

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

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

NCI Group Inc., dba Metal Coaters
951 Prisock Road
Jackson, Mississippi
Hinds 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: August 3, 2020

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

Krystal Rudolph

AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: July 31, 2025

Permit No.: 1080-00068

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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-001	Continuous Coil Coating Line [Includes: cleaning, treating, and coating] Emissions from the coating operating are captured in a permanent total enclosure and routed to a 46 MMBTU/hr natural gas-fired thermal oxidizer for the destruction of volatile organic compounds and hazardous air pollutants. The thermal oxidizer exhaust provides heat for the ovens.
AA-002	10,000 Gallon Virgin Solvent Storage Tank

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
AA-001	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10), as established in the Permit to Construct issued May 10, 1994, and modified via the Title V Operating Permit issued herein	3.B.1	VOCs	240 tons per year (tpy)
	40 CFR Part 60, Subpart TT NSPS for Metal Coil Surface Coating 40 CFR 60.460, Subpart TT	3.B.2	VOCs	Applicability
	40 CFR 60.462(a)(2) or (a)(3), Subpart TT	3.B.3		0.14 kilograms of VOCs per liter of coating solids applied, or 10% of the VOCs applied (90% emission reduction) for each calendar month
	11 Miss. Admin. Code Pt.2, R. 1.3.D(1)(b).	3.B.4	PM (filterable only)	$E = 0.8808 * I^{-0.1667}$
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.B.5	SO ₂	4.8 lbs/MMBTU
	40 CFR Part 63, Subpart SSSS NESHAP for Metal Coil Surface Coating 40 CFR 63.5090(a) and (e), 63.5140(c), and Table 2, Subpart SSSS	3.B.6	HAPs	Applicability
	40 CFR 63.5120(a)(2), Subpart SSSS	3.B.7		0.046 kilogram (kg) of organic HAP per liter of solids applied
	40 CFR 63.5121(a) and Table 1, Subpart SSSS	3.B.8	Operating Limits	Establish operating limits
	40 CFR 63.5140(a), Subpart SSSS	3.B.9	General Requirements	Compliance with general requirements
	40 CFR Part 64 – Compliance Assurance Monitoring (CAM) 40 CFR 64.2(a), CAM	3.B.9	VOCs	CAM applicability

- 3.B.1 For Emission Point AA-001, the permittee shall limit volatile organic compound (VOC) emissions to no more than 240 tons per year for each consecutive 12-month period on a rolling basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10), as established in the Permit to Construct issued May 10, 1994, and modified via the Title V Operating Permit issued herein.)

- 3.B.2 For Emission Point AA-001, the permittee is subject to and shall comply with 40 CFR Part 60, Subpart TT – New Source Performance Standards for Metal Coil Surface Coating and the applicable requirements of 40 CFR Part 60, Subpart A – General Provisions.

(Ref.: 40 CFR 60.460, Subpart TT)

- 3.B.3 For Emission Point AA-001, the permittee shall not cause to be discharged into the atmosphere more than 0.14 kg VOC per liter of coating solids applied for each calendar month or more than 10 percent of the VOCs applied for each calendar month (90 percent emission reduction), while continuously using the thermal oxidizer operated at the most recently demonstrated overall efficiency.

(Ref.: 40 CFR 60.462(a)(2) and (a)(3), Subpart TT)

- 3.B.4 For Emission Point AA-001, the maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations equal to or greater than 10 million BTU per hour heat input but less than 10,000 million BTU per hour heat input shall not exceed an emission rate determined by the equation $E = 0.8808 * I^{-0.1667}$, where E is the emission rate in pounds per million BTU per hour input and I is the heat input in millions of BTU per hour.

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

- 3.B.5 For Emission Point AA-001, the maximum discharge of sulfur dioxides from any fuel burning installations 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).)

- 3.B.6 For Emission Point AA-001, the permittee is subject to and shall comply with 40 CFR Part 63, Subpart SSSS, National Emission Standards for Hazardous Air Pollutants for Metal Coil Surface Coating and the applicable requirements of 40 CFR 63, Subpart A – General Provisions as noted in Table 2 of Subpart SSSS.

This subpart does not apply to the application of incidental markings (including letters, numbers, or symbols) that are added to bare metal coils and that are used for product

identification or for product inventory control. The application of letters, numbers, or symbols to a coated metal coil is considered a coil coating process and part of the coil coating affected source.

(Ref.: 40 CFR 63.5090(a) and (e), 63.5140(c), and Table 2, Subpart SSSS)

- 3.B.7 For Emission Point AA-001, the permittee shall limit organic HAP emissions to no more than 0.046 kilogram (kg) of organic HAP per liter of solids applied [0.38 pounds (lbs) of organic HAP per gallon of solids applied] during each consecutive 12-month period on a rolling basis.

(Ref.: 40 CFR 5120(a)(2), Subpart SSSS)

- 3.B.8 For Emission Point AA-001, the permittee shall meet the following operating limits, established during performance testing required in Condition 5.B.7:

- (a) For the thermal oxidizer, the average combustion temperature in any 3-hour period shall not fall below the combustion temperature limit established according to Condition 5.B.7.
- (b) For the emission capture system, the permittee shall develop a monitoring plan that identifies operating parameters to be monitored and specifies operating limits according to Condition 5.B.8.

(Ref.: 40 CFR 63.5121(a) and Table 1, Subpart SSSS)

- 3.B.9 Before August 24, 2020, the permittee shall be in compliance with the applicable emission standards in Condition 3.B.7 and the operating limits in Table 1 of Subpart SSSS at all times, except during periods of start-up, shutdown, and malfunction of any capture system and control device used to comply with this subpart. On and after August 24, 2020, the permittee must be in compliance with the applicable emission standards in Condition 3.B.7 and the operating limits in Table 1 of Subpart SSSS at all times. If the permittee is complying with the emission standards of this subpart without the use of a capture system and control device, the permittee shall be in compliance with the standards at all times.

(Ref.: 40 CFR 63.5140(a), Subpart SSSS)

- 3.B.10 For Emission Point AA-001, the permittee is subject to and shall comply with all applicable requirements of 40 CFR Part 64 – Compliance Assurance Monitoring (CAM).

(Ref.: 40 CFR 64.2(a), Compliance Assurance Monitoring)

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
AA-001	40 CFR 63.5140(b), Subpart SSSS	3.D.1	HAP	Minimization of Emissions

3.D.1 Before August 24, 2020, the permittee shall always operate and maintain affected sources, including air pollution control and monitoring equipment, according to the provisions in 40 CFR 63.6(e)(1). On and after August 24, 2020, at all times, the permittee must operate and maintain the affected sources, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the owner or operator to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements will be based on information available to the MDEQ that 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 affected source.

(Ref.: 40 CFR 63.5140(b), Subpart SSSS)

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
AA-001	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.1	VOC	Quantity and properties of VOC-containing materials
		5.B.2	Capture Efficiency	EPA Reference Method 204
	40 CFR 60.463(b) and (c)(2), Subpart TT	5.B.3	VOC	Determining the monthly volume-weighted average emissions
	40 CFR 60.464(a), Subpart TT	5.B.4	VOC	Determining the average VOC content of coatings used monthly
	40 CFR 60.464(c), Subpart TT	5.B.5	Temperature	Continuously monitor and record combustion temperature of thermal oxidizer
	40 CFR 60.465(e), Subpart TT	5.B.6	VOC	Records of data and calculations
	40 CFR 63.5160(b) through (e), Subpart SSSS	5.B.7	Destruction Efficiency and Capture Efficiency	Conduct performance tests every five (5) years
	40 CFR 63.5150(a)(3) and (a)(4), Subpart SSSS	5.B.8	Temperature and Capture Efficiency	Monitor operating parameters
	40 CFR 63.5150(b), Subpart SSSS	5.B.9		Definition of deviation
	40 CFR 63.5170(d)(2) and (f), Subpart SSSS	5.B.10	Capture and Control Efficiency	Demonstration of continuous compliance
	40 CFR 63.5190(a)(1), (a)(2), and (a)(5), Subpart SSSS	5.B.11	Recordkeeping	Recordkeeping requirements
	40 CFR 64.3(a) and (b), 64.6(c), CAM	5.B.12	Pressure Drop	CAM requirements: continuous pressure drop monitoring of coater rooms
		5.B.13	Temperature	CAM requirements: continuous temperature monitoring of thermal oxidizer
	40 CFR 64.7(b) and (c), CAM	5.B.14	Operation & Maintenance	Operation and maintenance requirements for monitoring system(s)
	40 CFR 64.7(d), CAM	5.B.15	Corrective Action	Corrective action response to an excursion/exceedance of a CAM indicator

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
AA-001	40 CFR 64.8, CAM	5.B.16	QIP	Upon request by DEQ, develop a Quality Improvement Plan (QIP)
	40 CFR 64.9(b), CAM	5.B.17	CAM Records	Maintain CAM records as specified
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.18	Solvent Recovery	Recordkeeping of cleanup solvent

5.B.1 For Emission Point AA-001, the permittee shall determine for each coating, solvent, or other VOC-containing material used:

- (a) The quantity used (gal or lbs);
- (b) The percentage of VOCs by weight;
- (c) The density (lb/gal), unless material usages are measured in pounds (lb);
- (d) The permittee shall calculate the VOC emissions from the use of these materials each month and shall determine the consecutive 12-month total VOC emissions on a rolling basis. VOC emissions may be reduced using the following equation to account for operation of the thermal oxidizer and recovery of spent solvent:

$$E_a = \text{VOC}_u \times [1 - (\text{ORE}/100)] - \text{VOC}_R$$

Where E_a is the actual VOC mass emission rate in tons per year (consecutive 12-month total), VOC_u is the actual VOC emission usage rate in tons per year (consecutive 12-month average), ORE is the most recently demonstrated overall VOC reduction efficiency, %, and VOC_R is the VOC recovered in spent solvent, as determined in Condition 5.B.18.

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

5.B.2 For Emission Point AA-001, the permittee shall demonstrate the capture efficiency (mass of total VOC captured and sent to the oxidizer) in accordance with EPA Reference Method 204 – Criteria for and Verification of a Permanent or Temporary Total Enclosure, 40 CFR 51, Appendix M and shall comply with the specific recordkeeping as described in Condition 5.C.5 during each shift.

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

5.B.3 For Emission Point AA-001, the permittee shall conduct a performance test for each calendar month using the following procedures for determining monthly volume-weighted average emissions of VOCs in kilogram per liter (kg/l) of coating solids applied.

- (a) Determine the overall reduction efficiency (R) for the capture system and control device. The permittee shall use the most recently determined overall reduction efficiency (R) for the performance test, providing control device and capture system operating conditions have not changed since the most recent test. The procedure in 40 CFR 60.463(c)(2)(i) (A), (B), and (C), shall be repeated when directed by the DEQ or when the permittee elects to operate the control device or capture system at conditions different from the most recent performance test. ***If the overall reduction efficiency (R) is equal to or greater than 0.90, the affected facility is in compliance and no further computations are necessary. If the overall reduction efficiency (R) is less than 0.90, the average total VOC emissions to the atmosphere per unit volume of coating solids applied (N) shall be computed as follows in paragraphs (b) through (d).***
- (b) Calculate the volume-weighted average of the total mass of VOCs per unit volume of coating solids applied (G) during each calendar month using equations in 40 CFR 60.463(c)(1)(i)(A), (B), and (C).
- (c) Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during each calendar month by the following equation:

$$N = G (1 - R)$$

- (d) If the volume-weighted average mass of VOCs emitted to the atmosphere for each calendar month (N) is less than or equal to 0.14 kg/l of coating solids applied, the permittee is in compliance. Each monthly calculation is a performance test.

(Ref.: 40 CFR 60.463(c)(2), Subpart TT)

- 5.B.4 For Emission Point AA-001, if the overall reduction efficiency (R) is less than 0.90, as determined in Condition 5.B.3, the permittee shall compute and record the average VOC content of coatings applied during each calendar month, according to the equations provided in 40 CFR 60.463.

(Ref.: 40 CFR 60.464(a); Subpart TT)

- 5.B.5 For Emission Point AA-001, the permittee shall install, calibrate, operate, and maintain a device that continuously records the combustion temperature of the effluent gases incinerated to achieve compliance with Condition 3.B.3. This device shall have an accuracy of $\pm 2.5^{\circ}\text{C}$ or ± 0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater. The permittee shall also record all periods (during actual coating operations) in excess of 3 hours during which the average temperatures in any thermal incinerator used to control emissions from an affected facility remains more than 28°C (50°F) below the temperature at which compliance with Condition 3.B.3 was demonstrated during the most recent measurement of incinerator efficiency. The permittee

shall identify each such occurrence and its duration in accordance with the requirements of 40 CFR 60.7(c).

(Ref.: 40 CFR 60.464(c), Subpart TT)

- 5.B.6 For Emission Point AA-001, in accordance with Condition 5.A.3., the permittee shall maintain records of all data and calculations used to determine monthly VOC emissions and to determine the monthly emission limit, where applicable. Where compliance is achieved through the use of thermal incineration, each owner or operator shall maintain, at the source, daily records of the incinerator combustion temperature.

(Ref.: 40 CFR 60.465(e), Subpart TT)

- 5.B.7 For Emission Point AA-001, the permittee shall comply with the following performance test requirements to demonstrate compliance with Condition 3.B.7:

- (a) The permittee shall determine the organic HAP weight fraction of each coating material applied by following one of the procedures in 40 CFR 63.5160(b)(1) through (b)(4).
- (b) The permittee shall determine the solids content and density of each coating material applied using the procedures in 40 CFR 63.5160(c). The solids content and density determinations may be performed by the manufacturer of the material, or the permittee may rely on the formulation data provided by the material providers to determine the volume solids. In the event of any inconsistency between test data obtained with the ASTM test methods specified in 40 CFR 63.5160(c) and formulation data, the test data will govern.
- (c) The permittee must conduct a performance test before March 25, 2023, and subsequent performance tests no later than five (5) years following the previous performance test to establish the destruction or removal efficiency of the thermal oxidizer. For each performance test, the permittee shall determine the destruction or removal efficiency of the thermal oxidizer according to the procedures in 40 CFR 63.5160(d) and the capture efficiency of each capture system according to 40 CFR 63.5160(e). The permittee shall also confirm or re-establish the operating limits required by Condition 3.B.8.

(Ref.: 40 CFR 63.5160(b) through (e); Subpart SSSS)

5.B.8 For Emission Point AA-001, the permittee shall install and operate the following monitoring equipment. On and after August 24, 2020, the permittee must also maintain the monitoring equipment at all times in accordance with Condition 3.D.1 and keep the necessary parts readily available for routine repairs of the monitoring equipment.

- (a) The permittee shall install, calibrate, maintain, and operate temperature monitoring equipment according to manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every three (3) months; or the chart recorder, data logger, or temperature indicator must be replaced. The permittee shall replace the equipment either if the permittee chooses not to perform the calibration, or if the equipment cannot be calibrated properly. Each temperature monitoring device must be equipped with a continuous recorder. The device must have an accuracy of ± 1 percent of the temperature being monitored in degrees Celsius, or ± 1 degree Celsius, whichever is greater. The permittee shall install the thermocouple or temperature sensor in the combustion chamber at a location in the combustion zone.
- (b) The permittee shall develop a capture system monitoring plan containing the information specified in paragraphs (1) and (2) below. The permittee shall monitor the capture system in accordance with paragraph (3) below. The permittee shall make the monitoring plan available for inspection by the DEQ upon request.
 - (1) The monitoring plan shall identify the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained, explain why this parameter is appropriate for demonstrating ongoing compliance, and identify the specific monitoring procedures.
 - (2) The plan also shall specify operating limits at the capture system operating parameter value, or range of values, that demonstrates compliance with the standards in Condition 3.B.7. The operating limits must represent conditions indicative of proper operation and maintenance of the capture system.
 - (3) The permittee shall conduct monitoring in accordance with the plan.

(Ref.: 40 CFR 63.5150(a)(3) and (4), Subpart SSSS)

5.B.9 For Emission Point AA-001, if an operating parameter monitored in accordance with Condition 5.B.8 is out of the allowed range specified in Condition 3.B.8, it will be considered a deviation from the operating limit.

(Ref.: 40 CFR 63.5150(b), Subpart SSSS)

5.B.10 For Emission Point AA-001, to demonstrate compliance with the 0.046 kg organic HAP emitted per liter of solids applied on a 12-month average as-applied basis, the permittee shall demonstrate compliance with the following provisions:

- (a) Demonstrate compliance through performance tests of capture efficiency and control device efficiency and continuous monitoring of capture system and control device operating parameters as specified in paragraphs (f)(1)(i) through (xi) of this section:
- (1) Determine the oxidizer destruction or removal efficiency, DRE, using the procedure in Condition 5.B.5(c).
 - (2) Whenever a work station is operated, continuously monitor the operating parameter established in accordance with Condition 5.B.7(a).
 - (3) Determine the capture system capture efficiency, CE, for each work station in accordance with Condition 5.B.5(c).
 - (4) Whenever a work station is operated, continuously monitor the operating parameter established in accordance with Condition 5.B.7(b).
 - (5) Calculate the overall organic HAP control efficiency, R, achieved using Equation 7 of Subpart SSSS.
 - (6) If demonstrating compliance with the organic HAP emission rate based on solids applied, measure the mass of each coating material applied on each work station during the month.
 - (7) If demonstrating compliance with the organic HAP emission rate based on solids applied, determine the organic HAP content of each coating material applied during the month following the procedure in Condition 5.B.5(a).
 - (8) If demonstrating compliance with the organic HAP emission rate based on solids applied, determine the solids content of each coating material applied during the month following the procedure in Condition 5.B.5(b).
 - (9) Calculate the organic HAP emitted during the month, H_e , for each month using Equation 8 of Subpart SSSS. For periods when the oxidizer has not operated within its established operating limit, the control device efficiency is determined to be zero.
 - (10) *Organic HAP emission rate based on solids applied for the 12-month compliance period, L_{ANNUAL} .* If demonstrating compliance with the organic HAP emission rate based on solids applied for the 12-month compliance period, calculate the organic HAP emission rate based on solids applied, L_{ANNUAL} , for the 12-month compliance period using Equation 6 of Subpart SSSS.
 - (11) *Compare actual performance to performance required by compliance option.* The affected source is in compliance with Condition 3.B.7 if each oxidizer is

operated such that the average operating parameter value is greater than the operating parameter value established in Condition 5.B.7(a) for each 3-hour period, and each capture system operating parameter average value is greater than or less than (as appropriate) the operating parameter value established in Condition 5.B.7(b) for each 3-hour period; and the requirement in either paragraph (i) or (ii) below is met.

- (i) The overall organic HAP control efficiency, R , is 98 percent or greater for each; or
 - (ii) The organic HAP emission rate based on solids applied, L_{ANNUAL} , is 0.046 kg organic HAP per liter solids applied or less for the 12-month compliance period.
- (b) *Continuous emission monitoring of control device performance.* Use continuous emission monitors, conduct performance tests of capture efficiency, and continuously monitor a site specific operating parameter to ensure that capture efficiency is maintained. Compliance must be demonstrated in accordance with 40 CFR 63.5170(e)(2).

(Ref.: 40 CFR 63.5170(d)(2) and (f), Subpart SSSS)

5.B.11 For Emission Point AA-001, the permittee shall maintain the following records in accordance with 40 CFR 63.10(b)(1):

- (a) Records of the compliance option used and the time periods (beginning and ending dates and times) the permittee used each option;
- (b) Records specified in 40 CFR 63.10(b)(2) of all measurements needed to demonstrate compliance with Subpart SSSS, including:
 - (1) Control device and capture system operating parameter data in accordance with Condition 5.B.7;
 - (2) Organic HAP content data for the purpose of demonstrating compliance in accordance with Condition 5.B.5;
 - (3) Volatile matter and solids content data for the purpose of demonstrating compliance in accordance with Condition 5.B.5;
 - (4) Overall control efficiency determination using capture efficiency tests and control device destruction or removal efficiency tests in accordance with Condition 5.B.5; and

- (5) Material usage, HAP usage, volatile matter usage, solids usage, and compliance demonstrations using this data in accordance with Condition 5.B.8;
- (c) On and after August 24, 2020, for each deviation from an emission limitation reported under Condition 5.C.4(e), a record of the information specified in paragraphs (1) through (4) below, as applicable.
 - (1) The date, time, and duration of the deviation, as reported under Condition 5.C.4(e).
 - (2) A list of affected sources or equipment for which the deviation occurred and the cause of the deviation, as reported under Condition 5.C.4(e).
 - (3) An estimate of the quantity of each regulated pollutant emitted over any applicable emission limit in Condition 3.B.7 or any applicable operating limit established according to Condition 3.B.8, and a description of the method used to calculate the estimate, as reported under Condition 5.C.4(e).
 - (4) A record of actions taken to minimize emissions in accordance with Condition 3.D.1 and any corrective actions taken to return the affected unit to its normal or usual manner of operation.

(Ref.: 40 CFR 63.5190(a)(1), (a)(2), and (a)(5); Subpart SSSS)

- 5.B.12 For Emission Point AA-001, the permittee shall monitor the pressure drop in the coater rooms in accordance with the CAM Plan found in Appendix C of the permit.

(Ref.: 40 CFR 64.3(a) and (b), 64.6(c), Compliance Assurance Monitoring)

- 5.B.13 For Emission Point AA-001, the permittee shall monitor the temperature of the thermal oxidizer continuously in accordance with the CAM Plan found in Appendix C of the permit.

(Ref.: 40 CFR 64.3(a) and (b), 64.6(c), Compliance Assurance Monitoring)

- 5.B.14 For Emission Point AA-001, the permittee shall comply with the following requirements for the monitoring required by the approved CAM Plan:

- (a) *Proper maintenance.* At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- (b) *Continued operation.* Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable,

calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used, including in data averaging and calculations or in fulfilling a minimum data availability requirement, as applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(Ref.: 40 CFR 64.7(b) and (c), Compliance Assurance Monitoring)

- 5.B.15 For Emission Point AA-001, upon detecting an excursion or exceedance, the permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

Determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(Ref.: 40 CFR 64.7(d), Compliance Assurance Monitoring)

- 5.B.16 For Emission Point AA-001, based on the results of a determination made under Condition 5.B.17, the DEQ may require the permittee to develop and implement a Quality Improvement Plan (QIP) containing the elements specified in 40 CFR 64.8(b). The QIP shall be developed and implemented within 180 days of written notification from DEQ that a QIP is required. The DEQ may require the permittee make reasonable changes to the QIP if the QIP fails to address the cause of the control device performance problem or fails to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Implementation of a QIP shall not excuse the permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that applies.

(Ref.: 40 CFR 64.8, Compliance Assurance Monitoring)

- 5.B.17 For Emission Point AA-001, the permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written QIP required pursuant to Condition 5.B.18 and any activities undertaken to implement a QIP, data used to document the adequacy of monitoring, and monitoring maintenance or corrective actions, as applicable. As applicable, records of monitoring data and monitoring performance data should include date and time, who performed the analysis, analytical techniques or methods used, results and operating conditions at the time of the sampling or measurement. These records may be maintained in hard copy form or electronically, provided they are available for expeditious inspection and review.

(Ref.: 40 CFR 64.9(b), Compliance Assurance Monitoring)

- 5.B.18 For purposes of demonstrating compliance with the VOC emission limit for AA-001, if waste cleanup solvent is collected for off-site disposal and/or recovery, the following records shall be maintained if a credit is to be applied to the monthly VOC emissions:
- (a) the amount of waste solvent recovered during the month* for off-site disposal and/or recovery, in gallons (or pounds, if records of recovered solvent is maintained by weight and VOC content in percent by weight);
 - (b) the VOC content of the recovered waste solvent, which shall be based upon an independent laboratory analyses performed for waste stream characterization within the previous 12 months or a laboratory analysis by the facility to which the waste solvent is shipped; and
 - (c) the date the recovered waste solvent was shipped, the amount shipped (minus the container weight), and the name and address of the receiving, disposal, and/or recovery facility.

Usage of recycled cleanup solvent generated from the coating line and returned to the facility for re-use is not required to be included in subsequent VOC records if a credit was not applied to the monthly VOC emissions during the initial usage and all VOC was assumed to be emitted.

*The monthly total volume or weight of the collected waste solvent may be calculated using a prorated method by averaging the volume or weight of the waste solvent recovered and shipped off-site over the number of operating days since the previous shipment.

(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
AA-001	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.1	VOC	Monthly recordkeeping and semiannual reports
	40 CFR 60.465(c), Subpart TT	5.C.2		Report any exceedances of the VOC emission standard
	40 CFR 60.465(d), Subpart TT	5.C.3	Temperature	Report incinerator temperature drops
	40 CFR 63.5180(c), (d), (e), (f), (g)(2), and (h), Subpart SSSS	5.C.4	Reporting	Reporting requirements
	40 CFR 63.5181(a), Subpart SSSS 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c).	5.C.5	Reporting	Electronic reporting of performance tests
	40 CFR 63.5181(c), Subpart SSSS 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.6	Reporting	Electronic reporting of semiannual compliance reports
	40 CFR 64.9(a), CAM	5.C.7	CAM Reporting	Semiannual reporting requirements
	40 CFR 64.7(e), CAM	5.C.8	CAM Modification	Promptly notify DEQ of failure to achieve limit/standard though no excursion or exceedance was indicated by approved monitoring

5.C.1 For Emission Point AA-001, in accordance with Condition 5.A.4, the permittee shall submit a report summarizing the monthly and 12-month rolling total VOC emissions calculated in accordance with 5.B.1, including any VOC emissions credits determined under Condition 5.B.18.

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

5.C.2 For Emission Point AA-001, in accordance with Condition 5.A.4, the permittee shall identify, record, and submit a written report to the DEQ semiannually of each instance in which the volume-weighted average of the local mass of VOCs emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under Condition

3.B.2. If no such instances have occurred, a report stating this shall be submitted to the DEQ semiannually.

(Ref.: 40 CFR 60.465(c), Subpart TT, and 40 CFR 60.7(e), Subpart A)

5.C.3 For Emission Point AA-001, the permittee shall also submit reports semiannually of each instance the incinerator temperature drops below the minimum temperature as set forth under Condition 5.B.5. If no such periods occur, the permittee shall state this in the report.

(Ref.: 40 CFR 60.465(d), Subpart TT)

5.C.4 For Emission Point AA-001, the permittee shall submit the following reports:

- (a) The permittee shall submit a Notification of Performance Test at least sixty (60) calendar days before the performance test is scheduled to begin. This notification and the site-specific test plan required under 40 CFR 63.7(c)(2) must identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. The permittee may consider the operating parameter identified in the site-specific test plan to be approved unless explicitly disapproved, or unless comments received from the DEQ require monitoring of an alternate parameter.
- (b) The permittee shall submit performance test reports before the close of business on the 60th day following the completion of the performance test.
- (c) Before August 24, 2020, the permittee shall submit start-up, shutdown, and malfunction reports as specified in 40 CFR 63.10(d)(5). If the permittee's actions during a start-up, shutdown, or malfunction (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the start-up, shutdown, and malfunction plan specified in 40 CFR 63.6(e)(3), the permittee shall state such information in the report. The start-up, shutdown, or malfunction report will consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy, that will be submitted to the DEQ. Separate start-up, shutdown, or malfunction reports are not required if the information is included in the report specified in paragraph (d). **The start-up, shutdown, and malfunction plan and start-up, shutdown, and malfunction report are no longer required on and after August 24, 2020.**
- (d) In accordance with Condition 5.A.4, the permittee shall submit semiannual compliance reports containing the information specified below.
 - (1) Company name and address.

- (2) Statement by a responsible official with that official's name, title, and signature, certifying the accuracy of the content of the report.
 - (3) 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.
 - (4) Identification of the compliance option or options used during the reporting period. If the permittee switched between compliance options during the reporting period, the permittee shall report the beginning dates the permittee used each option.
 - (5) A statement that there were no deviations from the applicable emission limit in Condition 3.B.7 or the applicable operating limit established according to Condition 3.B.8 during the reporting period.
- (e) For each deviation, the semiannual compliance report shall contain the following information:
- (1) The total operating time of the coating line during the reporting period.
 - (2) Before August 24, 2020, the permittee shall provide information on the number, duration, and cause of deviations (including unknown cause, if applicable) as applicable, and the corrective action taken. On and after August 24, 2020, the permittee must provide information on the number, date, time, duration, and cause of deviation from an emission limit in Condition 3.B.7 or any applicable operating limit established according to Condition 3.B.8 (including unknown cause, if applicable) as applicable, and corrective action taken.
 - (3) Before August 24, 2020, the permittee shall provide information on the number, duration, and cause for monitor downtime incidents (including unknown cause other than downtime associated with zero and span and other daily calibration checks, if applicable). On and after August 24, 2020, the permittee must provide the information specified in paragraphs (i) and (ii) below.
 - (i) Number, date, time, duration, cause (including unknown cause), and descriptions of corrective actions taken for continuous parameter monitoring systems that are inoperative.
 - (ii) Number, date, time, duration, cause (including unknown cause), and descriptions of corrective actions taken for continuous parameter

monitoring systems that are out of control as specified in 40 CFR 63.8(c)(7).

- (4) On and after August 24, 2020, for each deviation from an emission limit in Condition 3.B.7 or any applicable operating limit established according to Condition 3.B.8, the permittee must provide a list of the affected source or equipment, an estimate of the quantity of each regulated pollutant emitted over the emission limit, a description of the method used to estimate the emissions, and the actions taken to minimize emissions in accordance with Condition 3.D.1.

(Ref.: 40 CFR 63.5180(c), (d), (e), (f), (g)(2), and (h); Subpart SSSS)

- 5.C.5 For Emission Point AA-001, beginning no later than August 24, 2020, the permittee must submit the results of each performance test required in 40 CFR 63.5180(e) following the procedures in 40 CFR 63.5181(a)(1) through (3), as it relates to electronic submittal of reports through EPA's Electronic Reporting Tool (ERT). In addition to electronic submittal of test reports, the permittee shall also submit a hard copy of the test report to the DEQ.

(Ref.: 40 CFR 63.5181(a), Subpart SSSS, and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c).)

- 5.C.6 For Emission Point AA-001, beginning on March 25, 2021, or once the reporting template has been available on the CEDRI website for one (1) year, whichever date is later, the permittee shall submit the semiannual compliance report required in Condition 5.C.5(d) and (e) to the EPA via the CEDRI. The CEDRI interface can be accessed through the EPA's CDX (<https://cdx.epa.gov>). If the reporting form for the semiannual compliance report specific to this subpart is not available in CEDRI at the time that this report is due, the permittee shall submit the report to the EPA at the appropriate address listed in 40 CFR 63.13. The permittee shall refer to 40 CFR 63.5181(c) for additional requirements pertaining to the electronic submittal of semiannual compliance reports. Regardless of the requirement to submit electronic copies of reports, a hard copy of the required reports shall be submitted to the DEQ according to Condition 5.A.4.

(Ref.: 40 CFR 63.5181(c), Subpart SSSS, and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)

- 5.C.7 For Emission Point AA-001, the permittee shall submit reports in accordance with Condition 5.A.4 of the following information, as applicable:
 - (a) Summary information on the number, duration, and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

- (b) Summary information on the number, duration, and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- (c) A description of the actions taken to implement a QIP during the reporting period as specified in Condition 5.B.18. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances.

(Ref.: 40 CFR 64.9(a), Compliance Assurance Monitoring)

- 5.C.8 For Emission Point AA-001, if the permittee identifies a failure to achieve compliance with the emission limitation or standard for which the approved CAM monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or monitoring additional parameters.

(Ref.: 40 CFR 64.7(e), Compliance Assurance Monitoring)

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 WITHIN THIS 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 (DEQ) 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, Subpart A – General Provisions

40 CFR Part 60, Subpart TT – New Source Performance Standards for Metal Coil Surface Coating

40 CFR Part 63, Subpart A – General Provisions

40 CFR Part 63, Subpart SSSS – National Emission Standards for Hazardous Air Pollutants for Metal Coil Surface Coating

APPENDIX C

COMPLIANCE ASSURANCE MONITORING PLAN FOR EMISSION POINT AA-001

	Indicator No. 1
Indicator	Thermal Oxidizer chamber temperature
Measurement Approach	A thermocouple or temperature sensor used to monitor the chamber temperature.
Monitoring Method and Location	Continuous monitoring (i.e. every second) clearly displayed and temperature sensors placed in the combustion chamber at a location in the combustion zone.
Indicator Range (including the corrective action taken for an excursion)	An excursion is defined as any 3-hour rolling temperature average 50°F below the minimum temperature established in Permit Condition 5.B.5.
Monitoring Frequency	Continuously monitored.
Data Collection/ Recordkeeping Procedures	Continuously monitor combustion chamber temperature, calculate and record each one-hour average and the three-hour rolling average.
Averaging Period	Continuous monitor combustion chamber temperature, calculate and record each one-hour average and the three-hour rolling average.
QA/QC Practices	The thermocouples shall be maintained according to the manufacturer's specifications, which shall be kept on site.