

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

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

**THIS CERTIFIES THAT**

Wade Services, Inc.  
500 Eastview Drive  
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**

*Krystal Rudolph*

**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Issued: March 6, 2017**

**Permit No.: 1360-00143**

**Modified: May 7, 2021**

**Expires: February 28, 2022**

## 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 2, Rule 2.1.D.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.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 permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).)
8. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)

9. The permittee shall furnish to the Mississippi Department of Environmental Quality (MDEQ) within a reasonable time any information the MDEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the MDEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the MDEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).)
10. The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits.  
(Ref.: Miss. Code Ann. 49-17-29)
11. 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)
12. 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.)
13. 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)

14. 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).)

15. 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.)

16. 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).)

17. The permittee shall furnish to MDEQ within a reasonable time any information 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 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 MDEQ along with a claim of confidentiality.

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

18. 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 [a]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 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 40CFR 51.66;
- (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 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.D(2).)

**B. GENERAL OPERATIONAL CONDITIONS**

- 1. The permittee shall at all times maintain in good working order and operate as efficiently as possible all air pollution control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A.)
- 2. 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.)
- 3. 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. The report shall be made within five (5) working days of the time the deviation began.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R.2.2.B(10).)
- 4. The permittee shall retain all required records, monitoring data, supported 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 of this permit upon request.

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

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

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

6. *Compliance Testing*: Regarding compliance testing (as applicable):

- (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” of 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. GENERAL SUBMITTAL REQUIREMENTS

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.

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

## 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 [Wade Services, Inc.]
AA-001	Surface Coating Operations [consists of one (1) paint booth and a curing oven]
AA-002	Wood Working Operations [consists of wood trimming and product assembly]
<b>AB-000</b>	<b>Facility Wide Metal Working Operations</b>
AB-001	Welding Operations [Manufactured by ESAB & Miller Welding Machines; Model: 353 CV, CP 300, CP 301; Model Year: 2006]
AB-002	One (1) Plasma Arc Cutting Table [Manufactured by Koike Aronson; Model Year: MGM 3100; Model Year: 2006]
AB-003	Grinding and Sanding Operations
AB-004	Sandblasting Operations [consists of one unit; emissions are released inside a building]
<b>AC-000</b>	<b>Facility-Wide Fuel Burning Equipment</b>
AC-001	Two (2) 2.0 MMBTU / Hour Natural Gas-Fired Air Handling Units [Manufactured by Carolina Virginia Spray Booth Inc.; Model Year: 2006; Semi Down Draft; Burner type: Atmospheric Inspirator; Design Controls: Discharge Dampers; Dry filters; Model Year: 2006]
AC-004	One (1) 0.8 MMBTU / Hour Natural Gas-Fired Curing Oven [New York blower; Manufactured by Weather-Rite; Model Year: 2006; Model No.: TOT 221 VTL Outdoor; Burner Type: Atmospheric Inspirator; Model Year: 2006]
AC-005	One (1) 0.38 MMBTU / Hour Natural Gas-Fired Cleaning and Phosphatizing Pressure Washer [2400 psi; Manufactured by Fremont Industries; Model Year: 2005; Model No.: 1024; Model Year: 2006]
<b>AD-000</b>	<b>Facility-Wide Storage Tanks</b>
AD-002	One (1) 300-Gallon Diesel Fuel Storage Tank [Horizontal, Fixed-Roof Tank used to store No. 2 Ultra Low Sulfur Diesel Dyed; Model Year: 2006]

**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.	3.1	Opacity (smoke)	≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2	Opacity	
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.3	VOCs	99.0 tpy (Rolling 12-Month Total)
	<b>(Title V Avoidance Limits)</b>	3.4	HAPs	9.9 tpy (Individual) 24.9 tpy (Total) (Rolling 12-Month Totals)
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.5	PM	$E = 4.1(p^{0.67})$
AC-000	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.6	PM	0.6 Pounds / MMBTU per Hour Heat Input

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 (40) percent opacity subject to the following exceptions:

- (a) Start-up operations may produce emissions that 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.
- (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed sixty percent (60%) opacity and provided that the aggregate duration of such emissions during any 24-hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one (1) hour.

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

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

(Ref.: 11 Miss. Admin. Code. Pt. 2, R 2.2.B(10). – Title V Avoidance Limit)

- 3.4 For Emission Point AA-000 (Facility-Wide), the permittee shall limit the emission of hazardous air pollutants (HAPs) to no more than 9.9 tons per year (tpy) for each individual HAP and no more than 24.9 tpy of all HAPs combined based on a rolling 12-month total basis.

(Ref.: 11 Miss. Admin. Code. Pt. 2, R 2.2.B(10). – Title V Avoidance Limit)

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

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

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

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

- 3.6 For Emission Point AC-000 (Facility-Wide Fuel Burning Equipment), the maximum permissible emission of ash and / or particulate matter (PM) from each fossil fuel-burning installation of less than ten (10) million BTU (MMBTU) per hour heat input shall not exceed 0.60 pounds per 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	Limitation / Standard
AC-000	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	4.1	PM	Operate Fuel Burning Equipment In Accordance With Manufacturer's Recommendations
AD-000	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	4.2	VOCs HAPs	Operate Tanks Efficiently to Minimize the Amount of Air Contaminants Released

4.1 For Emission Point AC-000 (Facility-Wide Fuel Burning Equipment), the permittee shall operate and maintain the fuel burning equipment in accordance with the manufacturer's emission-related written instructions and change only those emission-related settings that are permitted by the manufacturer.

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

4.2 For Emission Point AD-000 (Facility-Wide Storage Tanks), the permittee shall operate all storage tanks as efficiently as possible to provide the maximum reduction of the release of air contaminants.

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

## 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	Monitor Each Coating, Adhesive, Solvent or Other VOC- / HAP-Containing Material
		5.3		Maintain Records on Each Coating, Adhesive, Solvent, or Other VOC- / HAP-Containing Material  Maintain Records on the Total VOC and HAP (Individual and Combined) Emission Rates

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

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

5.2 For Emission Point AA-000 (Facility-Wide), the permittee shall determine the following information for each coating, adhesive, solvent or other VOC or HAP containing material used:

- (a) The volume used (gallons);
- (b) The percentage of VOC by weight;
- (c) The percentage of each individual HAP and all HAPs combined by weight; and
- (d) The density (in pounds per gallon).

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

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

- 5.3 For Emission Point AA-000 (Facility-Wide), the permittee shall maintain records that document the following information:
- (a) The identification of each coating, adhesive, solvent, or other VOC- / HAP-containing material;
  - (b) The total volume (in gallons) of each coating, adhesive, solvent, or other VOC- / HAP-containing material used on both a monthly basis and rolling 12-month total basis;
  - (c) The VOC and HAP content of each coating, adhesive, solvent, or other VOC- / HAP-containing material used. A description of the method used to determine the VOC and HAP content shall accompany this data;
  - (d) The density (in pounds per gallon) of each coating, adhesive, solvent, or other VOC- / HAP-containing material used; and
  - (e) The total VOC emission rate, the total HAP emission rate, and the emission rate of each individual HAP in tons based on a rolling 12-month total basis.

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

**SECTION 6  
REPORTING AND SUBMITTAL 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 Permit Deviations Within Five (5) Working Days
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.2	Submit a 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

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. The report shall be made within five (5) working days of the time the deviation began.

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

6.2 For Emission Points AA-000 (Facility-Wide), except as otherwise specified herein, the permittee shall submit a certified annual synthetic minor monitoring report (AMR) postmarked no later than January 31 of each calendar year for the preceding calendar year. This report shall address any required monitoring specified in Section 6 of 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. The AMR shall include the following information (at a minimum):

(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 total VOC emission rate, the total HAP emission rate, and the emission rate of each individual HAP in tons per month and TPY for each consecutive 12-month period.

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

6.3 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).)