

STATE OF MISSISSIPPI AND FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL PERMIT

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

THIS CERTIFIES THAT

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

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

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: _____

Permit No.: 1620-00054

Effective Date: As specified herein.

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

Draft/Proposed [Date]

Section 1.

A. GENERAL CONDITIONS

This permit is for air pollution control purposes only.

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

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.4.D.)

Any activities not identified in the application are not authorized by this permit.

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

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).)

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).)

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).)

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).)

The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:

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

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

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)

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).)

This permit does not authorize a modification as defined in Regulation 11 Miss. Admin. Code Pt. 2, Ch.2., "Permit Regulations for the Construction and/or Operation of Air Emission Equipment." A modification may require a Permit to Construct and a modification of this permit. Modification is defined as "Any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

- (c) Routine maintenance, repair, and replacement;
- (d) 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;
- (e) Use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
- (f) Use of an alternative fuel or raw material by a stationary source which:

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

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

B. GENERAL OPERATIONAL CONDITIONS

- 1. Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in Regulation, 11 Miss. Admin. Code Pt. 2, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared.

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

- 2. Any diversion from or bypass of collection and control facilities is prohibited, except as provided for in 11 Miss. Admin. Code Pt. 2, R. 1.10., "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants."

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

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

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

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

- a. Upsets

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

b. Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.)

- (A) 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.

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).

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.)

Compliance Testing: Regarding compliance testing:

- (i) 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.
- (j) Compliance testing will be performed at the expense of the permittee.
- (k) Each emission sampling and analysis report shall include but not be limited to the following:
 - (i) Detailed description of testing procedures;
 - (ii) Sample calculation(s);
 - (iii) Results; and
 - (iv) 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

- 1.2 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.)

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

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

- 1.4 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).)

- 1.5 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.)

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

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

SECTION 2 EMISSION POINT DESCRIPTION

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

Emission Point	Facility ID	Description
AA-001	CONT1	Car Depressurization and Steam Purge
AA-001a	--	Open Air Assisted Flare
AA-002	TRMT1	Railcar Steam Cleaning
AA-003	EQPT1	Natural Gas Fired Boiler, 6.695MMBTU/hr
AA-004	ACT2	Welding Operations
AA-005	EQPT3	Natural Gas Fired Space Heaters, 0.4 MMBTU/hr
AA-006	EQPT4	560-gallon Diesel Storage Tank
AA-007	--	Exterior Blast Operation equipped with baghouse
AA-008	--	Interior Blast Operation equipped with baghouse
AA-009	--	Interior Lining Painting Operation
AA-010	--	Exterior Painting Operation
AA-011	--	Hopper Car Painting Operation

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
	Title V Avoidance Limit	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-001a	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.7	Operation	Control flare operating requirements
AA-001		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)., Title V Avoidance Limit)

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-month period on a rolling monthly basis.

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

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 Limit)

- 3.7 For Emission Point AA-001a, 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 AA-001a (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).)

- 3.10 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 non-operational 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-001a		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 all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to MDEQ as required by Applicable Rules and Regulations or this permit upon request.

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

- 5.2 For 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-001a, 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 using 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 monitor 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-001a, 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	Report permit deviations within five (5) working days.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.2	Submit certified annual monitoring report.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.3	All documents submitted to MDEQ shall be certified by a Responsible Official.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). MACT Avoidance Limit	6.4	Certification statement that target HAP containing coatings and paint stripping with methylene chloride is not performed
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.5	VOC and HAP annual report
AA-001a		6.6	Flare reporting requirements

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

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

- 6.2 Except as otherwise specified herein, the permittee shall submit a certified annual synthetic minor monitoring report postmarked no later than 31st of January for the preceding calendar year. This report shall address any required monitoring specified in the permit. All instances of deviations from permit requirements must be clearly identified in the report. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration.

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

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

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

- 6.4 For the entire facility, the permittee shall include in the certified annual monitoring report required by Condition 6.2 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).)

- 6.5 For the entire facility, the permittee shall submit to DEQ an annual monitoring report in accordance with Condition 6.2. 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).)

- 6.6 For Emission Point AA-001a, the permittee shall submit to DEQ an annual monitoring report in accordance with Condition 6.2. 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).)