

STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

AITX Railcar Services LLC, Brookhaven Facility
113 Boyce Drive
Brookhaven, Mississippi
Lincoln County

has been granted permission to construct air emissions equipment to comply with the emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued:_____

Permit No.: 1620-00054

SECTION 1. GENERAL CONDITIONS

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

of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

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

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

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

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

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

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

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

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

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

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

- (a) To enter at reasonable times upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and

- (b) To have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air contaminants or waste waters, fuel, process material, or other material which affects or may affect emission of air contaminants from any source.

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

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

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

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

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

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

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

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

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

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

- 1.18 *Permit Expiration:* The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance, if construction is suspended for eighteen (18) months or more, or if construction is not completed within a reasonable time. The DEQ may extend the 18-month period upon a satisfactory showing that an extension is justified.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1)., R. 2.5.C(4)., and R. 5.2.)

- 1.19 *Certification of Construction:* A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee.

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

- 1.20 *Beginning Operation:* After certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by 11 Miss. Admin. Code Pt. 2, R. 2.13.G.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).)
- 1.21 *Application for a Permit to Operate:* The application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).)
- 1.22 *Operating Under a Permit to Construct:* Upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).)
- 1.23 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.
- (a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:
- (i) An upset occurred and that the source can identify the cause(s) of the upset;
- (ii) The source was at the time being properly operated;
- (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
- (iv) That within five (5) working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;

- (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
 - (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
 - (3) This provision is in addition to any upset provision contained in any applicable requirement.
 - (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- (b) Startups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
 - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).
 - (3) Where an upset, as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., occurs during startup or shutdown, see the upset requirements above.
- (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)
- 1.24 *General Duty:* All air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants.
- (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 1.25 *Compliance Testing:* Regarding compliance testing:
- (a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.
 - (b) Compliance testing will be performed at the expense of the permittee.
 - (c) Each emission sampling and analysis report shall include but not be limited to the following:
 - (1) detailed description of testing procedures;
 - (2) sample calculation(s);

- (3) results; and
- (4) comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

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

SECTION 2. EMISSION POINT DESCRIPTION

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

Emission Point	Description
AA-001	Car Depressurization and Steam Purge equipped with Open Air Assisted Flare
AA-002	Railcar Steam Cleaning
AA-003	200 hp (6.695 MMBTU/hr) natural gas-fired boiler
AA-004	Welding Operations
AA-005	0.4 MMBTU/hr natural gas-fired space heaters
AA-006	560-gallon diesel storage tank
AA-007	Exterior Blast Operations equipped with baghouse
AA-008	Interior Blast Operations equipped with baghouse
AA-009	Painting Operations – Interior Lining
AA-010	Painting Operations – Exterior
AA-011	Painting Operations – Hopper Car

SECTION 3. EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.1	VOC	≤ 99.0 tons/year
		3.2	HAP	≤ 24.0 tons/year for total HAP, ≤ 9.0 tons/year for individual HAP
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.3	Equivalent Opacity	≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.4	Opacity	≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.5	All Pollutants	Minimizing Pollutants
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). MACT Avoidance Limit	3.6	HAP	Methylene chloride paint stripping and coatings containing target HAPs prohibited
AA-001	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.7	Operation	Control flare operating requirements
		3.8		Route emissions to the flare
AA-003 AA-005	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.9	PM	≤ 0.6 lb/MMBTU
AA-007 AA-008	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.10	Operation	Route emissions to baghouse

3.1 For the entire facility, the permittee shall not emit more than 99.0 tons per year (tpy) of volatile organic compound (VOC) as determined for each consecutive 12-month period on a rolling monthly basis.

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

3.2 For the entire facility, the permittee shall not emit more than 24.0 tons per year (tpy) of total combined hazardous air pollutants (HAPs) and no more than 9.0 tons per year (tpy) of any single hazardous air pollutant (HAP) as determined for each consecutive 12-mnth period on a rolling monthly basis.

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

3.3 For the entire facility, except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Condition 3.4. This shall not apply to vision obscuration caused by uncombined water droplets.

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

3.4 For the entire facility, 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.)

- 3.5 For the entire facility, the permittee shall operate all air emissions equipment as efficiently as possible in order to minimize the emissions of air pollutants. Furthermore, the permittee shall perform routine maintenance on all air emissions equipment such that the equipment may be operated in an efficient manner.

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

- 3.6 For the entire facility, the permittee is prohibited from performing the following:

- (a) Paint stripping using methylene chloride for the removal of dried paint.
- (b) Spray application of coatings that contain any of the following:
 - (1) Chromium (Cr);
 - (2) Lead (Pb);
 - (3) Manganese (Mn);
 - (4) Nickel (Ni); and/or
 - (5) Cadmium (Cd).

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

- 3.7 For Emission Point AA-001, the permittee shall operate the control flare according to 40 CFR 60.18(b) and the requirements specified below:

- (a) The control flare shall be operated at all times when emissions may be vented to it.
- (b) The flare shall be operated and maintained according to the manufacturer's recommendations.
- (c) The flare shall be operated with no visible emissions as determined by EPA Method 22, except for a period not to exceed a total of five (5) minutes during any two (2) consecutive hours.
- (d) The permittee shall maintain a flare pilot flame at all times when emission may be vented to the flare.

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

- 3.8 For Emission Point AA-001, the permittee shall route all gaseous emissions to the flare for control.

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

- 3.9 For Emission Points AA-003 and AA-005, the maximum permissible emission of ash and/or particulate matter from each 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, 1.3.D(1)(a).)

- 3.11 For Emission Points AA-007 and AA-008, the permittee shall route all emissions to the respective control device. The permittee shall operate each control device at all times when processing. Should the control technologies become nonoperational then the respective process shall be shut down immediately, but not as to cause damage to equipment or property or cause further environmental problems. The process shall not startup until such time that the control technology becomes operational. The permittee shall maintain on hand at all times sufficient equipment as is necessary to repair and/or overhaul each control device at all times. The permittee shall maintain and perform quality assurance/quality control measures in accordance with the manufacture's specifications.

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

SECTION 4. WORK PRACTICES

This section was intentionally left blank since no work practice standards apply to this permit action.

SECTION 5. MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Monitoring/Recordkeeping Requirement
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain records for a minimum of five (5) years.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2		Monitor and record facility wide VOC and HAP emissions
		5.3		Monitor and record fuel combustion
		5.4	VOC and HAP	Monitor VOC or HAP containing material
		5.5		Record VOC or HAP containing material
AA-001		5.6		Record railcar flared and steamed
	5.7	Flare Operations	Monitoring	
	5.8		Recordkeeping	
AA-007 AA-008		5.9	Baghouse inspections	Monitoring and Recordkeeping

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

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

5.2 For the entire facility, the permittee shall monitor and record the total VOC emission rate, the emission rate of each individual HAP, and the total HAP emission rate in tons per year on a monthly basis and for each consecutive 12-month period on a rolling basis. The records shall include all calculations and supporting documentation that were used in determining the emission rates. The records shall be kept in accordance with Condition 5.1.

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

5.3 For the entire facility, the permittee shall monitor and record the type and quantity of each fuel used in each stationary combustion source. Fuel quality data shall be collected and maintained with sufficient detail to support the emission calculations.

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

5.4 For the entire facility, the permittee shall determine the following for each coating, adhesive, solvent, or other VOC or HAP containing material used:

- (a) The identification of each coating, adhesive, solvent, or other VOC or HAP containing material and the total gallons of each coating, adhesive, solvent, or other VOC or HAP containing material used on a monthly basis and for each consecutive 12-month period on a rolling basis.

- (b) The VOC and/or HAP content(s) of each coating, adhesive, solvent, or other VOC or HAP containing material used. A description of the method used to determine the VOC and HAP content shall accompany this data. The permittee may utilize data supplied by the manufacturer, or analysis of VOC and HAP content by EPA Test Method 24, 40 CFR 60, Appendix A and/or EPA Test Method 24.
- (c) The density of each coating, adhesive, solvent, or other VOC or HAP containing material used.

The permittee shall use the given parameters to determine VOC, individual HAP, and total HAP emissions in accordance with Condition 5.2 and demonstrate compliance with Conditions 3.1, 3.2 and 3.6.

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

- 5.5 For the entire facility, the permittee shall maintain in accordance with Condition 5.1 sufficient records to document:

- (a) The identification of each coating, adhesive, solvent, or other VOC or HAP containing material and the total gallons of each coating, adhesive, solvent, or other VOC or HAP containing material used on a monthly basis and for each consecutive 12-month period on a rolling basis.
- (b) The VOC and/or HAP content(s) of each coating, adhesive, solvent, or other VOC or HAP containing material used with a description of the method used to determine the VOC and/or HAP content.
- (c) The density of each coating, adhesive, solvent, or other VOC or HAP containing material used.

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

- 5.6 For Emission Point AA-001, the permittee shall maintain in accordance with Condition 5.1 sufficient records to document the total number of railcars flared and steam cleaned on a monthly basis and for each consecutive 12-month period on a rolling basis.

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

- 5.7 For Emission Point AA-001, the permittee shall comply with the following monitoring requirements outlined below:

- (a) The permittee shall continuously monitor and record the presence of the flare pilot flame by use of a thermocouple or any other equivalent device to detect the presence of a flame.
- (b) The permittee shall perform monthly visible emissions tests for a minimum of fifteen (15) minutes using EPA Method 22 while the facility is operating with all gases being flared. If visible emissions are observed for a period greater than one (1) minute, corrective action shall be taken immediately. Immediately following completion of the corrective action(s), the permittee shall demonstrate compliance by performing an EPA Method 22 test for a period of two (2) hours and shall monitoring and maintain records of the flare rate during the test. The monthly visible emissions tests shall be separated by at least fifteen (15) days between each test.

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

5.8 For Emission Point AA-001, the permittee shall comply with the following recordkeeping requirements:

- (a) The permittee shall maintain a copy of the flare manufacturer operating and maintenance recommendations and detailed records of all maintenance performed on the flare.
- (b) The permittee shall maintain continuous records of the thermocouple or equivalent device output demonstrating the presence of a flame in the control flare whenever the facility is in operation.
- (c) The permittee shall maintain records of all EPA Method 22 tests and details of any corrective/preventative action(s) taken.

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

5.9 For Emission Points AA-007 and AA-008, the permittee shall perform monthly inspections of each device to ensure the device is operating according to manufacturer's specifications. The permittee shall keep and maintain the following records of the monthly inspections:

- (a) The date, place, and time of each inspection;
- (b) Person performing the inspection; and
- (c) Results of the inspection, including the date, time, and duration of the corrective action period from the time the inspection indicated a problem to the time of the indication that the device was replaced or restored to operation.

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

SECTION 6. REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1(a)	Report deviations within five (5) working days
		6.1(b)	Annual reporting
		6.1(c)	Certification by responsible official
	11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).	6.1(d)	Notification of beginning actual construction within 15 days
	11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).	6.1(e)	Notification when construction does not begin or is suspended
	11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).	6.1(f)	Certification of completion of construction prior to operation
	11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).	6.1(g)	Notification of changes in construction
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). MACT Avoidance Limit	6.2	Certification statement that target HAP containing coatings and paint stripping with methylene chloride is not performed
AA-001	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.3	VOC and HAP annual report
		6.4	Flare reporting requirements

6.1 General Reporting Requirements:

- (a) The permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- (b) Beginning upon issuance of this permit and lasting until issuance or modification of the applicable operating permit, the permittee shall submit reports of any required monitoring by January 31st for the preceding calendar year. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 2.1.C. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration. For any air emissions equipment not yet constructed and/or operating the report shall so note and include an estimated date of commencement of construction and/or startup, whichever is applicable.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- (c) Any document required by this permit to be submitted to the DEQ shall contain a certification signed by a responsible official stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- (d) Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun.

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

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

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

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

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

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

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

- 6.2 For the entire facility, the permittee shall include in the certified annual monitoring report required by paragraph (b) of Condition 6.1 a certification statement that states the facility has not performed paint stripping using methylene chloride for the removal of dried paint and/or performed spray application of coatings containing chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), and/or cadmium (Cd). This certification statement shall be accompanied by MSDS for all coatings used in the previous 12-month period.

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

- 6.3 For the entire facility, the permittee shall submit to DEQ an annual monitoring report in accordance with paragraph (b) of Condition 6.1. This report shall provide the following:
 - (a) The total VOC emissions rate, the emission rate of each individual HAP, and the total HAP emission rate in tons per month and tons per year for each consecutive 12-month period;
 - (b) The type and total quantity of each fuel used in each stationary combustion source for each consecutive 12-month period;
 - (c) The identification of each coating, adhesive, solvent, or other VOC or HAP containing material used;
 - (d) The VOC and/or HAP content(s) of each coating, adhesive, solvent, or other VOC or HAP containing material used;
 - (e) The total gallons of each coating, adhesive, solvent, or other VOC or HAP containing material used in each consecutive 12-month period; and

- (f) The total number of railcars flared and steam cleaned in each consecutive 12-month period.

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

6.4 For Emission Point AA-001, the permittee shall submit to DEQ an annual monitoring report in accordance with paragraph (b) of Condition 6.1. This report shall provide the following:

- (a) Details of any periods where the pilot flame was not present, including data, start and end times, duration, cause, corrective and preventive actions taken, and whether or not any gases were being vented to the flare;
- (b) Copies of data sheets for all EPA Method 22 tests performed during the reporting period, including data on gas flow rate to the flare where required by paragraph (c) of Condition 5.8, and details of any accompanying corrective and preventative actions taken; and
- (c) Continuous pilot flame monitor downtime data; monitor downtime event data, start and end times, duration, cause, corrective and preventive actions taken, and total duration monitor downtime for the reporting period.

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