

**STATE OF MISSISSIPPI
AND FEDERALLY ENFORCEABLE
AIR POLLUTION CONTROL
PERMIT**

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

THIS CERTIFIES THAT

Southern Metals Company of Mississippi Inc
144 Doncurt Drive
Laurel, Mississippi
Jones 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: MAR 16 2020

Permit No.: 1360-00083

Effective Date: As specified herein.

Expires: FEB 28 2025

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-001	Surface Coating Operations including one manual dip-coating container and two (2) spray booths
AA-002	1.6 MMBTU/hr Natural Gas-fired Paint Dry Oven
AA-003	1.2 MMBTU/hr Natural Gas-fired Dry Off Oven
AA-004	0.25 MMBTU/hr Natural Gas Fired Detergent Bath Heater
AA-005	Natural Gas Fired Space Heaters
AA-007	Shotblaster with Dust Collector (Dry Abrasive Blasting - enclosed and unvented)
AA-008	Metal Working Operations including cutting, bending, shaping, hand grinding, and welding (Machining and Welding)

**SECTION 3
EMISSION LIMITATIONS AND STANDARDS**

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
Entire Facility	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity	Opacity from smoke ≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2	Opacity	Opacity from contaminants ≤ 40%
AA-002 AA-003 AA-004 AA-005	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.3	PM (filterable)	0.6 lb/MMBTU
Entire Facility	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.4	PM (filterable)	$E = 4.1p^{0.67}$
AA-004	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.5	SO ₂	4.8 lb/MMBTU
Entire Facility	11 Miss. Admin. Code Pt. 2, R. 1.3.C.	3.6	PM	General nuisance prohibition
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.7	VOC	98.0 tpy
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.8	HAP	9.9/24.9 tpy
	40 CFR Part 63, Subpart XXXXXX- National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories 40 CFR 63.11514(a)	3.9	HAP	General Applicability

- 3.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).
- (a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.
 - (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour.

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

- 3.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Condition 3.1. 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 Points AA-002, AA-003, AA-004, and AA-005, the maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input.

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

- 3.4 For the entire facility, except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission from any manufacturing process, in any one hour from any point source, particulate matter in total quantities in excess of the amount determined by the relationship

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

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

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

- 3.5 For Emission Point AA-004, the maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)

- 3.6 For the entire facility, 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 and cause a nuisance to a property other than the one from which it originated or any other provision of this regulation is violated, the

MDEQ may order 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.)

- 3.7 For the entire facility, the permittee shall limit volatile organic compound (VOC) emissions to no more than 98.0 tons/year (TPY) as determined for each consecutive 12-month period.

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

- 3.8 For the entire facility, the permittee shall limit hazardous air pollutant (HAP) emissions to no more than 9.9 tons/year (TPY) of any single HAP and no more than 24.9 TPY of total combined HAPs as determined for each consecutive 12-month period.

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

- 3.9 For the entire facility, the permittee is subject to 40 CFR Part 63, Subpart XXXXXX – National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories and Subpart A – General Provisions as specified in Table 2 of Subpart XXXXXX. The permittee is specifically subject to the Metal Finishing Hazardous Air Pollutant (MFHAP) Provisions as described in 40 CFR 63.11514(b)(1), (2), and (5), for the Dry Abrasive Blasting Operations, Machining Operations and Welding Operations.

(Ref.: 40 CFR 63.11514(a) and 63.11523, Subpart XXXXXX)

**SECTION 4
WORK PRACTICES**

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Work Practice
AA-007	40 CFR 63.11516(a)(1), Subpart XXXXXX	4.1	MFHAP	Minimize dust generation and operate equipment according to manufacturer's instructions
AA-008	40 CFR 63.11516(b), Subpart XXXXXX	4.2	MFHAP	Minimize excess dust and operate equipment according to manufacturer's instructions
AA-008	40 CFR 63.11516(f)(1-2), Subpart XXXXXX	4.3	MFHAP	See management practices in the condition
AA-008	40 CFR 63.11516(f)(3)-(8), Subpart XXXXXX	4.4	MFHAP	See management practices in the condition

4.1 For Emission Point AA-007, the permittee shall implement the following management practices to minimize the emissions of MFHAP for each totally enclosed and unvented abrasive blasting chamber:

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

(Ref.: 40 CFR 63.11516(a)(1), Subpart XXXXXX)

4.2 For Emission Point AA-008, the permittee shall implement the following management practices to minimize emissions of MFHAP for each machining operation:

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

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

4.3 For Emission Point AA-008, the permittee shall comply with the following for each welding operation that uses materials that contain MFHAP or have the potential to emit MFHAP. This requirement does not apply when the welding operation does not use any materials containing MFHAP or does not have the potential to emit MFHAP:

- (a) The permittee shall operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions. The permittee

shall demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the capture and control devices, as specified by the requirements found in Condition 5.8.

- (b) The permittee shall implement one or more of the management practices specified in paragraphs (1) through (5) below to minimize emissions 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.
 - (5) Use a welding fume capture and control system, operated according to the manufacturer's specifications.

(Ref.: 40 CFR 63.11516(f)(1-2), Subpart XXXXXX)

4.4 For Emission Point AA-008, for welding operations, the permittee uses 2,000 pounds or more per year of welding rod containing one or more MFHAP (calculated on a rolling 12-month basis), and must demonstrate that management practices or fume control measures are being implemented by complying with the requirements below:

- (a) *Tier 1 compliance requirements for welding:* The permittee shall perform visual determinations of welding fugitive emissions as specified in Condition 5.5, at the primary vent, stack, exit, or opening from the building containing the welding operations. The permittee must keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in Condition 5.8(b).
- (b) *Requirements upon initial detection of visible emissions from welding:* If visible fugitive emissions are detected during any visual determination required above, the permittee shall:
 - (1) Perform corrective actions that include, but are not limited to, inspection of welding fume sources and evaluation of the proper operation and effectiveness of the management practices or fume control measures

implemented in accordance with Condition 4.3(b). After completing such corrective actions, the permittee must perform a follow-up inspection for visible fugitive emissions in accordance with Condition 5.4, at the primary vent, stack, exit, or opening from the building containing the welding operations.

- (2) Report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions and submit the annual certification and compliance report as required by Condition 6.5(c).
- (c) *Tier 2 requirements upon subsequent detection of visible emissions:* 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 comply with the requirements below:
- (1) Within 24 hours of the end of the visual determination of fugitive emissions in which visible fugitive emissions were detected, the permittee shall conduct a visual determination of emissions opacity, as specified in Condition 5.6, at the primary vent, stack, exit, or opening from the building containing the welding operations.
 - (2) In lieu of the requirement of paragraph (a) of this condition, to perform visual determinations of fugitive emissions with EPA Method 22, the permittee shall perform visual determinations of emissions opacity in accordance with Condition 5.7, using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
 - (3) The permittee shall keep a record of each visual determination of emissions opacity performed in accordance with the requirements above, along with any subsequent corrective action taken, in accordance with the requirements in Condition 5.8(c) of this permit.
 - (4) The permittee shall report the results of all visual determinations of emissions opacity performed in accordance with the requirements above, along with any subsequent corrective action taken, and submit with the annual certification and compliance report as required by Condition 6.5 (d).
- (d) *Requirements for opacities less than or equal to 20 percent but greater than zero:* For each visual determination of emissions opacity performed in accordance with paragraph (c) above for which the average of the six-minute average opacities recorded is 20 percent or less but greater than zero, the permittee shall perform corrective actions, including inspection of all welding fume sources, and

evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with Condition 4.3(b).

- (e) *Tier 3 requirements for opacities exceeding 20 percent:* For each visual determination of emissions opacity performed in accordance with paragraph (c) above for which the average of the six-minute average opacities recorded exceeds 20 percent, the permittee shall comply with the requirements in paragraphs (1) through (5) below.
- (1) The permittee shall submit a report of exceedance of 20 percent opacity, along with the annual certification and compliance report, as specified in Condition 6.5 (e).
 - (2) Within 30 days of the opacity exceedance, the permittee shall prepare and implement a Site-Specific Welding Emissions Management Plan, as specified in paragraph (f) of this condition. If the permittee has already prepared a Site-Specific Welding Emissions Management Plan in accordance with this paragraph, the permittee shall prepare and implement a revised Site-Specific Welding Emissions Management Plan within 30 days.
 - (3) During the preparation (or revision) of the Site-Specific Welding Emissions Management Plan, the permittee shall continue to perform visual determinations of emissions opacity, beginning on a daily schedule as specified in Condition 5.7, using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
 - (4) The permittee shall maintain records of daily visual determinations of emissions opacity performed in accordance with paragraph (3) above, during preparation of the Site-Specific Welding Emissions Management Plan, in accordance with the requirements in Condition 6.5(f).
 - (5) The permittee shall include these records in the annual certification and compliance report, according to the requirements of Condition 6.5.
- (f) *Site-Specific Welding Emissions Management Plan:* The Site-Specific Welding Emissions Management Plan shall comply with the requirements in paragraphs (1) through (3) below:
- (1) Site-Specific Welding Emissions Management Plan shall contain the information in the paragraphs below:
 - i. Company name and address;

- ii. A list and description of all welding operations which currently comprise the welding affected source;
 - 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 the welding affected source;
 - v. A description of additional management practices and/or fume control methods to be implemented pursuant to paragraph (e)(2) and the projected date of implementation; and
 - vi. Any revisions to a Site-Specific Welding Emissions Management Plan shall contain copies of all previous plan entries, pursuant to paragraphs (iv) and (v) above
- (2) The Site-Specific Welding Emissions Management Plan shall be updated annually to contain current information, as required by paragraphs (i) through (iii) above, and submitted with the annual certification and compliance report, according to the requirements of Condition 6.5.
- (3) The permittee shall maintain a copy of the current Site-Specific Welding Emissions Management Plan in the permittee's records in a readily accessible location for inspector review, in accordance with the requirements in Condition 5.8(e).

(Ref.: 40 CFR 63.11516(f)(3)-(8), Subpart XXXXXX)

**SECTION 5
MONITORING AND RECORDKEEPING REQUIREMENTS**

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain records for a minimum of 5 years
AA-001	11 Miss. Admin. Code Pt. 2, R.2.2.B(11).	5.2	VOC/HAP	Record VOC and HAP content of coating materials
Facility-Wide	11 Miss. Admin. Code Pt. 2, R.2.2.B(10).	5.3	VOC/HAP	Record VOC and HAP emission rates
AA-008	40 CFR 63.11517(a), Subpart XXXXXX	5.4	MFHAP	Use EPA Method 22 for determination of fugitive emissions
	40 CFR 63.11517(b), Subpart XXXXXX	5.5	MFHAP	Fugitive Emissions Observations Frequency
	40 CFR 63.11517(c), Subpart XXXXXX	5.6	Opacity	Use EPA Method 9 for emissions opacity determination
	40 CFR 63.11517(d), Subpart XXXXXX	5.7	Opacity	Emissions Opacity Evaluation Frequency
	40 CFR 63.11519(c), Subpart XXXXXX	5.8	MHAP	See condition for 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-001, the permittee shall determine for each coating, adhesive, solvent or other VOC or HAP containing material used:

- (a) The quantity used (gallons);
- (b) The percentage of VOCs by weight;
- (c) The percentage of each individual HAP and total HAP by weight;
- (d) The density (lbs/gal);

The permittee may utilize data supplied by the manufacturer, or analysis of VOC and HAP content by EPA Test Method 24, 40 CFR 60, Appendix A and/or EPA Test Method 311, 40 CFR 63, Appendix A, and/or an alternate EPA approved test method.

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

- 5.3 For the entire facility, the permittee shall maintain sufficient records to document:
- (a) The identification of each coating, adhesive, solvent or other VOC or HAP containing material and the total gallons of each coating, adhesive, solvent or other VOC or HAP containing material used on a monthly basis and in each consecutive 12-month period;
 - (b) The VOC and HAP content(s) of each coating, adhesive, solvent or other VOC or HAP containing material used. A description of the method used to determine the VOC and HAP content shall accompany this data;
 - (c) The density of each coating, adhesive, solvent or other VOC or HAP containing material used;
 - (d) The amount of natural gas combusted each month;
 - (e) The type and amount of each welding electrode (i.e., rod and/or wire) used each month;
 - (f) The total VOC emission rate, the emission rate of each individual HAP and the total HAP emission rate in tons/yr for each consecutive 12-month period.

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

- 5.4 For Emission Point AA-008, visual determination of fugitive emissions shall be performed according to the procedures of EPA Method 22, of 40 CFR part 60, Appendix A-7. The permittee shall conduct the EPA Method 22 test while the affected source is operating under normal conditions. The duration of each EPA Method 22 test shall be at least 15 minutes, and visible emissions will be considered to be present if they are detected for more than six minutes of the fifteen- minute period.

(Ref.: 40 CFR 63.11517(a), Subpart XXXXXX)

- 5.5 For Emission Point AA-008, for welding operations, the visual determinations of fugitive emissions shall be performed in accordance with Condition 5.4 and the requirements below:
- (a) *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.

- (b) *Weekly Method 22 Testing:* If no visible fugitive emissions are detected in consecutive daily EPA Method 22 tests, performed in accordance with paragraph (a) above for 10 days of work day operation of the process, the permittee may decrease the frequency of EPA Method 22 testing to once every five days of operation of the process (one calendar week). If visible fugitive emissions are detected during these tests, the permittee shall resume EPA Method 22 testing of that operation once per day during each day that the process is in operation, in accordance with paragraph (a) above.
- (c) *Monthly Method 22 Testing:* If no visible fugitive emissions are detected in four consecutive weekly EPA Method 22 tests performed in accordance with paragraph (b) above, the permittee may decrease the frequency of EPA Method 22 testing to once per 21 days of operation of the process (one calendar month). If visible fugitive emissions are detected during these tests, the permittee shall resume weekly EPA Method 22 in accordance with paragraph (b) above.
- (d) *Quarterly Method 22 Testing:* If no visible fugitive emissions are detected in three consecutive monthly EPA Method 22 tests performed in accordance with paragraph (c) above, the permittee may decrease the frequency of EPA Method 22 testing to once per 60 days of operation of the process (3 calendar months). If visible fugitive emissions are detected during these tests, the permittee shall resume monthly EPA Method 22 in accordance with paragraph (c) above.

(Ref.: 40 CFR 63.11517(b), Subpart XXXXXX)

- 5.6 For Emission Point AA-008, visual determination of emissions opacity shall be performed in accordance with the procedures of EPA Method 9, of 40 CFR part 60, Appendix A-4, and while the affected source is operating under normal conditions. The duration of the EPA Method 9 test shall be thirty minutes.

(Ref.: 40 CFR 63.11517(c), Subpart XXXXXX)

- 5.7 For Emission Point AA-008, for welding operations, the permittee shall perform visual determination of emissions opacity in accordance with Condition 5.6 and according to the schedule in the paragraphs below:
- (a) *Daily Method 9 testing for welding, Tier 2 or 3:* Perform visual determination of emissions opacity once per day during each day that the process is in operation.
 - (b) *Weekly Method 9 testing for welding, Tier 2 or 3:* If the average of the six minute opacities recorded during any of the daily consecutive EPA Method 9 tests performed in accordance with paragraph (a) above does not exceed 20 percent for 10 days of operation of the process, the permittee may decrease the frequency of EPA Method 9 testing to once per five days of consecutive work day operation. If opacity greater than 20 percent is detected during any of these tests, the permittee

shall resume testing every day of operation of the process according to the requirements of paragraph (a) above.

- (c) *Monthly Method 9 testing for welding Tier 2 or 3:* If the average of the six minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed in accordance with paragraph (b) above does not exceed 20 percent for four consecutive weekly tests, the permittee may decrease the frequency of EPA Method 9 testing to once per every 21 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any monthly test, the permittee shall resume testing every five days of operation of the process according to the requirements of paragraph (b) above.
- (d) *Quarterly Method 9 testing for welding Tier 2 or 3:* If the average of the six minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed in accordance with paragraph (c) above does not exceed 20 percent for three consecutive monthly tests, the permittee may decrease the frequency of EPA Method 9 testing to once per every 120 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any quarterly test, the permittee shall resume testing every 21 days (month) of operation of the process according to the requirements of paragraph (c) above.
- (e) *Return to Method 22 testing for welding, Tier 2 or 3:* If, after two consecutive months of testing, the average of the six minute opacities recorded during any of the monthly EPA Method 9 tests performed in accordance with paragraph (c) above does not exceed 20 percent, the permittee may resume EPA Method 22 testing as in Condition 5.5 (c) and (d). In lieu of this, the permittee may elect to continue performing EPA Method 9 tests in accordance with paragraphs (c) and (d) above.

(Ref.: 40 CFR 63.11517(d), Subpart XXXXXX)

5.8 For Emission Point AA-008, the permittee shall collect and keep records of the data and information specified in the paragraphs below:

- (a) Maintain the information below for each affected source:
 - (1) Each notification and report that the permittee submitted to comply with Subpart XXXXXX, and the documentation supporting each notification and report.
 - (2) Records of the applicability determinations according to 40 CFR 63.11514(b)(1-2) and (5), listing equipment included in its affected source, as well as any changes to that and on what date they occurred, shall be maintained for 5 years and be made available for inspector review at any time.

- (b) For welding operations, maintain a record of the information specified below for each affected source, which performs visual determination of fugitive emissions in accordance with Condition 5.4.
 - (1) The date and results of every visual determination of fugitive emissions;
 - (2) A description of any corrective action taken subsequent to the test; and
 - (3) The date and results of any follow-up visual determination of fugitive emissions performed after the corrective actions.

- (c) For welding operations, maintain a record of the information specified below for each affected source which performs visual determination of emissions opacity in accordance with Condition 5.6.
 - (1) The date of every visual determination of emissions opacity; and
 - (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.

- (d) For welding operations, maintain a record of the manufacturer's specifications for the control devices used to comply with Condition 4.4.

- (e) For welding operations, the permittee shall maintain a record of each visual determination of emissions opacity performed during the preparation (or revision) of a Site-Specific Welding Emissions Management Plan (SSWEMP), in Condition 4.4(f).

- (f) For welding operations, maintain if the permittee has been required to prepare a plan in accordance with Condition 4.4(f), the permittee shall maintain a copy of the permittee's current SSWEMP in the permittee's records and it shall be readily available for inspector review.

- (g) If the permittee complies by operating any equipment according to manufacturer's instruction, the permittee shall keep these instructions for inspector review.

(Ref.: 40 CFR 63.11519(c), Subpart XXXXXX)

SECTION 6 REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	Report permit deviations within five (5) working days
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.2	Submit certified annual monitoring report
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.3	All documents submitted to MDEQ shall be certified by a Responsible Official
	11 Miss. Admin. Code Pt. 2, R.2.2.B(11).	6.4	VOC and HAP reporting requirements
	40 CFR 63.11519(b)(1-2)(4-6)(8-9), Subpart XXXXXX	6.5	MFHAP 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 the entire facility, the permittee shall submit a monitoring report due annually by the 31st of January for the preceding calendar year. This report shall provide the following:

- (a) The identification of each coating, adhesive, solvent or other VOC or HAP containing material used;

- (b) The VOC and HAP content(s) of each coating, adhesive, solvent, or other VOC or HAP containing material used;
- (c) The total gallons of each coating, adhesive, solvent or other VOC or HAP containing material used in each consecutive 12-month period;
- (d) The amount of natural gas combusted;
- (e) The type and amount of each welding electrode (i.e., rod and/or wire) used; and
- (f) The total VOC emission rate, the emission rate of each individual HAP and the total HAP emission rate in tons per month and TPY for each consecutive 12-month period.

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

6.5 The permittee shall prepare and submit annual reports for each affected source and shall comply with the following reporting requirements:

- (a) Each annual report, including exceedance reports if one has occurred, shall cover the subsequent annual reporting period from January 1st through December 31st, and shall be prepared and submitted no later than January 31st.
- (b) The annual report shall contain the following information:
 - (1) Company name and address;
 - (2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report; and
 - (3) Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31. Note that the information reported for the 12 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
- (c) The annual report shall contain the information specified in paragraphs below for each affected source, which performs visual determination of fugitive emissions, using Method 22, in accordance with Condition 5.4.
 - (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.
- (d) The annual report shall contain the information specified below for each affected source which performs visual determination of emissions opacity, using EPA Method 9, in accordance with Condition 5.6.
 - (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.
- (e) As required by Condition 4.4(e)(1), the permittee shall prepare an exceedance report whenever the average of the six-minute average opacities recorded during a visual determination of emissions opacity exceeds 20 percent. This report shall be submitted along with the annual report, and shall contain 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.
- (f) The permittee shall submit a copy of the records of daily visual determinations of emissions recorded in accordance with Condition 4.4(e)(4), "Tier 3 requirements for opacities exceeding 20 percent," and a copy of the SSWEMP and any subsequent revisions to the plan pursuant to Condition 4.4(f), along with the annual certification and compliance report.

(Ref.: 40 CFR 63.11519(b)(1-2)(4-6)(8-9), Subpart XXXXXX)