

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

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

**THIS CERTIFIES THAT**

Hitachi Energy USA Inc.  
101 Kuhlman Drive  
Crystal Springs, Copiah County, Mississippi

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

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

*Becky Simonson*

**AUTHORIZED SIGNATURE  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Issued: July 8, 2020**

**Permit No.: 0600-00018**

**Effective Date: As specified herein.**

**Expires: June 30, 2025**

**Modified: July 12, 2024 (Admin. Mod. – Name Change)**

## SECTION 1

### A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
2. This permit is a Federally-approved permit to operate a synthetic minor source as described in Mississippi Administrative Code, Title 11, Part 2, Chapter 2, Rule 2.4.D.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.4.D.)
3. Any activities not identified in the application are not authorized by this permit.  
(Ref.: Miss. Code Ann. 49-17-29 1.b)
4. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(5).)
5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(7).)
6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(15)(a).)
7. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(15)(c).)

8. The permittee shall allow the Mississippi Department of Environmental Quality (MDEQ) Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:
- (a) To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and
  - (b) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission.

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

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

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

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

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

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

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

- (a) Routine maintenance, repair, and replacement;
- (b) Use of an alternative fuel or raw material by reason of an order under Sections 2(a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974

(or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;

- (c) Use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
- (d) Use of an alternative fuel or raw material by a stationary source which:
  - (1) The source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51 – Subpart I, or 40 CFR 51.166; or
  - (1) The source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51 – Subpart I, or 40 CFR 51.166;
- (e) An increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51 – Subpart I or 40 CFR 51.166; or
- (f) Any change in ownership of the stationary source.

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

## **B. GENERAL OPERATIONAL CONDITIONS**

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

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

2. Any diversion from or bypass of collection and control facilities is prohibited, except as provided for in Mississippi Administrative Code, Title 11, Part 2, Chapter 1 – *Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants*.

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

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

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

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

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

- (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:
  - (i) An upset occurred and that the source can identify the cause(s) of the upset;
  - (ii) The source was at the time being properly operated;
  - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
  - (iv) That within five (5) working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
  - (v) That as soon as practicable but no later than twenty-four (24) hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
- (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
- (3) This provision is in addition to any upset provision contained in any applicable requirement.

- (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- (b) Start-ups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) Start-ups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for start-ups and shutdowns are defined by an applicable rule, regulation, or permit.
  - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in Mississippi Administrative Code, Title 11, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for start-ups and shutdowns. Source specific emission limitations or work practice standards established for start-ups and shutdowns are subject to the requirements prescribed in Mississippi Administrative Code, Title 11, Part 2, Rule 1.10.B.(2)(a) through (e).
  - (3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

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

5. *Compliance Testing*: Regarding compliance testing (as applicable):

- (a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any “Applicable Rules and Regulations” or this permit and in units of mass per time.
- (b) Compliance testing will be performed at the expense of the permittee.
- (c) Each emission sampling and analysis report shall include but not be limited to the following:
  - (1) Detailed description of testing procedures;
  - (2) Sample calculation(s);
  - (3) Results; and
  - (4) Comparison of results to all “Applicable Rules and Regulations” and to emission limitations in the permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B.(3), (4), and (6).)

**C. PERMIT RENEWAL / MODIFICATION / TRANSFER / TERMINATION**

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

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

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

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

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

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

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

4. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:
  - (a) Persistent violation of any terms or conditions of this permit.
  - (b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

- (c) A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

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

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



**SECTION 2**  
**EMISSION POINT DESCRIPTION**

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

<b>EMISSION POINT</b>	<b>DESCRIPTION</b>
AA-100	Facility-Wide (ABB Kuhlman)
<b>AB-100</b>	<b>Facility-Wide Manufacturing Operations</b>
AB-101	Plasma Cutting Activities [sheet metal is cut to make the external case for each transformer; consists of on (1) plasma cutting table with one (1) cutting torch; emissions are routed through a common baghouse]
AB-102	Welding Activities
AB-103	Insulation Cutting / Sizing Activities [cellulose fiber boards are cut, sanded, and sized to serve as insulation material for transformer cores and windings; emissions are routed to a common baghouse]
AB-104	Wood Chipping Activities [wood pallets (originally used as transport structures) are chipped in order to minimize occupying space in on-site solid waste roll-off bins]
AB-105	No. 1 Vapor Phase Vacuum Chamber [kerosene vapor is introduced under vacuum to remove moisture from assembled transformers; emissions are routed through a respective condenser to recycle kerosene]
AB-106	No. 2 Vapor Phase Vacuum Chamber [kerosene vapor is introduced under vacuum to remove moisture from assembled transformers; emissions are routed through a respective condenser to recycle kerosene]
AB-107	Steel-Shot Blasting Activities [transformer cases are blasted to remove dirt and debris in preparation for painting; consists of two (2) shot-blasting booths; emissions are routed to a common baghouse]
AB-108	Metalworking Activities [includes (but not limited to) milling, drilling, boring, tapping, planing, broaching, sawing, cutting, shaving, shearing, threading, reaming, shaping, slotting, hobbing, and chamfering]
<b>AC-100</b>	<b>Facility-Wide Surface Coating Operations</b>
AC-101	Transformer Case Paint Booth
AC-102	Transformer Assembly Paint Booth [includes (but not limited to) paint touch-up activities to remove scratches / imperfections on transformer cases as a result of assembly]

EMISSION POINT	DESCRIPTION
AC-103	Powder Coat Paint Booth [emissions are routed through fabric filters]
AC-104	Gluing Activities
<b>AD-100</b>	<b>Facility-Wide Natural Gas-Fired Equipment</b>
AD-101	No. 1 Coil Drying Oven [Total Heat Input Capacity: 1.00 MMBTU / Hour]
AD-102	No. 2 Coil Drying Oven [Total Heat Input Capacity: 1.00 MMBTU / Hour]
AD-103	1.20 MMBTU / Hour Core Assembly Drying Oven
AD-104	1.80 MMBTU / Hour Make-Up Air Unit for Transformer Case Paint Booth
AD-105	0.55 MMBTU / Hour Powder Coat Paint Booth Drying Oven
AD-106	0.403 MMBTU / Hour Instrument Transformer (IT) Case Pre-Heating Oven
AD-107	1.00 MMBTU / Hour IT Case Powder Coat Paint Booth Drying Oven
AD-108	Fifty-One (51) Miscellaneous Radiant / Space Heaters [Total Heat Input Capacity: 8.649 MMBTU / Hour]
AD-109	0.854 MMBTU / Hour Vapor Phase Heater for Vacuum Chambers
<b>AE-100</b>	<b>Facility-Wide Liquid Storage Tanks</b>
AE-101	One (1) 3,000-Gallon Above-Ground Kerosene Tank
AE-102	Four (4) Above-Ground Used Mineral Oil Tanks [one (1) 10,000-gallon tank, one (1) 6,000-gallon tank, one (1) 3,000-gallon tank, and one (1) 2,500-gallon tank]
AE-103	Four (4) 12,000-Gallon Above-Ground Transformer Oil Tanks

**SECTION 3  
EMISSION LIMITATIONS AND STANDARDS**

<b>Emission Point(s)</b>	<b>Applicable Requirement(s)</b>	<b>Condition Number</b>	<b>Pollutant(s) / Parameter(s)</b>	<b>Limitation(s) / Standard(s)</b>
AA-100	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity	40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2		
AB-100 AC-100	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.3	PM (filterable only)	90.0 tpy (Rolling 12-Month Total)
			PM <sub>10</sub> / PM <sub>2.5</sub> (filterable only)	90.0 tpy (Rolling 12-Month Total)
			HAPs	7.0 tpy (Individual) (Rolling 12-Month Period) 20.0 tpy (Total) (Rolling 12-Month Period)
	11 Miss. Admin. Code Pt. 2, R. 1.3.F.(1).	3.4	PM (filterable only)	$E = 4.1 (p^{0.67})$
AB-105 AB-106 AC-100	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.5	VOCs	90.0 tpy (Rolling 12-Month Total)
AD-100	11 Miss. Admin. Code Pt. 2, R. 1.3.D.(1)(a).	3.6	PM	0.6 Pounds / MMBTU per Hour
	11 Miss. Admin. Code Pt. 2, R. 1.4.(1).	3.7	SO <sub>2</sub>	4.8 Pounds / MMBTU Heat Input (As Applicable)

3.1 For Emission Point AA-100 (Facility-Wide), except as otherwise specified herein, the permittee shall not cause or allow the emission of smoke from a point source into the open air that exceeds forty percent (40%) opacity from any process on-site.

Start-up operations may produce emissions that exceed 40% opacity for up to fifteen (15) minutes per start-up in any one hour and not to exceed three (3) start-ups per stack in any twenty-four (24) hour period.

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

3.2 For Emission Point AA-100 (Facility-Wide), unless otherwise specified herein, the permittee shall not discharge into the ambient (from any point source) any air

contaminant of such opacity as to obscure an observer's view to a degree in excess of forty percent (40%) opacity. This shall not apply to vision obscuration caused by uncombined water droplets.

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

- 3.3 For Emission Points AB-100 (Facility-Wide Manufacturing Operations) and AC-100 (Facility-Wide Surface Coating Operations), the permittee shall limit the total respective emission of particulate matter (PM – filterable only), particulate matter less than 10  $\mu\text{m}$  (PM<sub>10</sub> – filterable only), and particulate matter less than 2.5  $\mu\text{m}$  (PM<sub>2.5</sub> – filterable only) to no more than 90.0 tons per year (tpy) based on a rolling 12-month total.

Additionally, the permittee shall respectively limit the emission of any individual hazardous air pollutant (HAP) to no more than 7.0 tpy based on a rolling 12-month total and the all HAPs in total to no more than 20.0 tpy based on a rolling 12-month total.

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

- 3.4 For Emission Point AB-100 (Facility-Wide Manufacturing Operations) and AC-100 (Facility-Wide Surface Coating Operations), except as otherwise specified herein, limited herein or as applicable, the permittee shall not cause or allow the emission of particulate matter (PM) in total quantities in any one (1) hour from any manufacturing process (which includes any associated stacks, vents, outlets, or combination thereof) to exceed the amount determined by the following relationship:

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

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

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

- 3.5 For Emission Points AB-105 (No. 1 Vapor Phase Vacuum Chamber), AB-106 (No. 2 Vapor Phase Vacuum Chamber), and AC-100 (Facility-Wide Surface Coating Operations), the permittee shall limit the emission of volatile organic compounds (VOCs) to no more than 90.0 tons per year (tpy) based on a rolling 12-month total.

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

- 3.6 For Emission Point AD-100 (Facility-Wide Natural Gas-Fired Equipment), except as otherwise specified or limited herein, the maximum emission of ash and/or particulate matter (PM) from each individual process unit shall not exceed 0.6 pounds per MMBTU per hour heat input.

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

- 3.7 For Emission Point AD-100 (Facility-Wide Natural Gas-Fired Equipment), where applicable, the maximum discharge of sulfur oxides from fuel burning equipment in which heat is produced by in-direct heat transfer shall not exceed 4.8 pounds [measured as sulfur dioxide (SO<sub>2</sub>)] per million BTU (MMBTU) heat input.

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

**SECTION 4**  
**WORK PRACTICE STANDARDS**

THIS SECTION WAS INTENTIONALLY LEFT BLANK BECAUSE NO WORK PRACTICE  
STANDARDS APPLY TO THIS PERMIT ACTION

**SECTION 5**  
**MONITORING AND RECORDKEEPING REQUIREMENTS**

<b>Emission Point(s)</b>	<b>Applicable Requirement(s)</b>	<b>Condition Number</b>	<b>Pollutant(s) / Parameter(s)</b>	<b>Monitoring / Recordkeeping Requirement(s)</b>
AA-100	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain Records for a Minimum of Five (5) Years
AB-100 AC-100	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.2	PM / PM <sub>10</sub> / PM <sub>2.5</sub> (filterable only) HAPs	Calculate and Record Emissions (Monthly; Rolling 12-Month Total)
AB-105 AB-106 AC-100	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.3	VOCs	Calculate and Record Emissions (Monthly; Rolling 12-Month Total)
AB-101 AB-103 AB-107	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.4	PM / PM <sub>10</sub> / PM <sub>2.5</sub>	Perform and Record Weekly Inspections / Maintenance Actions on Baghouse
		5.5		Monitor and Record the Differential Pressure Drop Daily
AB-101	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.6	PM / PM <sub>10</sub> / PM <sub>2.5</sub> HAPs	Record and Maintain Operational and Material Data for Plasma Cutting (Monthly)
AB-102	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.7	PM / PM <sub>10</sub> / PM <sub>2.5</sub> HAPs	Record and Maintain Operational for Welding (Monthly)
AB-105 AB-106	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.8	VOCs	Perform and Record Monthly Inspection of Condenser Units
AB-107	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.9	PM / PM <sub>10</sub> / PM <sub>2.5</sub> HAPs	Record and Maintain Operational and Material Data for Shot-Blasting (Monthly)
AB-108	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.10	PM / PM <sub>10</sub> / PM <sub>2.5</sub> HAPs	Monitor and Record Quantity of Sheet Metal Processed via Metalworking (Monthly)
AC-100	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.11	VOCs HAPs	Record and Maintain Surface Coating Usage and Specifications (Monthly)
AC-103	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.12	PM / PM <sub>10</sub> / PM <sub>2.5</sub>	Perform and Record Regular Inspections / Replacement of Fabric Filters

- 5.1 For Emission Point AA-100 (Facility-Wide), except as otherwise specified or limited herein, the permittee shall retain all required records, monitoring data, supporting information, and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes all calibration and maintenance records, all original strip-chart recordings or other data from continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to the MDEQ as required by “Applicable Rules and Regulations” of this permit upon request.

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

- 5.2 For Emission Points AB-100 (Facility-Wide Manufacturing Operations) and AC-100 (Facility-Wide Surface Coating Operations), the permittee shall calculate and record the respective total emission of particulate matter (PM – filterable only), particulate matter less than 10  $\mu\text{m}$  (PM<sub>10</sub> – filterable only), particulate matter less than 2.5  $\mu\text{m}$  (PM<sub>2.5</sub> – filterable only), each individual hazardous air pollutant (HAP), and all HAPs combined in tons from all sources that can reasonably emit the pollutant(s) both monthly and on a rolling 12-month total.

Unless otherwise specified herein, the permittee shall include all reference data utilized to calculate emissions (*e.g.* operational data required by Conditions 5.5, 5.6, and 5.8 through 5.10; applicable emission factors; engineering judgement determinations; etc.).

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

- 5.3 For Emission Points AB-105 (No. 1 Vapor Phase Vacuum Chamber), AB-106 (No. 2 Vapor Phase Vacuum Chamber), and AC-100 (Facility-Wide Surface Coating Operations), the permittee shall calculate and record the total emission of volatile organic compounds (VOCs) from all sources that can reasonably emit the pollutant both monthly and on a rolling 12-month total.

Unless otherwise specified herein, the permittee shall include all reference data utilized to calculate emissions (*e.g.* operational data required by Condition 5.10; applicable emission factors; engineering judgement determinations; etc.).

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

- 5.4 For Emission Points AB-101 (Plasma Cutting Activities), AB-103 (Insulation Cutting / Sizing Activities), and AB-107 (Steel-Shot Shot-Blasting Activities), the permittee shall perform and record an inspection of the baghouse weekly to note any required maintenance.

If a problem is noted with the baghouse during an inspection, the permittee shall perform the necessary maintenance on the applicable unit to ensure operation as originally



designed. Additionally, the permittee shall maintain on-site sufficient components as is necessary to replace baghouse filters / bags.

In the event the baghouse fails and/or malfunctions, the permittee shall cease operations at the associated process equipment until such time when repairs are made to return the baghouse to its normal operational state.

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

- 5.5 For Emission Points AB-101 (Plasma Cutting Activities), AB-103 (Insulation Cutting / Sizing Activities), and AB-107 (Steel-Shot Shot-Blasting Activities), the permittee shall monitor and record the differential pressure drop on the baghouse weekly during active operation of the noted activities to demonstrate that the pressure drop does not exceed 4.0 inches of water.

In the event that the differential pressure drop exceeds the specified threshold, the permittee shall take immediate corrective action taken to return the baghouse to an operational state in which the pressure drop complies with the specified threshold. Any corrective action(s) taken shall be recorded and maintained in accordance with Condition 5.1.

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

- 5.6 For Emission Point AB-101 (Plasma Cutting Activities), the permittee shall monitor, record, and maintain the following information on a monthly basis:

- (a) The total duration (in hours) spent plasma cutting sheet metal; and
- (b) Documentation that details the weight percent (wt.%) of any metal hazardous air pollutant (HAP) present in the sheet metal cut.

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

- 5.7 For Emission Point AB-102 (Welding Activities), the permittee shall monitor, record, and maintain the quantity (in pounds) and type of welding wire and/or welding electrode consumed on a monthly basis.

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

- 5.8 For Emission Points AB-105 and AB-106 (Vapor Phase Vacuum Chambers), the permittee shall the permittee shall perform and record an inspection of the condenser units monthly to ensure each is operating in accordance with the manufacturer's specifications.

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

5.9 For Emission Point AB-107 (Steel-Shot Shot-Blasting Activities), the permittee shall monitor, record, and maintain the following information on a monthly basis:

- (a) The quantity (in pounds) of abrasive blasting medium consumed;
- (b) Documentation that details the weight percent (wt.%) of any metal hazardous air pollutant (HAP) present in the abrasive blasting medium.

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

5.10 For Emission Point AB-108 (Metalworking Activities), the permittee shall monitor and record the quantity (in pounds) of sheet metal altered via a metalworking activity on a monthly basis.

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

5.11 For Emission Point AC-100 (Facility-Wide Surface Coating Operations), the permittee shall monitor and record the total volume (in gallons) of any coating material (*e.g.* thinner, adhesive, glue, paint, etc.) used on a monthly basis. Additionally, the permittee shall maintain documentation for any coating material that includes (at a minimum) the following information:

- a) Product name and identification;
- (b) The density (in pounds per gallon);
- (c) The weight percentage (wt.%) of the volatile organic compound (VOC) content;
- (d) The wt.% of the solids content (as applicable); and
- (d) The wt.% of any individual hazardous air pollutant (HAP).

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

5.12 For Emission Point AC-103 (Powder Coat Paint Booth), the permittee shall perform and record the regular inspection and replacement of fabric filters in the paint booth in accordance with the manufacturer's instructions. Additionally, the permittee shall maintain documentation that identifies the capture efficiency of the filters used in the paint booth.

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

**SECTION 6**  
**REPORTING REQUIREMENTS**

<b>Emission Point(s)</b>	<b>Applicable Requirement(s)</b>	<b>Condition Number</b>	<b>Reporting Requirement(s)</b>
AA-100	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.1	Report Deviation from Requirements Within Five (5) Working Days
		6.2	Submit Annual Monitoring Report
		6.3	Submit Documents Certified by a Responsible Official
		6.4	Submit Annual Report on Maintenance Actions for Air Pollution Control Devices
AB-100 AC-100	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.5	Submit Annual Report on PM, PM <sub>10</sub> , PM <sub>2.5</sub> , and HAP Emissions
AB-100	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.6	Submit Annual Report of Material Usage and Specifications
AB-105 AB-106 AC-100	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.7	Submit Annual Report on Maintenance Actions for Air Pollution Control Devices
AC-100	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.8	Submit Annual Report on Surface Coating Usage and Specifications

6.1 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective action(s) and/or preventive measures taken. The report shall be submitted to the MDEQ within five (5) working days of the time the deviation began.

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

6.2 Except as otherwise specified herein, the permittee shall submit an annual monitoring report postmarked no later than January 31<sup>st</sup> of each calendar year for the preceding calendar year. This report shall contain any required monitoring specified in Section 6 of the permit. Additionally, all instances of deviations from permit requirements shall be clearly identified in the report. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration.

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

- 6.3 Any document required by this permit to be submitted to the MDEQ shall contain a certification signed by a Responsible Official (RO) that affirms, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

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

- 6.4 For Emission Point AA-100 (Facility-Wide), the permittee shall submit an annual report in accordance with Condition 6.2 that details any maintenance action(s) performed on an applicable air pollution control device (i.e. the baghouse; a condenser; a fabric filter).

Additionally, the permittee shall include within the report the corresponding date and duration (in hours) in which a control device was non-operational while the respective manufacturing activity was still operating.

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

- 6.5 For Emission Points AB-100 (Facility-Wide Manufacturing Operations) and AC-100 (Facility-Wide Surface Coating Operations), the permittee shall submit an annual report in accordance with Condition 6.2 that summarizes the total emission of particulate matter (PM), particulate matter less than 10  $\mu\text{m}$  ( $\text{PM}_{10}$ ), particulate matter less than 2.5  $\mu\text{m}$  ( $\text{PM}_{2.5}$ ), individual hazardous air pollutants (HAPs), and all HAPs combined from all applicable equipment in tons both monthly and on a rolling 12-month total.

The report shall include all reference data utilized to validate the presented emissions (e.g. applicable emission factors, engineering judgement determinations, etc.).

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

- 6.6 For Emission Point AB-100 (Facility-Wide Manufacturing Operations), the permittee shall submit an annual report in accordance with Condition 6.2 that outlines the following information based on a rolling 12-month period:

- (a) The total duration (in hours) spent plasma cutting;
- (b) The quantity (in pounds) and type of welding wire and/or welding electrode consumed;
- (c) The quantity (in pounds) and type of abrasive blasting medium consumed;
- (d) The quantity (in pounds) and type of sheet metal altered via a metalworking activity; and

- (e) The weight percentage (wt.%) of any metal hazardous air pollutant (HAP) present in the welding wire / electrode, abrasive blasting medium, and/or sheet metal altered.

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

- 6.7 For Emission Points AB-105 (No. 1 Vapor Phase Vacuum Chamber), AB-106 (No. 2 Vapor Phase Vacuum Chamber), and AC-100 (Facility-Wide Surface Coating Operations), the permittee shall submit an annual report in accordance with Condition 6.2 that summarizes the total emission of volatile organic compounds (VOCs) from all applicable equipment in tons both monthly and on a rolling 12-month total.

The report shall include all reference data utilized to validate the presented emissions (*e.g.* applicable emission factors, engineering judgement determinations, etc.).

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

- 6.8 For Emission Point AC-100 (Facility-Wide Surface Coating Operations), the permittee shall submit an annual report in accordance with Condition 6.2 that details the following information for each coating material based on a rolling 12-month period:

- (a) Product name and identification;
- (b) The density (in pounds per gallon);
- (c) The volume (in gallons) consumed;
- (d) The weight percentage (wt.%) of the volatile organic compound (VOC) content;
- (e) The wt.% of the solids content (as applicable); and
- (f) The wt.% of any individual hazardous air pollutant (HAP).

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