

STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Kloeckner Metals Corporation, Weld Shop
604 Stringer Industrial Park Road
Louisville, Winston County, Mississippi

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

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

Krystal Rudolph

AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: May 7, 2021

Permit No.: 2980-00042

SECTION 1

A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
2. Any activities not identified in the application are not authorized by this permit.

(Ref.: Miss. Code Ann. 49-17-29 1.b)
3. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for operating without a valid permit pursuant to State Law.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
4. It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(6).)
5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit, unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)
7. The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

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

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

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

9. The permittee shall furnish to the MDEQ within a reasonable time any information the MDEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.

Upon request, the permittee shall also furnish to the MDEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the MDEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

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

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

11. *Solids Removal:* The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits.

(Ref.: Miss. Code Ann. 49-17-29)

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

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

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

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

14. *Right of Entry:* The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives upon presentation of credentials:
- (a) To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and
 - (b) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emissions.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

24. *Application Requirements for a Permit to Operate for Moderate Modifications:* For moderate modifications that require contemporaneous enforceable emissions reductions from more than one emission point in order to “net” out of Prevention of Significant Deterioration / New Source Review (PSD / NSR), the applicable Title V Permit to Operate

or State Permit to Operate must be modified prior to beginning operation of the modified facilities.

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

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

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

26. *Deviation Reporting:* Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began.

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

27. *Compliance Testing:* Regarding compliance testing:

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

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

SECTION 2
EMISSION POINT DESCRIPTION

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

Emission Point	Description
AA-000	Facility-Wide [Kloeckner Metals Corporation, Weld Shop]
AA-100	Facility-Wide Wire Welding [includes six (6) wire welding units]
AA-200	Facility-Wide Surface Coating Operations [consists of one (1) spray paint booth; the exhaust from the booth is routed through fabric filter panels. Paint guns are cleaned with solvents]
AA-300	Natural Gas-Fired Space Heaters [includes twenty-four (24) 0.125 MMBTU / hour and two (2) 0.05 MMBTU / hour space heaters]

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	40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2		
AA-100 AA-200	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). <i>(Title V Avoidance Limit)</i>	3.3	HAPs	9.0 tpy (Individual) 24.0 tpy (Total) (12-Month Rolling Totals)
	11 Miss. Admin. Code Pt. 2, R. 1.3.F.(1).	3.4	PM (filterable only)	$E = 4.1 (p^{0.67})$
AA-100	40 CFR Part 63, Subpart XXXXXX – National Emission Standards for Nine Metal Fabrication and Finishing Source Categories 40 CFR 63.11514(a) and (b)(5); Subpart XXXXXX	3.5	MFHAPs	Applicability
AA-200	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). <i>(Title V Avoidance Limit)</i>	3.6	VOCs	99.0 tpy (12-Month Rolling Total)
AA-300	11 Miss. Admin. Code Pt. 2, R. 1.3.D.(1)(a).	3.7	PM	0.6 Pounds / MMBTU per Hour

3.1 For Emission Point AA-000 (Facility-Wide), except as otherwise specified herein, the permittee shall not cause or allow the emission of smoke from a point source into the open air that exceeds forty percent (40%) opacity from any process on-site.

Start-up operations may produce emissions that exceed 40% opacity for up to fifteen (15) minutes per start-up in any one 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.)

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

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

- 3.3 For Emission Points AA-100 and AA-200, the permittee shall limit the emission of any individual hazardous air pollutant (HAP) to no more than 9.0 tpy based on a rolling 12-month total basis and all HAPs in total to no more than 24.0 tpy based on a rolling 12-month total basis.

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

- 3.4 For Emission Points AA-100 and AA-200, except as otherwise specified herein, limited herein or as applicable, 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 following 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.(1).)

- 3.5 For Emission Point AA-100, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 63, Subpart XXXXXX – National Emission Standards for Hazardous Air Pollutants Area Source Standard for Nine Metal Fabrication and Finishing Categories.

For the purpose of this permit, the permittee is an area source of hazardous air pollutants (HAPs) that primarily engages in operations listed under the category “Fabricated Metal Products Manufacturing”.

(Ref.: 40 CFR 63.11514(a) and (b)(5); Subpart XXXXXX)

- 3.6 For Emission Point AA-200, the permittee shall limit the total emission of volatile organic compounds (VOCs) to no more than 99.0 tons per year (tpy) based on a rolling 12-month total.

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

- 3.7 For Emission Point AA-300, except as otherwise specified or limited herein, the maximum emission of ash and/or particulate matter (PM) from each individual process unit shall not exceed 0.6 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	Work Practice Standard
AA-100	40 CFR 63.11516(f)(1 – 2); Subpart XXXXXX	4.1	MFHAPs	Standards for Welding

- 4.1 For Emission Point AA-100, the permittee shall comply with the requirements in Parts (a) and (b) of this condition for each welding operation that uses materials that contain metal fabrication hazardous air pollutants (MFHAPs) or has the potential to emit MFHAPs. These welding standards do not apply when welding operations are being performed that do not use any materials containing MFHAPs or do not have the potential to emit MFHAPs.

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

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

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

SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant / Parameter	Monitoring / Recordkeeping Requirement(s)
AA-000	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain Records for a Minimum of Five (5) Years
AA-100 AA-200	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.2	HAPs	Calculate and Record Emissions (Monthly and 12-Month Rolling Total)
AA-100	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.3	HAPs (Metal)	Record and Maintain Operational Data for Welding Activities (Monthly)
AA-100	40 CFR 63.11517(a) and (b)(1 – 4); Subpart XXXXXX	5.4	MFHAPs	Requirements for the Visual Determination of Fugitive Emissions
	40 CFR 63.11519(c)(1 – 4), (11 – 13), and (15); Subpart XXXXXX	5.5		Recordkeeping Requirements
	40 CFR 63.11517(c); Subpart XXXXXX	5.6		Requirements for the Visual Determination of Opacity for Welding
	40 CFR 63.11516(f)(3 – 7); Subpart XXXXXX	5.7		Tier 1, 2, and 3 Compliance Requirements for Welding
	40 CFR 63.11516(f)(8); Subpart XXXXXX	5.8		Requirements for Developing a Site-Specific Welding Emissions Management Plan
AA-200	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.9	VOCs	Calculate and Record Emissions (Monthly; Rolling 12-Month Total)
		5.10	VOCs HAPs	Record and Maintain Surface Coating Usage and Specifications (Monthly)
		5.11	VOCs	Perform and Record Regular Inspections of a Fabric Filter Panels in Accordance with Manufacturer's Instructions

- 5.1 For Emission Point AA-000 (Facility-Wide), except as otherwise specified or limited herein, the permittee shall retain all required records, monitoring data, supporting information, and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes all calibration and maintenance records, all original strip-chart recordings or other data from continuous monitoring instrumentation, and copies of all reports required by this

permit. Copies of such records shall be submitted to the MDEQ as required by “Applicable Rules and Regulations” of this permit upon request.

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

- 5.2 For Emission Points AA-100 and AA-200, the permittee shall calculate and record the respective total emission of each individual hazardous air pollutant (HAP), and all HAPs combined in tons both on a monthly and on a rolling 12-month total basis.

Unless otherwise specified herein, the permittee shall include all reference data utilized to calculate emissions (*e.g.* operational data required by Conditions 5.3 and 5.9; applicable emission factors; engineering judgement determinations; etc.).

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

- 5.3 For Emission Point AA-100, the permittee shall monitor and record both the quantity (in pounds) and type of each welding wire or welding electrode both on a monthly and rolling 12-month total basis. Additionally, the permittee shall maintain the following information for each welding wire or welding electrode consumed:

- (a) The product name or identification; and
- (b) The HAP component content (in weight percent). A description of the method used to determine the HAP content should also accompany the corresponding data.

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

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

- 5.4 For Emission Point AA-100, **if the permittee uses 2,000 pounds or more of welding wires and electrodes collectively that contain one or more MFHAPs in any rolling 12-month total basis**, the permittee shall demonstrate that the work practice standards outlined in Condition 4.1 by conducting the following “Tier” procedures (as applicable):

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

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

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

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

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

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

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

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

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

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

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

- (1) Daily Method 9 Testing – Perform visual determination of emissions opacity once per day during each day that welding operations are conducted.

- (2) Weekly Method 9 Testing – If the average of the six-minute opacities recorded during any of the daily consecutive Method 9 tests performed do not exceed twenty percent (20%) for ten (10) days of welding operations, the permittee may decrease the frequency of Method 9 testing to once per five (5) days of consecutive welding operations.

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

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

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

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

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

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

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

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

- (1) The permittee shall prepare (or revise), implement, and maintain a Site-Specific Welding Emissions Management Plan (SSWEMP) no later than thirty (30) days

after determining that the average of the six-minute opacities recorded exceed 20%. The SSWEMP shall contain the following information:

- (i) Company name and address;
- (ii) A list and description of all welding operations that are currently utilized;
- (iii) A description of all management practices and/or fume control methods in place at the time of the opacity exceedance;
- (iv) A list and description of all management practices and/or fume control methods currently employed for welding activities; and
- (v) A description of additional management practices and/or fume control methods to be implemented pursuant to triggering this requirement, and the projected date of implementation.

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

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

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

5.5 For Emission Point AA-100, upon the detecting fugitive emissions as result of a visual determination performed in accordance with Condition 5.4(a), the permittee shall implement corrective actions that include (but are not limited to) the following protocols:

- (a) Inspecting welding fume sources;
- (b) Evaluating the proper operation and effectiveness of the management practices and/or fume control measures implemented in accordance with Condition 4.1(b); and
- (c) After completing the corrective actions, the permittee shall perform a follow-up inspection for visible fugitive emissions in accordance with Condition 5.4(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)

5.6 For Emission Point AA-100, upon any visual determination of emissions opacity performed in accordance with Condition 5.4(b) that results in the average of the 6-minute opacities recorded equaling 20% or less but greater than 0%, 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 4.1(b).

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

5.7 For Emission Point AA-100, the permittee shall collect and maintain records that contains the following information:

- (a) General Compliance and Applicability Records:
 - (1) Each notification and report that was submitted to comply with this subpart and the documentation supporting each notification and report.
 - (2) Applicability determinations listing equipment included in welding operations (as well as any changes to that and on what date they occurred) shall be maintained for five (5) years and be made available for review at any time.
- (b) Visual Determination of Fugitive Emissions Records:
 - (1) The date and results of every visual determination of fugitive emissions performed in accordance with Condition 5.4(a);
 - (2) A description of any corrective actions implemented in accordance with Condition 5.5; and
 - (3) The date and results of any follow-up visual determination of fugitive emissions performed after the corrective actions in accordance with Condition 5.4.
- (c) Visual Determination of Emissions Opacity Records:
 - (1) The date of every visual determination of emissions opacity performed in accordance with Condition 5.4(b);
 - (2) The average of the six-minute opacities measured by a Method 9 test; and
 - (3) A description of any corrective actions implemented in accordance with Condition 5.6.

- (d) Visual Determination of Emissions Opacity Performed During the Preparation (or Revision) of the Site-Specific Welding Emissions Management Plan – The permittee shall maintain a record of each visual determination of emissions opacity performed during the preparation (or revision) of a SSWEMP, as outlined in Condition 5.4(c)(2).

The noted information shall be maintained in a form suitable and readily available for expeditious (where appropriate, the records may be maintained as electronic spreadsheets or as a database). At a minimum, the most recent two (2) years of data shall be retained on-site while the remaining three (3) years of data may be retained off-site.

(Ref.: 40 CFR 63.11519(c)(1) – (3), (11), and (15); Subpart XXXXXX)

- 5.8 For Emission Point AA-200, the permittee shall calculate and record the total emission of volatile organic compounds (VOCs) both on a monthly and on rolling 12-month total basis.

Unless otherwise specified herein, the permittee shall include all reference data utilized to calculate emissions (*e.g.* operational data required by Condition 5.9; applicable emission factors; engineering judgement determinations; etc.).

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

- 5.9 For Emission Point AA-200, the permittee shall monitor and record the total volume (in gallons) of any surface coating material (*e.g.* thinner, solvent, primer, paint, etc.) used that contains a volatile organic compound (VOC) and/or hazardous air pollutant (HAP). 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 volatile organic compound (VOC) content; and
- (d) The wt.% of any individual hazardous air pollutant (HAP).

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

- 5.11 For Emission Point AA-200, the permittee shall perform and record the regular inspection and replacement of fabric filter panels in each paint booth in accordance with the manufacturer's instructions. Additionally, the permittee shall maintain documentation that identifies the capture efficiency of the filter panels used in a paint booth.

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

SECTION 6 REPORTING REQUIREMENTS

Emission Point(s)	Applicable Requirement(s)	Condition Number	Reporting Requirement(s)
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 VOC and HAP Emissions
AA-100	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.5	Submit Facility-Wide Wire Welding Operational Data
	40 CFR 63.11516(b)(1, 2, 4 – 6, 8, and 9); Subpart XXXXXX	6.6	Reporting Requirements
AA-200	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.7	Submit Facility-Wide Surface Coating Usage Data / Specifications

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 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.

(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 (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.

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

- 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 emission of volatile organic compounds (VOCs), any individual hazardous air pollutant (HAP), and all HAPs in total 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.).

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

- 6.5 For Emission Point AA-100, the permittee shall submit an annual monitoring report (AMR) in accordance with Condition 6.2 that outlines the following information based on a rolling 12-month total basis:

- (a) The quantity (in pounds) and type of welding wire and/or welding electrode consumed; and
- (b) The weight percentage (wt.%) of any metal hazardous air pollutant (HAP) present in any welding wire / electrode consumed.

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

- 6.6 For Emission Point AA-100, the permittee must prepare and submit an annual certification and compliance report in accordance with the following requirements:

- (a) Dates – The permittee must prepare and submit each annual certification and compliance report in accordance with the dates specified in subparagraphs (1) and (2) below. Note that the information reported for each of the months in the reporting period will be based on the last twelve (12) months of data prior to the date of each monthly calculation.
 - (1) The annual certification and compliance report shall cover each subsequent annual reporting period from January 1 through December 31.
 - (2) Each annual certification and compliance report shall be prepared and submitted no later than January 31 and kept in a readily-accessible location for inspector review. If an exceedance has occurred during the year, each annual certification and compliance report must be submitted along with the exceedance reports, and postmarked or delivered no later than January 31.

- (b) General Requirements – The annual certification and compliance report shall contain the information specified in subparagraphs (1) – (3) below and the information specified in Parts (c) through (f) of this condition (as applicable):
- (1) The company name and address;
 - (2) A 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) The date of the report and the beginning / 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) Visual Determination of Fugitive Emissions Requirements – The annual certification and compliance report shall contain the information specified in subparagraphs (1) – (3) below in accordance with Condition 5.7(b).
- (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) Visual Determination of Emissions Opacity Requirements – The annual certification and compliance report shall contain the information specified in subparagraphs (1) – (3) below in accordance with Condition 5.7(c):
- (i) The date of every visual determination of emissions opacity;
 - (ii) The average of the six-minute opacities measured by the test; and
 - (iii) A description of any corrective action taken subsequent to the test.
- (e) Exceedances of 20% Opacity for Welding Operations – 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%. This report must be submitted along with the annual certification and compliance report according to the requirements of this condition and must contain the information in subparagraphs (1) and (2) below:
- (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) Site-Specific Welding Emissions Management Plan (SSWEMP) Reporting (as applicable) – The permittee shall submit a copy of the records of daily visual determinations of emissions recorded in accordance with Condition 5.4(c)(2), a copy of the SSWEMP, and any subsequent revisions to the SSWEMP.

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

6.7 For Emission Point AA-200, the permittee shall submit an annual monitoring report (AMR) in accordance with Condition 6.2 that details the following information for each surface coating material used that contains a volatile organic compound (VOC) and/or hazardous air pollutant (HAP) based on a rolling 12-month total basis:

- (a) The product name and identification;
- (b) The density (in pounds per gallon);
- (c) The volume (in gallons) consumed;
- (d) The weight percentage (wt.%) of the volatile organic compound (VOC) content; and
- (e) The wt.% of any individual hazardous air pollutant (HAP).

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