

**STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
TITLE V PERMIT
TO OPERATE AIR EMISSIONS EQUIPMENT
THIS CERTIFIES THAT**

Gulf Coast Shipyard Group
13085 Industrial Seaway Road
Gulfport, Mississippi
Harrison 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: July 14, 2020

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: June 30, 2025

Permit No.: 1020-00027

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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 Prior to its expiration, this permit may be reopened in accordance with the provisions listed below.

(a) This permit shall be reopened and revised under any of the following circumstances:

- (1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of 3 or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.
- (2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
- (3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.
- (4) The Administrator or the Permit Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

- (b) Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.
- (c) Reopenings shall not be initiated before a notice of such intent is provided to the Title V source by the DEQ at least 30 days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.G.)

- 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 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).)

- 1.7 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).)

- 1.8 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).)

- (c) 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).)

- (d) 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.)

- (e) 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.)

- 1.9 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).)

- 1.10 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.)

- 1.11 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).)

- 1.12 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).)

- 1.13 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).)

- 1.14 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).)

1.15 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).)

1.16 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.)

1.17 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).)

1.18 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).)

- 1.19 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.)

- 1.20 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, Subpart I, or 40 CFR 51.166; or
 - (2) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, or 40 CFR 51.166;
- (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.

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

- 1.21 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).)

- 1.22 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).)

- 1.23 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 airfields, 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.)

1.24 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.)

1.25 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 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 this regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).
 - (3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

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

- 1.26 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.

(Ref.: 11 Miss Admin. Code Pt. 2, R. 1.8.)

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-100	Facility-Wide Cutting Operations
AB-100	Facility-Wide Welding Operations
AC-100	Facility-wide Abrasive Blasting Operations (indoor and outdoor)
AD-100	Facility-wide Surface Coating Operations (indoor and outdoor)

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 Condition 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 (filterable only)	$E = 4.1 (p)^{0.67}$
	11 Miss. Admin. Code Pt. 2, R.1.3.C.	3.B.2	PM/ Nuisance Conditions	General nuisance provisions
AD-100	40 CFR Part 63, Subpart II NESHAP for Shipbuilding and Ship Repair (Surface Coating) 40 CFR 63.780, 63.781(a), and Table 1	3.B.3	VOHAP	General Applicability
	40 CFR 63.783(a), Subpart II	3.B.4	VOHAP	As-applied VOHAP content limit dependent on the type of coating
AD-100	40 CFR 63.781(b), Subpart II	3.B.5	VOHAP	Low-usage exemption

- 3.B.1 For the Entire Facility, except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the emission of particulate matter in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship:

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

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

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

- 3.B.2 For the Entire Facility, 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 from which it originated or to violate any other provision of this regulation, the Commission may order such corrected in a way that all air and gases or air and gas-borne 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.)

- 3.B.3 For Emission Point AD-100, the permittee is affected by and shall comply with 40 CFR Part 63, Subpart II – National Emission Standards for Hazardous Air Pollutants for Shipbuilding and Ship Repair and the applicable provisions to 40 CFR Part 63, Subpart A – General Provisions.

(Ref.: 40 CFR 63.780, 63.781(a), and Table 1 of Subpart II)

- 3.B.4 For Emission Point AD-100, the permittee shall not cause or allow the application of any coating to a ship with an as-applied VOHAP content exceeding the applicable limit given in Table 2 of Subpart II, as determined by the procedures described in Conditions 5.B.2(a) through (d). For compliance procedures described in Conditions 5.B.2(a) through (c), VOC shall be used as a surrogate for VOHAP, and EPA Reference Method 24 of 40 CFR Part 60, Appendix A, shall be used as the definitive measure for determining compliance. For the compliance procedure described in Condition 5.B.2(d), the permittee shall use an alternative test method capable of measuring

independent VOHAP to determine compliance. The method must be submitted to and approved by the MDEQ.

(Ref.: 40 CFR 63.783(a), Subpart II)

- 3.B.5 For Emission Point AD-100, the coatings which are used in volumes of less than 52.8 gallons per year for one coating and a total of less than 264 gallons per year for all exempted coatings, shall be required to meet only the requirements of Condition 5.B.6.

(Ref.: 40 CFR 63.781(b), Subpart II)

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 ₂	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

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AD-100	40 CFR 63.783(b)(1)-(3), Subpart II	3.D.1	VOHAP	Handling and transfer procedures for VOHAP-containing coatings, and inspection of equipment.

3.D.1 For Emission Point AD-100, the permittee shall ensure that:

- (a) At all times, the owner or operator shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operations and maintenance procedures are being used will be based on information available to the MDEQ which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.
- (b) All handling and transfer of VOHAP-containing materials to and from containers, tanks, vats, drums, and piping systems is conducted in a manner that minimizes spills.
- (c) All containers, tanks, vats, drums, and piping systems are free of cracks, holes, and other defects and remain closed unless materials are being added to or removed from them.

(Ref. 40 CFR 63.783(b)(1)-(3), Subpart II)

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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

- 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) working 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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

B. Specific Monitoring and Recordkeeping Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
AD-100	40 CFR 63.785(a), Subpart II	5.B.1	VOHAP	Determination and certification of compliance with VOHAP limit(s)
	40 CFR 63.785(b),(c),(d), Subpart II	5.B.2		Compliance procedures
	40 CFR 63.785(e), Subpart II	5.B.3		Demonstrating continuous compliance
	40 CFR 63.786(a),(b),(c), Subpart II	5.B.4		Compliance test methods and procedures
	40 CFR 63.786(d), Subpart II	5.B.5		Use of proper forms and procedures
	40 CFR 63.787(b), Subpart II	5.B.6		Prepare and maintain a written implementation plan
	40 CFR 63.788(b)(2)and(3), Subpart II	5.B.7		Monthly records requirements
	40 CFR 63.788(b)(4), Subpart II	5.B.8		Specific deviation/violation recordkeeping requirements
	40 CFR 63.781(b) and 63.788(b)(1), Subpart II	5.B.9		“Low usage exempt” recordkeeping requirements.
Entire Facility	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.10	Best Management Practices for Dust	Comply with Dust Control Plan in Appendix C

5.B.1 For Emission Point AD-100, for each batch of coating received, the permittee shall:

- (a) Determine the coating category and applicable VOHAP limit as specified in Condition 3.B.4; and
- (b) Certify the as-supplied VOC content of the batch of coating using a certification supplied by the manufacturer for the batch, although the permittee retains liability should subsequent testing reveal a violation. If the permittee performs the certification testing, only one of the containers in which the batch of coating was received is required to be tested.

(Ref.: 40 CFR 63.785(a), Subpart II)

5.B.2 For Emission Point AD-100, as an alternative to testing each batch of coating, as applied, the permittee may determine compliance with the applicable limits determined in Condition 5.B.1(a) using any combination of the following procedures. The procedure used for each coating shall be determined and documented prior to application. The results of any compliance demonstration conducted using Method 24 shall take precedence over the results using the procedures in paragraphs (a) through (c) below. The results of any compliance demonstration conducted by the permittee or any regulatory agency using an approved test method to determine VOHAP content shall take precedence over the results using the procedures in paragraph (d) below.

- (a) For coatings to which thinning solvent (or any other material) will not be added under any circumstance or to which only water is added, the permittee shall:
 - (1) Certify the as-applied VOC content of each batch of coating.
 - (2) Notify the persons responsible for applying the coating that no thinning solvent may be added to the coating by affixing a label to each container of coating in the batch or through another means described in the implementation plan required in Condition 5.B.6.
 - (3) If the certified as-applied VOC content of each batch of coating used during a calendar month is less than or equal to the applicable VOHAP limit in Condition 5.B.1(a), then compliance is demonstrated for that calendar month, unless a violation is revealed using Method 24 of Appendix A to 40 CFR Part 60.
- (b) For a coating to which thinning solvent is routinely or sometimes added, the permittee shall:
 - (1) Prior to the first application of each batch, designate a single thinner for the coating and calculate the maximum allowable thinning ratio (or ratios) using the

equation and procedures specified in 40 CFR 63.785(c)(2)(i).

- (2) Prior to the first application of each batch, notify painters and other persons, as necessary, of the designated thinner and maximum allowable thinning ratio(s) for each batch of the coating by affixing a label to each container of coating or through another means described in the implementation plan required in Condition 5.B.6
 - (3) By the 15th day of each calendar month, determine the volume of each batch of the coating used, as supplied during the previous month.
 - (4) By the 15th day of each calendar month, determine the total allowable volume of thinner for the coating used during the previous month using the equation specified in 40 CFR 63.785(c)(2)(iv).
 - (5) By the 15th day of each calendar month, determine the volume of thinner actually used with the coating during the previous month.
 - (6) If the volume of thinner actually used with the coating is less than or equal to the total allowable volume of thinner for the coating, then compliance is demonstrated, unless a violation is revealed using Method 24 of Appendix A of 40 CFR Part 60.
- (c) For coatings to which the same thinning solvent (or other material) is routinely or sometimes added, the permittee shall:
- (1) Designate a single thinner to be added to each coating during the month and "group" coatings according to their designated thinner.
 - (2) Prior to the first application of each batch, calculate the maximum allowable thinning ratio (or ratios, if the affected source complies with the cold weather limits in addition to the other limits specified in Table 2 of Appendix C of the federally enforceable permit herein) for each batch of coating in the group using the equations in 40 CFR 63.785(c)(2).
 - (3) Prior to the first application of each "batch," notify painters and other persons, as necessary, of the designated thinner and maximum allowable thinning ratio(s) for each batch in the group by affixing a label to each container of coating or through another means described in the implementation plan required in Condition 5.B.6
 - (4) By the 15th day of each calendar month, determine the volume of each batch of the group used, as supplied, during the previous month.

- (5) By the 15th day of each calendar month, determine the total allowable volume of thinner for the group for the previous month using the equation specified in 40 CFR 63.785(c)(2)(iv)(Equation 3).
 - (6) By the 15th day of each calendar month, determine the volume of thinner actually used with the group during the previous month.
 - (7) (If the volume of thinner actually used with the group is less than or equal to the total allowable volume of thinner for the group, then compliance is demonstrated, unless a violation is revealed using Method 24 of Appendix A of 40 CFR Part 60.
- (d) For demonstrating compliance through alternative methods, the permittee shall follow the requirements below.
- (1) Certify the as-supplied VOHAP content ($\text{g}_{\text{VOHAP}}/\text{L}_{\text{solids}}$) of each batch of coating.
 - (2) If no thinning solvent will be added to the coating, the permittee shall follow the procedure described in paragraph (a) of this condition, except that VOHAP content shall be used in lieu of VOC content.
 - (3) If thinning solvent will be added to the coating, the permittee shall follow the procedure described in paragraph (b) or (c) of this condition, except that in Equation 1 of this 40 CFR 63.785(c)(2), the term “mVOC” shall be replaced by the term “mVOHAP,” defined as the VOHAP content of the coating as supplied ($\text{g}_{\text{VOHAP}}/\text{L}_{\text{solids}}$) and the term “Dth” shall be replaced by the term “Dth(VOHAP)” defined as the average density of the VOHAP thinner(s) (g/L).
- (e) A violation revealed through any approved test method shall result in a 1-day violation for enforcement purposes. A violation revealed through the recordkeeping procedures shall result in a 30-day violation for enforcement purposes, unless the owner or operator provides sufficient data to demonstrate the specific days during which noncompliant coating were applied.

(Ref.: 40 CFR 63.785(b),(c),(d), Subpart II)

- 5.B.3 For Emission Point AD-100, the permittee shall demonstrate continuous compliance with the emission standards and operating limits of Subpart II by using the performance test methods and procedures in Conditions 5.B.4 and 5.B.5 for each affected source. The permittee must monitor and collect data, and provide a site specific monitoring plan, as required by Condition 5.B.6.

(Ref.: 40 CFR 63.785(e), Subpart II)

5.B.4 For Emission Point AD-100, the permittee shall use the following test methods and procedures as applicable:

- (a) When using the compliance procedures described in Conditions 5.B.2(a) through (c), the permittee shall use Method 24 of Appendix A of 40 CFR Part 60 to determine the VOC content of coatings as-supplied or as-applied. When a coating or thinner contains exempt compounds that are volatile HAP or VOHAP, the permittee shall ensure, when determining the VOC content of a coating, that the mass of these exempt compounds is included.
- (b) When using the compliance procedure described in Condition 5.B.2(d), the permittee shall use a DEQ-approved method that meets the specified accuracy limits in 40 CFR 63.786(b).
- (c) When using batch formulation data as a test method in lieu of Method 24 of Appendix A of 40 CFR Part 60 to certify the as-supplied VOC content of a coating if it has been determined that the batch formulation data have been a consistent and quantitatively known relationship to Method 24 results. This determination shall consider the role of cure volatiles, which may cause emissions to exceed an amount based solely upon coating formulation data. Notwithstanding such determination, in the event of conflicting results, Method 24 of Appendix A of 40 CFR Part 60 shall take precedence.

(Ref.: 40 CFR 63.786(a),(b),(c), Subpart II)

5.B.5 For Emission Point AD-100, the permittee shall use or ensure that the manufacturer uses the forms and procedures in Appendix A of Subpart II to determine the values for the thinner and coating parameters to be used in Equations 1 and 2 of 40 CFR 63.785(c). The permittee shall ensure that the coating/thinner manufacturer (or supplier) provides information on the VOC or VOHAP contents of the coatings/thinners and the procedure(s) used to determine those values.

(Ref.: 40 CFR 63.786(d), Subpart II)

5.B.6 For Emission Point AD-100, the permittee shall prepare and maintain a written implementation plan that addresses the following subject areas:

- (a) *Coating compliance procedures.* The implementation plan shall include the compliance procedure(s) under Condition 5.B.2(a)-(d) that the source intends to use.
- (b) *Recordkeeping procedures.* The implementation plan shall include the procedures for maintaining the records required under Condition 5.B.7, including the procedures for gathering the necessary data and making the necessary calculations.

- (c) *Transfer, handling, and storage procedures.* The implementation plan shall include the procedures for ensuring compliance with Condition 3.D.1.

(Ref.: 40 CFR 63.787(b); Subpart II)

5.B.7 For Emission Point AD-100, the permittee shall keep the following records on a monthly basis and retain them in accordance with Condition 5.A.3.

- (a) All documentation supporting initial notification;
- (b) A copy of the approved implementation plan;
- (c) The volume of each low usage exempt coating applied;
- (d) Identification of the coatings used, their appropriate coating categories, and the applicable VOHAP limit;
- (e) Certification of the as-supplied VOC content of each batch coating;
- (f) A determination of whether the containers meet the standards as described in Condition 3.D.1(c); and
- (g) The result of any Method 24 or approved VOHAP measurement test conducted on individual containers or coating, as-applied.
- (h) In addition to the records in (a) through (g) above, the permittee shall also include additional records required in 40 CFR 63.788(b)(3)(i) through (iv), as determined by the compliance procedure(s) described in Condition 5.B.2(a)-(d) and summarized in Table 3 to Subpart II.

(Ref.: 40 CFR 63.788(b)(2) and (3); Subpart II)

5.B.8 For Emission Point AD-100, if the permittee detects a violation of the standards specified in Condition 3.B.4 and 3.D.1, the permittee shall, for the remainder of the reporting period during which the violation(s) occurred, include the following information in the records:

- (a) A summary of the number and duration of deviations during the reporting period classified by reason, including known causes for which a Federally-approved or promulgated exemption from an emission limitation or standard may apply.
- (b) Identification of the data availability achieved during the reporting period, including a summary of the number and total duration of incidents that the monitoring protocol failed to perform in accordance with the design of the protocol or produced data that

did not meet the minimum data accuracy and precision requirements, classified by reason.

- (c) Identification of the compliance status as of the last day of the reporting period and whether compliance was continuous or intermittent during the reporting period.
- (d) If, pursuant to paragraph (c), the permittee identifies any deviation as resulting from a known cause for which no Federally-approved or promulgated exemption from an emission limitation or standard applies, the monitoring report shall also include all records that the source is required to maintain that pertain to the periods during which such deviation occurred and:
 - (1) The magnitude of the deviation;
 - (2) The reason for each deviation;
 - (3) A description of the corrective action taken for each deviation, including action taken to minimize each deviation and action taken to prevent recurrence; and
 - (4) All quality assurance activities performed on any element of the monitoring protocol.

(Ref.: 40 CFR 63.788(b)(4), Subpart II)

5.B.9 For Emission Point AD-100, the coatings which are used in volumes of less than 52.8 gallons per year, provided the total volume of coatings exempted under this condition does not exceed 264 gallons per year, shall be required to meet only the following:

- (a) The permittee shall clearly label the coating as "low-usage exempt".
- (b) The permittee shall record the total volume of coating applied at the source to ships. Such records shall be compiled monthly and maintained for a minimum of five (5) years.

(Ref.: 40 CFR 63.781(b) and 63.788(b)(1), Subpart II)

5.B.10 For the Entire Facility, to minimize fugitive emissions of particulate matter site-wide, the permittee shall utilize best management practices, as stated in the permittee's site specific dust control plan in Appendix C of the permit. The site-specific dust control plan shall be updated to address changes to best management practices needed to reflect changes in operations at the facility or to implement corrective actions. Any records (e.g., inspection forms) required by the plan shall be maintained on-site and made readily available for review by DEQ personnel.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

C. Specific Reporting Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Reporting Requirement
AD-100	40 CFR 63.788(c); Subpart II	5.C.1	VOHAP	Semi-annual report
Entire Facility	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.2	Best management practices	Semiannual certification of compliance with the site-specific dust control plan
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.3	Best management practices	Semiannual submittal of revised site-specific dust control plan or statement declaring no changes

5.C.1 For Emission Point AD-100, the permittee shall submit a semiannual report to the DEQ, in accordance with Condition 5.A.4, of all of the information that must be retained pursuant to Condition 5.B.7, except for the following: (1) initial notifications and implementation plan, (2) manufacturer's certifications, and (3) the density and mass fraction of water and exempt compounds of each thinner and the volume fraction of solids in each batch. If a violation at an affected source is detected, the permittee shall also report the information specified in Condition 5.B.8 for the reporting period during which the violation(s) occurred. To the extent possible, the report shall be organized according to the compliance procedure(s) followed each month by the permittee.

(Ref.: 40 CFR 63.788(c); Subpart II)

5.C.2 For the entire facility, the permittee shall include in the semiannual reports required by Condition 5.A.4 a certification by the Responsible Official that the permittee implemented and followed the site-specific dust control plan, located in Appendix C, for the minimization of fugitive particulate emissions.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)

5.C.3 In accordance with Condition 5.A.4, the permittee shall submit a semiannual notification summarizing revisions made to the dust control plan (if any). If no amendments are made to the plan during the semiannual period, the permittee shall include a statement declaring that no revisions occurred. DEQ reserves the right to comment on the plan or request changes, as needed, to ensure fugitive dust does not create nuisance conditions off-site.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

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://www.ecfr.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, as well

as persons selling, offering for sale, and/or purchasing class I, class II, or non-exempt substitute 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 _x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM ₁₀	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 ₂	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound

APPENDIX B

LIST OF REGULATIONS REFERENCED IN PERMIT

The full text of the regulations referenced in this permit may be found on-line at <http://www.deq.state.us.us> and <http://ecfr.gpoaccess.gov>, or the Mississippi Department of Environmental Quality (MDEQ) will provide a copy upon request. A list of regulations referenced in this permit is shown below:

11 Miss. Admin. Code Pt. 2, Ch. 1, Mississippi Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants (Amended December 14, 2011)

11 Miss. Admin. Code Pt. 2, Ch. 2, Permit Regulations for the Construction and/or Operation of Air Emissions Equipment (Amended July 28, 2005)

11 Miss. Admin. Code Pt. 2, Ch. 6, Mississippi Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Air Emissions Operating Permit Regulations for the Purpose of Title V of the Federal Clean Air Act (Amended December 14, 2011)

40 CFR Part 60, Appendix A, Method 24 – Determination of Volatile Matter Content, Water Content, Density, Volume Solids, And Weight Solids Of Surface Coatings

40 CFR Part 63, Subpart A – General Provisions

40 CFR Part 63, Subpart II – National Emission Standards for Shipbuilding and Ship Repair (Surface Coating)

Table 2 to Subpart II of Part 63—Volatile Organic HAP (VOHAP) Limits for Marine Coatings

Coating category	VOHAP limits ^{a b c}		
	Grams/liter coating (minus water and exempt compounds)	Grams/liter solids ^d	
		t ≥4.5 °C	t <4.5 °C ^e
General use			
Specialty:			
Air flask	340	571	728
Antenna	530	1,439	
Antifoulant	400	765	971
Heat resistant	420	841	1,069
High-gloss	420	841	1,069
High-temperature	500	1,237	1,597
Inorganic zinc high-build	340	571	728
Military exterior	340	571	728
Mist	610	2,235	
Navigational aids	550	1,597	
Nonskid	340	571	728
Nuclear	420	841	1,069
Organic zinc	360	630	802
Pretreatment wash primer	780	11,095	
Repair and maint. of thermoplastics	550	1,597	
Rubber camouflage	340	571	728
Sealant for thermal spray aluminum	610	2,235	
Special marking	490	1,178	
Specialty interior	340	571	728
Tack coat	610	2,235	
Undersea weapons systems	340	571	728
Weld-through precon. primer	650	2,885	

^aThe limits are expressed in two sets of equivalent units. Either set of limits may be used for the compliance procedure described in §63.785(c)(1), but only the limits expressed in units of g/L solids (nonvolatiles) shall be used for the compliance procedures described §63.785(c) (2) through (4).

^bVOC (including exempt compounds listed as HAP) shall be used as a surrogate for VOHAP for those compliance procedures described in §63.785(c) (1) through (3).

^cTo convert from g/L to lb/gal, multiply by (3.785 L/gal)(1/453.6 lb/g) or 1/120. For compliance purposes, metric units define the standards.

^dVOHAP limits expressed in units of mass of VOHAP per volume of solids were derived from the VOHAP limits expressed in units of mass of VOHAP per volume of coating assuming the coatings contain no water or exempt compounds and that the volumes of all components within a coating are additive.

^eThese limits apply during cold-weather time periods, as defined in §63.782. Cold-weather allowances are not given to coatings in categories that permit less than 40 percent volume solids (nonvolatiles). Such coatings are subject to the same limits regardless of weather conditions.

[60 FR 64336, Dec. 15, 1995, as amended at 61 FR 66228, Dec. 17, 1996; 76 FR 72070, Nov. 21, 2011]

APPENDIX C
SITE SPECIFIC DUST MANAGEMENTT PLAN



Dust Management Plan

Procedure: ENV-109

Gulf Coast Shipyard group.

13085 SEAWAY ROAD
GULFPORT, MISSISSIPPI 39503

Phone number: (228) 231-7786

Reviewed/Prepared By: Jeffrey Perry
Safety Environmental Coordinator

02/28/2020

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1.0 INTRODUCTION

As part of operations, the Gulf Coast Shipyard Group, Inc. (GCSG) located at 13085 Seaway Road, Gulfport, Mississippi submitted an application for a Title V Air Permit for the manufacture and repair of barges and offshore support vessels occurring at their facility. This manufacturing involves the use of sandblasting to prepare the surfaces for coating.

Based on concerns from a community group located in Pascagoula, the Mississippi Department of Environmental Quality (MDEQ) requested that the GCSG prepare a site- specific Dust Management Plan (DMP). As detailed by the MDEQ, the DMP will be attached to the Title V Air Permit, Permit No. 1020-00027 as an appendix, allowing revisions to be made as needed and includes the following components:

- a. Responsible individual(s) for implementing the plan.
- b. Locations of potential/ actual dust sources.
- c. Peripheral areas of potential impact for dust.
- d. Suppressants used or available.
- e. Best management practices for controlling dust emissions.
- f. Contingencies to address inability to control dust emissions.
- g. Compliance procedures for the plan
- h. Dust observation/ escapement log
- l. Certification by responsible official

Both the United States Environmental Protection Agency (EPA) and the MDEQ have promulgated regulations regarding discharges of air pollutants. As the GCSG's air emissions are above the minor source threshold, a major source Title V Air Permit must be obtained. In obtaining a Title V permit, the regulatory authority may, at times, request additional information. This facility has a Standard Industrial Classification (SIC) Code of 3731 and encompasses approximately forty-eight (48) acres of elevated, flat land.

2.0 RESPONSIBLE INDIVIDUALS

In order to properly administer the DMP the following personnel have been assigned. The following table details their job title, responsibilities and telephone number.

Contact (Name, Title)	Responsibilities	Telephone Numbers
Corby Autin Executive VP of QHSSE/HR	Responsible Individual	985-677-2364 (Cell)
Delfino Chavez Facility Manager	Management Responsibility	985-772-4847
Jeffrey Perry Safety/Environmental Coordinator	Safety And Environmental Management	985-691-1087
Weberte Silva Paint Supervisor	Assist in DMP Procedures	228-213-7786
Rouen Robinson Scaffold Supervisor	Method 9 Opacity Reader	228-343-0644

3.0 LOCATION OF POTENTIAL/ ACTUAL DUST SOURCES

The potential sources which may be reasonably expected to add significant amounts of pollutants (dust) to the surrounding area include the outdoor sandblasting/coating area, main assembly building (Bay 2-8) and the shipyard's slipways. No other areas in the facility are expected to add significant amounts of dust. These areas are identified on **Figure 1**.

4.0 PERIPHERAL AREAS OF POTENTIAL IMPACT FOR DUST

The facility is located at 13085 Seaway Road, Gulfport, Mississippi and is south of Interstate 10 on Seaway Road. It is bounded on the northeast by Keesler Federal Credit Union, and Seaway Road; to the south by Bernard Bayou Industrial Seaway; and to the east by a seventy-five (75)-foot drainage easement, and a vacant lot. Along the western edge is an industrial park. To evaluate all potential sources for impact, GCSG evaluated a one mile radius around the facility. Within this one mile radius, the following locations have been identified and are identified on **Figure 2:**

Adjacent:

- To the Northwest- Unites States Marine, Inc.
- To the Northeast- Keesler Federal Credit Union
- To the South- "Gulfport Lake"
- To the West- Industrial Park and "The Dock" Restaurant

Across Seaway Road:

- Yellow Freight
- Harrison County Department of Human Services
- Mississippi Rehabilitation
- United States Customs and Border Protection
- Mississippi Detention Center

Located on Seaway Road:

- United Postal Services
- Goldin Metals
- Soprema

To the South across Gulfport Lake:

- To the West- Kennedy Marine
- Lake Vista Estates(Residential)
- Mississippi National Guard
- Bayou Vista Golf Course

It should be noted that both Bayou and Coast Concrete, located to the South of GCSG, are also potential sources of the same dust material as sand blast media. Louis Smith Construction, Gulfship and Gulf States Ready-Mix Concrete properties are to the East of us and Glascock Drive.

5.0 BEST MANAGEMENT PRACTICES TO INCLUDE SUPPRESSANTS USED OR AVAILABLE FOR CONTROLLING DUST EMISSIONS

GCSG, during the operations of painting and sandblasting, utilizes wind screens to reduce any potential pickup of particulate matter. Outdoor blasting will be curtailed when wind direction towards the west and south exceed fifteen (15) miles per hour (mph). This will ensure that any potential dust generation does not impact the adjacent restaurant and the residential area to the south. GCSG will also circulate to all locations identified in Section 4.0 above, a call in procedure in case they identify any dust impact to their property.

While sandblasting and painting operations are conducted on shipyard's ship lift, which extends over the adjacent Bernard Bayou waterway, additional measures shall be taken. These measures include blast curtains around the entire vessel and a containment tarp placed beneath the vessel. These measures shall be put in place to minimize potential contamination as much as practicable in the surrounding waters. All spent media will then be vacuumed with a dust collector which utilizes high efficiency filters to minimize dust into the atmosphere.

Blast media will not be allowed to accumulate on paved areas. Any spent media will be collected and transported as required to prevent any piles from developing. Blasting screens will be erected and maintained permanently along the western edge of the outdoor blasting area and erected on the Southern and Northern boundaries only during active blasting or painting operations. GCSG will utilize a wind sock for determining the prevailing direction and the Gulfport-Biloxi International Airport for wind speed information. Wind speed and direction data will be recorded every four hours when outdoor blasting or painting is occurring and will be recorded on the GCSG Weather Form located in Appendix A. Other sources of weather data retrieval may include the following:

[Http://forecast.weather.gov](http://forecast.weather.gov)

[Http://www.wunderground.com/](http://www.wunderground.com/)

6.0 CONTINGENCIES TO ADDRESS INABILITY TO CONTROL DUST EMISSIONS

In order to ensure that the surrounding areas do not experience any dust impact, as addressed above, GCSG will provide specific call in procedures if a dust episode is experienced. At the first notice of a dust incident, GCSG will record all appropriate meteorological parameters to include, wind speed and direction, temperature and humidity and weather (precipitation, etc.). GCSG will also employ EPA (Method 9) Trained Opacity readers to evaluate the actual emissions from the property and record these observations on a Visible Emissions Observation Form (appendix B). GCSG will ensure that all wind screens are in proper conduction with no more than 6 holes measuring more that 1 inch or any hole greater than 6 inches. GCSG will conduct an investigation into all complaints to include statements from callers. If the utilization of wind screens does not restrict the potential dust, GCSG will research the potential use of water spray curtains during certain wind directions and speeds.

7.0 COMPLIANCE PROCEDURES FOR THE PLAN

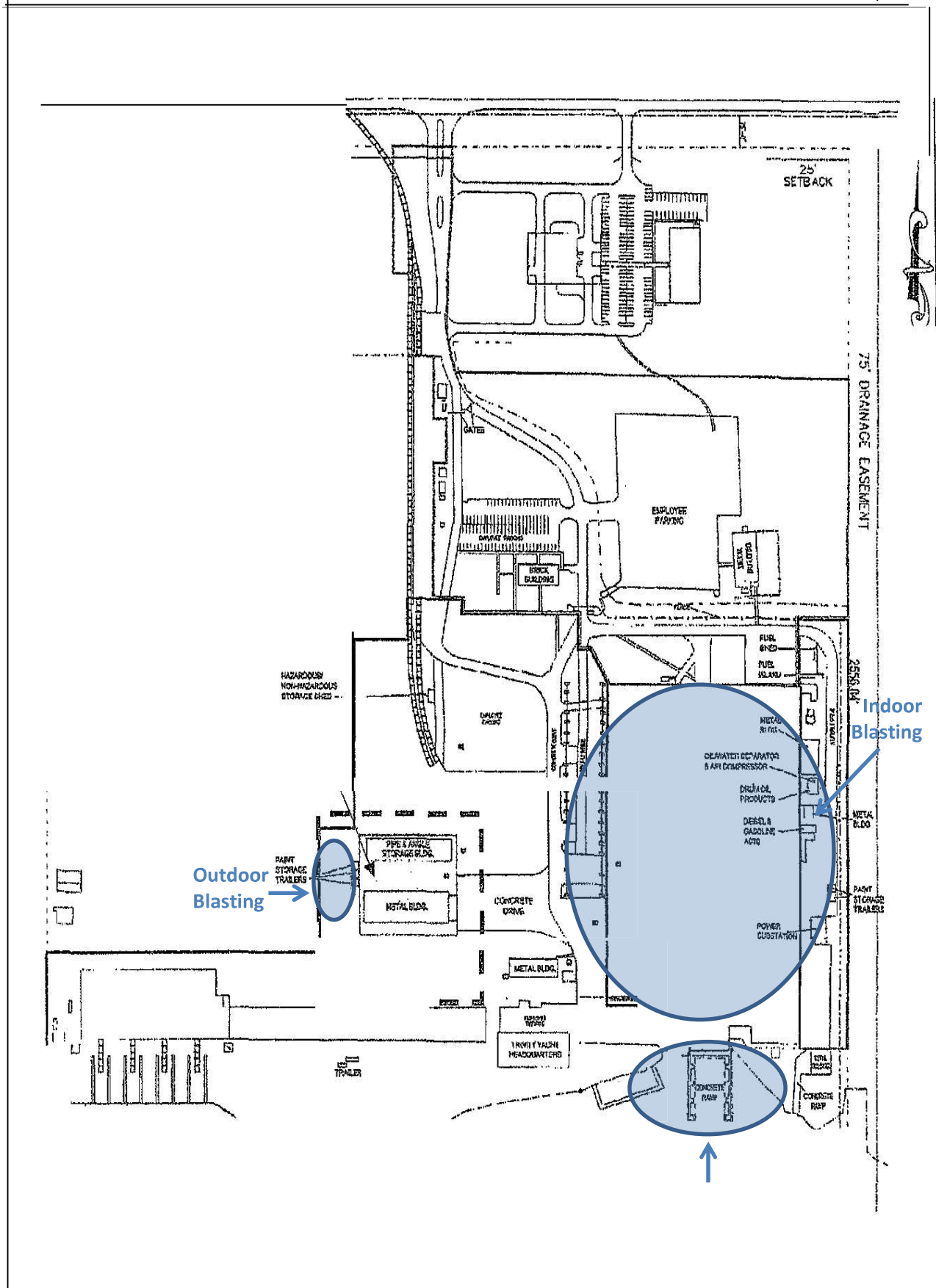
In order to ensure that identified GCSG sandblast and coating employees are knowledgeable about the DMP, they will be provided the plan after approval. Each operation will have a trained EPA (Method 9) Opacity Reader to observe emissions and complete GCSG's Dust Management Weather Form (Appendix A) or a Method 9 Observation Form (Appendix B) in the event of a dust incident. All specified employees will be provided training initially after approval of DMP, upon new hire and retrained annually. Documentation regarding training will be maintained in Human Resources.

8.0 MANAGEMENT APPROVAL

The provisions of this plan have been reviewed and are consistent with the objectives, policies and procedures of GCSG, which have been implemented to ensure that all requirements necessary to achieve and maintain compliance with the MDEQ Air Quality Regulations. The MDEQ is charged with controlling, preventing, and abating air pollution to achieve compliance with air emissions regulations promulgated by the U.S. Environmental Protection Agency (EPA), and the Federal Clean Air Act. I attest that this plan has been prepared in accordance with the best available information.

Signature of Corby Autin/Date

FIGURE 1
POTENTIAL SOURCES OF DUST



Gulfport Lake

Outdoor Blasting

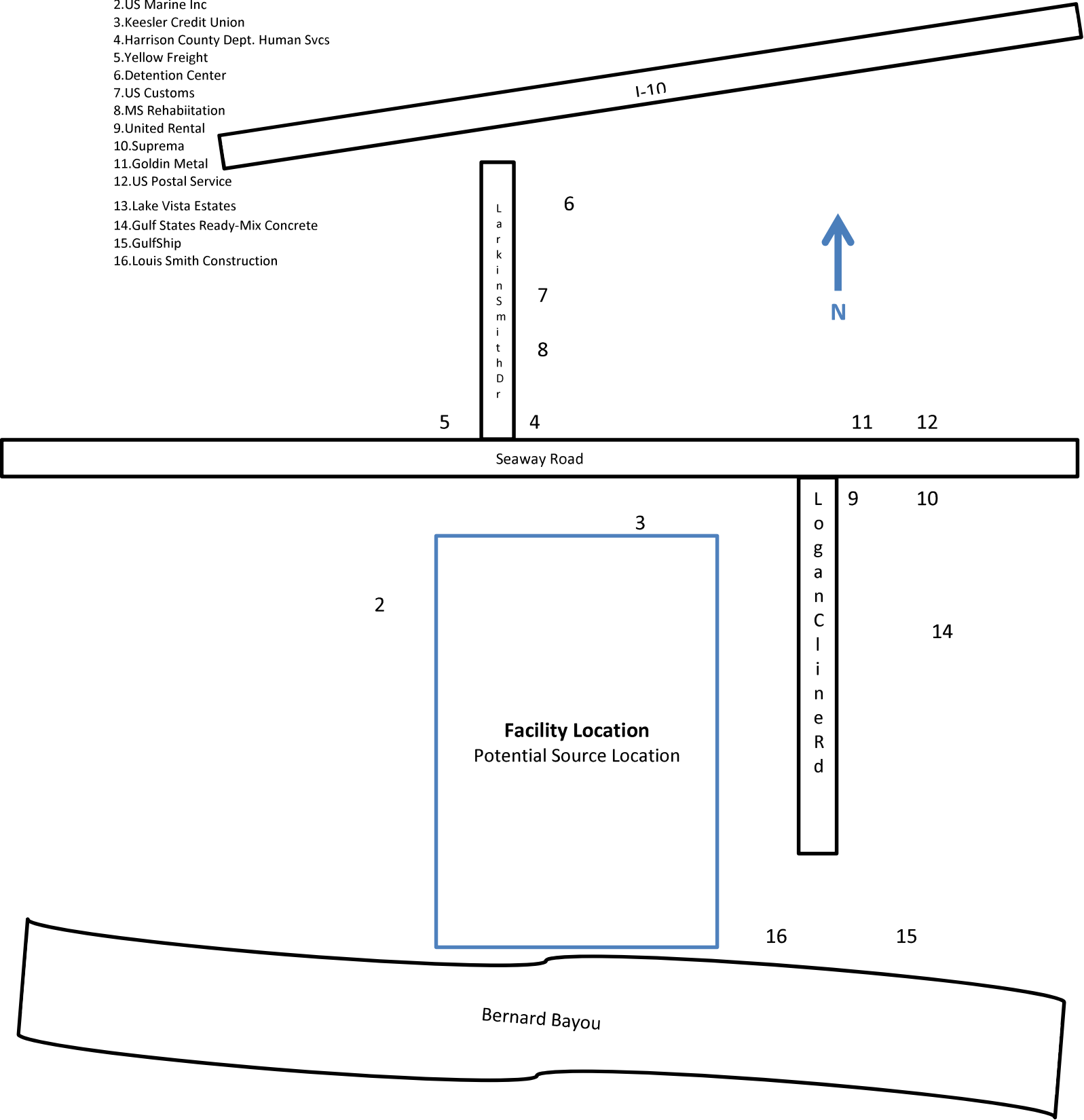
FIGURE2
POTENTIAL IMPACT SITES

DUST MANAGEMENT PLAN

GULF COAST SHIPYARD GROUP, INC. GULFPORT, MISSISSIPPI

February 2020

- 1.Dock Restaurant
- 2.US Marine Inc
- 3.Keesler Credit Union
- 4.Harrison County Dept. Human Svcs
- 5.Yellow Freight
- 6.Detention Center
- 7.US Customs
- 8.MS Rehabilitation
- 9.United Rental
- 10.Suprema
- 11.Goldin Metal
- 12.US Postal Service
- 13.Lake Vista Estates
- 14.Gulf States Ready-Mix Concrete
- 15.GulfShip
- 16.Louis Smith Construction

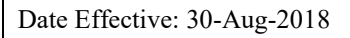


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APPENDIX A

WEATHER FORM

[illegible]

APPENDIX B

METHOD 9

OPACITY OBSERVATION FORM

**EPA METHOD 9 (40 CFR 60 - Appendix A)
 VISIBLE EMISSION OBSERVATION FORM**

COMPANY NAME Gulf Coast Shipyard Group			
LOCATION 13085 Seaway Rd			
LOCATION			
CITY Gulfport	STATE MS	ZIP 39503	
PROCESS EQUIPMENT		OPERATING MODE	
CONTROL EQUIPMENT		OPERATING MODE	
DESCRIBE EMISSION POINT			
HEIGHT OF EMISSION POINT		HEIGHT OF EMISSION POINT RELATIVE TO OBSERVER	
		START END	
DISTANCE TO EMISSION POINT		DIRECTION TO EMISSION POINT (DEGREES 0-360)	
START END		START END	
VERTICAL ANGLE TO OBSERVATION POINT		DIRECTION TO OBSERVATION POINT (DEGREES 0-360)	
START END		START END	
DISTANCE & DIRECTION TO OBSERVATION POINT (40 OBSERVATION POINT)			
START END			
DESCRIBE EMISSIONS			
START END			
EMISSION COLOR		WATER DROPLET PLUME	
START END		ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/> SMOKE <input type="checkbox"/>	
DESCRIBE PLUME BACKGROUND			
START END			
BACKGROUND COLOR		SKY CONDITIONS	
START END		START END	
WIND SPEED		WIND DIRECTION	
START END		START END	
AIR WET TEMP		WET BULB TEMP RH percent	
START END			

Source Layout Sketch

Draw North Arrow
☐ TV ☐ MA

Side View
 0-100 FT
 0-100 FT
 0-100 FT

ADDITIONAL INFORMATION

OBSERVATION DATE		START TIME		END TIME	
MIN	SEC	0	15	30	45
COMMENTS					
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
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27					
28					
29					
30					

OBSERVER'S NAME (PRINT)	
OBSERVER'S SIGNATURE	DATE
ORGANIZATION	
CERTIFIED BY	DATE

HSE REFERENCE DOCUMENTS RELATED TO THIS PROCEDURE

Training:

- ENV-109A Dust Management Plan

Forms:

- ENV-109B Dust Management Plan Weather Form
- Method 9 Opacity Observation Form

Procedure and Related Documents Locations:

- Safety U-Drive: (Folders) GULFPORT YARD-ENVIRONMENTAL-(ENV)PROCEDURES, TRAINING AND FORMS
- Hard Copies available in the Safety and Environmental Building