

**STATE OF MISSISSIPPI  
AIR POLLUTION CONTROL  
TITLE V PERMIT**

**TO OPERATE AIR EMISSIONS EQUIPMENT**

**THIS CERTIFIES THAT**

Ershigs Inc, Ershigs Iuka FRP Facility  
751 County Road 989  
Tishomingo, County

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with Title V of the Federal Clean Air Act (42 U.S.C.A. § 7401 - 7671) and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

**Permit Issued:** DEC 19 2014

**Effective Date:** As specified herein.

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

  
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**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Expires:** November 30, 2019

**Permit No.:** 2640-00056

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### **APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT**

#### **OTHER RELEVANT DOCUMENTS:**

**40 CFR 63, SUBPART A- National Emission Standards for Hazardous Air  
Pollutants, General Provisions**

**40 CFR 63, SUBPART WWWW – National Emission Standards for Hazardous Air  
Pollutants for Reinforced Plastic Composites Production**

**40 CFR 63, SUBPART MMMM - National Emission Standards for Hazardous Air  
Pollutants for Surface Coating of Miscellaneous Parts and Products**

## SECTION 1. GENERAL CONDITIONS

- 1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(a).)
- 1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(b).)
- 1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(c).)
- 1.4 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(d).)
- 1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(e).)
- 1.6 The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(5).)
- 1.7 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.)
  - (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant

for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).)

- (b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D(2).)
- (c) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.)
- (d) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.C.)

1.8 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(8).)

1.9 Any document required by this permit to be submitted to the DEQ shall contain a

certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)

- 1.10 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:
- (a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - (c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
  - (d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(2).)
- 1.11 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(1).)
- 1.12 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(2).)
- 1.13 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(1).)
- 1.14 Nothing in this permit shall alter or affect the following:
- (a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
  - (b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

- (c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
- (d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(2).)

1.15 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.H.)

1.16 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C(2)., R. 6.4.B., and R. 6.2.A(1)(c).)

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

- (a) the changes are not modifications under any provision of Title I of the Act;
- (b) the changes do not exceed the emissions allowable under this permit;
- (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:
  - (1) a brief description of the change(s),
  - (2) the date on which the change will occur,
  - (3) any change in emissions, and
  - (4) any permit term or condition that is no longer applicable as a result of the change;
- (d) the permit shield shall not apply to any Section 502(b)(10) change. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F(1).)

1.18 Should the Executive Director of the Mississippi Department of Environmental Quality

declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in 11 Miss. Admin. Code Pt. 2, Ch. 3., "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)

- 1.19 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 11 Miss. Admin. Code Pt. 2, Ch. 2., "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations 11 Miss. Admin. Code Pt. 2, Ch. 6., "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:
- (a) routine maintenance, repair, and replacement;
  - (b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
  - (c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
  - (d) use of an alternative fuel or raw material by a stationary source which:
    - (1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or
    - (2) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166;
  - (e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or

- (f) any change in ownership of the stationary source."
- 1.20 Any change in ownership or operational control must be approved by the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.D(4).)
- 1.21 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.B(1).)
- 1.22 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.
- (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.
  - (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.
  - (c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.G.)
- 1.23 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies.
- (a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.



- (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.
- (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
  - (1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
  - (2) the permitted facility was at the time being properly operated;
  - (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
  - (4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.G.)

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

- (a) Upsets (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.KK.)
  - (1) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
    - (i) an upset occurred and that the permittee can identify the cause(s) of the upset;

- (ii) the source was at the time being properly operated;
    - (iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;
    - (iv) the permittee submitted notice of the upset to the DEQ within 5 working days of the time the upset began; and
    - (v) the notice of the upset shall contain a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.
  - (2) In any enforcement proceeding, the permittee 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.
- (b) Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.HH. & R. 1.2.CC.)
- (1) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows:
    - (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above;
    - (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or
    - (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.
  - (2) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.
  - (3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply.

(c) Maintenance.

- (1) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following:
  - (i) the permittee can identify the need for the maintenance;
  - (ii) the source was at the time being properly operated;
  - (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;
  - (iv) the permittee submitted notice of the maintenance to the DEQ within 5 working days of the time the maintenance began or such other times as allowed by DEQ; and
  - (v) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.
- (2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.
- (3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

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

## SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
<b>AA-000</b>	<b>Type of operations conducted /shared between the Fabrication Building No.1 (#1032) , the Fabrication Building No.2 (#3011), and Fabrication Building No.3 (#1020) are as follows:</b>
AA-001	Open Mold Spray & Filament Winding Lay Up Operations - Used to make reinforced plastic composite products. Operations included in this emission point are open molding with high strength corrosion resistant (CR/HS) resin type using non-atomized spray equipment with Mechanical and Filament application.
AA-002	Fitting Operations: Installation of miscellaneous fittings, lugs, and ports joining stack pieces in-place manually using hand lay-up process. Operations included in this emission point are open molding with high strength corrosion resistant (CR/HS) resin type using manual hand lay-up application.
AA-004	Fiberglass Finishing Operations (i.e. Hand Cutting, Grinding, and Trimming of Cured Composite Products)
<b>AA-000</b>	<b>Equipment located outside the Fabrication Buildings (#1032, #3011 &amp; #1020)</b>
AA-003	Four (4) 4500 gallon Polyester Resin Storage Tanks.
<b>AB-000</b>	<b>Facility Wide Operations and Equipment</b>
AB-001	Metal Surface Coating (Painting) Operations
AB-003	Plastic Surface Coating (Painting) Operations

### SECTION 3. EMISSION LIMITATIONS & STANDARDS

#### A. Facility-Wide Emission Limitations & Standards

- 3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).
- (a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.
  - (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.A.)
- 3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Paragraph 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)

**B. Emission Point Specific Emission Limitations & Standards**

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
Entire facility	11 Miss. Admin. Code Pt. 2, R. 1.3. F(1).	3.B.1	PM	$E = 4.1(P)^{0.67}$ or as otherwise limited by facility modification restrictions
Entire facility	Construction Permit issued on <u>January 3, 2008</u>	3.B.2	VOC	77.0 tons/yr
AA-001 & AA-002	11 Miss. Admin. Code Pt. 2, R. 1.8.A. & NESHAP for Reinforced Plastic Composites Production, 40 CFR Part 63, Subpart WWWW	3.B.3	Organic HAP's	Applicability for major sources
AA-001 & AA-002	40 CFR Part 63, Subpart WWWW, §63.5805(c) & Table 3	3.B.4 & 3.B.5	Organic HAP's	<p><b><u>Open molding – Corrosion resistant and/or high strength (CR/HS):</u></b></p> <p>(1) <u>Mechanical resin application</u> Emission limit: 113 lb HAP/ton<sub>resin</sub></p> <p>(2) <u>Filament application</u> Emission limit: 171 lb HAP/ton<sub>resin</sub></p> <p>(3) <u>Manual resin application</u> Emission limit: 123 lb HAP/ton<sub>resin</sub></p>
AB-001	11 Miss. Admin. Code Pt. 2, R. 1.8.A. & NESHAP for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR Part 63, Subpart MMMM	3.B.6	HAP	Applicability for major sources
	40 CFR §63.3890(a)(1)	3.B.7	Organic HAP-	1.9 lb organic HAP/gal of coating solids during each 12-month compliance period

3.B.1 For the Entire Facility, the Permittee shall not cause, permit, or allow the emission from any manufacturing process, in any one hour from any point source, particulate matter in total quantities in excess of the amount determined by the relationship

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

where E is the Emission rate in pounds per hour and p is the process weight input rate in tons per hour.

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

- 3.B.2 The Permittee shall not emit more than 77.0 TPY of Volatile Organic Compounds (VOC) in a consecutive 12 month period.

(Ref.: Construction Permit issued on January 3, 2008)

- 3.B.3 For Emission Points AA-001 and AA-002, the Permittee is subject to 40 CFR 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants, Reinforced Plastics Composites Production.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.8.A. and 40 CFR §63.5785(a))

- 3.B.4 For Emission Point AA-001, the Permittee shall comply with the following applicable emission limits:

- (a) For open molding operations using mechanical resin application, the Permittee shall limit HAP emissions according to the following type of operation:

For corrosion-resistant and/or high strength (CR/HS) operations, the emission limit is 113 pounds of organic HAP emitted per ton of resin applied, based on a 12-month rolling average.

- (b) For open molding operations using filament application, the Permittee shall limit HAP emissions according to the following type of operation:

For corrosion-resistant and/or high strength (CR/HS) operations, the emission limit is 171 pounds of organic HAP emitted per ton of resin applied, based on a 12-month rolling average.

(Ref.: 40 CFR §63.5805(c) and Table 3 of Subpart WWWW)

- 3.B.5 For Emission Point AA-002, the Permittee shall comply with the following applicable emission limits:

- (a) For open molding operations using manual resin application, the Permittee shall limit HAP emissions according to the following type of operation:

For corrosion-resistant and/or high strength (CR/HS) operations, the emission limit is 123 pounds of organic HAP emitted per ton of resin applied, based on a 12-month rolling average.

(Ref.: 40 CFR §63.5805(c) and Table 3 of Subpart WWWW)

- 3.B.6 For Emission Point AB-001, the Permittee is subject to 40 CFR 63, Subpart MMMM, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.8.A. and 40 CFR §63.3881(b))

- 3.B.7 For Emission Point AB-001, the Permittee shall limit organic HAP emissions to no more than 1.9 lb organic HAP per gallon of coating solids used during each 12-month compliance period.

(Ref.: 40 CFR §63.3890(a)(1))



C. Insignificant and Trivial Activity Emission Limitations & Standards

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

- 3.C.1 The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).)
- 3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)

**D. Work Practice Standards**

**3.D.1** The Permittee shall comply with the following work practice standards:

- (a) The Permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
- (b) The Permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
- (c) The Permittee shall use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation <sup>i</sup>.
- (d) The Permittee shall close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement <sup>i</sup>.
- (e) The Permittee shall keep the mixer covers closed which actual mixing is occurring except when adding materials or changing covers to the mixing vessels <sup>i</sup>.

<sup>i</sup> Containers of five (5) gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin).

(Ref.: 40 CFR §63.5805(c) and Table 4 of Subpart WWWW)

#### **SECTION 4. COMPLIANCE SCHEDULE**

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:
- (a) the identification of each term or condition of the permit that is the basis of the certification;
  - (b) the compliance status;
  - (c) whether compliance was continuous or intermittent;
  - (d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
  - (e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(5)(a), (c), & (d).)

## SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

### A. General Monitoring, Recordkeeping and Reporting Requirements

- 5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.
- 5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:
- (a) the date, place as defined in the permit, and time of sampling or measurements;
  - (b) the date(s) analyses were performed;
  - (c) the company or entity that performed the analyses;
  - (d) the analytical techniques or methods used;
  - (e) the results of such analyses; and
  - (f) the operating conditions existing at the time of sampling or measurement. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(1).)
- 5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(2).)
- 5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 6.2.E. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)
- 5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) days of the time the deviation began. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(2).)

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

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

**B. Specific Monitoring, Recordkeeping, and Reporting Requirements**

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping/Reporting Requirement	Condition Number	Applicable Requirement
Entire Facility	VOC	Recordkeeping	5.B.1	Air Construction Permit issued on <u>January 3, 2008</u> and 11 Miss. Admin Code Pt. 2, R.6.3.A.(3)(a and b)
Entire Facility	VOC	Reporting	5.B.2	Air Construction Permit issued on <u>January 3, 2008</u> and 11 Miss. Admin Code Pt. 2, R.6.3.A.(3)(c)
AA-001 & AA-002	Organic HAP's	General Compliance, Operation, and Maintenance Requirements	5.B.3	40 CFR §63.5835
		Compliance Demonstration	5.B.4, 5.B.5 & 5.B.6	40 CFR §63.5805(c),(e), and (f) and §63.5810
		Monitoring	5.B.7	40 CFR §63.5895(c) and (d)
		Continuous Compliance Demonstration	5.B.8	40 CFR §63.5900(a)(2)-(4), (b), and (c)
		Notification of Change	5.B.9	40 CFR §63.5905 and Table 13
		Compliance Report	5.B.10	40 CFR §63.5910(a)-(d),(f), and (i)
		Recordkeeping	5.B.11 5.B.12	40 CFR §63.5915(a), (c), and (d) 40 CFR §63.5920
		Requirements in General Provisions	5.B.13	40 CFR §63.5925

Emission Points	Pollutant/Parameter Monitored	Monitoring and Recording Requirement	Condition Number	Applicable Requirement
AB-000	Organic HAP's	Compliant Material Option and Emission Rate without Add-on Controls Options	5.B.14	40 CFR 63.3891(a) and (b)
		Compliance with Emission Limitations at all times	5.B.1.5	40 CFR 63.3900(a)(1)
		Operate and Maintain affected source in accordance with 63.6(e)(1)(i)	5.B.16	63.3900(b) by way of 63.6(e)(1)(i)
		Recordkeeping (Notifications, Manufacturer Data, Compliance Period, Nature and Volume of Coatings, Mass and Volume Fractions, Organic HAP Allowance, and Deviations)	5.B.17	40 CFR 63.3930(a), (b), (c)(1), (c)(2), c(3), (d), (e), (f), (h), and (j)
			5.B.18	40 CFR 63.3930(c)(3) and (g)
		Form and Duration of Records to be kept	5.B.19	40 CFR 63.3931
		Demonstration of Continuous Compliance	5.B.20	40 CFR 63.3942 and 63.3952
		Semiannual Compliance Reports	5.B.21	40 CFR 63.3920(a)(1) through (a)(6)
		Requirements in General Provisions	5.B.22	40 CFR §63.3901

5.B.1 For the entire facility, the permittee shall determine and maintain sufficient records to document for each resin, coating, catalyst or other VOC containing material used:

- (a) Identification of and the total quantity used (gal or lb) of each resin, coating, solvent, or other VOC containing material used on a monthly basis and in any consecutive 12-month period.
- (b) The VOC content of each resin, coating, solvent or other VOC containing material used. A description of the method used to determine the VOC content shall accompany this data.
- (c) The density of each resin, coating, solvent or other VOC containing material used, unless material usages are measured in lbs.
- (d) The permittee shall calculate the VOC emissions from the use of these

materials each month and compare the emissions to those allowed under Condition 3.B.2 using a twelve month rolling total. This shall include the total gallons of each resin, coating, solvent or other VOC containing material used in any consecutive 12-month period and the total VOC emission rate in tons/year for each consecutive 12-month period.

- (e) The permittee may utilize data supplied by the manufacturer, or analysis of VOC content by EPA Test Method 24, 40 CFR 60, Appendix A.
- (f) The Permittee shall maintain copies of all records and reports on site for at least five (5) years and shall make them available upon request by the Mississippi Department of Environmental Quality (MDEQ) personnel.

(Ref.: Air Construction Permit issued on January 3, 2008 and 11 Miss. Admin Code Pt. 2, R.6.3.A.(3)(a and b))

5.B.2 For the Entire Facility, the permittee shall submit semi-annuals reports providing:

- (a) Identification of and the total quantity used of each resin, coating, solvent, or other VOC containing material used on a monthly basis and in any consecutive 12-month period.
- (b) The VOC content(s) of each resin, coating, solvent or other VOC content shall accompany this data.
- (c) The density of each resin, coating, solvent or other VOC containing material, unless material usages are measured in lbs.
- (d) The total gallons of each resin, coating, solvent or other VOC containing material used in any consecutive 12-month period.
- (e) The total VOC emission rate in tons/year for each consecutive 12-month period. The report shall be submitted no later than 30 days from the semi-annual periods ending June 30 and December 31.

(Ref.: Air Construction Permit issued on January 3, 2008 and 11 Miss. Admin Code Pt. 2, R.6.3.A.(3)(c))

5.B.3 For Emission Points AA-001 and AA-002, the Permittee shall be in compliance at all times with the work practice standards in 3.D.1, as well as, the organic HAP emissions limits in 3.B.4 and 3.B.5. The Permittee shall always operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in §63.6(e)(1)(i).

(Ref.: 40 CFR §63.5835)

- 5.B.4 For Emission Points AA-001 and AA-002, the Permittee must comply with the standards in §63.5805(c). The Permittee shall demonstrate compliance with the standards in §63.5805(c) using the compliance option listed in §63.5810, as further described in Condition 5.B.6 of this permit.

(Ref.: 40 CFR §63.5805(c) and §63.5810)

- 5.B.5 If Emission Points AA-001 and AA-002 subsequently meet or exceed the 100 tpy threshold (see §63.5799) in any calendar year, the Permittee must notify the DEQ in their annual compliance report. The Permittee, at this time, may request a one-time exemption from the requirements of §63.5805(d) in the compliance report if the Permittee can demonstrate all of the following:

- (a) The exceedance of the threshold was due to circumstances that will not be repeated.
- (b) The average annual organic HAP emissions from the potentially affected operations for the last 3 years were below 100 tpy.
- (c) The projected organic HAP emissions for the next calendar year are below 100 tpy, based on projected resin and gel coat use and the HAP emission factors calculated according to the procedures in §63.5799.

If the Permittee applies for the above exemption and subsequently exceeds the 100 tpy HAP emission thresholds over the next 12-month period, the Permittee must notify the DEQ in the semi-annual report. The exemption will be removed and the permittee shall comply with §63.5805(d) within 3 years from the time the Permittee's organic HAP emissions first exceeded the threshold.

(Ref.: 40 CFR §63.5805(e) and (f))

- 5.B.6 For Emission Points AA-001 and AA-002, the permittee shall comply with the emission limits by using one of the following options:

- (a) Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Condition 3.B.4 as specified in §63.5810(a);
- (b) Demonstrate that, on average, you meet the individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type as specified in §63.5810(b);
- (c) Demonstrate compliance with a weighted average emission limit as specified in §63.5810(c); or



- (d) Meet the organic HAP emission limit for one application method and use the same resin(s) for all application methods of that resin type as specified in §63.5810(d).

The permittee may switch between compliance options listed in (a) through (d) above. If the permittee changes to an option based on a 12-month rolling average, the permittee must base the average on the previous 12 months of data calculated using the compliance option the permittee is changing to, unless the permittee was previously using an option that did not require you to maintain records of resin and gel coat use. In this case, the permittee must immediately begin collecting resin and gel coat data and demonstrate compliance 12 months after changing options.

(Ref: 40 CFR §63.5810)

5.B.7 For Emission Points AA-001 and AA-002, the Permittee shall monitor and collect data to demonstrate continuous compliance by the following as applicable:

- (a) The Permittee shall collect and keep records of resin and gel coat used, organic HAP content, and operation where the resin is used when the Permittee is meeting either the organic HAP emissions or content limits. Resin use records may be based on purchase records if the Permittee can reasonably estimate how the resin is applied. The organic HAP records may be based on MSDS or on resin specifications supplied by the resin supplier.
- (b) Resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission limits as defined under 3.B.4 and 3.B.5. However, the Permittee shall retain the records of resin and gel coat organic HAP content, and shall include the list of these resins and gel coats and identify their application methods in their semiannual compliance reports. If after the Permittee have initially demonstrated that a specific combination of an individual resin or gel coat, application method, and controls meets its applicable emission limit, and the resin or gel coat changes or the organic HAP content increases, or Permittee change the application method or controls, then the Permittee shall again demonstrate that the individual resin or gel coat meets its emission limit as states in 3.B.4 and 3.B.5. If any of the previously mentioned changes results in a situation where an individual resin or gel coat exceeds its applicable emission limit as stated in 3.B.4 and 3.B.5, the Permittee shall begin collecting resin or gel coat use record and calculate compliance using one of the averaging options on a 12-month rolling average.

(Ref.: 40 CFR §63.5895(c) and (d))

5.B.8 The Permittee shall demonstrate continuous compliance with 3.B.4, 3.B.5, 3.D.1, and  
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the appropriate organic HAP content limits in Table 7 of Subpart WWWW as specified below:

- (a) Compliance with organic HAP emissions limits is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the limits as stated in 3.B.4 and 3.B.5 on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as stated in 3.B.4 and 3.B.5;
- (b) Compliance with organic HAP content limits in Table 7 of Subpart WWWW is demonstrated by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in table 7 to this subpart, on a 12-month rolling average, and/or by including in each compliance report a statement that resins and gel coats individually meet the appropriate organic HAP content limits in Table 7 to this subpart, as stated in §63.5895(d);
- (c) Compliance with the work practice standards as stated in 3.D.1 of this permit is demonstrated by performing the required work practice;
- (d) The Permittee shall report each deviation from 3.B.4, 3.B.5 and 3.D.1. The deviations shall be reported according to the requirements in 5.B.10(f); and
- (e) During periods of startup, shutdown or malfunction, the Permittee shall meet the organic HAP emissions limits and work practice standards in 3.B.4, 3.B.5 and 3.D.1.

(Ref.: 40 CFR §63.5900(a)(2)-(4),(b), and (c))

- 5.B.9 For Emission Points AA-001 and AA-002, the Permittee shall submit all applicable notifications from Subpart WWWW Table 13 when complying with the emission limits as stated in 3.B.4 & 3.B.5 of this permit. If the permittee changes any information submitted in any notification, the Permittee shall submit the changes in writing to the DEQ within 15 calendar days after the change.

(Ref.: 40 CFR §63.5905 and Table 13 of Subpart WWWW)

- 5.B.10 For Emission Points AA-001 and AA-002, the Permittee shall submit a semi-annual "compliance report" of any required monitoring by July 31 and January 31 for the preceding six-month period and it shall include the following information, as applicable:

- (a) Company name and address.
- (b) Statement by a responsible official with that officials name, title, and

signature, certifying the truth, accuracy, and completeness of the content of the report.

- (c) Date of the report and beginning and ending dates of the reporting period.
- (d) If you has a start up, shut down, or malfunction during the reporting period and you took actions consistent with your startup, shut down, and malfunction plan, the compliance report must include the information in §63.10(d)(5)(i).
- (e) If there are no deviations from any organic HAP emissions limitations or the work practice standards, include a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period.
- (f) For each deviation from an organic HAP emissions limitation and work practice standard that occurs, the compliance report shall contain 5.B.10 (a) through (d) and the following information:
  - (1) The total operating time of each affected source during the reporting period, and
  - (2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.
- (g) The Permittee shall report any exceedance of the 100-tpy organic HAP emissions threshold if that exceedance would make the Permittee subject to §63.5805(d). Include with the compliance report any request for an exemption as specified in 5.B.5. If the Permittee receives the exemption and subsequently exceed the 100-tpy organic HAP emissions threshold, this exceedance shall be reported as required in 5.B.5.
- (h) Where multiple compliance options are available, the Permittee shall state in next compliance report if compliance options have changed since their last compliance report.

(Ref.: 40 CFR §63.5910(a)-(d), (f), and (i))

5.B.11 For Emission Points AA-001 and AA-002, the Permittee shall keep the following applicable records:

- (a) A copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart WWW, including all documentation supporting any Initial

Notification or Notification of Compliance Status submitted, according to the requirements in §63.10(b)(2)(xiv);

- (b) The Permittee shall keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents; and
- (c) The Permittee shall keep a certified statement that the Permittee is in compliance with the work practice requirements in 3.D.1.

(Ref.: 40 CFR §63.5915(a), (c), and (d))

5.B.12 For Emission Points AA-001 and AA-002, the Permittee shall maintain all applicable records specified in 5.B.1 and 5.B.11 in the following manner:

- (a) The Permittee shall maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to §63.10(b)(1);
- (b) As specified in §63.10(b)(1), the Permittee shall keep each record for 5 (five) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record;
- (c) These records shall be kept onsite for at least 2 (two) years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee may keep the records offsite for the remaining 3 (three) years; and
- (d) The Permittee may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

(Ref.: 40 CFR §63.5920)

5.B.13 For Emission Points AA-001 and AA-002, the Permittee shall comply with all applicable requirements in 40 CFR Part 63, Subpart A, General Provisions as specified in 40 CFR Part 63, Subpart WWWW, Table 15.

(Ref.: 40 CFR §63.5925)

5.B.14 For Emission Point AB-001, the Permittee shall include all coatings (as defined in §63.3981), thinners and/or other additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in Condition 3.B.7 of the permit herein. To make this determination, the permittee shall use at least one of the compliance options listed in

paragraphs (a) or (b) of this section. The permittee may apply any of the compliance options to an individual coating operation, or to multiple coating operations as a group, or to the entire affected source. The permittee may use different compliance options for different coating operations, or at different times on the same coating operation. The permittee may employ different compliance options when different coatings are applied to the same part, or when the same coating is applied to different parts. However, the permittee may not use different compliance options at the same time on the same coating operation. If the permittee switches between compliance options for any coating operation or group of coating operations, the permittee shall document this switch as required by Condition 5.B.17(c) of the permit herein, and the permittee shall report it in the next semiannual compliance report required in Condition 5.B.21 of the permit herein. The permittee shall utilize either of the following options to demonstrate compliance with the emission limitation of Condition 3.B.7:

- (a) Compliant material option. Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in Condition 3.B.7 of the permit herein, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. The permittee shall meet all the requirements of Condition 5.B.20 of the permit herein to demonstrate compliance with the applicable emission limit using this option.
- (b) Emission rate without add-on controls option. Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in Condition 3.B.7 of the permit herein, calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee shall meet all the requirements of Condition 5.B.20 of the permit herein to demonstrate compliance with the emission limit using this option.

(Ref.: 40 CFR §63.3891(a) and (b))

5.B.15 For Emission Point AB-001, the Permittee shall be in compliance with the emission limitation specified in Condition 3.B.7 at all times. (40 CFR §63.3900(a)(1))

5.B.16 For Emission Point AB-001, the permittee shall operate and maintain the affected source for purposes of complying with this subpart at all times.

(Ref.: 40 CFR §63.3900(b))

5.B.17 For Emission Point AB-001, the permittee shall collect and keep records of the data and information as specified in this Condition. Failure to collect and keep these records is a deviation from Subpart MMMM.

- (a) A copy of each notification and report that the permittee submitted to comply with this subpart, and the documentation supporting each notification and report. The permittee shall also keep records of any data used in the calculation of the facility-specific emission limit for each 12-month compliance period included in the semi-annual compliance reports.
- (b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. If the permittee conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, the permittee shall keep a copy of the complete test report. If the permittee uses information provided to the permittee by the manufacturer or supplier of the material that was based on testing, the permittee shall keep the summary sheet of results provided to the permittee by the manufacturer or supplier. The permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier.
- (c) For each compliance period, the records specified in paragraphs (c)(1) through (3) of this section.
  - (1) A record of the coating operations on which the permittee used each compliance option and the time periods (beginning and ending dates and times) for each option the permittee used.
  - (2) For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 2 of §63.3941.
  - (3) For the emission rate without add-on-control option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of §63.3951; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4); the calculation of the total volume of coating solids used each month using Equation 2 of §63.3951; and the calculation of each 12-month organic HAP emission rate using Equation 3 of §63.3951.
- (d) A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the permittee is using the compliant material option for all coatings at the source, the permittee may maintain purchase records for each material used rather than a record of the volume used.

- (e) A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight.
- (f) A record of the volume fraction of coating solids for each coating used during each compliance period.
- (g) If the permittee uses an allowance in Equation 1 of Condition 5.B.12 of the permit herein for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to §63.3951(e)(4) of the permit herein, the permittee shall keep records of the information specified in paragraphs (g)(1) through (3) of this section.
  - (1) The name and address of each TSDF to which the permittee sent waste materials for which the permittee uses an allowance in Equation 1 of §63.3951; a statement of which subparts under 40 CFR §§ 262, 264, 265, and 266 apply to the permittee; and the date of each shipment.
  - (2) Identification of the coating operations producing waste materials included in each shipment and the month or months in which the permittee used the allowance for these materials in Equation 1 of §63.3951.
  - (3) The methodology used in accordance with §63.3951(e)(4) of the permit herein to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment.
- (h) The permittee shall keep records of the date, time, and duration of each deviation.

(Ref.: 40 CFR §63.3930(a), (b), (c)(1), (c)(2), (c)(3), (d), (e), (f), (g), (h), and (j))

5.B.18 For Emission Point AB-001, the Permittee shall collect and keep records of the data and information as specified in this Condition when the Permittee uses the emission rate without add-on controls option:

- (a) A record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of §63.3951; and, if applicable, the calculation used to determine mass of organic HAP in

waste materials according to §63.3951(e)(4) of the permit herein; the calculation of the total volume of coating solids used each month using Equation 2 of §63.3951 of the permit herein; and the calculation of each 12-month organic HAP emission rate using Equation 3 of § 63.3951.

- (b) The density for each coating, thinner and/or other additive, and cleaning material used during each compliance period.

(Ref.: 40 CFR §63.3930(c)(3) and (g))

5.B.19 For Emission Point AB-001, the Permittee shall maintain records in the following form and duration:

- (a) The Permittee's records shall be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.
- (b) As specified in §63.10(b)(1), the Permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
- (c) The Permittee shall keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to §63.10(b)(1). The Permittee may keep the records off-site for the remaining 3 years.

(Ref.: 40 CFR §63.3931)

5.B.20 For Emission Point AB-001, the permittee shall utilize either of the following options to demonstrate continuous compliance with the emission limitation of Condition 3.B.7 and shall maintain records as specified in Condition 5.B.17 or 5.B.18 of the permit herein and §63.3931:

- (1) Compliant material option
  - (a) For each compliance period to demonstrate continuous compliance, the permittee shall use no coating for which the organic HAP content (determined using Equation 2 of §63.3941) exceeds the applicable emission limit in Condition 3.B.7 of the permit herein, and use no thinner and/or other additive, or cleaning material that contains organic HAP, determined according to §63.3941(a). A compliance period consists of 12 months. Each month, after the end of the initial compliance period described in §63.3940, is the end of a compliance period consisting of that month and the preceding 11 months.
  - (b) If the permittee chooses to comply with the emission limitations by using the compliant material option, the use of any coating,



thinner and/or other additive, or cleaning material that does not meet the criteria specified in paragraph (a) of this section is a deviation from the emission limitations that must be reported as specified in §63.3910(c)(6) and Condition 5.B.21(a)(5) of the permit herein.

- (c) As part of each semiannual compliance report required by Condition 5.B.21 of the permit herein, the permittee shall identify the coating operation(s) for which the permittee used the compliant material option. If there were no deviations from the applicable emission limit in Condition 3.B.7 of the permit herein, submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the permittee used no coatings for which the organic HAP content exceeded the applicable emission limit in Condition 3.B.7 of the permit herein, and the permittee used no thinner and/or other additive, or cleaning material that contained organic HAP, determined according to §63.3941.

(2) Emission rate without add-on controls option.

- (a) To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, determined according to §63.3951(a) through (g), must be less than or equal to the applicable emission limit in Condition 3.B.7 of the permit herein. A compliance period consists of 12 months. Each month after the end of the initial compliance period described in §63.3950 is the end of a compliance period consisting of that month and the preceding 11 months. The permittee shall perform the calculations in §63.3951(a) through (g) on a monthly basis using data from the previous 12 months of operation.
- (b) If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in Condition 3.B.7 of the permit herein, this is a deviation from the emission limitation for that compliance period and shall be reported as specified in §63.3910(c)(6) and 5.B.21(a)(6) of the permit herein.
- (c) As part of each semiannual compliance report required by Condition 5.B.21 of the permit herein, the permittee shall identify the coating operation(s) for which the permittee used the emission rate without add-on controls option. If there were no deviations from the emission limitations, the permittee shall submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in Condition 3.B.7 of the permit herein, determined according to §63.3951.

(Ref.: 40 CFR 63.3942 and 63.3952)

5.B.21 For Emission Point AB-001, the permittee shall submit the following reports for determining compliance with Subpart MMMM:

- (a) *Semiannual compliance reports.* The permittee shall submit semiannual compliance reports for each affected source according to the requirements of paragraphs (a)(1) through (6) of this section. The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in paragraph (a)(2) of this section.
  - (1) *Dates.* Unless the Administrator has approved or agreed to a different schedule for submission of reports under §63.10(a), the permittee shall prepare and submit each semiannual compliance report according to the dates specified in paragraphs (a)(1)(i) through (iv) of this section. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
    - (i) The first semiannual compliance report must cover the first semiannual reporting period which begins the day after the end of the initial compliance period described in Condition 5.B.7 herein, or §63.3960 that applies to the permittee's affected source and ends on June 30 or December 31, whichever date is the first date following the end of the initial compliance period.
    - (ii) Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
    - (iii) Each semiannual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
    - (iv) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), the permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in paragraph (a)(1)(iii) of this section.

- (2) *Inclusion with title V report.* Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 40 CFR part 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a semiannual compliance report pursuant to this section along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the semiannual compliance report includes all required information concerning deviations from any emission limitation in this subpart, its submission will be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.
- (3) *General requirements.* The semiannual compliance report must contain the information specified in paragraphs (a)(3)(i) through (vii) of this section, and the information specified in paragraphs (a)(4) through (7) and (c)(1) of this section that is applicable to the permittee's affected source.
- (i) Company name and address.
  - (ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
  - (iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
  - (iv) Identification of the compliance option or options specified in Condition 5.B.14 of the permit herein that the permittee used on each coating operation during the reporting period. If the permittee switched between compliance options during the reporting period, the permittee shall report the beginning and ending dates for each option the permittee used.
  - (v) If the permittee used the emission rate without add-on controls compliance option (Condition 5.B.14(b)) of the permit herein), the calculation results for each rolling 12-

month organic HAP emission rate during the 6-month reporting period.

- (4) *No deviations.* If there were no deviations from the emission limitations in Condition 3.B.7 of the permit herein, §§63.3892, and 63.3893 that apply to the permittee, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period.
- (5) *Deviations: Compliant material option.* If the permittee used the compliant material option and there was a deviation from the applicable organic HAP content requirements in Condition 3.B.7 of the permit herein, the semiannual compliance report must contain the information in paragraphs (a)(5)(i) through (iv) of this section.
  - (i) Identification of each coating used that deviated from the applicable emission limit, and each thinner and/or other additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used.
  - (ii) The calculation of the organic HAP content (using Equation 2 of §63.3941) for each coating identified in paragraph (a)(5)(i) of this section. The permittee does not need to submit background data supporting this calculation (*e.g.*, information provided by coating suppliers or manufacturers, or test reports).
  - (iii) The determination of mass fraction of organic HAP for each thinner and/or other additive, and cleaning material identified in paragraph (a)(5)(i) of this section. The permittee does not need to submit background data supporting this calculation (*e.g.*, information provided by material suppliers or manufacturers, or test reports).
  - (iv) A statement of the cause of each deviation.
- (6) *Deviations: Emission rate without add-on controls option.* If the permittee used the emission rate without add-on controls option and there was a deviation from the applicable emission limit in Condition 3.B.7 of the permit herein, the semiannual compliance report must contain the information in paragraphs (a)(6)(i) through (iii) of this section.
  - (i) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate

exceeded the applicable emission limit in Condition 3.B.7 of the permit herein.

- (ii) The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. The permittee shall submit the calculations for Equations 1, 1A through 1C, 2, and 3 of §63.3951; and if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4) of the permit herein. The permittee does not need to submit background data supporting these calculations (*e.g.*, information provided by materials suppliers or manufacturers, or test reports).
- (iii) A statement of the cause of each deviation.

(Ref.: 40 CFR §63.3920(a)(1) through (6))

- 5.B.22 For Emission Points AB-001, the Permittee shall comply with all applicable requirements in 40 CFR Part 63, Subpart A, General Provisions as specified in 40 CFR Part 63, Subpart MMMM, Table 2. (Ref.: 40 CFR §63.3901)

## **SECTION 6. ALTERNATIVE OPERATING SCENARIOS**

6.1 None permitted.

## SECTION 7. TITLE VI REQUIREMENTS

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

- 7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A – Production and Consumption Controls.
- 7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.
- 7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E – The Labeling of Products Using Ozone-Depleting Substances, for the following containers and products:
  - (a) All containers in which a class I or class II substance is stored or transported;
  - (b) All products containing a class I substance; and
  - (c) All products directly manufactured with a process that uses a class I substance, unless otherwise exempted by this subpart or, unless EPA determines for a particular product that there are no substitute products or manufacturing processes for such product that do not rely on the use of a class I substance, that reduce overall risk to human health and the environment, and that are currently or potentially available. If the EPA makes such a determination for a particular product, then the requirements of this subpart are effective for such product no later than January 1, 2015.
- 7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F – Recycling and Emissions Reduction:
  - (a) Servicing, maintaining, or repairing appliances;
  - (b) Disposing of appliances, including small appliances and motor vehicle air conditioners; or
  - (c) Refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations,

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

- 7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any acceptable alternative that is listed in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR Part 82, Subpart G – Significant New Alternatives Policy Program. The permittee shall also comply with any use conditions for the acceptable alternative substance.
- 7.6 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart H – Halon Emissions Reduction:
- (a) Any person testing, servicing, maintaining, repairing, or disposing of equipment that contains halons or using such equipment during technician training;
  - (b) Any person disposing of halons;
  - (c) Manufacturers of halon blends; or
  - (d) Organizations that employ technicians who service halon-containing equipment.



## APPENDIX A

### List of Abbreviations Used In this Permit

11 Miss. Admin. Code Pt. 2, Ch. 1.	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
11 Miss. Admin. Code Pt. 2, Ch. 2.	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
11 Miss. Admin. Code Pt. 2, Ch. 3.	Regulations for the Prevention of Air Pollution Emergency Episodes
11 Miss. Admin. Code Pt. 2, Ch. 4.	Ambient Air Quality Standards
11 Miss. Admin. Code Pt. 2, Ch. 5.	Regulations for the Prevention of Significant Deterioration of Air Quality
11 Miss. Admin. Code Pt. 2, Ch. 6.	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
11 Miss. Admin. Code Pt. 2, Ch. 7.	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lbs/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards For Hazardous Air Pollutants, 40 CFR 61
	or
	National Emission Standards For Hazardous Air Pollutants for Source Categories, 40 CFR 63
NMVOC	Non-Methane Volatile Organic Compounds
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter less than 10 µm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound