# STATE OF MISSISSIPPI AND FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT AT A SYNTHETIC MINOR SOURCE

### THIS CERTIFIES THAT

The Essmueller Company
334 Avenue A Airbase
Laurel, Jones County, Mississippi

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: December 23, 2020 Permit No.: 1360-00082

Effective Date: As specified herein.

Expires: November 30, 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. Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)

11. 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).)

- 12. This permit does not authorize a modification as defined in Mississippi Administrative Code, Title 11, Part 2, Chapter 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 Mississippi Administrative Code, Title 11, Part 2 Chapter 3 – "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 Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 1.10. – "Provisions for Upsets, Start-Up, and Shutdowns".

(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, start-ups, 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 five (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) Start-ups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.)
    - (1) Start-ups 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 start-ups 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for start-ups 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 start-up 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 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).)

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

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

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

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

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

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

## SECTION 2 EMISSION POINT DESCRIPTION

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

Emission Point	Description		
AA-000	Facility-Wide (The Essmueller Company)		
AA-001	Binks Spray Paint Booth No. 1 [equipped with dry filters to control particulate matter emissions]		
AA-003	Facility-Wide Welding Operations [consists of forty-six (46) welding stations]		
AA-004	Plasma Cutting Machine No. 1		
AA-005	Facility-Wide Solvent Wipe Operations		
AA-006	Binks Spray Paint Booth No. 2 [equipped with dry filters to control particulate matter emissions]		
AA-007	Plasma Cutting Machine No. 2		
AA-008	Plasma Cutting Machine No. 3		
AA-009	Plasma Cutting Machine No. 4		
AA-010	Custom Powder Coat Booth [equipped with dry filters to control particulate matter emissions]		
AA-011	Facility-Wide Grinding and Polishing Operations		
AA-012	Facility-Wide Sandblasting Operations		
AA-013	Facility-Wide Machining Operations		
AA-014	Eighteen (18) Natural Gas-Fired Comfort Space Heaters [individual heat input capacity: 0.25 MMBTU / hour; total heat input capacity: 4.5 MMBTU / hour]		

## 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.A(1) and (2).	3.1	Opacity	40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2		
	11 Miss. Admin. Code Pt. 2, R. 1.3. F(1).	3.3	PM	$E = 4.1(p)^{0.67}$
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.4	VOCs	95.0 tpy (Rolling 12-Month Total)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). 40 CFR 63.9(j) and 63.10(b)(3), Subpart A  (MACT Avoidance Limits)	3.5	HAPs	9.0 tpy (Individual) 22.5 tpy (Total) (Rolling 12-Month Totals)
	40 CFR Part 63, Subpart XXXXXX – National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories 40 CFR 63.11514 and 63.11515(b), Subpart XXXXXX	3.6	Metal HAPs (MFHAPs)	Applicability
AA-001 AA-005 AA-006 AA-010	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.7	Operating Restriction	Operational Requirement
AA-014	11 Miss. Admin. Code Pt. 2, R. 1.3. D(1)(a).	3.8	PM (filterable only)	0.6 Pounds / MMBTU

3.1 For Emission Point AA-000 (Facility-Wide), except as otherwise specified or limited herein, the permittee shall not cause or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial, or waste disposal process that exceeds forty percent (40%) opacity. Start-up operations may produce emissions, which exceed 40% opacity for up to fifteen (15) minutes per start-up in any one (1) hour and not to exceed three (3) start-ups per stack in any twenty-four (24) hour period.

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

3.2 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 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 Point AA-000 (Facility-Wide), except as otherwise specified, 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 determined by the relationship:

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

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

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

3.4 For Emission Point AA-000 (Facility-Wide), the permittee shall limit the emission of volatile organic compounds (VOC) to no more than 95.0 tons per year (tpy) on a rolling 12-month total basis.

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

3.5 For Emission Point AA-000 (Facility-Wide), the permittee shall limit the emission of each individual hazardous air pollutant (HAP) to no more than 9.0 tons per year (tpy) on a rolling 12-month total basis. Additionally, the permittee shall limit the emission of all HAPs in total to no more than 22.5 tpy on a rolling 12-month total basis.

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

3.6 For Emission Point AA-000 (Facility-Wide), the permittee is subject to and shall comply with all applicable standards found in 40 CFR Part 63, Subpart XXXXXX – National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories.

For purpose of the permit, a material is considered as containing a metal fabrication / 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) <u>or</u> if it contains manganese in amounts greater than or equal to 1.0 wt.% (as the metal).

(Ref.: 40 CFR 63.11514 and 63.11515(b), Subpart XXXXXX)

3.7 For Emission Points AA-001, AA-005, AA-006, and AA-010, the permittee shall operate and maintain the dry filters in each booth at all times during active operations. In the event that a dry filter fails, the permittee shall cease operations of the corresponding process until such time repairs are made and the proper efficiency of the dry filter is restored.

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

3.8 For Emission Point AA-014, the maximum permissible emission of ash and/or particulate matter (PM) shall not exceed 0.6 pounds per million BTU (MMBTU) per hour heat input.

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

## SECTION 4 WORK PRACTICE STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-001 AA-005 AA-006	40 CFR 63.11516(d), Subpart XXXXXX	4.1	MFHAPs	Implement Spray Painting Management Practices
AA-003	40 CFR 63.11516(f), Subpart XXXXXX	4.2	MFHAPs	Implement Welding Management Practices
AA-004 AA-007 AA-008 AA-009 AA-013	40 CFR 63.11516(b), Subpart XXXXXX	4.3	MFHAPs	Implement Machining Management Practices
AA-011	40 CFR 63.11516(c), Subpart XXXXXX	4.4	MFHAPs	Implement Dry Grinding / Dry Polishing Management Practices
AA-012	40 CFR 63.11516(a)(3)(i), Subpart XXXXXX	4.5	MFHAPs	Implement Dry Abrasive Blasting Management Practices

- 4.1 For Emission Points AA-001, AA-005, and AA-006, the permittee shall implement the following management practices when a spray-applied paint contains metal fabrication hazardous air pollutants (MFHAPs). However, these practices **do not** apply when spray-applied paints that do not contain any MFHAPs are used:
  - (a) Standards for spray painting for MFHAP control: All spray-applied painting of objects shall meet the requirements specified in Parts (a)(1) through (4) of this condition. These requirements do not apply to any operation in which objects greater than fifteen (15) feet are spray painted or to any operation in which objects are not spray painted in a booths / rooms
    - (1) A spray booth or spray room shall have a full roof, at least two (2) complete walls, and one (1) or two (2) complete side curtains / other barrier material so that all four (4) sides are covered. The spray booth or spray room shall be ventilated so that air is drawn into the booth and leaves only though the filter. The roof may contain narrow slots for connecting fabricated products to overhead cranes, and/or for cords or cables.
    - (2) All spray booths or spray rooms shall be fitted with a type of filter technology that is demonstrated to achieve at least ninety-eight percent (98%) capture of MFHAPs. The procedure used to demonstrate the filter efficiency shall be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1 "Gravimetric and Dust-

Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992".

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

- (3) The permittee shall perform regular inspection and replacement of the filters in a spray booth or spray room in accordance with the manufacturer's instructions and maintain documentation of these activities [as detailed in Condition 5.3(b)].
- (4) As an alternative compliance requirement, a spray booth or spray room equipped with a water curtain (called a "waterwash" or "waterspray" booth / room that is operated and maintained in accordance with the manufacturer's specifications and achieve at least 98% control of MFHAPs) may be used in lieu of the requirements outlined in Parts (a)(1) through (3) of this condition.
- (b) Standards for spray painting application equipment of all objects painted for MFHAP control: All paints applied via spray-applied painting must be applied with a high-volume, low-pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated to achieve transfer efficiency comparable to one (1) of the aforementioned spray gun technologies for a comparable operation and for which written approval has been obtained from the MDEQ.

The procedure used to demonstrate that the spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002" – Revision 0.

- (c) Spray system recordkeeping: The permittee must maintain documentation of the HVLP or other high transfer efficiency spray paint delivery methods [as detailed in Condition 5.3(d)(1) and (2)].
- (d) Spray gun cleaning: The cleaning of paint spray gun shall be done with either non-HAP gun cleaning solvents or in such a manner that an atomized mist of spray of gun cleaning solvent / paint residue is not created outside of a container that collects the used gun cleaning solvent.

- (e) Spray painting worker certification: A worker that performs painting shall be certified that he / she has completed training in the proper spray application of paints and the proper set-up and maintenance of spray equipment. The minimum requirements for training and certification are described in Part (f) of this condition.
  - The spray application of paint is prohibited by persons who are not certified as having completed the training described in Part (f) of this condition. The requirements of this paragraph do not apply to the students of an accredited painting training program who are under the direct supervision of an instructor who meets the requirements of this paragraph. The requirements of this paragraph do not apply to operators of robotic or automated painting operations.
- (f) Spray painting training program content: The permittee shall ensure and certify that all new and existing personnel (including contract personnel) who spray apply paints are trained in the proper application of paints as required by Part (e) of this condition. The training program must include (at a minimum) the following items:
  - (1) A list of all current personnel by name and job description who are required to be trained;
  - (2) Hands-on, in-house, or external classroom instruction that addresses (at a minimum) initial and refresher training in the following topics:
    - (i) Spray gun equipment selection, set-up, and operation (including measuring paint viscosity), selecting the proper fluid tip / nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate;
    - (ii) Spray technique for different types of paints to improve transfer efficiency and minimize paint usage and overspray (including maintaining the correct spray gun distance and angle to the part) using proper banding and overlap, and reducing lead / lag spraying at the beginning and end of each stroke;
    - (iii) Routine spray booth and filter maintenance (including filter selection and installation); and
    - (iv) Environmental compliance with the requirements of 40 CFR Part 63, Subpart XXXXXX.
  - (3) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training.
    - Alternatively, if the permittee can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent

to the training required in Part (f)(2) of this condition, the permittee is not required to provide the initial training required to this painter.

- (g) Records of spray painting training: The permittee shall maintain records of employee training certification for use of HVLP or other high transfer efficiency spray paint delivery methods [as detailed in Condition 5.3(d)(3)].
- (h) Spray painting training dates: As required by Part (e) of this condition, all new and existing personnel (including contract personnel) who spray apply paints must be trained within one hundred eighty (180) days after hiring. Training that was completed within five (5) years prior to the date training is required [which must meet the requirements specified in Part (f)(2) of the condition] and is valid for a period not to exceed five (5) years after the date the training is completed.
- (i) Duration of training validity: Training and certification will be valid for a period not to exceed five (5) years after the date the training is completed. All personnel must receive refresher training that meets the requirements of this condition and be recertified every five (5) years.

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

- 4.2 For Emission Point AA-003, the permittee shall implement the following management practices for each welding operation (as applicable). However, these practices <u>do not</u> apply when welding operations are being performed that do not use any materials containing MFHAPs and do not have the potential to emit MFHAPs:
  - (a) The permittee shall operate all equipment and any capture / control devices associated with welding operations in accordance with the manufacturer's instructions. Additionally, 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 in Condition 5.3(a)].
  - (b) The permittee shall implement one or more of the following management practices to minimize the emission of MFHAPs (as practicable) as a result of welding activities while maintaining the required welding quality through the application of sound engineering judgement:
    - (1) Use welding processes with reduced fume generation capabilities;
    - (2) Use welding process variations that can reduce fume generation rates;
    - (3) Use welding filler metals, shielding gases, carrier gases, or other process materials that 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 according to the manufacturer's specifications.

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

- 4.3 For Emission Points AA-004, AA-007, AA-008, AA-009, and AA-013, the permittee implement the following management practices to minimize the emission of MFHAPs as a result of each "machining activity" as defined by 40 CFR Part 63, Subpart XXXXXX [i.e. milling, drilling, boring, tapping, planing, broaching, sawing, cutting, shaving, shearing, threading, reaming, shaping, slotting, hobbing, and chamfering]. However, these practices **do not** apply when an applicable machining activity is being performed that does not use any materials containing MFHAPs and does not have the potential to emit MFHAPs:
  - (a) The permittee shall take the necessary measures to minimize excess dust in the surrounding area (as practicable); and
  - (b) The permittee shall operate all equipment associated with each machining activity according to the applicable manufacturer's instructions.

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

- 4.4 For Emission Point AA-011, the permittee shall implement the following management practices for an operation that conducts dry grinding / dry polishing with machines. However, these practices **do not** apply when dry grinding and dry polishing operations are being performed that do not use any materials containing MFHAP and do not have the potential to emit MFHAP:
  - (a) The permittee shall capture emissions and vent them to a filtration control device. Additionally, the permittee shall demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices [as specified in Condition 5.3(a)].
  - (b) The permittee shall take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions (as practicable); and
  - (c) The permittee shall operate all equipment associated with the operation of dry grinding and dry polishing with machines (including the filtration control device in accordance with the manufacturer's instructions).

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

- 4.5 For Emission Point AA-012, the permittee shall implement the following management practices for any operation in which dry abrasive blasting is performed on objects greater than eight (8) feet in any one (1) dimension:
  - (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 enclose abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive material;
  - (c) The permittee shall operate all equipment associated with dry abrasive blasting operations in accordance with the manufacturer's instructions;
  - (d) The permittee shall not re-use dry abrasive blasting media unless contaminants [i.e. any material other than the base metal (such as paint residue)] have been removed by filtration / screening and the abrasive material conforms to its original size; and
  - (e) Whenever practicable, the permittee shall switch from high particulate matter (PM)-emitting blast media [e.g. sand] to low PM-emitting blast media [e.g. crushed glass, specular hematite, steel shot, aluminum oxide] where PM is a surrogate for MFHAPs.

(Ref.: 40 CFR 63.11516(a)(3)(i), Subpart XXXXXX)

# 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	VOCs HAPs	Calculate and Record Emissions (Monthly and Rolling 12-Month Totals)
	40 CFR 63.11519(c), Subpart XXXXXX	5.3	MFHAPs	Maintain Operational Information
		5.4	VOCs	Record and Maintain Data on Surface
AA-001 AA-005	11 Miss. Admin. Code Pt. 2,	5.4	HAPs	Coatings and Solvents
AA-006	R. 2.2.B(11).			Perform Weekly Inspections; and
AA-010		5.5	PM	Perform Maintenance Actions (As Necessary)
AA-003 AA-012	40 CFR 63.11516(a)(ii) – (iv), (f)(3), and 63.11517(a) – (b), Subpart XXXXXX	5.6	Opacity	Conduct Visual Determinations of Fugitive Emissions
	40 CFR 63.11519(c)(2); Subpart XXXXXX	5.7		Maintain Information Related to Visual Determinations of Fugitive Emissions
AA-003	40 CFR 63.11516(f)(4); Subpart XXXXXX	5.8	Opacity	Perform Corrective Actions for Fugitive Emissions
	40 CFR 63.11516(f)(5) and 63.11517(c) – (d), Subpart XXXXXX	5.9		Conduct Visual Determinations of Emissions Opacity
	40 CFR 63.11516(f)(6), Subpart XXXXXX	5.10		Perform Corrective Actions for Opacity (0% < Opacity ≤ 20%)
	40 CFR 63.11516(f)(7) – (8), Subpart XXXXXX	5.11		Prepare / Revise a Site-Specific Welding Emissions Management Plan
	40 CFR 63.11519(c)(3); Subpart XXXXXX	5.12		Maintain Information Related to Visual Determinations of Emissions Opacity
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.13	MFHAPs	Maintain Quantity and Type of Welding Material
AA-014	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.14	Fuel	Maintain Records on the Volume of Natural Gas Combusted

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.

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(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.9.)
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5.2 For Emission Point AA-000 (Facility-Wide), the permittee shall calculate and record the respective total emission rate of each individual hazardous air pollutant (HAP), all HAPs combined, and volatile organic compounds (VOCs) in tons from all sources that can reasonably emit the pollutant(s) both on a monthly basis and on a rolling 12-month total basis.

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

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(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
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- 5.3 For Emission Point AA-000 (Facility-Wide), the permittee shall maintain the following documentation (as applicable):
  - (a) The manufacturer's specifications for the respective air pollution control device(s) used in spray painting operations, welding operations, and dry grinding / dry polishing operations;
  - (b) A record of each filter efficiency demonstration and any spray paint booth filter maintenance activities;
  - (c) A record of each water curtain or waterspray booth efficiency demonstration performed; and
  - (d) For each high-volume, low-pressure (HVLP) or other high transfer efficiency spray paint delivery system, the following documentation shall be maintained:
    - (1) The manufacturer's specifications for the equipment and any manufacturer's operational instructions;
    - (2) A record of the approval granted by the MDEQ along with documentation of the demonstration of equivalency for any alternative spray application system;

(3) Certification that each worker performing spray painting operations has completed the training with the date the initial training and the most recent refresher training was completed.

(Ref.: 40 CFR 63.11519(c)(4) – (8), Subpart XXXXXX)

- 5.4 For Emission Points AA-001, AA-005, AA-006, and AA-010, the permittee shall monitor and record the total respective volume (in gallons) of each surface coating (e.g. thinner, paint, etc.) and solvent used that contains a volatile organic compound (VOC) and/or hazardous air pollutant (HAP) on a monthly basis. Additionally, the permittee shall maintain documentation for any coating material that includes (at a minimum) the following information:
  - (a) The product name and identification;
  - (b) The density (in pounds per gallon);
  - (c) The weight percentage (wt.%) of the VOC content;
  - (d) The wt.% content for each individual HAP; and
  - (e) The wt.% of the solids content (as applicable).

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

5.5 For Emission Points AA-001, AA-005, AA-006, and AA-010, the permittee shall perform (at a minimum) a weekly inspection of the dry filters contained within each paint booth. However, maintenance shall be performed as necessary to maintain proper operation of the dry filters.

The records for each inspection and any maintenance work performed shall be kept in log form and must be made available for review upon request during any inspection visit by MDEQ personnel.

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

- 5.6 For Emission Points AA-003 and AA-012, the permittee shall perform and record a visual determination of welding fugitive emissions as specified by the following procedure at the primary vent, stack, exit, or opening from the building containing each noted operation:
  - (a) Any visual determination of fugitive emissions must be performed according to the provisions outlined in EPA Test Method 22 (i.e. "Method 22"). Additionally, the permittee shall adhere to the following guidelines:
    - (1) The permittee must conduct a Method 22 test while an associated operation is proceeding and under normal conditions; and

- (2) The duration of any Method 22 test shall be at least fifteen (15) minutes, and visible emissions will be considered present if they are detected for more than six (6) minutes of any 15-minute period.
- (b) Perform a visual determination of fugitive emissions once per day on each day while an associated operation is conducted.
- (c) If no visible fugitive emissions are detected in ten (10) consecutive daily Method 22 testing an associated operation and performed in accordance with Parts (a) (b) of this condition, the permittee may decrease the frequency of Method 22 testing to once every five (5) days of welding activities (i.e. one calendar week).
  - If visible fugitive emissions are detected during the decreased frequency period, the permittee shall revert to daily Method 22 testing in accordance with Parts (a) (b) of this condition during each day that an associated operation is conducted.
- (d) If no visible emissions are detected in four (4) consecutive weekly Method 22 testing of welding activities and performed in accordance with Part (c) of this condition, the permittee may decrease the frequency of Method 22 testing to once every twenty-one (21) days of an associated operation (i.e. one calendar month).
  - If visible emissions are detected during the decreased frequency period, the permittee shall revert to weekly Method 22 testing in accordance with Part (c) of this condition.
- (e) If no visible emissions are detected in three (3) consecutive monthly Method 22 testing of an associated operation and performed in accordance with Part (d) of this condition, the permittee may decrease the frequency of Method 22 testing to once every sixty (60) days of welding operations (i.e. three calendar months).
  - If visible emissions are detected during the decreased frequency period, the permittee shall revert to monthly Method 22 testing in accordance with Part (d) of this condition.

(Ref.: 40 CFR 63.11516(a)(ii) – (iv), (f)(3), and 40 CFR 63.11517(a) – (b); Subpart XXXXXX)

- 5.7 For Emission Points AA-003 and AA-012, the permittee shall record and maintain the following information as it relates to any required visual determination of fugitive emissions each noted operation:
  - (a) The date and results of every visual determination performed;
  - (b) A description of any corrective action(s) taken as a result of a conducted visual determination; and

(c) The date and results of any follow-up visual determination performed after any corrective action(s) has been completed.

(Ref.: 40 CFR 63.11519(c)(2); Subpart XXXXXX)

- 5.8 For Emission Point AA-003, upon the initial detection of fugitive emissions as result of a visual determination performed in accordance with Condition 5.6, the permittee shall implement corrective actions that include (but are not limited to) the following protocols:
  - (a) Inspecting welding fume sources; and
  - (b) Evaluating the proper operation and effectiveness of the management practices and/or fume control measures implemented in accordance with Condition 4.2(b).

After completing the mentioned corrective actions, the permittee shall perform a follow-up inspection for visible fugitive emissions in accordance with Condition 5.6(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)

- 5.9 For Emission Point AA-003, upon detection of fugitive emissions from more than one (1) visual determination in accordance with Condition 5.6 during any consecutive 12-month period [notwithstanding the results of any follow-up inspections required by Condition 5.8], the permittee shall comply with the following requirements:
  - (a) Within twenty-four (24) hours, the permittee shall perform a visual determination of emissions opacity at the primary vent, stack, exit, or opening from the building containing welding operations.

The visual determination of emissions opacity shall be performed in accordance with the provisions outlined in EPA Test Method 9 (i.e. "Method 9"). Additionally, the permittee shall adhere to the following guidelines:

- (1) The permittee must conduct a Method 9 test while welding activities are proceeding and under normal conditions; and
- (2) The duration of any Method 9 testing shall be thirty (30) minutes.
- (b) In lieu of performing the procedure outlined in Condition 5.6(b) through (e), the permittee shall perform visual determinations of emissions opacity in accordance with the following schedule:
  - (1) Perform a visual determination of emissions opacity once per day on each day while welding activities are conducted.

- (2) If the average of the 6-minute opacities recorded during ten (10) consecutive daily Method 9 tests of welding activities and performed in accordance with Parts (a) and (b)(1) of this condition does not exceed twenty percent (20%), the permittee may decrease the frequency of Method 9 testing to once per five (5) consecutive days of active welding activities (i.e. one calendar week).
  - If an opacity greater than 20% is detected during the decreased frequency period, the permittee shall revert to daily Method 9 testing in accordance with Parts (a) and (b)(1) of this condition during each day that welding activities are conducted.
- (3) If the average of the 6-minute opacities recorded during four (4) consecutive weekly tests of welding operations and performed in accordance with Part (b)(2) of this condition does not exceed 20%, the permittee may decrease the frequency of Method 9 testing to once per every twenty-one (21) days of active welding activities (i.e. one calendar month).
  - If an opacity greater than 20% is detected during the decreased frequency period, the permittee shall revert to weekly Method 9 testing in accordance with Part (b)(2) of this condition.
- (4) If the average of the 6-minute opacities recorded during three (3) consecutive monthly tests of welding activities and performed in accordance with Part (b)(3) of this condition does not exceed 20%, the permittee may decrease the frequency of Method 9 testing to once every one hundred twenty (120) days of active welding operations (i.e. three calendar months).
  - If any opacity greater than 20% is detected during the decreased frequency period, the permittee shall revert to monthly Method 9 testing in accordance with Part (b)(3) of this condition.
- (5) If the average of the 6-minute opacities recorded during two (2) consecutive monthly tests of welding activities and performed in accordance with Part (b)(3) of this condition does not exceed 20%, the permittee may revert to monthly Method 22 testing in accordance with Condition 5.6(d) and (e).
  - In lieu of reverting to Method 22 testing, the permittee may elect to continue performing Method 9 testing in accordance with Parts (b)(3) and (4) of this condition.

(Ref.: 40 CFR 63.11516(f)(5) and 63.11517(c) - (d); Subpart XXXXXX)

5.10 For Emission Point AA-003, upon any visual determination of emissions opacity performed in accordance with Condition 5.9 that result in the average of the 6-minute opacities recorded equaling twenty percent (20%) or less but greater than zero percent

(0%), the permittee shall implement corrective actions that include (but are not limited to) the following protocols:

- (a) Inspecting welding fume sources; and
- (b) Evaluating the proper operation and effectiveness of the management practices and/or fume control measures implemented in accordance with Condition 4.2(b).

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

- 5.11 For Emission Point AA-003, upon any visual determination of emissions opacity performed in accordance with Condition 5.9 that results in the average of the 6-minute opacities recorded exceeding twenty percent (20%), the permittee shall adhere to the following requirements:
  - (a) Within thirty (30) days of exceeding 20% opacity, the permittee shall prepare (or revise) and implement a Site-Specific Welding Emissions Management Plan (SSWEMP) that contains the following information:
    - (1) Company name and address;
    - (2) A list and description of all welding operations that are currently utilized;
    - (3) A description of all management practices and/or fume control methods in place at the time of the opacity exceedance;
    - (4) A list and description of all management practices and/or fume control methods currently employed for welding activities; and
    - (5) 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 shall contain copies of all previous plan entries.

- (b) During the revision of the SSWEMP, the permittee shall continue to perform and maintain the visual determination of emissions opacity beginning on a daily schedule as specified by Condition 5.9(a) and (b)(1).
- (c) The SSWMP shall be updated annually (if necessary) to contain current information for Part (a)(1-3) of this condition and maintained on-site.

(Ref.: 40 CFR 63.11516(f)(7)(ii), (iii), and (8), Subpart XXXXXX

- 5.12 For Emission Point AA-003, the permittee shall maintain following information as it relates to any required visual determination of emissions opacity from welding operations [as specified by Condition 5.9]:
  - (a) The date of every visual determination of emissions opacity;
  - (b) The average of the 6-minute opacities measured by a Method 9 test; and
  - (c) A description of any corrective action(s) taken as a result of a performed Method 9 test.

(Ref.: 40 CFR 63.11519(c)(3), Subpart XXXXXX)

5.13 For Emission Point AA-003, the permittee shall record and maintain the quantity (in pounds) and type of welding wire and/or welding electrode consumed on a monthly basis. Additionally, the permittee shall maintain documentation that indicates the weight percentage (wt.%) of any metal hazardous air pollutant (HAP) present in welding wire / electrode consumed.

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

5.14 For Emission Point AA-014, the permittee shall maintain records on the volume (in cubic feet) of natural gas combusted on a monthly basis.

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

## SECTION 6 REPORTING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Reporting Requirement
AA-000	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	Report Deviation from Requirements Within Five (5) Working Days
		6.2	Submit an Annual Monitoring Report (AMR)
		6.3	Submit Documents Certified by a Responsible Official
		6.4	Submit an Annual Report on VOC and HAP Emissions
AA-001 AA-005 AA-006 AA-010	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.5	Submit an Annual Report on Usage Data for Surface Coatings and Solvents
AA-003	40 CFR 63.11519(b)(5), (6), and (8); Subpart XXXXXX	6.6	Submit an Annual Summary on Visual Determinations and Opacity Exceedances
	40 CFR 63.11519(b)(9); Subpart XXXXXX 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.7	Submit Prepared / Revised Site-Specific Welding Emissions Management Plan Annually (or Corresponding Negative Declaration)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.8	Submit an Annual Report on Welding Wire / Electrode Consumed
AA-014	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.9	Submit an Annual Report on Natural Gas Usage

6.1 For Emission Point AA-000 (Facility-Wide), 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 action(s) and/or preventive measures taken. The report shall be submitted to the MDEQ 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 For Emission Point AA-000 (Facility-Wide), except as otherwise specified herein, the permittee shall submit an annual monitoring report (AMR) postmarked no later than January 31<sup>st</sup> of each year for the preceding calendar year. This report shall contain any required monitoring specified in Section 6 of this permit. Additionally, all instances of deviations from permit requirements shall be clearly identified within 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.

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(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
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6.3 Any document required by this permit to be submitted to the MDEQ shall contain a certification signed by a Responsible Official (RO) that affirms, based on the information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

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(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
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6.4 For Emission Point AA-000 (Facility-Wide), the permittee shall submit an annual monitoring report (AMR) in accordance with Condition 6.2 that details the total respective emission rates of volatile organic compounds (VOCs), each individual hazardous air pollutant (HAP), and total combined HAPs in tons on both a monthly and 12-month rolling total basis.

The report shall include all reference data utilized to calculate emissions (e.g. applicable emission factors, engineering judgement determinations, etc.).

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(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
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- 6.5 For Emission Points AA-001, AA-005, AA-006, and AA-010, the permittee shall submit an annual report in accordance with Condition 6.2 that summarizes the following information for each surface coating (e.g. thinner, paint, etc.) and solvent used that contains a volatile organic compound (VOC) and/or hazardous air pollutant (HAP):
  - (a) The product name and identification;
  - (b) The density (in pounds per gallon);
  - (c) The total volume (in gallons) of each surface coating or solvent used during each rolling 12-month period;
  - (d) The weight percentage (wt.%) of the volatile organic compound (VOC) content; and
  - (e) The wt.% content for each individual hazardous air pollutant (HAP).

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(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
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- 6.6 For Emission Point AA-003, the permittee shall submit an annual report in accordance with Condition 6.2 that details the following information as it pertains to welding operations:
  - (a) Visual Determination of Fugitive Emissions:

- (1) The date of every visual determination of fugitive emissions (as specified by Condition 5.6) that resulted in the detection of visible emissions;
- (2) A description of the corrective action(s) taken subsequent to detecting visible emissions; and
- (3) The date and results of the follow-up visual determination of fugitive emissions after the corrective action(s).
- (b) Visual Determination of Emissions Opacity:
  - (1) The date of every visual determination of emissions opacity (as specified by Condition 5.9);
  - (2) The average of the six-minute opacities as measured by the Method 9 testing; and
  - (3) A description of any corrective action(s) taken subsequent to the test.
- (c) Exceedances of 20% Opacity (as determined by Method 9 testing):
  - (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.

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

6.7 For Emission Point AA-003, the permittee shall submit a copy of the prepared (or revised) Site-Specific Welding Emissions Management Plan (SSWEMP) and any subsequent revisions annually in accordance with Condition 6.2.

If no subsequent revision(s) is made to the most recently submitted SSWEMP in a calendar year, the permittee shall notify the MDEQ in the corresponding annual monitoring report with a negative declaration.

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(Ref.: 40 CFR 63.11519(b)(9); Subpart XXXXXX)
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
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6.8 For Emission Point AA-003, the permittee shall submit an annual monitoring report (AMR) in accordance with Condition 6.2 that details the quantity (in pounds) and type of welding wire or welding electrode consumed during each rolling 12-month period. Additionally, the AMR should include information that details the weight percentage of any metal hazardous air pollutant (HAP) present in the welding wire / electrode consumed.

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(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
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6.9 For Emission Point AA-003, the permittee shall submit an annual monitoring report (AMR) in accordance with Condition 6.2 that details the total volume (in cubic feet) of natural gas combusted on both a monthly and 12-month rolling total basis.

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