

# **STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT**

**TO CONSTRUCT AIR EMISSIONS EQUIPMENT**

**THIS CERTIFIES THAT**

Milwaukee Electric Tool Corporation, Milwaukee Tool-Grenada  
2817 American Way  
Grenada, Mississippi  
Grenada 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**

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**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Issued:** \_\_\_\_\_

**Permit No.: 0960-00044**

## 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.

| <b>Emission Point</b> | <b>Description</b>                                                                                                                                               |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| AA-000                | Facility-Wide [Milwaukee Tool-Grenada]                                                                                                                           |
| AA-001                | Two (2) electrostatic paint lines equipped with fabric filters                                                                                                   |
| AB-001                | Two (2) Natural Gas-Fired Ovens for Curing Blades Following Powder Coat Application [Individual Heat Input Capacity: 1.0 MMBTU/Hour]                             |
| AB-002                | Natural Gas-Fired Burn-Off Oven for Powder Coat Removal from Rack System Components equipped with Integrated Afterburner [Heat Input Capacity: 0.875 MMBTU/Hour] |
| AB-003                | Two (2) Natural Gas-Fired Ovens for Curing Blades Following Paint Application [Individual Heat Input Capacity: 1.0 MMBTU/Hour]                                   |
| AD-001                | 158 HP Diesel-Fired Emergency Generator [Heat Input Capacity: 0.137 MMBTU/Hour]                                                                                  |

### SECTION 3. EMISSION LIMITATIONS AND STANDARDS

| Emission Point                       | Applicable Requirement                                                                                                                                                                                                                         | Condition Number(s) | Pollutant/Parameter                                  | Limitation/Standard                                                                                          |
|--------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|
| AA-000<br>(Facility-Wide)            | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Permit to Construct issued <b>DATE</b>                                                                                                                                            | 3.1                 | VOC                                                  | $\leq 245.0$ tpy (Rolling 12-month period)                                                                   |
|                                      | 11 Miss. Admin. Code Pt. 2, R. 1.3.A.                                                                                                                                                                                                          | 3.2                 | Opacity                                              | $\leq 40\%$ (Smoke)                                                                                          |
|                                      | 11 Miss. Admin. Code Pt. 2, R. 1.3.B.                                                                                                                                                                                                          | 3.3                 |                                                      | $\leq 40\%$                                                                                                  |
|                                      | 11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).                                                                                                                                                                                                       | 3.4                 | PM (Filterable)                                      | $E = 4.1 \times p^{0.67}$                                                                                    |
| AA-001                               | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Permit to Construct issued <b>DATE</b>                                                                                                                                            | 3.5                 | HAPs                                                 | $\leq 9.00$ tpy (Individual) (Rolling 12-month period)<br>$\leq 24.00$ tpy (Total) (Rolling 12-month period) |
| AB-001<br>AB-002<br>AB-003<br>AD-001 | 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).                                                                                                                                                                                                    | 3.6                 | PM (Filterable)                                      | $< 0.6$ lb/MMBTU                                                                                             |
| AB-001<br>AB-002<br>AB-003           | 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).                                                                                                                                                                                                       | 3.7                 | SO <sub>2</sub>                                      | $\leq 4.8$ lb/MMBTU                                                                                          |
| AD-001                               | 40 CFR Part 63, Subpart ZZZZ<br>National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines<br>40 CFR 63.6580, 63.6585(a) and (c), 63.6590(a)(2)(iii) and (c)(1), Subpart ZZZZ | 3.8                 | HAPs                                                 | Applicability                                                                                                |
|                                      | 40 CFR Part 60, Subpart IIII<br>Standards of Performance for Stationary Compression Ignition Internal Combustion Engines<br>40 CFR 60.4200(a)(2), 60.4218(a), and Table 8, Subpart IIII                                                        | 3.9                 | NHMC + NO <sub>x</sub><br>CO<br>PM (Filterable only) | Applicability                                                                                                |
|                                      | 40 CFR 60.4205(b), 60.4202(a)(2), and 60.4206, Subpart IIII; 40 CFR Appendix I to Part 1039(c), Table 3; and 40 CFR 1039.105(b), Subpart B                                                                                                     | 3.10                | Opacity (Smoke)                                      | Emissions Standards                                                                                          |
|                                      | 40 CFR 60.4207(b), Subpart IIII; and 40 CFR 1090.305, ULSD Standards                                                                                                                                                                           | 3.11                | Fuel Requirement                                     | $\leq 15$ ppm sulfur content<br>$\geq 40$ cetane index or $\leq 35$ vol.% aromatic content                   |
|                                      | 40 CFR 60.4211(f)(1-3), Subpart IIII                                                                                                                                                                                                           | 3.12                | Hours of Operation                                   | Emergency engine requirements                                                                                |
|                                      |                                                                                                                                                                                                                                                |                     |                                                      |                                                                                                              |

| Emission Point | Applicable Requirement                                                       | Condition Number(s) | Pollutant/Parameter | Limitation/Standard                              |
|----------------|------------------------------------------------------------------------------|---------------------|---------------------|--------------------------------------------------|
| AD-001         | 40 CFR 60.4209(a), Subpart III; and 11 Miss. Admin. Code Pt. 2, R.2.2.B(10). | 3.13                | Hours of Operation  | Operate and Maintain a Non-Resettable Hour Meter |

- 3.1 For Emission Point AA-000 (Facility-Wide), the permittee shall limit the emission of volatile organic compounds (VOCs) to no more than 245.0 tons per year (tpy) as determined on a rolling 12-month total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Permit to Construct issued **DATE**)

- 3.2 For Emission Point AA-000 (Facility-Wide), except as otherwise specified or limited herein, the permittee shall not cause 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 percent (40%) opacity subject to the following exceptions:

- (a) Start-up 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) start-ups per stack in any twenty-four (24) hour period.
- (b) Emissions resulting from soot blowing operations (i.e. ash removal) shall be permitted provided such emissions do not exceed sixty percent (60%) 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 (1) hour.

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

- 3.3 For Emission Point AA-000 (Facility-Wide), except as otherwise specified or limited herein, the permittee shall not cause or allow the discharge into the ambient air from any point source any air contaminant or emissions of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Condition 3.2. 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 Emission Point AA-000 (Facility-Wide), the permittee shall not cause, permit, 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:

$$E = 4.1 \times p^{0.67}$$

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 Point AA-001, the permittee shall limit the emission of hazardous air pollutants (HAPs) to no more than 9.0 tpy of any individual HAP and no more than 24.0 tpy of all combined HAPs as determined on a rolling 12-month total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Permit to Construct issued **DATE**)

- 3.6 For Emission Points AB-001, AB-002, AB-003, and AD-001, the maximum emission of ash and/or particulate matter (PM) from each fossil fuel burning installation shall not exceed 0.6 pounds per million BTU (MMBTU) per hour heat input.

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

- 3.7 For Emission Points AB-001, AB-002, AB-003, except as otherwise provided herein, the maximum discharge of sulfur oxides (SO<sub>x</sub>) shall not exceed 4.8 pounds (measured as sulfur dioxide or SO<sub>2</sub>) per million BTU (MMBTU) heat input.

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

- 3.8 For Emission Point AD-001, the permittee is subject to and shall comply with applicable requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ.

For the purposes of this subpart, the engines is considered a new, emergency, compression ignition (CI) RICEs located at an area source of HAP emissions. As such, the permittee shall comply with 40 CFR Part 63, Subpart ZZZZ, by complying with the applicable requirements of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart IIII.

(Ref.: 40 CFR 63.6580, 63.6585(a) and (c), 63.6590(a)(2)(iii) and (c)(1), Subpart ZZZZ)

- 3.9 For Emission Point AD-001, the permittee is subject to and shall comply with all applicable requirements of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart IIII and with the General Provisions of 40 CFR Part 60, Subpart A as established in Table 8 to Subpart IIII.

(Ref.: 40 CFR 60.4200(a)(2), 60.4218(a), and Table 8, Subpart IIII)

- 3.10 For Emission Point AD-001, the permittee shall comply with the following emission standards:

- (a) Non-Methane Hydrocarbons + Nitrogen Oxides (NHMC + NO<sub>x</sub>) ≤ 4.0 grams per kilowatt-hour (g/kW-hr);
- (b) Carbon Monoxide (CO) ≤ 3.5 g/kW-hr; and
- (c) PM ≤ 0.20 g/kW-hr.

The permittee shall operate and maintain each engine in such a manner to achieve the referenced emission standards over the entire life of the engine.

Additionally, the permittee shall not discharge into the atmosphere any smoke exhaust that exceeds the following opacity standards:

- (a) Twenty percent (20%) during the acceleration mode;
- (b) Fifteen percent (15%) during the lugging mode; and
- (c) Fifty percent (50%) during the peaks in either the acceleration or lugging modes.

The permittee shall operate and maintain each engine in such a manner to achieve the referenced emission standards over the entire life of the engine.

(Ref.: 40 CFR 60.4205(b), 60.4202(a)(2), and 60.4206, Subpart IIII; 40 CFR Appendix I to Part 1039(c), Table 3; and 40 CFR 1039.105(b), Subpart B)

- 3.11 For Emission Point AD-001, the permittee shall use diesel fuel that meets the following requirements on a per-gallon basis:

- (a) A maximum sulfur content of fifteen (15) parts per million (ppm); and
- (b) A minimum cetane index of forty (40) or a maximum aromatic content of thirty-five percent (35%) by volume.

(Ref.: 40 CFR 60.4207(b), Subpart IIII; and 40 CFR 1090.305, ULSD Standards)

- 3.12 For Emission Point AD-001, any operation of the engine for other than emergency operation, maintenance and testing, and operation in non-emergency situations for fifty (50) hours per year is prohibited. If an engine is not operated in accordance with (a) through (c) below, the engine will not be considered an emergency engine under 40 CFR Part 60, Subpart IIII and shall meet all requirements for a corresponding non-emergency engine. As such, the permittee shall operate each engine according to the following provisions:

- (a) There is no limit on the use of the engine in emergency situations
- (b) The permittee may operate the engine for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. Maintenance checks and readiness testing of an engine is limited to a maximum of one hundred (100) hours per calendar year. The permittee may petition MDEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.
- (c) The permittee may operate the engine for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

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

- 3.13 For Emission Point AD-001, the permittee shall operate and maintain a non-resettable hour meter on the engine.

(Ref.: 40 CFR 60.4209(a), Subpart IIII; and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

#### SECTION 4. WORK PRACTICES

| Emission Point | Applicable Requirement                    | Condition Number(s) | Pollutant/Parameter                                                                  | Limitation/Standard                     |
|----------------|-------------------------------------------|---------------------|--------------------------------------------------------------------------------------|-----------------------------------------|
| AA-001         | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). | 4.1                 | PM<br>(Filterable)                                                                   | Operate with Fabric Filters             |
| AB-002         |                                           | 4.2                 |                                                                                      | Conduct According to Manufacturer Specs |
| AD-001         | 60.4211(a)(1)-(3), Subpart IIII           | 4.3                 | NHMC + NO <sub>x</sub><br><br>CO<br><br>PM (Filterable only)<br><br>Opacity (Smoke)) | Conduct Compliance Practices            |

- 4.1 For Emission Point AA-001, the permittee shall at all times operate the fabric filters during active painting operations to minimize the emission of filterable particulate matter (PM). In the event the fabric filter malfunctions, the permittee shall cease loading activities until the fabric filter returns to service.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 4.2 For Emission Point AB-002, the permittee shall operate and maintain the natural gas-fired burn-off oven and the integrated afterburner control device in accordance with the manufacturer's specifications.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 4.3 For Emission Point AD-001, the permittee shall conduct the following practices to demonstrate compliance with the applicable emission standards specified in Condition 3.10:
- (a) Operate and maintain each engine and control device (if any) in accordance with the manufacturer's emission-related written instructions;
  - (b) Change only those emission-related settings that are permitted by the manufacturer; and
  - (c) Meet the requirements of 40 CFR Part 1068 (as applicable)
- (Ref.: 40 CFR 60.4211(a)(1)-(3), Subpart IIII)

## SECTION 5. MONITORING AND RECORDKEEPING REQUIREMENTS

| Emission Point            | Applicable Requirement                                                         | Condition Number(s) | Pollutant/Parameter          | Monitoring/Recordkeeping Requirement                                                                                        |
|---------------------------|--------------------------------------------------------------------------------|---------------------|------------------------------|-----------------------------------------------------------------------------------------------------------------------------|
| AA-000<br>(Facility-Wide) | 11 Miss. Admin. Code Pt. 2, R. 2.9.                                            | 5.1                 | Recordkeeping                | Maintain records for a minimum of 5 years.                                                                                  |
|                           | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).                                      | 5.2                 | VOC                          | Calculate and Record Emissions (Monthly and Rolling 12-Month Period)                                                        |
| AA-001                    | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).                                      | 5.3                 | HAPs                         | Calculate and Record Emissions (Monthly and Rolling 12-Month Period)                                                        |
|                           |                                                                                | 5.4                 | HAPs<br>VOCs                 | Monitor Paint Usage / Data (Monthly)                                                                                        |
|                           |                                                                                | 5.5                 |                              | Record Paint Usage / Data (Monthly)                                                                                         |
| AD-001                    | 40 CFR 60.4214(b), Subpart IIII; and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 5.6                 | Emergency Operations         | Record Hours of Operation (Emergency and Non-Emergency)                                                                     |
|                           | 40 CFR 60.4211(c), Subpart IIII; and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 5.7                 | NMHC + NO <sub>x</sub><br>CO | Maintain Documentation Indicating Engine Certification                                                                      |
|                           | 40 CFR 60.4211(g)(2), Subpart IIII                                             | 5.8                 | PM<br>Opacity (Smoke)        | Demonstrate Compliance if Engine is Not Installed, Operated, or Maintained in Accordance with Manufacturer's Specifications |
|                           | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).                                      | 5.9                 | SO <sub>2</sub>              | Records concerning specifications of diesel fuel                                                                            |

- 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 Emission Point AA-000 (Facility-Wide), the permittee shall demonstrate compliance with the emission limitation specified in Condition 3.1 by calculating and recording the total emission of volatile organic compounds (VOCs) from all sources that can reasonably emit the pollutant(s) in tons both on a monthly basis and rolling 12-month total basis.

Unless otherwise specified herein, the permittee shall include all reference data utilized to validate the calculated emissions including but not limited to operational data, applicable emission factors, and engineering determinations.

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

- 5.3 For Emission Point AA-001, the permittee shall demonstrate compliance with the emission limitations specified in Condition 3.5 by calculating and recording the total respective emissions of each individual hazardous air pollutant (HAP) and of all HAPs

combined from all sources within the emission point in tons both on a monthly basis and rolling 12-month total basis.

Unless otherwise specified herein, the permittee shall include all reference data utilized to validate the calculated emissions including but not limited to operational data, applicable emission factors, and engineering determinations.

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

5.4 For Emission Point AA-001, the permittee shall determine for each paint, coating, or other VOC and/or HAP containing material used:

- (a) The identification of each paint, coating, or other VOC and/or HAP containing material and the total gallons of each paint, surface coating, or other VOC and/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 of each paint, coating, or other VOC and/or HAP containing material used. A description of the method used to determine the VOC and/or HAP content shall accompany this data. The permittee may utilize data supplied by the manufacturer, or analysis of VOC content by EPA Test Method 24 and/or EPA Test Method 24A, or analysis of HAP content by EPA Test Method 311.
- (c) The density of each paint, coating, or other VOC and/or HAP containing material.

The permittee shall use the given parameters to determine VOC, individual HAP, and total HAP emissions on a monthly basis for each consecutive 12-month period on a rolling basis.

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

5.5 For Emission Point AA-001, the permittee shall maintain sufficient documentation for the following information:

- (a) The identification of each paint, coating, or other VOC and/or HAP containing material and the total gallons of each paint, coating, or other VOC and/or HAP containing material used on a monthly basis and in each consecutive 12-month period.
- (b) The VOC and/or HAP content of each paint, coating, or other VOC and/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 paint, coating, or other VOC and/or HAP containing material used;
- (d) The total VOC, individual HAP, and total HAP emission rate in tpy 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).)

5.6 For Emission Point AD-001, the permittee shall keep records documenting the hours of operation recorded through the non-resettable hour meter for each engine. These records must identify how many hours are spent in emergency operation, including what

classified the operation as an emergency, and how many hours are spent in non-emergency operation and the type of non-emergency operation.

(Ref.: 40 CFR 60.4214(b), Subpart III; and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 5.7 For Emission Point AD-001, the permittee shall maintain documentation that identifies the emergency engine as certified for the applicable emission standards referenced in Condition 3.10. Additionally, the permittee shall maintain records that demonstrate the emergency engine was installed and configured to the manufacturer's emission-related specifications.

(Ref.: 40 CFR 60.4211(c), Subpart III; and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 5.8 For Emission Point AD-001, if the permittee does not operate and maintain the engine according to the manufacturer's emission-related written instructions as specified in Condition 4.3 (or the permittee changes emission-related settings in a way that is not permitted by the manufacturer), the permittee shall demonstrate compliance with the applicable emission standards specified in Condition 3.10 through the following actions:

- (a) Keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions; and
- (b) Conduct an initial performance test to demonstrate compliance with the applicable emission standards within one (1) year of start-up, or within 1 year after an engine is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after the permittee changes emission-related settings in a way that is not permitted by the manufacturer

(Ref.: 40 CFR 60.4211(g)(2), Subpart III)

- 5.9 For Emission Point AD-001, the permittee shall maintain records documenting the diesel fuel meets the requirements of 40 CFR 1090.305 for nonroad diesel fuel.

(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                                                         |
|---------------------------|--------------------------------------------------|---------------------|-------------------------------------------------------------------------------|
| AA-000<br>(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)              | Semiannual 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                                       |
| AA-001                    | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).        | 6.2                 | Report monthly and 12-month rolling total VOC emissions                       |
|                           | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).        | 6.3                 | Report monthly and 12-month rolling individual and total HAPs emissions       |
| AD-001                    | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).        | 6.4                 | Submit Semiannual Report of Paint Usage and Data                              |
|                           | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).        | 6.5                 | Submit Semiannual Summary on Hours of Operation (Non-Emergency and Emergency) |

### 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 July 31<sup>st</sup> and January 31<sup>st</sup> for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 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 Emission Point AA-000 (Facility-Wide), the permittee shall submit semiannual reports in accordance with Condition 6.1(b) that summarizes the total emission of volatile organic compounds (VOCs) from all applicable sources in tons both monthly and on a rolling 12-month period.

The report shall include all reference data utilized to validate the presented VOC emissions including all applicable emission factors and engineering judgement determinations.

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

- 6.3 For Emission Point AA-001, the permittee shall submit semiannual reports in accordance with Condition 6.1(b) that detail the respective total emissions of each individual hazardous air pollutant (HAP) and of all HAPs combined in tons both on a monthly basis and rolling 12-month total basis.

The report shall include all reference data utilized to validate the presented HAPs emissions including all applicable emission factors and engineering judgement determinations.

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

- 6.4 For Emission Point AA-001, the permittee shall submit semiannual reports in accordance with Condition 6.1(b) that summarizes the information specified in Condition 5.5 for each paint, coating, or other VOC and/or HAP containing material.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 6.5 For Emission Points AD-001, the permittee shall submit semiannual reports in accordance with Condition 6.1(b) that details the hours of operation for the engine. The report shall also document how many hours are spent for emergency operation, what classified the operation as an emergency situation, how many hours are spent for non-emergency operation, and the circumstance(s) for non-emergency operation.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)