STATE OF MISSISSIPPI
AND FEDERALLY ENFORCEABLE
AIR POLLUTION CONTROL
PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT AT A SYNTHETIC MINOR SOURCE

THIS CERTIFIES THAT

Kloeckner Metals Corporation
4404 North Church Avenue
Louisville, Winston 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: August 14, 2023 **Permit No.: 2980-00021**

Effective Date: As Specified Herein.

Expires: July 31, 2028

1913 PER20210001

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 (MDEQ) Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:

(a) To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and

(b) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission.

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

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

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

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

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

11. This permit does not authorize a modification as defined in 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]ny 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, Startups, 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 twenty-four (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 the 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 start-ups 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 start-ups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).

(3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

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

5. *Compliance Testing*: Regarding compliance testing:

(a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations 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. 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 [Kloeckner Metals Corporation]
AA-100	Facility-Wide Abrasive Blasting Operations
AA-101	One (1) Steel-Shot Blaster [maximum design capacity: 5,500 pounds of steel-shot per hour; emissions are controlled by two (2) baghouses (Emission Points AA-101a and AA-101b)]
AA-101a	One (1) Baghouse [air inlet flow rate: 10,000 acfm; cloth area: 3,040 ft^2; controls emissions from a Steel-Shot Blaster (AA-101)]
AA-101b	One (1) Baghouse [air inlet flow rate: 5,000 acfm; cloth area: 1,520 ft^2; controls emissions from a Steel-Shot Blaster (AA-101)]
AA-200	Facility-Wide Metal Working Operations [includes (but not limited to) metal cutting (laser, oxy-acetylene, oxy-methane, plasma), drilling, grinding, and welding; emissions from the Messer steel cutting machine are routed to a baghouse]
AA-300	Facility-Wide Surface Coating Operations [includes (but not limited to) the application of spray-can paint, solvents, lubricants, and cutting oils]
AA-400	Facility-Wide Fuel Burning Equipment
AA-401	Twenty (20) Natural Gas-Fired Space Heaters (total heat input capacity: 4.20 MMBTU / hour)
AA-500	Facility-Wide Tank Storage
AA-501	500-Gallon Diesel Storage Tank
AA-502	500-Gallon Used Oil Storage Tank
AA-503	275-Gallon Motor Oil Totes
AA-504	275-Gallon Hydraulic Fluid Totes

SECTION 3
EMISSION LIMITATIONS AND STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limitation / Standard
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity (Smoke)	≤ 40% (except during start-up)
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2	Opacity	≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.F.(1).	3.3	PM (filterable)	$E = 4.1(p^{0.67})$
	11 Miss. Admin. Code Pt. 2, R.1.3.C.	3.4	All Pollutants	General Nuisance Provisions
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). **(PSD Avoidance Limit)**	3.5	PM (filterable)	249.0 tpy (Rolling 12-Month Total)
	11 Miss. Admin. Code Pt.2, R. 2.2.B.(10). **(Title V Avoidance Limits)**	3.6	PM_{10} / $PM_{2.5}$ (filterable only)	99.0 tpy (Rolling 12-Month Totals)
AA-100 AA-200	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.7	PM / PM_{10} (filterable only)	Operate the Baghouses at All Times the Process Equipment is in Operation
	40 CFR Part 63, Subpart XXXXXX – NESHAP Area Source Standards for Nine Metal Fabrication and Finishing Source Categories 40 CFR 63.11514(a)(3) and (b)(1), (2), (3), and (5); Subpart XXXXXX	3.8	HAPs	General Applicability
AA-200 AA-300	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). **(Major Source Avoidance Limits)**	3.9	HAPs	9.0 tpy (Individual) 24.0 tpy (Total) (Rolling 12-Month Totals)
AA-300	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). **(Title V Avoidance Limit)**	3.10	VOCs	95.0 tpy (Rolling 12-Month Total)
AA-400	11 Miss. Admin. Code Pt. 2, R. 1.3.D.(1)(a).	3.11	PM	0.6 lb. / 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 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, 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.

(b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed sixty (60) percent opacity and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one (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 discharge into the ambient air from a point source any contaminant of such opacity as to obscure an observer's view to a degree in excess of forty (40) percent 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 Point AA-000 (Facility-Wide), the permittee shall not 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 rate in tons per hour. The 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).)

3.4 For Emission Point AA-000 (Facility-Wide), the permittee shall not cause or allow the emission of particles or any contaminants in sufficient amounts or of such duration from any process as to be injurious to humans, animals, plants, or property, or to be a public nuisance, or create a condition of air pollution.

The permittee shall not cause or permit the handling, transporting, or storage of any material in a manner which allows or may allow unnecessary amounts of particulate matter to become airborne.

When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than from which it originated or to violate any other provision of this regulation, the Commission may order such corrected in a way that all air and gases or air and gas-borne material leaving the building or equipment are controlled or removed prior to discharge to the open air.

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

3.5 For Emission Point AA-000 (Facility-Wide), the permittee shall limit the total emission of particulate matter (PM; filterable) to no more than 249.0 tons per year (tpy) based on a rolling 12-month total basis.

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

3.6 For Emission Point AA-000 (Facility-Wide), the permittee shall limit the total emission of particulate matter less than 10 microns (µm) in diameter (PM_{10}; filterable only) and particulate matter less than 2.5 microns (µm) in diameter ($PM_{2.5}$; filterable only) to no more than 99.0 tpy based on a rolling 12-month total basis.

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

3.7 For Emission Points AA-100 and AA-200, the permittee shall operate each baghouse at all times while the associated process equipment is in operation. In the event a baghouse malfunctions or becomes non-operational, the permittee shall take actions as expeditiously as possible to bring the baghouse back to normal operation or cease the operation of the associated process equipment. "Normal operation" shall be defined as operation of the baghouse and no visible emissions.

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

3.8 For Emission Points AA-100 and AA-200, the permittee is subject to and shall comply with the applicable requirements found in 40 CFR Part 63, Subpart XXXXXX – National Emission Standards for Hazardous Air Pollutants (NESHAP) Area Source Standards for Nine Metal Fabrication and Finishing Source Categories and 40 CFR Part 63, Subpart A – General Provisions (as required in Table 2 of Subpart XXXXXX).

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) **or** if it contains manganese in amounts greater than or equal to 1.0 wt.% (as the metal).

(Ref.: 40 CFR 63.11514(a)(3), (b)(1) – (3), and (5); Subpart XXXXXX)

3.9 For Emission Points AA-200 and AA-300, the permittee shall limit the emission of hazardous air pollutants (HAPs) to no more than 9.0 tpy for any individual HAP and no more than 24.0 tpy for all HAPs in total based on rolling 12-month totals.

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

3.10 For Emission Point AA-300 (Facility-Wide), the permittee shall limit the emission of volatile organic compounds (VOCs) to no more than 95.0 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)

3.11 For Emission Point AA-400, the maximum permissible emission of ash and/or PM from any fossil fuel burning installation of less than ten (10) million BTU (MMBTU) per hour heat input 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
AA-100	40 CFR 63.11516(a)(2); Subpart XXXXXX	4.1	MFHAPs	Requirements for Vented Dry Abrasive Blasting Operations
	40 CFR 63.11516(a)(3)(i); Subpart XXXXXX	4.2		Requirements for Abrasive Blasting of Objects Greater Than Eight (8) Feet in Any One Dimension
AA-200	40 CFR 63.11516(b); Subpart XXXXXX	4.3	MFHAPs	Requirements for Machining Operations
	40 CFR 63.11516(c); Subpart XXXXXX	4.4		Requirements for Dry Grinding and Dry Polishing with Machines
	40 CFR 63.11516(f)(1) – (2); Subpart XXXXXX	4.5		Requirements for Welding Operations

4.1 For Emission Point AA-100, the permittee must comply with the following requirements for a dry abrasive blasting operation that has a vent allowing any air or blast material to escape.

These abrasive blasting standards **do not** apply when abrasive blasting is being performed that does not use any materials containing MFHAPs or do not have the potential to emit MFHAPs.

(a) The permittee must capture emissions and vent them to a filtration control device. Additionally, the permittee must operate the filtration control device in accordance with manufacturer's instructions and must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices [as specified by Condition 5.3(e)].

(b) The permittee must implement the following management practices to minimize emission of MFHAPs:

(1) The permittee must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions (as practicable);

(2) The permittee must enclose dusty abrasive material storage areas and holding bins, seal chutes, and conveyors that transport abrasive materials; and

(3) The permittee must operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions.

(Ref.: 40 CFR 63.11516(a)(2); Subpart XXXXXX)

4.2 For Emission Point AA-100, the permittee may implement the following management practices in lieu of those required by Condition 4.1 for dry abrasive blasting operation of objects greater than eight (8) feet in any one dimension to minimize the emission of MFHAPs:

(a) The permittee must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions (as practicable);

(b) The permittee must enclose abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive material;

(c) The permittee must operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions;

(d) The permittee must 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 (or screening) and the abrasive material conforms to its original size; and

(e) Whenever practicable, the permittee must 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)

4.3 For Emission Point AA-200, the permittee must implement the following management practices for each machining operation (as defined in 40 CFR 63.11522, Subpart XXXXXX) to minimize MFHAP emissions.

These requirements **do not** apply when a machining operation is being performed that does not use any materials containing MFHAPs and do not have the potential to emit MFHAPs.

(a) The permittee must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and

(b) The permittee must operate all equipment associated with machining according to manufacturer's instructions.

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

4.4 For Emission Point AA-200, the permittee must comply with the following requirements for any “dry grinding and dry polishing with machine” operation that uses materials containing a MFHAP:

(a) The permittee must capture emissions and vent them to a filtration control device. The permittee must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices [as

specified by Condition 5.3(e)].

(b) The permittee must implement the following management practices to minimize the emission of MFHAPs:

(1) The permittee must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions (as practicable); and

(2) The permittee must 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-200, the permittee must comply with the following requirements for any welding operation.

These requirements **do not** apply when a welding operation is being performed that does not use any materials containing MFHAPs or do not have the potential to emit MFHAPs.

(a) The permittee must operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions. The permittee must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the capture and control devices [as specified by Condition 5.3(e)].

(b) The permittee must implement one or more of the management practices specified below to minimize the emission of MFHAPs (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 that is operated in accordance with the manufacturer's specifications.

(Ref.: 40 CFR 63.11516(f)(1) – (2); Subpart XXXXXX)

SECTION 5
MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Monitoring / Recordkeeping Requirement
AA-000 (Facility-Wide)	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	PM_{10} / $PM_{2.5}$ (filterable only)	Calculate Emissions (Monthly and Rolling 12-Month Totals)
	40 CFR 63.11519(c)(1) – (4), (11) – (14); Subpart XXXXXX 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.3	MFHAPs	Recordkeeping Requirements
AA-100 AA-200	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.4	PM_{10} / $PM_{2.5}$ (filterable only) MFHAPs	Perform an Inspection on Each Baghouse Monthly
AA-100	40 CFR 6311516(a)(3)(ii) and 63.11517(a) – (b); Subpart XXXXXX	5.5	Fugitive Emissions	Perform a Routine Visual Determination
AA-200	40 CFR 63.11516(f)(3), (5), (7), and 63.11517(a) – (d); Subpart XXXXXX	5.6	Fugitive Emissions Opacity	Perform "Tiered" Compliance Requirements for Welding Operations (As Applicable)
	40 CFR 63.11516(f)(4)(i) and (6); Subpart XXXXXX	5.7		Perform Corrective Actions (As Applicable)
AA-200 AA-300	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.8	HAPs	Calculate Emissions (Monthly and Rolling 12-Month Totals)
AA-300	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.9	VOCs HAPs	Recordkeeping Requirements for Applicable Materials Calculate VOC Emissions (Monthly and Rolling 12-Month Total)

5.1 For Emission Point AA-000 (Facility-Wide), 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 for 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 calculate and record the emission of PM_{10} (filterable only) and $PM_{2.5}$ (filterable only) in tons on both a monthly and rolling 12-month total basis.

Unless otherwise specified herein, the permittee shall include all reference data to validate calculated emissions (e.g. operational data, applicable emission factors, manufacturer's specifications, engineering judgement determinations, control device efficiency data, etc.).

(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 documentation that details the following information:

(a) Each notification and report submitted to comply with Subpart XXXXXX (including any documentation supporting a notification and/or report);

(b) Records on each applicability determination that lists the equipment included within an affected source (as well as any changes to that and on what date they occurred);

(c) For each visual determination of fugitive emissions performed in accordance with Condition 5.5(c), the permittee shall maintain the following information:

(1) The date and results of each determination;

(2) A description of any corrective actions implemented as a result of a visual determination; and

(3) The date and results of any follow-up visual determination of fugitive emissions performed after the corrective actions;

(d) For each visual determination of emissions opacity performed in accordance with Condition 5.6(b), the permittee shall maintain the following information:

(1) The date of every visual determination performed;

(2) The average of the six-minute opacities measured by a Method 9 test; and

(3) A description of any corrective actions implemented as a result of a Method 9 test.

(e) The manufacturer's specifications for any control device(s) used to comply with a work management practice specified in Conditions 4.1 through 4.5 (as applicable);

(f) A record of each visual determination of emissions opacity performed during the preparation (or revision) of a Site-Specific Welding Emissions Management Plan (SSWEMP);

(g) A copy of the most current SSWEMP;

(h) If the permittee complies with a work management practice specified in Condition 4.1 through 4.5 by operating the equipment in accordance with the manufacturer's instruction, the permittee shall maintain the corresponding instructions; and

(i) The quantity of each welding rod used that contains a MFHAP (in tons) based on a rolling 12-month total basis and the individual HAP content of each welding rod used.

(Ref.: 40 CFR 63.11519(c)(1) – (4), (11) – (14); Subpart XXXXXX)
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).)

5.4 For Emission Points AA-100 and AA-200, the permittee shall perform an inspection that evaluates the performance capability of each baghouse on a monthly basis. If a problem is noted during an inspection, the permittee shall perform the necessary maintenance to ensure operation as originally designed. Additionally, the permittee shall maintain on-site (to the extent practicable) sufficient components as is necessary to repair the baghouse(s).

The permittee shall maintain documentation that details the date / time of each inspection, the results of each inspection, any problem that is experienced, any maintenance (either corrective or preventative) performed to return the baghouse(s) to operation as originally designed, and the duration in which a baghouse is non-operational due to malfunction.

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

5.5 For Emission Point AA-100, the permittee shall demonstrate compliance with work management practices specified in Condition 4.1 or 4.2 (as applicable) by performing a visual determination of fugitive emissions in accordance with EPA Test Method 22 ("Method 22") and the following requirements (as applicable):

(a) For any abrasive blasting of objects greater than eight (8) feet in any one dimension that is performed outdoors, the permittee shall perform a visual determination at the fence line or property border nearest to the outdoor dry abrasive blasting operation.

(b) For any abrasive blasting of objects greater than eight (8) feet in any one dimension that is performed indoors, the permittee shall perform the visual determination at the primary vent, stack, existing, or opening from the building containing the abrasive blasting operations.

(c) 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. Additionally, the frequency for performing a Method 22 test is as follows:

(1) *Daily Method 22 Testing* – Perform a visual determination of fugitive emissions once per day on each day the applicable process is in operation.

(2) *Weekly Method 22 Testing* – If no visible fugitive emissions are detected during the 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 applicable 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 operations once per day during each day that the applicable 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 paragraph (c)(2) of this condition, the permittee may decrease the frequency of Method 22 testing to once per twenty-one (21) days of applicable 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.

(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 paragraph (c)(3) of this condition, the permittee may decrease the frequency of Method 22 testing to once per sixty (60) days of applicable 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.

(Ref.: 40 CFR 6311516(a)(3)(ii) and 63.11517(a) – (b); Subpart XXXXXX)

5.6 For Emission Point AA-200, the permittee shall demonstrate compliance with the work management practices specified in Condition 4.5 by performing the following "tiers" **if** the permittee uses at least 2,000 pounds of welding rod that contains a MFHAP based on a rolling 12-month total:

(a) **Tier 1** – The permittee shall perform a visual determination of fugitive emissions at the primary vent, stack, exit, or opening from the building that contains the welding operations in accordance with Condition 5.5(c).

(b) **Tier 2** – If visible fugitive emissions are detected more than once during any rolling 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 ("Method 9") at the primary vent, stack, exit, or opening from the building that contains 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 permittee shall perform any Method 9 test for at least thirty (30) consecutive minutes and during active welding operations under normal conditions. Additionally, the frequency for performing a Method 9 test is as follows:

(1) *Daily Method 9 Testing* – Perform a 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 (20) percent 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 paragraph (b)(1) of this condition.

(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 paragraph (b)(2) of this condition 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.

(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 paragraph (b)(3) of this condition 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.

(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 paragraph (b)(3) of this condition do not exceed 20%, the permittee may resume Method 22 testing as specified in Condition 5.5(c)(3) and (c)(4).

However, in lieu of performing Method 22 testing, the permittee may elect to continue perform Method 9 testing in accordance with paragraphs (b)(3) and (b)(4) of this condition.

(c) **Tier 3** – For each visual determination of emissions opacity performed in accordance with paragraph (b) of this condition in which the average of the 6-minute opacities recorded exceed 20%, the permittee shall comply with the following requirements:

(1) The permittee shall revise, implement, and maintain a 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 and maintained on-site for review by MDEQ personnel.

(2) During the revision of the SSWEMP, the permittee shall perform daily Method 9 testing in accordance with paragraph (b)(1) of this condition.

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

5.7 For Emission Point AA-200, the permittee shall perform the following corrective actions for each detection of visible emissions **or** opacity reading equal to / less than 20% but greater than 0% from welding operations (as applicable):

(a) If visible fugitive emissions are detected during any visual determination performed in accordance with Condition 5.5 or 5.6(a), perform corrective actions that include (but are not limited to) the following action items:

(1) The inspection of welding fume sources; and

(2) The evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with Condition 4.5(b).

Upon completing such corrective actions, the permittee shall perform a one-time follow-up inspection for visible fugitive emissions in accordance with Condition 5.5(c).

(b) If the average of the six-minute opacities is equal to / less than 20% but greater than 0% for any visual determination of emissions opacity performed in accordance within Condition 5.6(b), perform corrective actions that include the following action items:

(1) The inspection of all welding fume sources; and

(2) The evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with Condition 4.5(b).

(Ref.: 40 CFR 63.11516(f)(4)(i) and (6); Subpart XXXXXX)

5.8 For Emission Points AA-200 and AA-300, the permittee shall calculate and record the emission of each individual HAP and all HAPs combined in tons on both a monthly and rolling 12-month total basis.

Unless otherwise specified herein, the permittee shall include all reference data to validate calculated emissions (e.g. operational data, applicable emission factors, manufacturer's specifications, engineering judgement determinations, control device efficiency data, etc.).

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

5.9 For Emission Point AA-300, the permittee shall maintain documentation that details the following information on each coating, adhesive, thinner, solvent, or other VOC- / HAP-containing material used on a monthly basis:

(a) The identification or product name;

(b) The total quantity used (in gallons);

(c) The VOC and/or HAP content (in weight percent) as well as a description of the method used to determine the VOC and/or HAP content.

The permittee may utilize data supplied by either the manufacturer or an analysis of the VOC and/or HAP content by an applicable test method (i.e. EPA Test Method 24, EPA Test Method 311, and/or an alternative EPA-approved test method).

(d) The density (in pounds per gallon); and

(e) The solids content (in weight percent) (as applicable).

Additionally, the permittee shall calculate and record the emission of VOCs in tons on both a monthly and rolling 12-month total 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 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.1	Report Permit Deviations Within Five (5) Working Days
		6.2	Submit a Certified Annual Monitoring Report
		6.3	All Documents Submitted to the MDEQ Shall be Certified by a Responsible Official
AA-100 AA-200	40 CFR 63.11519(b); Subpart XXXXXX	6.4	Submit an Annual Monitoring Report

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 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 Point AA-000, except as otherwise specified herein, the permittee shall submit a certified annual monitoring report postmarked no later than January 31 of each calendar year for the preceding calendar year that addresses any required monitoring specified in this condition. 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.

Each report shall include the information specified in Conditions 5.2, 5.8 and 5.9 as well as the duration of each period (i.e. the start and end time) in which active operations are conducted while a corresponding baghouse is non-operational due to malfunction.

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

6.3 Any document required by this permit to be submitted to the MDEQ shall contain a certification signed by a responsible official stating that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

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

6.4 For Emission Points AA-100 and AA-200, the permittee shall submit an annual certification and compliance report in accordance with Condition 6.2 that includes the following information **if** the permittee uses at least 2,000 pounds of welding rod in any rolling 12-month total that collectively contains one or more MFHAPs (as applicable):

(a) The company name and address;

(b) 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;

(c) The information specified in Condition 5.3(c) and (d);

(d) An exceedance report that details whenever the average of the six-minute average opacities recorded during a visual determination of emissions opacity exceeds 20%. This report shall also include the following information:

(1) The date on which the exceedance occurred; and

(2) The average of the six-minute average opacities recorded during the visual determination of emissions opacity.

(e) A copy of the daily visual determinations of emissions recorded in accordance with Condition 5.6(c)(2); and

(f) A copy of the SSWEMP and any subsequent revisions to the plan.

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