

STATE OF MISSISSIPPI AND FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL PERMIT

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

THIS CERTIFIES THAT

Crystal Finishing Systems Inc
140 Matthews Drive
Senatobia, Mississippi
Tate County

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

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: September 22, 2026

Permit No.: 2600-00026

Effective Date: As specified herein.

Expires: August 31, 2031

Section 1.

A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
2. This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.4.D.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.4.D.)
3. Any activities not identified in the application are not authorized by this permit.
(Ref.: Miss. Code Ann. 49-17-29 1.b)
4. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)
7. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)
8. The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:
 - a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and
 - b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission.
(Ref.: Miss. Code Ann. 49-17-21)

9. Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control.

(Ref.: Miss. Code Ann. 49-17-39)

10. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(7).)

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

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

B. GENERAL OPERATIONAL CONDITIONS

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

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

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

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

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

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

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

a. Upsets

- (1) For an upset defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:

- (i) An upset occurred and that the source can identify the cause(s) of the upset;
- (ii) The source was at the time being properly operated;
- (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
- (iv) That within 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
- (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or

caused a general nuisance to the public, the source provided notification to the Department.

- (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
- (3) This provision is in addition to any upset provision contained in any applicable requirement.
- (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.

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

- (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.)

5. Compliance Testing: Regarding compliance testing:

- a. The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.
- b. Compliance testing will be performed at the expense of the permittee.
- c. Each emission sampling and analysis report shall include but not be limited to the following:
 - (1) Detailed description of testing procedures;
 - (2) Sample calculation(s);
 - (3) Results; and
 - (4) Comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B(3), (4), and (6).)

C. PERMIT RENEWAL / MODIFICATION / TRANSFER / TERMINATION

1. For renewal of this permit, the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board. If the applicant submits a timely and complete application pursuant to this paragraph and the Permit Board, through no fault of the applicant, fails to act on the application on or before the expiration date of the existing permit, the applicant shall continue to operate the stationary source under the terms and conditions of the expired permit, which shall remain in effect until final action on the application is taken by the Permit Board. Permit expiration terminates the source's ability to operate unless a timely and complete renewal application has been submitted.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.8.)

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

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

3. The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

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

4. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:
 - a. Persistent violation of any terms or conditions of this permit.
 - b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
 - c. A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

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

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

SECTION 2 EMISSION POINT DESCRIPTION

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

Emission Point	Description
AA-000	Facility Wide [Crystal Finishing Systems, Inc.]
AA-100	Metal Cutting Operations
AA-101	Aluminum Extruder Press Operations [includes one (1) 1,250-ton press and one (1) 1,400-ton press; presses jointly consist of two (2) 3.0 MMBTU / hour natural gas-fired Billet Oven, one (1) 3.5 MMBTU / hour natural gas-fired Age Oven, and one (1) 3.0 MMBTU / hour natural gas-fired Age Oven; emissions routed to a shared cyclone]
AA-102	2,200-Ton Aluminum Extruder Line [includes one (1) 5.4 MMBTU / hour Billet Oven and one (1) 3.5 MMBTU/hour Age Oven; emissions route to a cyclone]
AA-103	Sawing Operations [includes three (3) cooling table saws, one (1) cutback saw, two (2) miter saws, and one (1) band saw]
AA-200	Surface Coating Operations
AA-201	5.0 MMBTU / hour Natural Gas-Fired Washer Tank Heater
AA-202	2.0 MMBTU / hour Natural Gas-Fired Washer Dry-Off Oven
AA-203	Two (2) Electrostatic Liquid Spray Paint Booths [each booth equipped with dry filter]
AA-204	4.0 MMBTU / hour Natural Gas-Fired Bake Oven
AA-300	Wood Cutting Operations [includes lumber sawing]
AA-400	Foam Filling Operations
AA-401	Graco EP250 Pour Gun [45.0 gallons / hour maximum design capacity; two-part foam material poured, not sprayed, into cavity]
AA-402	De-Bridge Sawing Operations [emissions routed to a cyclone]

SECTION 3 EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity	$\leq 40\%$ (Smoke)
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2		$\leq 40\%$
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.3	PM (filterable)	$\leq 0.6 \text{ lb. / MMBTU}$
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.4		$E = 4.1 \times p^{0.67}$
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.5	PM/PM ₁₀ / PM _{2.5}	Operate Pollution Control Devices at All Times Process Equipment is in Operation
		3.6	VOCs	$\leq 99.0 \text{ tpy}$ (Rolling 12-Month Total)
		3.7	HAPs	$\leq 9.0 \text{ tpy}$ (Individual) $\leq 24.0 \text{ tpy}$ (Total) (Rolling 12-Month Totals)
AA-200	40 CFR Part 63, Subpart HHHHHH National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources 40 CFR 63.11169(c), 63.11170(a)(3), 63.11174(a), Table 1, and 63.11180 “ <i>Target HAP containing coating</i> ”, Subpart HHHHHH	3.8	HAPs	General Applicability

3.1 For Emission Point AA-000 (Facility-Wide), except as otherwise specified or limited herein, the permittee shall not cause or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial, or waste disposal process, which exceed forty percent (40%) opacity subject to the following exceptions:

- (a) Start-up operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) start-ups per stack in any twenty-four (24) hour period.
- (b) Emissions resulting from soot blowing operations (i.e. ash removal) shall be permitted provided such emissions do not exceed sixty percent (60%) opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one (1) hour.

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

3.2 For Emission Point AA-000 (Facility-Wide), the permittee shall not cause or allow the discharge of any air contaminant of such opacity into the ambient air from a point source

as to obscure an observer's view to a degree of forty percent (40 %). This shall not apply to vision obscuration caused by uncombined water droplets.

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

- 3.3 For Emission Point AA-000 (Facility-Wide), the maximum permissible emission of ash and/or particulate matter (PM) from any fossil fuel burning installation of less than 10 million BTU (MMBTU) per hour heat input shall not exceed 0.6 pounds per MMBTU per hour heat input.

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

- 3.4 For Emission Point AA-000 (Facility-Wide), except as otherwise specified herein, the permittee shall not cause or allow the emission of PM in total quantities in any one (1) hour from any manufacturing processes (which includes any associated stacks, vents, outlets, or combination thereof) to exceed the rate determined by the following relationship:

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

Where "E" is the emission rate in pounds per hour and "p" is the process weight input rate in tons per hour. Conveyer discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs.

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

- 3.5 For Emission Point AA-000 (Facility-Wide), the permittee shall at all times operate each air pollution control device (i.e. a cyclone or dry filter) while the associated process equipment is in active operation to minimize the respective emission of filterable PM less than 10 microns in diameter (PM₁₀) and filterable PM less than 2.5 microns in diameter (PM_{2.5}).

In the event that a control device malfunctions, or becomes non-operational, the permittee shall take actions as expeditiously as possible to bring the control device back to its designed capacity or cease the operation of the associated process equipment.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

- 3.6 For Emission Point AA-000 (Facility-Wide), the permittee shall limit the emission of volatile organic compounds (VOCs) to no more than 99.0 tons per year (tpy) as determined on a rolling 12-month total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

- 3.7 For Emission Point AA-000 (Facility-Wide), the permittee shall limit the emission of hazardous air pollutants (HAPs) to no more than 9.0 tpy for each individual HAP and no more than 24.0 tpy for all combined HAPs as determined on a rolling 12-month total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

- 3.8 For Emission Point AA-200, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 63, Subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and

Miscellaneous Surface Coating Operations and 40 CFR Part 63, Subpart A – General Provisions (as required in Table 1 of Subpart HHHHHH).

For the purpose of this subpart, a “*target HAP-containing coating*” means any spray-applied coating that meets one of following criteria:

- (a) The coating contains cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by mass (of the metal); or
- (b) The coating contains manganese in amounts greater than or equal to 1.0 percent by mass (of the metal).

(Ref.: 40 CFR 63.11169(c), 63.11170(a)(3), 63.11174(a), Table 1, and 63.11180 “*Target HAP containing coating*”, Subpart HHHHHH)

SECTION 4 WORK PRACTICES

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Work Practice
AA-200	40 CFR 63.11173(e), Subpart HHHHHH	4.1	HAPs	Spray Coating Application Requirements
	40 CFR 63.11173(f) and (g), Subpart HHHHHH	4.2		Personnel Training Requirements
	40 CFR 63.11173(h), Subpart HHHHHH	4.3		Operate in Compliance at All Times

4.1 For Emission Point AA-200, the permittee shall comply with the following requirements,

- (a) All painters must certify that they have completed training in the proper spray application of surface coatings and the proper set-up / maintenance of spray equipment. The minimum requirements for training and certification are outlined in Condition 4.2(a).

The spray application of surface coatings is prohibited by persons who are not certified as having completed the training outline in Condition 4.2(a).

- (b) All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets following requirements:

- (1) All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least ninety-eight (98) percent capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1 – “*Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter*” (June 4, 1992) (incorporated by reference – see 40 CFR 63.14, Subpart A).

The test coating for measuring filter efficiency shall be a high-solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional [i.e. non-high volume low pressure (HVLP)] air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure, and the air flow rate across the filter shall be 150 feet per minute. However, the permittee may use published filter efficiency data provided by filter vendors to satisfy this requirement and are not required to perform this measurement.

This requirement **does not** apply to water-wash spray booths that are operated and maintained in accordance with the manufacturer's specifications

Additionally, the permittee shall comply with one of the following requirements:

- (2) Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, have four (4) complete walls or complete side curtains, and must be ventilated

at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to (but not more than) 0.05 inches water gauge positive pressure.

- (3) Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, have at least three (3) complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings (if needed) to allow for conveyors and parts to pass through the booth during the coating process.
 - (4) Mobile ventilated enclosures that are used to perform spot repairs must enclose and (if necessary) seal against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a filter to capture paint overspray.
- (c) All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the MDEQ.

The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of a HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User" (May 24, 1989) and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns" (September 26, 2002) (incorporated by reference – see 40 CFR 63.14, Subpart A).

The requirement specified in this paragraph do not apply to painting performed by students and instructors at a paint training center. Additionally, the requirements do not apply to the following situations:

- (d) All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used.
- (e) As provided in 40 CFR 63.6(g), Subpart A, the permittee may request approval from the EPA to use an alternative to the emission standards.

(Ref.: 40 CFR 63.11173(e), Subpart HHHHHH)

- 4.2 For Emission Point AA-200, the permittee shall comply with the following personnel-related requirements:

- (a) The permittee must ensure and certify that all new and existing personnel (including contract personnel) who spray apply “*surface coatings*” [as defined in 40 CFR 63.11180, Subpart HHHHHH] are trained in the proper application of surface coatings as required by Condition 4.1(a). The training program must include (at a minimum) the following items:
- (1) A list of all current personnel by name and job description who are required to be trained;
 - (2) Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the following topics:
 - (i) Spray gun equipment selection, set-up, and operation (including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate);
 - (ii) Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray (including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke);
 - (iii) Routine spray booth and filter maintenance (including filter selection and installation); and
 - (iv) Environmental compliance with the requirements specified in Subpart HHHHHH.
 - (3) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training.
 - (4) The permittee can show by documentation or certification that a painter's work experience and/or existing training has resulted in training equivalent to that required by paragraph (a)(2) of this condition and the permittee is not required to provide the required initial training for that painter.
- (b) As required by Condition 4.1(a), all new and existing personnel (including contract personnel) who spray apply surface coatings must be trained by the following specified deadlines:
- (1) All personnel must be trained and certified no later than one hundred eighty (180) days after hiring. Painter training completed within five (5) years prior to the required training deadline that meets the requirements specified in (a)(2) of this condition shall satisfy this requirement and is valid for a period not to exceed five (5) years after the date the most recent training is completed.
 - (2) Training and certification will be valid for a period not to exceed five (5) years after the date the specific training is completed. Additionally, all personnel must receive refresher training that meets the requirements of (a)(2) of this condition and be re-certified every five (5) years.

- (c) Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire.

(Ref.: 40 CFR 63.11173(f) and (g), and 63.11180 “*Coating*”, Subpart HHHHHH)

- 4.3 For Emission Point AA-200, the permittee shall be in compliance with the requirements of 40 CFR 63, Subpart HHHHHH, at all times. At all times, the permittee must 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. The general duty to minimize emissions does not require the permittee 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 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.

(Ref.: 40 CFR 63.11173(h), Subpart HHHHHH)

SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain records for a minimum of 5 years.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2	PM ₁₀ / PM _{2.5} (filterable only)	Perform an Inspection on Each Control Device Monthly
		5.3	Opacity	Perform a Visible Emissions Observation Monthly
		5.4	VOCs HAPs	Calculate and Record Emissions (Monthly and Rolling 12-Month Period)
		5.5		Monitor Paint Usage / Data (Monthly)
		5.6		Record Paint Usage / Data (Monthly)
AA-200	40 CFR 63.11177(a) – (d), and (g), Subpart HHHHHH	5.7	HAPs	Recordkeeping Requirements

- 5.1 The permittee shall retain all required records, monitoring data, supporting information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to MDEQ as required by Applicable Rules and Regulations or this permit upon request.

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

- 5.2 For Emission Point AA-000 (Facility-Wide), the permittee shall perform an inspection that evaluates the performance capability of each air pollution control device (i.e. a cyclone or dry filter) on a monthly basis. If a problem is noted during the inspection of a control device, the permittee shall perform the necessary maintenance to ensure operation as originally designed. Additionally, the permittee shall maintain on-site (to the extent practicable) sufficient components as is necessary to repair a control device.

The permittee shall maintain documentation that details the date / time of each inspection, the results of each inspection, any problem that is experienced, any maintenance (either corrective or preventative) performed to return a control device to operation as originally designed, and the duration in which a control device is non-operational due to malfunction.

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

- 5.3 For Emission Point AA-000 (Facility-Wide), the permittee shall visible emissions observation in accordance with EPA Test Method 22 on the exhaust from each stack associated with an air pollution control device during daylight hours and during representative operating conditions on a monthly basis. Each observation shall be conducted for a minimum period of six (6) consecutive minutes.

If visible emissions are detected during an observation, the permittee shall immediately determine the cause of the visible emissions and implement the necessary corrective action(s) to prevent further emissions.

The permittee shall maintain all documentation and information specified by EPA Test Method 22, the results from each observation, any corrective actions taken as a result of an evaluation, and the date / time when each observation was conducted in accordance with Condition 5.1.

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

- 5.4 For Emission Point AA-000 (Facility-Wide), the permittee shall demonstrate compliance with the emission limitations specified in Conditions 3.6 and 3.7 by calculating and recording the total respective emissions of volatile organic compounds (VOCs), each individual hazardous air pollutant (HAP) and of all HAPs combined from all sources that can reasonably emit the pollutant(s) in tons both on a monthly basis and rolling 12-month total basis.

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

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

- 5.5 For Emission Point AA-000 (Facility-Wide), the permittee shall determine for each paint, coating, adhesive, solvent, or other VOC and/or HAP containing material used:
- (a) The identification of each paint, coating, adhesive, solvent, or other VOC and/or HAP containing material and the total gallons of each paint, surface coating, or other VOC and/or HAP containing material used on a monthly basis and for each consecutive 12-month period on a rolling basis.
 - (b) The VOC and/or HAP content of each paint, coating, adhesive, solvent, or other VOC and/or HAP containing material. A description of the method used to determine the VOC and/or HAP content shall accompany this data. The permittee may utilize data supplied by the manufacturer, or analysis of VOC content by EPA Test Method 24 and/or EPA Test Method 24A, or analysis of HAP content by EPA Test Method 311.
 - (c) The density of each paint, coating, adhesive, solvent, or other VOC and/or HAP containing material.

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

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

- 5.6 For Emission Point AA-000 (Facility-Wide), the permittee shall maintain sufficient documentation for the following information:
- (a) The identification of each paint, coating, adhesive, solvent, or other VOC and/or HAP containing material and the total gallons of each paint, coating, adhesive,

solvent, or other VOC and/or HAP containing material used on a monthly basis and in each consecutive 12-month period.

- (b) The VOC and/or HAP content of each paint, coating, adhesive, solvent, or other VOC and/or HAP containing material used with a description of the method used to determine the VOC and/or HAP content.
- (c) The density of each paint, coating, adhesive, solvent, or other VOC and/or HAP containing material used;
- (d) The total VOC, individual HAP, and total HAP emission rate in tpy on a monthly basis and for each consecutive 12-month period on a rolling basis.

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

5.7 For Emission Point AA-200, the permittee shall maintain documentation that details the following information:

- (a) Certification that each painter has completed the training specified in Condition 4.2(a) with the date the initial training and the most recent refresher training was completed;
- (b) Documentation on the filter efficiency of any spray booth exhaust filter material in accordance with the procedures outlined in Condition 4.1(b)(1);
- (c) Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to / greater than 3.0 fluid ounces (or 89 cubic centimeters) that does not meet the definition of a HVLP spray gun, an electrostatic application, an airless spray gun, or an air-assisted airless spray gun has been determined by the MDEQ to achieve a transfer efficiency equivalent to that of a HVLP spray gun in accordance with the procedures specified in Condition 4.1(d);
- (d) The copies of any submitted “Initial Notification” and/or “Annual Notification of Changes Report”; and
- (e) Records on any deviation from the requirements specified in either Condition 4.1 or 4.2. The records must include the date and time period of the deviation, a description that details the nature of the deviation, and the actions taken to correct the deviation.

(Ref.: 40 CFR 63.11177(a) – (d), and (g), Subpart HHHHHH)

SECTION 6 REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	Report permit deviations within five (5) working days.
		6.2	Submit certified annual monitoring report.
		6.3	All documents submitted to MDEQ shall be certified by a Responsible Official.
		6.4	Submit report with record of maintenance actions
		6.5	Report monthly and 12-month rolling individual and total HAPs emissions
		6.6	Submit Report of Paint Usage and Data
AA-200	40 CFR 63.11176(a), Subpart HHHHHH	6.7	Submit an Annual Notification of Changes Report (As Applicable)
	40 CFR 63.11175(c) and 63.11176(c), Subpart HHHHHH	6.8	CEDRI Reporting Requirements

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

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

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

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

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

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

6.4 For Emission Point AA-000 (Facility-Wide), the permittee shall submit an annual report in accordance with Condition 6.2 that details any maintenance action(s) performed on an air pollution control device (i.e. a cyclone or a dry filter) and any periods of time (including the date and duration) in which a control device was non-operational due malfunction.

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

6.5 For Emission Point AA-000 (Facility-Wide), the permittee shall submit an annual report in accordance with Condition 6.2 that details the respective total emissions of volatile

organic compounds (VOCs), each individual hazardous air pollutant (HAP) and of all HAPs combined in tons both on a monthly basis and rolling 12-month total basis.

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

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

- 6.6 For Emission Point AA-000 (Facility-Wide), the permittee shall submit an annual report in accordance with Condition 6.2 that summarizes the information specified in Condition 5.6 for each paint, coating, adhesive, solvent, or other VOC and/or HAP containing material.

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

- 6.7 For Emission Point AA-200, the permittee shall submit an “Annual Notification of Changes Report” no later than March 1 of the following year for the preceding calendar year **if** the information submitted in the previous “Annual Notification of Changes Report” or the initial notification required by 40 CFR 63.11175(a)(1) – (5)(i) and (7) has changed. The report shall include the following information:
- (a) The company's name, street address (i.e. the physical location) of the facility, and street address for where compliance records are maintained (if different);
 - (b) The name, title, address, telephone, e-mail address (if available), and signature of the responsible official (or other certifying company official) certifying the truth, accuracy, and completeness of the notification; and
 - (c) A statement on whether the source has complied with all relevant standards and requirements specified in Subpart HHHHHH, an explanation of any non-compliance, and a description of corrective actions being taken to achieve compliance (if applicable).

For the purpose of this condition, any deviations from a relevant requirement specified in either Condition 4.1 or 4.2 on the date of the report will be deemed to be a change.

(Ref.: 40 CFR 63.11176(a), Subpart HHHHHH)

- 6.8 For Emission Point AA-200, the permittee shall submit any notification and/or report required by Subpart HHHHHH to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). The CEDRI interface can be accessed through the EPA's CDX: <https://cdx.epa.gov>.

The permittee shall refer to 40 CFR 63.11175(c) and 63.11176(c) – (e), Subpart HHHHHH for additional requirements pertaining to the electronic submittal of semi-annual compliance reports.

(Ref.: 40 CFR 63.11175(c) and 63.11176(c), Subpart HHHHH)