PERMIT REVIEW SUMMARY

Permit Writer: Megan Rupp Date: July 19, 2021

Company Name: Signet Maritime Corporation, Signet Shipbuilding and Repair

Facility Location: 3802 Port River Road

Pascagoula, MS 39567

Source Number: 1280-00047

County: Jackson

FACILITY DESCRIPTION

Signet Maritime Corporation, Signet Shipbuilding and Repair (“Signet”) is an existing shipyard that constructs, repairs, refurbishes, and maintains steel and aluminum marine vessels. The facility’s operations primarily fall under SIC Code 3731 (Ship Building and Repairing) and NAICS Code 336611. The primary operations at the facility include abrasive blasting, painting/coating, and welding.

PERMIT ACTION DESCRIPTION

Signet has submitted an application for renewal of its Synthetic Minor Operating Permit. No modifications have been requested with this permit action. However, the following changes have been made to the permit:

* Requirements from 40 CFR Part 63, Subpart CCCCCC have been added as a result of the 1,500-gallon gasoline storage tank on-site.
* In the previous permit, the volatile organic compound (VOC) and hazardous air pollutant (HAP) limitations were applied only to the surface coating operations (Emission Point AA-002). The limits were as follows: 38.0 tpy for VOCs, 20.0 tpy for total HAP, and 7.0 tpy for a single HAP.

Signet’s main source of VOC and HAP emissions are the surface coating operations. However, the welding operations should not have been excluded from being subject to the HAP limitations. Therefore, the HAP limitations have been applied facility-wide, and the aforementioned limitations have been raised as follows (based on a rolling 12-month total): 95.0 tpy for VOCs, 24.0 tpy for total HAPs, and 9.0 tpy for any single HAP.

* Requirements to operate and maintain the filters at Emission Point AA-002 according to the manufacturer’s specifications have been added.

EMISSION SUMMARY

**Facility-Wide Potential-to-Emit Summary1**

| Pollutant | PTE Emissions(tons/yr) |
| --- | --- |
| Particulate Matter (TSP) | 12.02 |
| PM10 | 9.08 |
| PM2.5 | 6.96 |
| Sulfur Dioxide (SO2) | — |
| Nitrogen Oxides (NOX) | 0.02 |
| Carbon Monoxide (CO) | 0.01 |
| Volatile Organic Compounds (VOCs) | 95.0 |
| Total Reduced Sulfur (TRS) | — |
| Lead | 0.86 |
| CFC/HCFC | — |
| Total HAPs | 24.0 |

1 The PTE emissions reflect any emission limits or enforceable restrictions included in the proposed permit

APPLICABLE/PROPOSED PERMIT LIMITATIONS

The facility’s potential-to-emit exceeds the Title V major source threshold of 100 tpy for volatile organic compounds (VOCs) and the threshold of 25 tpy for total hazardous air pollutants (HAPs).

To maintain its status as a synthetic minor source, Signet will limit operations in order to comply with the modified VOC and HAP limitations mentioned in the Permit Action Description section above. Compliance with the noted emission limitations will be demonstrated through applicable monitoring and recordkeeping requirements outlined within the permit.

Signet is also subject to the process weight PM (filterable only) limitation in 11 Miss. Admin. Code Pt. 2, R. 1.3.F(1). As such, Signet will demonstrate compliance with this limit by operating and maintaining filters at the paint booths (AA-002) and totally shrouding/enclosing the blasting operations (AA-001) to minimize and reduce PM emissions.

NSPS APPLICABILITY

40 CFR Part 60, Subpart Kb – *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*

Subpart Kb is applicable to storage vessels with a capacity greater than or equal to 75 m3 (≈19812.9 gallons) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984. Signet does not have any storage tanks with capacities greater than 75 m3; therefore, Subpart Kb does not apply.

MACT APPLICABILITY

Signet has federally enforceable limitations in place that restrict HAP emissions below the applicable Title V thresholds. Therefore, the facility is considered an area source of HAPs.

40 CFR Part 63, Subpart CCCCCC *– National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities*

Subpart CCCCCC is applicable to gasoline dispensing facilities located at area sources. Because Signet is an area source of HAPs, Signet’s 1,500-gallon gasoline storage tank is subject to Subpart CCCCCC.

40 CFR Part 63, Subpart HHHHHH *– National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*

Signet does perform surface coating operations and is classified as an area source of HAPs. However, the coatings used at Signet do not contain the target HAPs (chromium, lead, manganese, nickel, or cadmium); therefore, Subpart HHHHHH does not apply.

40 CFR Part 63, Subpart MMMM *– National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products*

Subpart MMMM is applicable to facilities which are a major source of HAPs. Signet is not a major source of HAPs; therefore, Subpart MMMM does not apply

40 CFR Part 63, Subpart VVVV *– National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing*

Subpart VVVV is applicable to boat manufacturing facilities that are a major source of HAPs. Signet is not a major source of HAPs; therefore, Subpart VVVV does not apply.

40 CFR Part 63, Subpart XXXXXX *– National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Fabrication and Finishing Source Categories*

Subpart XXXXXX is applicable to area sources that are primarily engaged in the operations in one of the nine source categories listed. Signet’s operations do not fall under any of the source categories listed within the subpart; therefore, Subpart XXXXXX does not apply.

**PUBLIC PARTICIPATION**

The 30-day public notice period began on July 21, 2021, with the publication of a notice in the Sun Herald and ends August 20, 2021.

**RECOMMENDATION**

The staff has preliminarily decided to recommend issuance of the permit to the Mississippi Environmental Quality Permit Board as shown in the draft permit. However, the staff recommendation to the Board will be made only after a thorough consideration of all public comments.