compliance was continuous or intermittent during the reporting period; and

(d) Each deviation shall also include records identifying the magnitude of each deviation, reason for each deviation, a description of the corrective action taken (including each action taken to minimize the deviation and what action was taken to prevent a recurrence), and what quality assurance activities were done on any element of the monitoring protocol.

(Ref.: 40 CFR 63.788(a) and (b)(4), Subpart II)

5.B.11 For Emission Points AA-020, AA-025, and AD-002, the permittee shall assure compliance with the volatile organic compound emission limitation by keeping a monthly inventory of paint usage. The paint usage will be converted to monthly volatile organic compound emissions using certified SDS's and EPA Reference Method 24, 40 CFR 60, Appendix A test results, and the tested VOC destruction efficiency (Condition 5.B.15 of the federally enforceable permit herein) for Emission Point AD-002. A 12-month consecutive total of volatile organic compound emissions will be calculated each month.

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

5.B.12 For the entire facility, the permittee shall assure compliance with the PM/PM_{10} emission cap of 319.26 tons per year by keeping monthly records of blasting material, paint, welding rods, and fuel used or issued on a 12-month consecutive basis.

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

5.B.13 For the entire facility, the permittee shall assure compliance with the nitrogen oxide emission cap of 84.02 tons per year by keeping monthly records of fuel usage on a 12-month consecutive basis.

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

5.B.14 For the entire facility, the permittee shall assure compliance with the volatile organic compound emission cap of 338.31 tons per year by keeping a monthly inventory of paint, adhesives, solvents, and other VOHAP containing chemicals used or issued on a 12-month consecutive basis.

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

5.B.15 For Emission Point AD-002, the permittee shall perform an initial stack test within 180 days of restoring the control equipment to full operation (following any shutdown, failure, or inadequate functioning of the control equipment) in accordance with EPA Reference Method 25A, 40 CFR 60, Appendix A, establishing a volatile organic compound destruction removal efficiency. Catalytic inlet temperature readings shall be recorded during the stack test; establishing a minimum catalytic inlet temperature following the performance test. The permittee shall continuously monitor and maintain sufficient records of the catalytic inlet temperature to demonstrate that the minimum destruction removal efficiency determined by the stack test is maintained. The permittee shall maintain copies of all inspections and calibrations of the catalytic thermal oxidizer and temperature monitoring devices.

Maintenance inspections shall be performed monthly. Calibrations shall be performed annually.

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

5.B.16 For Emission Points AD-016, AD-028, AD-029, and AD-035, the permittee shall install a non-resettable hour meter on each engine (if not already installed). The permittee shall keep records of the hours of operation of each engine that are recorded through the hour meters. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency, and how many hours are spent for non-emergency operation.

(Ref.: 40 CFR 63.6625 (f) and 63.6655(f)(1), Subpart ZZZZ)

5.B.17 For Emission Points AD-016, AD-018, AD-025, AD-026, AD-028, AD-029, and AD-035, the permittee shall keep the following records:

(a) A copy of each notification and report submitted to comply with Subpart ZZZZ.

(b) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.

(c) Records of the maintenance performed on each engine to demonstrate the engines were operated and maintained in accordance to the maintenance plan.

(d) Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore a malfunctioning engine to its normal or usual manner of operation.

All records shall be in a form suitable and readily available for expeditious review for a period of five (5) years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. These records may be kep in an electronic or hard copy format.

(Ref.: 40 CFR 63.6655(a)(1), (2), and (5) and (e)(2),; 40 CFR 63.6660)

5.B.18 For Emission Points AD-017, AD-019, AD-020, AD-022, AD-023, AD-027, AD-031 through AD-034, AD-036, AD-037, and AD-040 through AD-043, the permittee shall install a non-resettable hour meter on each engine, if one is not already installed. The permittee shall keep records of the operation of the engine in emergency and non-emergency service that are recorded through the hour meter. The permittee shall record the time of operation and the reason the engine was in operation during that time.

(Ref.: 40 CFR 60.4209(a) and 60.4214(b), Subpart IIII)

5.B.19 For Emission Points AB-001 and AD-008, the permittee shall keep records of the following information:

(a) A copy of each notification and report submitted to comply with subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report submitted.

(b) Compliance demonstrations as required by 40 CFR 63.10(b)(2)(viii).

(c) If the permittee uses an alternative fuel other than natural gas, records of the total hours per calendar year that alternative fuel is burned and the total hours per calendar year that the unit operated during periods of gas curtailment or gas supply emergencies.

(Ref.: 40 CFR 63.7555(a)(1) and (2) and (h), Subpart DDDDD)

5.B.20 For Emission Points AB-001 and AD-008, the permittee shall maintain records in accordance with the following requirements:

(a) Records shall be in a form suitable and readily available for expeditious review.

(b) Each record shall be kept for five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) Keep each record on site, or shall be accessible from on site (for example, through a computer network), for at least two (2) years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. Records can be kept off site for the remaining 3 years.

(Ref.: 40 CFR 63.7560, Subpart DDDDD)

5.B.21 For Emission Points AD-038 and AD-039, specifically the control equipment, the permittee shall perform a weekly observation for the presence of any visible emissions.

(1) The operator shall conduct an observation/EPA Reference Method 22 test for the presence of visible emissions from all stacks and other emission points of this equipment on a weekly basis. Observations shall be conducted during daylight hours and while the equipment is in operation. If visible emissions (not including condensed water vapor) are observed, the operator shall:

(a) Within 24 hours, take corrective action that eliminates the visible emissions or verify that the unit causing the emissions and any associated air pollution control equipment are operating normally, in accordance with design and standard procedures, and under the same conditions in which compliance was achieved in the past, and

(b) If visible emissions are not eliminated, have a certified visual emissions observer determine compliance with the opacity standard using EPA Reference Method 9 within three business days, and

(c) Report the visible emissions as a potential deviation (or as a violation if demonstrated by EPA Reference Method 9) according to the reporting requirements of this permit.

(2) The operator shall keep records of the following items for a minimum of five years:

(a) Identification of stack or emission point;

(b) Results of all required visual observations;

(c) Description of corrective actions or statement of verification under (1)(a) above and record of testing under (1)(b) above; and

(d) Date and time any visible emissions were abated.

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

5.B.22 The permittee shall calculate and maintain a record of the annual PM_{10} and $PM_{2.5}$ emissions in tons per year on a calendar year basis for a period of five (5) years beginning upon issuance of this permit and in accordance with the modifications and methodology covered in the Shipyard of the Future (SYoF) project. This requirement would be satisfied upon expiration of this permit. The permittee shall make this information available for review upon request by MDEQ personnel or the general public through the MDEQ in accordance with the requirements contained in 40 CFR 70.4(b)(3)(viii).

(Ref.: 40 CFR 52.21(r)(6)(iii) and (7))

C. Specific Reporting Requirements

Emission Point(s)	Pollutant/ Parameter Monitored	Reporting Requirement	Condition Number	Applicable Requirement
AA-001, AA-002, AA-011, AD-003 & AD-011	Opacity	Semiannual reporting.	5.C.1	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).; 40 CFR 64.9.
	PM/PM_{10}			
AA-003 & AA-004	VOC	Semiannual reporting.	5.C.2	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).
AD-002	VOC	Stack test report.	5.C.3	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).
AA-003, AA-004, AA-020, AA-025, AA-023, AA-026, AA-027, AB-003, AB-004 & AD-002	VOHAP	General Provisions - Notification requirements and implementation plan.	5.C.4	40 CFR 63.787(b), Subpart II
AA-003, AA-004, AA-020, AA-023, AA-025, AA-026, AA-027, AB-003, AB-004 & AD-002	VOHAP	General Provisions - Reporting requirements and standard specific reporting.	5.C.5	40 CFR 63.788(a) and (c), Subpart II
AA-020, AA-025 & AD-002	VOC	Semiannual reporting.	5.C.6	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).
Entire Facility	$PM/PM_{10}/PM_{2.5}$	Semiannual reporting.	5.C.7	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).
	NO_x	Semiannual reporting.	5.C.8	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).
	VOC	Semiannual reporting.	5.C.9	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).
AD-016, AD-028, AD-029 & AD-035	HAP	Report deviations	5.C.10	40 CFR 63.6640(b), 63.6650(f), and Footnote 1 to Table 2c, Subpart ZZZZ
AB-001 & AD-008	Reporting Requirements	Compliance Reports	5.C.11	40 CFR 63.7550(a), (b), (c)(1), and (c)(5)(i) – (iv) and (xiv), Subpart DDDDD
AD-038 & AD-039	Visible Emissions	Semiannual reporting.	5.C.12	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).
Entire Facility (SYoF Project)	$PM_{10}/PM_{2.5}$	Annual report if emissions, in tons per calendar year, exceed the baseline actual emissions for the SYoF project.	5.C.13	40 CFR 52.21(r)(6)(v)

5.C.1 For Emission Points AA-001, AA-002, AA-011, AD-003, and AD-011, the permittee shall submit semiannual reports summarizing the results of Condition 5.B.1 of the federally enforceable permit herein, in accordance with 40 CFR 64.9.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).; 40 CFR 64.9)

5.C.2 For Emission Points AA-003 and AA-004 (combined), the permittee shall demonstrate compliance with the volatile organic compound emission cap through monthly inventories of paint issued, which is totaled on a 12-month consecutive basis. A summary of this recordkeeping shall be submitted every six (6) months in accordance with Condition 5.A.4 of the federally enforceable permit herein.

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

5.C.3 For Emission Point AD-002, the permittee shall submit a report summarizing the results of any performance testing no later than 60 days following the stack test.

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

5.C.4 For Emission Points AA-003, AA-004, AA-020, AA-023, AA-025, AA-026, AA-027, AB-003, AB-004, and AD-002, the permittee shall develop, submit for approval, and maintain an implementation plan that identifies which compliance procedure(s) the permittee intends to use, identifies the procedures used by the permittee to gather the necessary data and make the required calculations, and the procedures the permittee will use to transfer, handle, and store VOHAP containing materials. If the permittee has not already done so, the permittee shall submit the required implementation plan to the MDEQ as soon as possible following the issuance of the federally enforceable permit herein.

(Ref.: 40 CFR 63.787(b), Subpart II)

5.C.5 For Emission Points AA-003, AA-004, AA-020, AA-023, AA-025, AA-026, AA-027, AB-003, AB-004, and AD-002, the permittee shall submit a report to the MDEQ in accordance with Condition 5.A.4 of the federally enforceable permit herein containing a summary of the records required to be kept in Conditions 5.B.9 and 5.B.10 of the federally enforceable permit herein.

(Ref.: 40 CFR 63.788(c), Subpart II)

5.C.6 For Emission Points AA-020, AA-025, and AD-002, the permittee shall demonstrate compliance with the volatile organic compound emission cap through monthly inventories of paint issued, which is totaled on a 12-month consecutive basis. A summary of this recordkeeping shall be submitted every six (6) months in accordance with Condition 5.A.4 of the federally enforceable permit herein.

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

5.C.7 For the entire facility, the permittee shall demonstrate compliance with the particulate matter emission cap through monthly records of blasting material, paint, welding rods, and fuel used or issued, which is totaled on a 12-month consecutive basis. A summary of this recordkeeping shall be submitted every six (6) months in accordance with Condition 5.A.4 of the federally enforceable permit herein.

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

5.C.8 For the entire facility, the permittee shall demonstrate compliance with the nitrogen oxide emission cap through monthly recordkeeping of fuel usage, which is totaled on a 12-month consecutive basis. A summary of this recordkeeping shall be submitted every six (6) months in accordance with Condition 5.A.4 of the federally enforceable permit herein.

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

5.C.9 For the entire facility, the permittee shall demonstrate compliance with the volatile organic compound emission cap through monthly inventories of paint, adhesives, solvents, and other VOHAP containing chemicals used or issued, which is totaled on a 12-month consecutive basis. A summary of this recordkeeping shall be submitted every six (6) months in accordance with Condition 5.A.4 of the federally enforceable permit herein.

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

5.C.10 For Emission Points AD-016, AD-028, AD-029, and AD-035, the permittee shall report all deviations from any emission or operating limitation of Subpart ZZZZ in the semi-annual report required by Condition 5.A.4. Such deviations shall include any failure to perform the work practice on the required schedule. In the event a work practice is delayed because the engine is operating during an emergency or if performing the work practice on the required schedule posed an unacceptable risk under federal, state, or local law, the permittee shall include in the report the reason for the delay.

(Ref.: 40 CFR 63.6640(b), 63.6650(f), and Footnote 1 to Table 2c, Subpart ZZZZ)

5.C.11 For Emission Points AB-001 and AD-008, as listed in Appendix D of the federally enforceable permit herein, the permittee shall submit a compliance report postmarked or submitted no later than January 31 following the year in which the tune-up is conducted. The report shall contain the following information:

(1) Company and facility name and address.

(2) Process unit information, emissions limitations, and operating parameter limitations.

(3) Date of report and beginning and ending dates of the reporting period.

(4) The total operating time during the reporting period.

(5) Include the date of the most recent tune-up. Include the date of the most recent burner inspection if it was done annually and was delayed until the next scheduled or unscheduled unit shutdown. (Ref.: 40 CFR 63.7550(c)(1), and (c)(5)(i) – (iv) and (xiv))

(Ref.: 40 CFR 63.7550(a), (b), (c)(1), and (c)(5)(i) – (iv) and (xiv), Subpart DDDDD)

5.C.12 For Emission Points AD-038 and AD-039, the permittee shall submit semiannual reports summarizing the results of Condition 5.B.21 of the federally enforceable permit herein.

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

5.C.13 The permittee shall submit an annual report to the MDEQ if the annual emissions of PM_{10} and/or $PM_{2.5}$ (in tons/year) calculated from the SYoF project exceed the baseline actual emissions by a significant amount (defined in 40 CFR 52.21(b)(23)) for that regulated NSR pollutant, and if such emissions differ from the preconstruction projection. Such a report shall be submitted within sixty (60) days after the end of such year and shall contain the following:

(a) The name, address, and telephone number of the facility.
(b) The annual emissions as calculated pursuant to paragraph 40 CFR 52.21(r)(6)(iii).
(c) Any other information that the permittee wishes to include in the report (i.e., explanation as to why the emissions differ from the preconstruction projection).

(Ref.: 40 CFR 52.21(r)(6)(v))

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act – Stratospheric Ozone Protection. The full text of the referenced regulations may be found on-line at **http://ecfr.gpoaccess.gov** under Title 40, or DEQ shall provide a copy upon request from the permittee.

7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A – Production and Consumption Controls.

7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.

7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E – The Labeling of Products Using Ozone-Depleting Substances, for the following containers and products:

(a) All containers in which a class I or class II substance is stored or transported;

(b) All products containing a class I substance; and

(c) All products directly manufactured with a process that uses a class I substance, unless otherwise exempted by this subpart or, unless EPA determines for a particular product that there are no substitute products or manufacturing processes for such product that do not rely on the use of a class I substance, that reduce overall risk to human health and the environment, and that are currently or potentially available. If the EPA makes such a determination for a particular product, then the requirements of this subpart are effective for such product no later than January 1, 2015.

7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F – Recycling and Emissions Reduction:

(a) Servicing, maintaining, or repairing appliances;

(b) Disposing of appliances, including small appliances and motor vehicle air conditioners; or

(c) Refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations,

persons selling class I or class II refrigerants or offering class I or class II refrigerants for sale, and persons purchasing class I or class II refrigerants.

7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any acceptable alternative that is listed in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR Part 82, Subpart G – Significant New Alternatives Policy Program. The permittee shall also comply with any use conditions for the acceptable alternative substance.

7.6 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart H – Halon Emissions Reduction:

(a) Any person testing, servicing, maintaining, repairing, or disposing of equipment that contains halons or using such equipment during technician training;

(b) Any person disposing of halons;

(c) Manufacturers of halon blends; or

(d) Organizations that employ technicians who service halon-containing equipment.

APPENDIX A

List of Abbreviations Used In This Permit

11 Miss. Admin. Code Pt. 2, Ch. 1.	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
11 Miss. Admin. Code Pt. 2, Ch. 2.	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
11 Miss. Admin. Code Pt. 2, Ch. 3.	Regulations for the Prevention of Air Pollution Emergency Episodes
11 Miss. Admin. Code Pt. 2, Ch. 4.	Ambient Air Quality Standards
11 Miss. Admin. Code Pt. 2, Ch. 5.	Regulations for the Prevention of Significant Deterioration of Air Quality
11 Miss. Admin. Code Pt. 2, Ch. 6.	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
11 Miss. Admin. Code Pt. 2, Ch. 7.	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lbs/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards for Hazardous Air Pollutants, 40 CFR 61 or National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR 63
NMVOC	Non-Methane Volatile Organic Compounds
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM_{10}	Particulate Matter less than 10 μm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound

APPENDIX B

List of Regulations Referenced and Enclosed within this Permit

40 CFR PART 60, APPENDIX A, METHOD 24 – DETERMINATION OF VOLATILE MATTER CONTENT, WATER CONTENT, DENSITY, VOLUME SOLIDS, AND WEIGHT SOLIDS OF SURFACE COATINGS

40 CFR PART 63, SUBPART II – NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SHIPBUILDING AND SHIP REPAIR (SURFACE COATING)

40 CFR PART 63, SUBPART ZZZZ – NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR STATIONARY RECIPROCATING INTERNAL COMBUSTION ENGINES (RICE)

40 CFR PART 60, SUBPART IIII – STANDARDS OF PERFORMANCE FOR STATIONARY COMPRESSION IGNITION INTERNAL COMBUSTION ENGINES (CI ICE)

40 CFR PART 63, SUBPART DDDDD – NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR INDUSTRIAL, COMMERCIAL, AND INSTITUTIONAL BOILERS AND PROCESS HEATERS

APPENDIX C

40 CFR PART 64

HUNTINGTON INGALLS, INC., INGALLS SHIPBUILDING DIVISION, PASCAGOULA OEPRATIONS' INDIVIDUAL AND SOURCE SPECIFIC COMPLIANCE ASSURANCE MONITORING PLAN

Compliance Assurance Monitoring (CAM) Plan

Permit Number 1280-00041

INGALLS SHIPBUILDING
1000 JERRY ST. PE' HIGHWAY
PASCAGOULA, MS 39568

Revised May 2015

Ingalls Shipbuilding
A Division of Huntington Ingalls Industries

Table of Contents

List of Tables

Executive Summary

The Compliance Assurance Monitoring (CAM) plan was prepared in accordance with 40 CFR Part 64.

Seven emission sources are determined to be subject to the CAM rule. Five of the affected sources are blasting operations for which opacity readings are the selected monitoring protocol for demonstrating compliance. Two of the affected sources are primer application activities at the plate line and shape line for which initial performance testing of the oxidizer and continuous monitoring of the combustion chamber temperature are the selected monitoring protocol for demonstrating compliance.

Section 1
Introduction

1.1 CAM Rule Applicability Criteria

The Federal CAM rules at 40 CFR Part 64 apply to individual emission units that meet the following criteria:

1. Are subject to an emission limitation or standard, other than the following exceptions:
   - Limits or standards that apply under NSPS or NESHAP rules proposed after November 15, 1990,
   - Stratospheric ozone protection requirements under title VI of the Act,
   - Acid rain program requirements,
   - Limits or standards that apply under an emissions trading program,
   - Federally-enforceable emissions caps established in a Title V permit that are independent of otherwise applicable requirements, and
   - Limits or standards that have continuous compliance determination methods established in the Title V permit unless the compliance method includes an assumed control device reduction factor that can be affected by the actual operation and maintenance of the control device
2. Use a control device to achieve compliance with the limitation or standard, and
3. Have potential pre-control emissions that exceed major source thresholds.

Backup utility power emissions units are specifically exempted from the CAM rules.

1.2 CAM Rule Applicability Determination

To determine applicability of the CAM rule, the potential precontrol device emission rates from the units were estimated based on maximum design rates. The following table identifies the emission units at the facility that are subject to the CAM rules.

Table 1. Emission Units Subject to CAM Rule

EMISSION ID	DESCRIPTION	POLLUTANT	EMISSION LIMITATIONS OR STANDARDS
AA-001	Plate line abrasive blasting with high efficiency dust collector	PM, Opacity	Construction permit (November 1988); 11 Miss. Admin. Code Pt. 2, R.1.3F(1). and 11 Miss. Admin. Code Pt. 2, R.1.3B.
AA-002	Shape line abrasive blasting with high efficiency dust collector	PM, Opacity	Construction permit (November 1988); 11 Miss. Admin. Code Pt. 2, R.1.3F(1). and 11 Miss. Admin. Code Pt. 2, R.1.3B.
AA-003	Plate line primer application with RTO	VOC	39 tons VOC per year (with AA-004)
AA-004	Shape line primer application with RTO	VOC	39 tons VOC per year (with AA-003)
AA-011	40 Wheel Wheelabrator with baghouses	PM, Opacity	11 Miss. Admin. Code Pt. 2, R.1.3F(1). and 11 Miss. Admin. Code Pt. 2, R.1.3B.
AD-003	Blast and Paint Hall with high efficiency dust collector	PM, Opacity	11 Miss. Admin. Code Pt. 2, R.1.3F(1). and 11 Miss. Admin. Code Pt. 2, R.1.3B.
AD-011	Southwest Wheelabrator Blast Booths with high efficiency dust collector	PM, Opacity	11 Miss. Admin. Code Pt. 2, R.1.3F(1). and 11 Miss. Admin. Code Pt. 2, R.1.3B.

Section 2
PM-limited Blasting Sources

2.1 Source Description

2.1.1 Emissions Units

The following blasting units and sources are subject to the CAM rule:

- AA-001 Plate line abrasive blasting
- AA-002 Shape line abrasive blasting
- AA-011 40 Wheel Wheelabrator
- AD-003 Blast and Paint Hall (blasting only)
- AD-011 East Bank Blast Booths (west booth and east booth)

2.1.2 Pollutant

- PM
- Opacity

2.1.3 Emission Control Technique

- AA-001 Torit® high-efficiency dust collector, model DFT 3-24
- AA-002 Torit® high-efficiency dust collector, model DFT 3-24
- AA-011 Three fabric filter baghouses manufactured by Wheelabrator
- AD-003 Two Torit® high-efficiency dust collectors, model DFT 4-128
- AD-011 Two Torit® high-efficiency dust collectors, model DFO 4-48

2.2 Emissions Limitation

- All applicable blasting units (AA-001, AA-002, AA-011, AD-003, and AD-011):
  - Opacity (11 Miss. Admin. Code Pt. 2, R.1.3B.): 40 percent
  - PM Standard (11 Miss. Admin. Code Pt. 2, R.1.3F(1).): $E = 4.1*(p)^{0.67}$ where, E = emission rate (lb/hr) and p = process rate (tons/hr)

2.3 Monitoring Approach

2.3.1 Indicators Monitored

- Visible Emissions
- Opacity

2.3.2 Indicator Ranges

- Visible emissions (VE) checks performed by the operator to ensure equipment is operating properly and control device is in adequate condition
- If the operator observes visible emissions, a certified EPA Method 9 observer will perform an opacity reading via EPA Method 9 to determine if the unit is in compliance with the opacity standard of 40 percent.

2.3.3 Data Acquisition and Measurement:

- Frequency of Measurements:
  - Weekly VE checks
  - Opacity readings as necessary.
- Recordkeeping:
  - Operators complete VE logs for each control device; certified visual emissions observers conduct EPA Method 9 opacity observations and complete opacity logs when required.

2.3.4 QA/QC Procedures:

- Opacity observers trained and certified per EPA Method 9.

2.3.5 Inspection/Maintenance Program:

- For units with baghouse control: baghouse is opened and clean sides of filter bags are inspected for dust accumulation. If dust is evident, bags are repaired as necessary. This inspection and maintenance procedure is performed each month for each baghouse.
- For units with high efficiency cartridge dust collectors: Compressor lines for cleaning mechanism is inspected for evidence of pressurized lines. If cleaning lines are observed to be lacking pressure, the air compressor supply sources and lines are checked and repaired or replaced as necessary. This inspection and maintenance procedure is performed each month for each dust collector.

2.4 Basis

Post control emissions from all of the affected blasting units (PM emission points) are less than major source thresholds. For this reason, continuous monitoring systems are not required for the blasting units. Ingalls believes the selected monitoring frequency of weekly recordkeeping of VE checks and opacity

readings, and monthly inspection and maintenance procedures are adequate and appropriate for providing reasonable assurance of compliance.

In general, the visible/no visible emission observation techniques of EPA Method 22 are applied to the PM control device emission points in order to reduce time required for demonstrating compliance through formal EPA Method 9 opacity readings. When an operator observes VE, a certified visible emissions observation will be performed in accordance with EPA Method 9 to demonstrate compliance with the 40 percent opacity limit. The presence of VE would occur prior to exceeding the PM emission rates allowed by the PM standard for manufacturing processes; therefore, the absence of VE acts as a surrogate for demonstrating compliance with the PM standard.

Ingalls is currently performing the monthly inspection and maintenance procedures in order to ensure proper operation of the control devices. In addition, AA-001, AA-002, and AA-011 are currently subject to VE checks in order to demonstrate compliance with the opacity limit from APC-S-1, Section 3.2.

2.5 References

1. Title V Operating Permit No. 1280-00041
2. EPA CAM webpage; URL: http://www.epa.gov/ttn/emc/cam.html

Table 2. Monitoring Approach for PM-Limited Blasting Sources

		INDICATOR # 1	INDICATOR # 2
I.	Indicator	Visible Emissions (VE)	Inspection/Maintenance
	Monitoring Approach	Conduct VE checks to ensure equipment is operating properly and control devices are in adequate condition.	Inspect the condition of the control devices: For baghouses: baghouse is opened and clean sides of filters are inspected for dust accumulation. For dust collectors: Compressor lines for cleaning mechanism are inspected for evidence of pressurized lines.
II.	Indicator Range	If VE are observed, perform opacity readings via EPA Method 9 to identify opacity. Any missed VE check is considered an excursion. Any opacity reading in exceedance of 40% is considered an excursion	Any missed inspection of the control device is considered an excursion. Any finding that the control device is inoperative is considered an excursion.
	Corrective Action	An excursion triggers a problem assessment, corrective action and a reporting requirement.	An excursion triggers immediate shutdown of process until problem is corrected. Each excursion triggers a problem assessment, corrective action and a reporting requirement.
III.	Performance Criteria		
A.	Data representativeness	VE checks will verify proper operation of the control device and identify any problems.	Inspections will verify operation and identify any problems.
B.	Verification Procedures	Records of VE checks and opacity readings	Inspection records
C.	Data QA/QC Practices	Opacity readers trained and certified per EPA Method 9	

Table 2. Monitoring Approach for PM-Limited Blasting Sources

		INDICATOR # 1	INDICATOR # 2
D.	Data Collection Procedures	Record results of VE checks and opacity readings, as applicable	Record inspection results and observations
E.	Data Collection Frequency	Weekly VE checks Opacity readings, as necessary	Monthly
F.	Data Averaging Period	Not applicable	Not applicable
G.	Recordkeeping	Maintain records of VE checks and corrective actions for 5 years.	Maintain records of inspections and corrective actions for 5 years.
H.	Reporting	Semiannual report of the number, duration, cause of any excursion and corrective action taken.	Semiannual report of the number, duration, cause of any excursion and corrective action taken.

3.1 Source Description

3.1.1 Emissions Units

- AA-003 Plate line primer application
- AA-004 Shape line primer application

3.1.2 Pollutant

- VOC

3.1.3 Emission Control Technique

- AA-003 Anguil Environmental Services Model 200 Regenerative Thermal Oxidizer
- AA-004 Anguil Environmental Services Model 200 Regenerative Thermal Oxidizer

3.2 Emissions Limitation

- VOC Emission Limit: 39 tpy combined emission limit for AA-003 and AA-004

3.3 Monitoring Approach

3.3.1 Initial Stack Testing

- Initial stack testing was performed in August 2008 and October 2008 for AA-003 and AA-004, respectively, using EPA Method 25A to establish a VOC destruction efficiency that will be used to demonstrate ongoing compliance with the requested VOC emission limit of 39 tons per year for the Plate and Shape lines, combined. Combustion chamber temperature readings were recorded during the performance test.

3.3.2 Indicators Monitored

- Combustion chamber temperature

3.3.3 Indicator Ranges

- Minimum combustion chamber temperature established during the initial performance test

3.3.4 Data Acquisition and Measurement

- Frequency of Measurements:
  - Continuous temperature measurement (i.e., at least every 15 minutes or a minimum of four equally spaced readings per hour)
- Recordkeeping:
  - Combustion chamber temperature will be recorded and monitored to ensure tested VOC destruction efficiency is achieved

3.3.5 QA/QC Procedures

- Temperature monitoring and recording instrumentation will be inspected annually and double-checked with second temperature measurement device for signs of malfunction. Adjustments to the burner will be made accordingly.

3.3.6 Inspection/Maintenance Program

- Temperature monitoring device will be double-checked with a second, portable temperature indicator. This inspection and maintenance procedure will be performed annually.

3.4 Basis

The RTO combustion chamber is indicative of the thermal incineration temperature. By maintaining the temperature of the combustion chamber at or above a selected minimum, a level of control efficiency can be expected to be achieved. In accordance with Section 5.B of Agreed Order No. 460503, Ingalls conducted a compliance test on the shape line RTO (AA-004) to establish the RTO control efficiency. A minimum combustion chamber temperature, which is linked to the established control efficiency, was established as part of the initial performance test. Annual inspection and tuning of the RTO burner is selected to verify equipment integrity and proper burner operation and efficiency.

3.5 References

1. Title V Operating Permit No. 1280-00041
2. EPA CAM webpage; URL: http://www.epa.gov/ttn/emc/cam.html

Table 3. Monitoring Approach for VOC-Limited Painting Sources

APPLICABLE REQUIREMENT		INDICATOR # 1	INDICATOR # 2
I.	Indicator	Oxidizer chamber temperature control.	Work practice/inspection.
	Monitoring Approach	Continuously record the operating temperature of the oxidizer combustion zone.	Inspect internal and external structural integrity of oxidizer to ensure proper operation.[1]
II.	Indicator Range	Any measurement less than the minimum temperature recorded during the most recent compliance demonstration is considered an excursion.	Any finding that the oxidizer structural integrity is compromised and the oxidizer no longer operates as designed is considered an excursion.
	Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
III.	Performance Criteria		
A.	Data representativeness	Any temperature monitoring device employed to measure the oxidizer combustion zone temperature shall be accurate to within 0.75% of temperature measured or ± 4°F, whichever is greater.	Inspections of the oxidizer system will identify problems.

[1] Internal inspection of RTOs will include annual assessment of valves for leakage; this assessment may be comprised of an internal inspection, or other method of assessment for leakage.

Table 3. Monitoring Approach for VOC-Limited Painting Sources

APPLICABLE REQUIREMENT		INDICATOR # 1	INDICATOR # 2
B.	Verification Procedures	Temperatures recorded on chart paper or electronic media.	Inspection records.
C.	Data QA/QC Practices	Annual validation of temperature system. Acceptance criteria ± 30°F [2].	Not applicable.
D.	Monitoring Frequency	Measured Continuously.	• External inspection – Monthly. • Internal inspection [1] – Annually.
	Data Collection Procedure	Recorded at least every 15-minutes on a chart or electronic media.	Record results of inspections and observations.
E.	Recordkeeping	Maintain for a period of 5 years records of chart recorder paper or electronic media and corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections and corrective actions taken in response to excursions.
F.	Reporting	Number, duration, cause of any excursion and corrective action taken.	Number, duration, cause of any excursion and corrective action taken.
	Frequency	Semiannually	Semiannually

Ingalls will maintain Standard Operating Procedure on-site for verifying accuracy of system.

APPENDIX D

List of Boilers and Process Heaters Subject to 40 CFR Part 63, Subpart DDDDD

Boilers/Process Heaters Subject to 40 CFR Part 63, Subpart DDDDD

Emission Point	Location(Asset ID)	Manufacturer	Year Constructed/ Installed[1]	Rated Heat Input Capacity (MMBtu/hr)	Fuel(s) Used	Category	Continuous Oxygen Trim System (YES/NO)	Tune-up Frequency[2]
AB-001	Annealing Furnace (Ref. 3123-035)	ISD/Schwegman	7/1/1990	24	Natural Gas	Process Heater	NO	1 Year
AD-008	Admin 1 (Ref. 3185-074)	RITE 400W	04/24/2006	4	Natural Gas	Boiler	NO	5 Year
	Admin 2 (Ref. 3185-056)	RITE 200W	04/06/2006	2	Natural Gas	Boiler	NO	5 Year
	Admin 2 (Ref. 3185-057)	RITE 200W	04/06/2006	2	Natural Gas	Boiler	NO	5 Year
	Admin 3 (Ref. 3185-064)	RITE 225WG	04/12/2006	2.25	Natural Gas	Boiler	NO	5 Year
	Machine Shop (Ref. 3185-213)	Raypack H-3-0624	02/08/2007	0.5	Natural Gas	Boiler	NO	5 Year
	Blast/Paint Hall (Ref. 3185-389)	RITE 550 WG	04/12/2006	5.5	Natural Gas	Boiler	NO	2 Year
	108-MS Paint Shop (Ref. 3185-205)	Hurst 545-G-100-30W	11/13/2006	4	Natural Gas	Boiler	NO	5 Year
	Pad Shop (Ref. 3185-351)	Rheem H3175A	04/12/2006	1.5	Natural Gas	Boiler	NO	5 Year
	Pad Shop (Ref. 3185-352)	Rheem H317A	04/12/2006	1.5	Natural Gas	Boiler	NO	5 Year
	Propulsion Bldg. Assembly (Ref. 3185-390)	Raypack H809926	04/12/2006	0.85	Natural Gas	Boiler	NO	5 Year
	Pipe Shop (Ref. 3108-140)	Walters Steam Works Model 282 FTX	2/16/2006	0.56	Natural Gas	Boiler	NO	5 Year
	MPA-055 (Ref. 3123-055)	Catalytic Industrial Systems Model #1-05 12-2	2012	1.98	Natural Gas	Process Heater	YES	5 Year
	MPA-056 (Ref. 3123-056)	Catalytic Industrial Systems Model #1-05 12-2	2012	1.98	Natural Gas	Process Heater	YES	5 Year
	MPA-057 (Ref. 3123-057)	Catalytic Industrial Systems Model #1-05 12-2	2012	1.98	Natural Gas	Process Heater	YES	5 Year
	MPA-058 (Ref. 3123-058)	Catalytic Industrial Systems Model #1-05 12-2	2012	1.98	Natural Gas	Process Heater	YES	5 Year
	MPA-059 (Ref. 3123-059)	Catalytic Industrial Systems Model #1-05 12-2	2012	1.98	Natural Gas	Process Heater	YES	5 Year

[1] 40 CFR 63, Subpart DDDDD, date for new affected sources is June 4, 2010.

[2] Units $\leq$ 5 MMBTU/hr and those with continuous oxygen trim conduct tune-ups every 5 years. Those without continuous oxygen trim and < 10 MMBTU/hr must conduct tune-ups biennially. Those without continuous oxygen trim $\geq$ 10 MMBTU/hr must conduct annual tune-ups.