

# STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

**THIS CERTIFIES THAT**

SAIPEM America, Inc. – SAIPEM Pascagoula Operations  
751 Bayou Casotte Parkway  
Pascagoula, Jackson County, Mississippi

has been granted permission to construct air emissions equipment to comply with the emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

*Krystal Rudolph*

**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Issued: May 4, 2022**

**Permit No.: 1280-00149**

## 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. Any activities not identified in the application are not authorized by this permit.  
  
(Ref.: Miss. Code Ann. 49-17-29 1.b)
3. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for operating without a valid permit pursuant to State Law.  
  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
4. It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits.  
  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(6).)
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 the permit, unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.  
  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)
7. 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).)

8. The permit does not convey any property rights of any sort, or any exclusive privilege.

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

9. The permittee shall furnish to the Mississippi Department of Environmental Quality (MDEQ) within a reasonable time any information the MDEQ 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 MDEQ 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 MDEQ 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).)

10. *Design and Construction Requirements:* The stationary source shall be designed and constructed so as to operate without causing a violation of an Applicable Rules and Regulations, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards (NAAQS), and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A.)

11. *Solids Removal:* The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may 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)

12. *Diversion and Bypass of Air Pollution Controls:* The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed except as provided for in Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 1.10 – “Provisions for Upsets, Start-Ups, and Shutdowns”.

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

13. *Fugitive Dust Emissions from Construction Activities:* The construction of the stationary source shall be performed in such a manner so as to reduce fugitive dust emissions from construction activities to a minimum.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A(4).)

14. *Right of Entry:* The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives upon presentation of credentials:
- (a) To enter 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 emissions.

(Ref.: Miss. Code Ann. 49-17-21)

15. *Permit Modification or Revocation:* After notice and opportunity for a hearing, the Permit Board may modify the permit or revoke it in whole or in part for good cause shown including, but not limited to:
- (a) Persistent violation of any of the terms or conditions of this permit;
  - (b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
  - (c) A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

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

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

17. *Permit Transfer:* This permit shall not be transferred except upon approval of the Permit Board.

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

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

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

19. *Permit Expiration:* The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance or if construction is suspended for eighteen (18) months or more.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1).)

20. *Certification of Construction:* A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(3).)

21. *Beginning Operation:* Except as prohibited in Section 1 – Condition 24 of this permit, after certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by Mississippi Administrative Code, Title 11, Part 2, Chapter 2, Rule 2.13.G.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).)

22. *Application for a Permit to Operate:* Except as otherwise specified in Section 1 – Condition 24 of this permit, the application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).)

23. *Operating Under a Permit to Construct:* Except as otherwise specified in Section 1, Condition 24 of this permit, upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).)

24. *Application Requirements for a Permit to Operate for Moderate Modifications:* For moderate modifications that require contemporaneous enforceable emissions reductions from more than one emission point in order to “net” out of Prevention of Significant

Deterioration / New Source Review (PSD / NSR), the applicable Title V Permit to Operate or State Permit to Operate must be modified prior to beginning operation of the modified facilities.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7).)

25. *General Duty:* All air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants.

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

26. *Deviation Reporting:* 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(10).)

27. *Compliance Testing:* Regarding compliance testing:

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

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

**SECTION 2**  
**EMISSION POINT DESCRIPTION**

The permittee is authorized to construct and operate, upon certification of construction, air emissions equipment as described in the following table:

| <b>Emission Point</b> | <b>Description</b>   |
|-----------------------|--|
| AA-000                | Facility-Wide (SAIPEM America, Inc. – SAIPEM Pascagoula Operations)  |
| AA-001                | Abrasive Blasting Operations [conducted inside an enclosed booth equipped with a cartridge filter]   |
| AA-002                | Metal-Working Operations [involves cutting and automated welding activities; welding type – shielded metal arc welding (SMAW)]   |
| AA-003                | Surface Coating Operations [consists of one (1) enclosed paint booth equipped with a cartridge filter to control PM emissions from overspray; solid polyurethane (SPU) insulation application is applied within a closed molding system] |

### SECTION 3 EMISSION LIMITATIONS AND STANDARDS

| Emission Point(s) | Applicable Requirement  | Condition Number | Pollutant / Parameter | Limitation / Standard                     |
|-------------------|---|------------------|-----------------------|---|
| AA-000            | 11 Miss. Admin. Code Pt. 2, R. 1.3.B.   | 3.1              | Opacity               | ≤ 40%                                     |
|                   | 11 Miss. Admin. Code Pt. 2, R. 1.3.C.   | 3.2              | All Pollutants        | General Nuisance Clause                   |
|                   | 11 Miss. Admin. Code Pt. 2, R. 1.3.F.(1).   | 3..3             | PM (filterable)       | $E = 4.1 \cdot (p^{0.67})$                |
|                   | 40 CFR Part 63, Subpart OOOOOO – NESHAP for Flexible Polyurethane Foam Production and Fabrication Area Sources<br>40 CFR 63.11414(a)(2) and (b)(2); Subpart OOOOOO        | 3.4              | HAPs                  | General Applicability                     |
|                   | 40 CFR Part 63, Subpart XXXXXX – NESHAP Area Source Standards for Nine Metal Fabrication and Finishing Source Categories<br>40 CFR 63.11514(a) and (b)(6); Subpart XXXXXX | 3.5              | MFHAPs                | General Applicability                     |
| AA-001<br>AA-003  | 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).  | 3.6              | PM                    | Operational Requirement (Control Devices) |

3.1 For Emission Point AA-000 (Facility-Wide), except as otherwise specified or limited herein, the permittee shall not cause or allow the discharge into the ambient air from any point source any air contaminant or emissions of such opacity as to obscure an observer's view to a degree in excess of forty (40) percent opacity. This shall not apply to vision obscuration caused by uncombined water droplets.

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

3.2 For Emission Point AA-000 (Facility-Wide), the permittee shall not cause or allow the emission of particles or any contaminants in sufficient amounts or of such duration from any process as to be injurious to humans, animals, plants, or property, or to be a public nuisance, or create a condition of air pollution.

Additionally, the permittee shall not cause the handling, transporting, or storage of any material in a manner, which allows or may allow unnecessary amounts of particulate matter to become airborne.



When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than that from which it originated or to violate any other provision of this regulation, the MDEQ may order such corrected in a way that all air and gases or air and gas-borne material leaving the building or equipment are controlled or removed prior to discharge to the open air

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

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

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

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

- 3.4 For Emission Point AA-000 (Facility-Wide), the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 63, Subpart OOOOOO – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Flexible Polyurethane Foam Production and Fabrication Area Sources.

(Ref.: 40 CFR 63.11414(a)(2) and (b)(2); Subpart OOOOOO)

- 3.5 For Emission Points AA-000 (Facility-Wide), the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 63, Subpart XXXXXX – National Emission Standards for Hazardous Air Pollutants (NESHAP) Area Source Standard for Nine Metal Fabrication and Finishing Categories and 40 CFR Part 63, Subpart A – General Provisions (as required in Table 2 of Subpart XXXXXX).

For the purpose of this permit, the permittee primarily engages in operations listed under the category “Industrial Machinery and Equipment Finishing Operations”.

(Ref.: 40 CFR 63.11514(a) and (b)(6); Subpart XXXXXX)

- 3.6 For Emission Points AA-001 and AA-003, the permittee shall only conduct the applicable process activity while the corresponding control device is equipped and operational. In the event that a control device is not equipped and/or becomes non-operational, the permittee shall cease active operation of the corresponding process activity until the control device is equipped and operational.

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

## SECTION 4 WORK PRACTICE STANDARDS

| Emission Point(s) | Applicable Requirement                                      | Condition Number | Pollutant / Parameter | Work Practice   |
|-------------------|---|------------------|-----------------------|---|
| AA-001<br>AA-003  | 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).                  | 4.1              | PM                    | Install, Operate, and Maintain Operational Areas / Control Devices in Accordance with Manufacturer’s Specifications / Recommendations |
| AA-001            | 40 CFR 63.11516(a)(1) – (2); Subpart XXXXXX                 | 4.2              | MFHAPs                | Standards for Dry Abrasive Blasting   |
| AA-002            | 40 CFR 63.11516(b); Subpart XXXXXX                          | 4.3              | MFHAPs                | Standards for Machining   |
|                   | 40 CFR 63.11516(f)(1) – (2) and 63.11519(c); Subpart XXXXXX | 4.4              |                       | Standards for Welding   |
| AA-003            | 40 CFR 63.11416(c); Subpart OOOOOO                          | 4.5              | Methylene Chloride    | Operational Restrictions  |

- 4.1 For Emission Points AA-001 and AA-003, the permittee shall install, operate, and maintain each operational area and the associated control devices in accordance with the applicable manufacturer’s specifications and recommendations. Additionally, the permittee shall maintain documentation that outlines the manufacturer’s specifications and recommendations for each control device.

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

- 4.2 For Emission Point AA-001, the permittee shall comply with the following work practices for any dry abrasive blasting activity (as applicable) that uses materials containing metal fabrication hazardous air pollutants (MFHAPs) or has the potential to emit MFHAPs. However, these abrasive blasting standards **do not** apply when abrasive blasting is being performed that does not use any materials containing MFHAPs or do not have the potential to emit MFHAPs.

For purpose of this permit, a material is considered to contain a “metal fabrication or finishing hazardous air pollutant” (MFHAP) if it contains cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (wt.%) (as the metal) **or** if it contains manganese in amounts greater than or equal to 1.0 wt.% (as the metal).

(a) For Abrasive Blasting in a Totally Enclosed and Unvented Blast Chamber:

- (1) The permittee shall minimize dust generation during emptying of abrasive blasting enclosures; and
- (2) The permittee shall operate all equipment associated with dry abrasive blasting operations according to the manufacturer's instructions.

(b) For Abrasive Blasting in a Vented Enclosure:

- (1) The permittee shall capture emissions and vent them to a filtration control device operated in accordance with the manufacturer's instructions. Additionally, the permittee shall demonstrate compliance with this requirement by maintaining the manufacturer's specifications for the filtration control device(s) on-site.
- (2) The permittee shall take all measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions (as practicable).
- (3) The permittee shall enclose dusty abrasive material storage areas and holding bins, seal chutes, and conveyors that transport abrasive materials.
- (4) The permittee shall operate all equipment associated with dry abrasive blasting activities in accordance with the manufacturer's instructions.

(Ref.: 40 CFR 63.11516(a)(1) – (2); Subpart XXXXXX)

4.3 For Emission Point AA-002, the permittee shall comply with the following work practices for any machining activities (as defined in 40 CFR 63.11522, Subpart XXXXXX) that has the potential to emit MFHAPs. However, these machining standards **do not** apply when any machining is being performed that does not have the potential to emit MFHAPs.

- (a) The permittee take all measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions (as practicable); and
- (b) The permittee shall operate all equipment associated with machining in accordance with manufacturer's instructions.

(Ref.: 40 CFR 63.11516(b); Subpart XXXXXX)

4.4 For Emission Point AA-002, the permittee shall comply with the following work practice requirements for any welding activity that uses materials containing MFHAPs or has the potential to emit MFHAPs. However, these welding standards **do not** apply when welding operations are being performed that do not use any materials containing MFHAPs or do not have the potential to emit MFHAPs.

- (a) The permittee shall operate all equipment, capture, and control devices associated with welding activities in accordance with the manufacturer's instructions. Additionally, the permittee shall demonstrate compliance with this requirement by maintaining the manufacturer's instructions on-site for all equipment, capture, and control devices.

- (b) The permittee shall implement one or more of the following management practices to minimize the emission of MFHAP (as practicable) while maintaining the required welding quality through the application of sound engineering judgment:
- (1) Use welding processes with reduced fume generation capabilities [e.g. gas metal arc welding (GMAW) – also called metal inert gas welding (MIG)];
  - (2) Use welding process variations (e.g. pulsed current GMAW), which can reduce fume generation rates;
  - (3) Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation;
  - (4) Optimize welding process variables (e.g. electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated; and
  - (5) Use a welding fume capture and control system operated in accordance with the manufacturer's specifications.

(Ref.: 40 CFR 63.11516(f)(1) – (2), and 63.11519(c)(13); Subpart XXXXXX)

4.5 For Emission Point AA-003, the permittee shall comply with the following work practice standards:

- (a) The permittee shall not use a material containing methylene chloride as an equipment cleaner to flush the mix-head or use a material containing methylene chloride elsewhere as an equipment cleaner in a molded flexible polyurethane foam process; and
- (b) The permittee shall not use a mold release agent containing methylene chloride in a molded flexible polyurethane foam process.

(Ref.: 40 CFR 63.11416(c); Subpart OOOOOO)

## SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

| Emission Point(s) | Applicable Requirement  | Condition Number | Pollutant / Parameter | Monitoring / Recordkeeping Requirement                                      |
|-------------------|---|------------------|-----------------------|---|
| AA-000            | 11 Miss. Admin. Code Pt. 2, R. 2.9.   | 5.1              | Recordkeeping         | Maintain Records for a Minimum of Five (5) Years                            |
|                   | 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).  | 5.2              | HAPs<br>VOCs          | Calculate and Maintain Emissions (Monthly and Rolling 12-Month Total)       |
|                   | 40 CFR 63.11417(c)(1); Subpart OOOOOO   | 5.3              | HAPs                  | Maintain a Compliance Certification   |
| AA-001<br>AA-003  | 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).  | 5.4              | PM<br>(filterable)    | Perform a Quarterly Inspection on Each Air Pollution Control Device         |
| AA-002            | 40 CFR 63.11517(a) and (b)(1) – (4); Subpart XXXXXX                                     | 5.5              | MFHAPs                | “Tiered” Compliance Requirements for Welding (As Applicable)                |
|                   | 40 CFR 63.11516(f)(3), (5), (7), 63.11517(a) – (d), and 63.11519(c)(12); Subpart XXXXXX | 5.5              |                       | “Tiered” Compliance Requirements for Welding                                |
|                   | 40 CFR 63.11516(f)(4); Subpart XXXXXX   | 5.6              |                       | Corrective Action Requirements (Visual Determination of Fugitive Emissions) |
|                   | 40 CFR 63.11516(f)(6); Subpart XXXXXX   | 5.7              |                       | Corrective Action Requirements (Visual Determination of Emissions Opacity)  |
|                   | 40 CFR 63.11519(c)(1) – (3) and (11); Subpart XXXXXX                                    | 5.8              |                       | Recordkeeping Requirements  |
| AA-002            | 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).  | 5.4              | HAPs                  | Monitoring / Recordkeeping Requirements                                     |
| AA-003            | 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).<br>40 CFR 63.11416(f); Subpart OOOOOO        | 5.5              | VOCs<br>HAPs          | Monitoring / Recordkeeping Requirements                                     |

5.1 For Emission Point AA-000 (Facility-Wide), except as otherwise specified or limited herein, 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. Supporting information includes all calibration and maintenance records, all original strip-chart recordings or other data from continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to the MDEQ as required by “Applicable Rules and Regulations” of 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 calculate and maintain the total emission of volatile organic compounds (VOCs), each individual hazardous air pollutant (HAP), and all combined HAPs in tons based on both a monthly and on rolling 12-month total basis.

Unless otherwise specified herein, the permittee shall maintain all reference data utilized to validate the calculated emissions (e.g. operational data, applicable emission factors, engineering judgement determinations, etc.).

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

- 5.3 For Emission Point AA-000 (Facility-Wide), permittee shall develop and maintain on-site a compliance certification signed by the Responsible Official that signifies the following statements (as applicable) upon initial start-up:

(a) “This facility does not use any equipment cleaner to flush the mix-head which contains methylene chloride or any other equipment cleaner containing methylene chloride in a molded flexible polyurethane foam process in accordance with Condition 4.2(a)”; and

(b) “This facility does not use any mold release agent containing methylene chloride in a molded flexible polyurethane foam process in accordance with Condition 4.2(b)”.

(Ref.: 40 CFR 63.11417(c); Subpart OOOOOO)

- 5.4 For Emission Points AA-001 and AA-003, the permittee shall conduct an inspection on the corresponding control device during each quarter calendar period. If any problem is noted during an inspection, the permittee shall perform the necessary maintenance activities to ensure operation of the control device as originally designed. Additionally, preventative maintenance shall be performed (as necessary) to maintain proper operation of a control device.

The permittee shall maintain documentation that details the date / time each inspection is performed, any problem experienced during an inspection, any maintenance (either corrective or preventative) performed to return a control device to operation, and any periods of time (including date and duration) in which a control device is not equipped and/or non-operational. Additionally, the permittee shall maintain documentation that details the capture efficiency of each control device.

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

- 5.5 For Emission Point AA-002, the permittee shall demonstrate that the work practices outlined in Condition 4.4 are being implemented by performing the following “tiers” (as

applicable) **if** the permittee uses at least 2,000 pounds of welding wires and electrodes in any rolling 12-month total that collectively contain one or more MFHAPs:

- (a) **Tier 1** – The permittee shall perform and record a visual determination of welding fugitive emissions in accordance with EPA Test Method 22 (i.e. “Method 22”) at the primary vent, stack, exit, or opening from the building containing the welding operations.

The duration of any Method 22 test shall be at least fifteen (15) consecutive minutes, and visible emissions will be considered present if they are detected for more than six (6) minutes of any 15-minute period.

The frequency for performing a Method 22 test is as follows:

- (1) **Daily Method 22 Testing** – Perform visual determination of fugitive emissions once per day on each day the process is in operation during operation of the process.
- (2) **Weekly Method 22 Testing** – If no visible fugitive emissions are detected in consecutive daily Method 22 tests for ten (10) days,, the permittee may decrease the frequency of Method 22 testing to once every five (5) days of welding operations (i.e. one calendar week).

However, if visible fugitive emissions are detected during any of these tests, the permittee shall resume Method 22 testing of welding operations once per day during each day that welding operations are conducted.

- (3) **Monthly Method 22 Testing** – If no visible fugitive emissions are detected in four (4) consecutive weekly Method 22 tests performed in accordance with sub-paragraph (2), the permittee may decrease the frequency of Method 22 testing to once per twenty-one (21) days of welding operations (i.e. one calendar month).

However, if visible fugitive emissions are detected during any of these tests, the permittee shall resume weekly Method 22 testing as outlined in sub-paragraph (a)(2).

- (4) **Quarterly Method 22 Testing** – If no visible fugitive emissions are detected in three (3) consecutive monthly EPA Method 22 tests performed in accordance with sub-paragraph (3), the permittee may decrease the frequency of Method 22 testing to once per sixty (60) days of welding operations (i.e. 3 calendar months).

However, if visible fugitive emissions are detected during any quarterly test, the permittee shall resume monthly testing once every 21 days as outlined in sub-paragraph (a)(3).

- (b) **Tier 2** – If visible fugitive emissions are detected more than once during any consecutive 12-month period (notwithstanding the results of any follow-up inspections), the permittee shall perform a visual determination of emissions opacity in accordance with EPA Test Method 9 (i.e. “Method 9”) and the following schedule at the primary vent, stack, exit, or opening from the building that contains welding operations no later than twenty-four (24) hours after the most recent visual determination of fugitive emissions in which visible fugitive emissions were detected.

The duration of any Method 9 test shall be at least thirty (30) consecutive minutes and shall be conducted during active welding operations under normal conditions.

- (1) **Daily Method 9 Testing** – Perform visual determination of emissions opacity once per day during each day that welding operations are conducted.
- (2) **Weekly Method 9 Testing** – If the average of the six-minute opacities recorded during any of the daily consecutive Method 9 tests performed do not exceed twenty percent (20%) for ten (10) days of welding operations, the permittee may decrease the frequency of Method 9 testing to once per five (5) days of consecutive welding operations.

However, if an opacity greater than 20% is detected during any of these tests, the permittee shall resume to testing every day of welding operations as outlined in sub-paragraph (b)(1).

- (3) **Monthly Method 9 Testing** – If the average of the six-minute opacities recorded during any of the consecutive weekly Method 9 tests performed in accordance with sub-paragraph (b)(2) do not exceed 20% for four (4) consecutive weekly tests, the permittee may decrease the frequency of Method 9 testing to once per every twenty-one (21) days of welding operations.

However, if visible emissions opacity greater than 20% is detected during any monthly test, the permittee shall resume to testing once every five (5) days of welding operations as outlined in sub-paragraph (b)(2).

- (4) **Quarterly Method 9 Testing** - If the average of the six-minute opacities recorded during any of the consecutive weekly Method 9 tests performed in accordance with sub-paragraph (b)(3) do not exceed 20% for three (3) consecutive monthly tests, the permittee may decrease the frequency of Method 9 testing to once per every one hundred twenty (120) days of welding operations.

However, if an opacity greater than 20% is detected during any quarterly test, the permittee shall resume to testing once every 21 days of welding operations as outlined in sub-paragraph (b)(3).



- (5) Return to Method 22 Testing – If after two (2) consecutive months of testing, the average of the six-minute opacities recorded during any of the monthly Method 9 tests performed in accordance with sub-paragraph (b)(3) do not exceed 20%, the permittee may resume Method 22 testing as specified in sub-paragraphs (a)(3) and (a)(4) of this condition.

However, in lieu of this, the permittee may elect to continue perform Method 9 testing in accordance with sub-paragraphs (b)(3) and (b)(4).

- (c) **Tier 3** – For each visual determination of emissions opacity performed in accordance with paragraph (b) of this condition in which the average of the 6-minute opacities recorded exceed 20%, the permittee shall comply with the following requirements:

- (1) The permittee shall prepare (or revise), implement, and maintain a Site-Specific Welding Emissions Management Plan (SSWEMP) no later than thirty (30) days after determining that the average of the six-minute opacities recorded exceed 20%. The SSWEMP shall contain the following information:
- (i) Company name and address;
  - (ii) A list and description of all welding operations that are currently utilized;
  - (iii) A description of all management practices and/or fume control methods in place at the time of the opacity exceedance;
  - (iv) A list and description of all management practices and/or fume control methods currently employed for welding activities; and
  - (v) A description of additional management practices and/or fume control methods to be implemented pursuant to triggering this requirement, and the projected date of implementation.

Any revisions to the SSWEMP (if any) shall contain copies of all previous plan entries. Additionally, the SSWEMP shall be updated annually (if necessary) to contain current information for subparagraph (c)(1)(i) – (iii) and maintained on-site for review by MDEQ personnel.

- (2) During the preparation or revision of the SSWEMP, the permittee shall perform a daily visual determination of emissions opacity in accordance with subparagraph (a)(1).

(Ref.: 40 CFR 63.11516(f)(3), (5), (7), 63.11517(a) – (d), and 63.11519(c)(12); Subpart XXXXXX)

5.6 For Emission Point AA-002, the permittee shall implement corrective actions that include (but are not limited to) the following protocols upon initially detecting fugitive emissions during a visual determination performed in accordance with Condition 5.5(a):

- (a) Inspect welding fume sources;
- (b) Evaluate the proper operation and effectiveness of the management practices and/or fume control measures implemented in accordance with Condition 4.4(b); and
- (c) Upon completing the corrective actions, the permittee shall perform a follow-up inspection for visible fugitive emissions in accordance with Condition 5.5(a) at the primary vent, stack, exit, or opening from the building containing the welding operations.

(Ref.: 40 CFR 63.11516(f)(4); Subpart XXXXXX)

5.7 For Emission Point AA-002, the permittee shall implement corrective actions that include (but are not limited to) the following protocols **if** any visual determination of emissions opacity performed in accordance with Condition 5.4(b) that results in the average of the 6-minute opacities recorded equaling 20% or less but greater than 0%:

- (a) Inspect welding fume sources; and
- (b) Evaluate the proper operation and effectiveness of the management practices and/or fume control measures implemented in accordance with Condition 4.1(b).

(Ref.: 40 CFR 63.11516(f)(6); Subpart XXXXXX)

5.8 For Emission Point AA-002, the permittee shall maintain documentation that details the following information:

- (a) General Compliance and Applicability Records:
  - (1) Each notification and report submitted to comply with Subpart XXXXXX and the corresponding supporting documentation; and
  - (2) Any applicability determination that lists the equipment included within welding operations (as well as any changes to that and on what date they occurred).
- (b) Visual Determination of Fugitive Emissions Records:
  - (1) The date and results of every visual determination of fugitive emissions performed in accordance with Condition 5.5(a);

- (2) A description of any corrective actions implemented as a result of a visual determination of fugitive emissions; and
  - (3) The date and results of any follow-up visual determination of fugitive emissions performed after the corrective actions.
- (c) Visual Determination of Emissions Opacity Records:
- (1) The date of every visual determination of emissions opacity performed in accordance with Condition 5.5(b);
  - (2) The average of the six-minute opacities measured by a Method 9 test; and
  - (3) A description of any corrective actions implemented as a result of a Method 9 test.
- (d) Visual Determination of Emissions Opacity Performed During the Preparation (or Revision) of the Site-Specific Welding Emissions Management Plan – The permittee shall maintain a record of each visual determination of emissions opacity performed during the preparation (or revision) of a SSWEMP [as required by Condition 5.5(c)(2)].

(Ref.: 40 CFR 63.11519(c)(1) – (3) and (11); Subpart XXXXXX)

5.8 For Emission Point AA-002, the permittee shall monitor and maintain the following information for each welding rod, electrode, or other HAP-containing welding material used on a monthly basis:

- (a) The identification / type of the material;
- (b) The total quantity (in pounds) consumed; and
- (c) The HAP content (in weight percent) and a description of the method used to determine the HAP content.

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

(Ref.: 40 CFR 63.11519(c)(14); Subpart XXXXXX)

5.9 For Emission Point AA-003, the permittee shall maintain documentation that details the following information for each coating, adhesive, solvent, or other material that contains volatile organic compound (VOC) or hazardous air pollutant (HAP) used on a monthly basis:

- (a) The identification or product name;
- (b) The total quantity (in either pounds or gallons) used;

- (c) The VOC and/or HAP content (in weight percent) as well as a description of the method used to determine the VOC and/or HAP content;
- (d) The density (in pounds per gallon); and
- (e) The solids content (in weight percent) (as applicable).

Additionally, the permittee may demonstrate compliance with the work practice requirements specified in Condition 4.2 by utilizing documentation applicable to this condition [i.e. adhesive usage records, applicable material safety data sheets (MSDS), and engineering calculations].

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

(Ref.: 40 CFR 63.11416(f); Subpart OOOOOO)

## SECTION 6 REPORTING REQUIREMENTS

| Emission Point(s)                         | Applicable Requirement                                   | Condition Number                                  | Reporting Requirement  |
|---|--|---|--|
| AA-000<br>(Facility-Wide)                 |  | 6.1(a)  | Report a Deviation from Requirements Within Five (5) Days                          |
|   |  | 6.1(b)  | Submit a Certified Annual Monitoring Report  |
|   |  | 6.1(c)  | Submit Documents Certified by a Responsible Official                               |
|   | 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).               | 6.1(d)  | Submit a Notification on the Commencement of Construction Within Fifteen (15) Days |
|   | 11 Miss. Admin. Code Pt. 2, R. 2.5.C.(2).                | 6.1(e)  | Submit a Notification on when Construction Does Not Begin or is Suspend            |
|   | 11 Miss. Admin. Code Pt. 2, R. 2.5.C.(3).                | 6.1(f)  | Submit a Notification on the Completion of Construction                            |
|   | 11 Miss. Admin. Code Pt. 2, R. 2.5.D.(1) and (3).        | 6.1(g)  | Submit a Notification on a Change in Construction                                  |
| 11 Miss. Admin. Code Pt. 2, R. 2.5.D.(2). | 6.1(g)   | Submit a Notification on a Change in Construction |  |
| AA-002                                    | 40 CFR 63.11519(b)(5), (6), (8), and (9); Subpart XXXXXX | 6.2   | Submit an Annual Certification and Compliance Report                               |

### 6.1 General Reporting Requirements:

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

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

- (b) Beginning upon issuance of this permit and lasting until issuance or modification of an applicable Operating Permit, the permittee shall submit a report containing any monitoring data required by Section 6 of this permit postmarked by January 31 of each year for the preceding calendar year. 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 2, Rule 2.1.C.

Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration. For any air emissions equipment not yet constructed and/or operating, the report shall so note

and include an estimated date for the commencement of construction and/or start-up (whichever is applicable).

Each AMR shall contain the following information (at a minimum):

- (1) The total emission of VOCs, each individual HAP, and all combined HAPs in tons based on a rolling 12-month total basis with the inclusion of all applicable data utilized to calculate emissions (e.g. applicable emission factors, engineering judgement determinations, etc.);
- (2) A copy of the compliance certification required by Condition 5.3;
- (3) For Emission Point AA-001 and AA-003, the report shall include the following information (as applicable):
  - (i) The results of each inspection performed on a control device;
  - (ii) Any maintenance actions (either corrective or preventative) performed on a control device; and
  - (iii) Each time period (including the date the duration) in which a control device was either not equipped to the applicable process equipment or non-operational.
- (4) The quantity (in pounds) and type of each welding wire and/or welding electrode consumed.

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

- (c) 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).)

- (d) Within fifteen (15) days of beginning actual construction, the permittee must notify the MDEQ in writing that construction has begun.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C.(2).)

- (e) The permittee must notify the MDEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C.(3).)

- (f) Upon the completion of construction or installation of an approved stationary source or modification (and prior to commencing operation), the applicant shall notify the Permit Board that construction or installation was performed in accordance with the approved plans and specifications on file with the Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D.(1) and (3).)

- (g) The Permit Board shall be promptly notified in writing on any change in construction from the previously approved plans and specifications or permit. If the Permit Board determines the changes are substantial, it may require the submission of a new application to construct with “as built” plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an “as built” application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D.(2).)

- 6.2 For Emission Point AA-002, the permittee shall submit an annual certification and compliance report in accordance with Condition 6.1(b) that details the following information **if** the permittee uses at least 2,000 pounds of welding wires and electrodes in any rolling 12-month total that collectively contain one or more MFHAPs:

(a) For Visual Determination of Fugitive Emissions:

- (1) The date of every visual determination of fugitive emissions, which resulted in detection of visible emissions;
- (2) A description of the corrective actions taken subsequent to the test; and
- (3) The date and results of the follow-up visual determination of fugitive emissions performed after the corrective actions.

(b) For Visual Determination of Emissions Opacity:

- (1) The date of every visual determination of emissions opacity;
- (2) The average of the six-minute opacities measured by the test; and
- (3) A description of any corrective action taken subsequent to the test.

- (c) Exceedances of 20% Opacity for Welding Operations (as applicable) – The permittee shall prepare and submit an exceedance report whenever the average of the six-minute average opacities recorded during a visual determination of emissions opacity exceeds 20%. This report shall include the following information:

- (1) The date on which the exceedance occurred; and
  - (2) The average of the six-minute average opacities recorded during the visual determination of emissions opacity.
- (d) Site-Specific Welding Emissions Management Plan (SSWEMP) Reporting (as applicable) – The permittee shall submit a copy of the records of daily visual determinations of emissions recorded in accordance with Condition 5.4(c)(2), a copy of the SSWEMP, and any subsequent revisions to the SSWEMP.

(Ref.: 40 CFR 63.11519(b)(5), (6), (8), and (9); Subpart XXXXXX)