

State of Mississippi



FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL PERMIT

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

THIS CERTIFIES

Southern Metals Company of Mississippi Inc 144 Doncurt Drive Laurel, MS Jones County

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with the Federal Clean Air Act and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. set., 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

Mississippi Department of Environmental Quality

Issued/Modified: MAY 2 6 2015

Expires: APR 3 0 2020

Permit No. 1360-00083

Agency Interest # 2178

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Southern Metals Company of Mississippi Inc Subject Item Inventory Permit Number:1360-00083 Activity ID No.: PER20140001

Subject Item Inventory:

ID	Designation	Description
EQPT1	AA-001	Surface Coating Operations
EQPT2	AA-002	1.6 MMBTU/hr Natural Gas Fired Paint Dry Oven
EQPT3	AA-003	1.2 MMBTU/hr Natural Gas Fired Dry Off Oven
EQPT4	AA-004	0.25 MMBTU/hr Natural Gas Fired Detergent Bath Heater
EQPT5	AA-005	Natural Gas Fired Space Heaters Totaling 1.0 MMBTU/hr
ACT1	AA-006	500 Gallon Propane Storage Tank
EQPT6	AA-007	Shotblaster with Dust Collector (Dry Abrasive Blasted - enclosed and unvented)
AREA1	AA-008	Metal Working Operations including cutting, bending, shaping, hand grinding and welding (Machining and Welding)
AI2178		Manufacturer of machine metal parts

Subject Item Groups:

ID	Description	Components
GRPT1	Operations Subject to 40 CFR Subpart XXXXXX	EQPT6 Shotblaster with Dust Collector (Dry Abrasive Blasted - enclosed and unvented)
		AREA1 Metal Working Operations including cutting, bending, shaping, hand grinding and welding
		(Machining and Welding)

KEY	
ACT = Activity	AI = Agency Interest
AREA = Area	CAFO = Concentrated Animal Feeding Operation
CONT = Control Device	EQPT = Equipment
IA = Insignificant Activity	IMPD = Impoundment
MAFO = Animal Feeding Operation	PCS = PCS
RPNT = Release Point	TRMT = Treatment
RPNT = Release Point	TRMT = Treatment

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KEY

WDPT = Withdrawal Point

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AI0000002178 Manufacturer of machine metal parts:

Condition		
No.	Parameter	Condition
L-1		For the entire facility, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity to obscure an observer's view to a degree in excess of 40%, as determined by EPA Test Method 9, 40 CFR 60, Appendix A. [11 Miss. Admin. Code Pt. 2, R. 1.3.B]
L-2		For the entire facility, the maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input. [11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).]
L-3		For the entire facility, the permitte shall not allow the emission of particulate matter in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship $E = (4.1)*(p^0.67)$, where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour. (Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs.). [11 Miss. Admin. Code Pt. 2, R. 1.3.F(1)]
L-4		For the entire facility, the maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. [11 Miss. Admin. Code Pt. 2, R. 1.4.A(1)]
L-5		Facility-Wide Emission Limitations The permittee shall limit volatile organic compound (VOC) emissions to no more than 98.0 tons/year (TPY) as determined for each consecutive 12-month period. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]
L-6		Facility-Wide Emission Limitations The permittee shall limit hazardous air pollutant (HAP) emissions to no more than 9.9 tons/year (TPY) of any single HAP and no more than 24.9 TPY of total combined HAPs as determined for each consecutive 12-month period. [11 Miss. Admin. Code Pt. 2, R.2.2.B(10).]

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AI0000002178 (continued):

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		Monitoring Requirements For the entire facility, the permittee shall determine for each coating, adhesive, solvent or other VOC or HAP containing material used: (a) The quantity used (gallons); (b) The percentage of VOCs by weight; (c) The percentage of each individual HAP and total HAP by weight; (d) The density (lbs/gal); The permittee may utilize data supplied by the manufacturer, or analysis of VOC and HAP content by EPA Test Method 24, 40 CFR 60, Appendix A and/or EPA Test Method 311, 40 CFR 63, Appendix A, and/or an alternate EPA approved test method. [11 Miss. Admin. Code Pt. 2, R.2.2.B(11).]

Record-Keeping Requirements:

Condition No.	Condition
R-1	Recordkeeping Requirements For the entire facility, the permittee shall maintain sufficient records to document: (a) The identification of each coating, adhesive, solvent or other VOC or HAP containing material and the total gallons of each coating, adhesive, solvent or other VOC or HAP containing material used on a monthly basis and in each consecutive 12-month period; (b) The VOC and HAP content(s) of each coating, adhesive, solvent or other VOC or HAP containing material used. A description of the method used to determine the VOC and HAP content shall accompany this data; (c) The density of each coating, adhesive, solvent or other VOC or HAP containing material used; (d) The total VOC emission rate, the emission rate of each individual HAP and the total HAP emission rate in tons/yr for each consecutive 12-month period. [11 Miss. Admin. Code Pt. 2, R.2.2.B(10).]
R-2	Recordkeeping Requirements

R-2

The permittee shall maintain copies of all records and reports on site for at least five (5) years and shall make them available upon request by Mississippi Department of Environmental Quality (MDEQ) personnel. [11 Miss. Admin. Code Pt. 2, R.2.2.B(10).]

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AI000002178 (continued):

Submittal/Action Requirements:

Condition No.	Condition
S-1	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.2.B(10).]
S-2	Except as otherwise specified herein, the permittee shall Submit a certified annual synthetic minor monitoring report: Due annually, by the 31st of January for preceding calendar year. This report shall address any required monitoring specified in the permit. [11 Miss. Admin.Code Pt. 2, R.2.2.B(11).]
S-3	For the entire facility, the permittee shall submit a monitoring report due annually by the 31st of January for the preceding calendar year. This report shall provide the following: (a) The identification of each coating, adhesive, solvent or other VOC or HAP containing material used; (b) The VOC and HAP content(s) of each coating, adhesive, solvent, or other VOC or HAP containing material used; (c) The total gallons of each coating, adhesive, solvent or other VOC or HAP containing material used in each consecutive 12-month period; (d) The total VOC emission rate, the emission rate of each individual HAP and the total HAP emission rate in tons per month and TPY for each consecutive 12-month period. [APC-S-2 II.B(11)]

Condition No.	Condition
T-1	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49-17-29 1.b]
T-2	General Condition: 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. [11 Miss. Admin. Code Pt. 2, R. 2.5.A.]
T-3	General Condition: 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. [Miss. Code Ann. 49-17-29 1.a(i and ii)]

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AI000002178 (continued):

Condition	
No.	Condition
T-4	General Condition: Any diversion from or bypass of collection and control facilities is prohibited except as provided for in 11 Miss. Admin. Code Pt.2, R. 1.10, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", [11 Miss. Admin.Code Pt. 2, R.1.10.]
T-5	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.10.]
T-6	General Condition: 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. [Miss. Code Ann. 49-17-21]
T-7	General Condition: 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) 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 any condition that required either a temporary or permanent reduction or elimination of authorized air emissions. [11 Miss. Admin.Code Pt. 2, R. 2.2.C.]
T-8	General Condition: This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for this 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 condition of the permit. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(b).]
T-9	General Condition: 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. [Miss. Code Ann. 49-17-39]

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AI000002178 (continued):

Condition No.	Condition
T-10	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(15)(c).]
T-11	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(7).]
T-12	General Condition: This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board. [11 Miss. Admin. Code Pt. 2, R. 2.16.B.]
T-13	General Condition: This permit is for air pollution control purposes only. [11 Miss. Admin.Code Pt. 2, R. 2.1.D(1).]
T-14	General Condition: 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 [11 Miss. Admin.Code Pt. 2, R. 2.4.D.]
T-15	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R. 2.1.D(7).]
T-16	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(15)(d).]

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AI0000002178 (continued):

Condition	
No.	Condition
T-17	General Condition: This permit does not authorize a modification as defined in 11 Miss. Admin. Code Pt. 2, Ch. 2 "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment". Modification is defined as "Any physical change in or change in the method of operation of a facility which increases actual emissions or 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: (i) 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 (ii) the source is approved to use under any permit issued under 40 CFR 52.51 or under regulations approved pursuant to 40 CFR 51.166; or (ii) the source is approved bursuant to Subpart I or 40 CFR 51.166; or (f) any change in ownership of the stationary source" [11 Miss. Admin.Code Pt. 2, R. 2.1.D(2).]
T-18	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(a).]
T-19	General Condition: 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 or this permit upon request. [11 Miss. Admin.Code Pt. 2, R.2.9.]
T-20	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.2.B(5).]

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AI0000002178 (continued):

Narrative Requirements:

Condition No.	Condition
T-21	General Condition: Emergencies (a) Except as otherwise specified herein, an emergency means any situation arising from sudden and reasonably unforseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include

- noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error. (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions
- specified in (c) following are met.
- (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence as follows:
- (i) an emergency occurred and that the permittee can identify the cause(s) of the emergency; (ii) the permitted facility was at the time being properly operated; (iii) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other
- requirements in the permit; and (iv) the permittee submitted notice of the emergency to MDEO within two (2) working days of the time when emission limitations were exceeded due to the emergency which contained a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of any emergency has the burden of proof.
- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein [11 Miss. Admin.Code Pt. 2, R.2.2.B(10).]

T-22 General Condition: Upsets

- (a) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows: (i) an upset occurred and that the permittee can identify the cause(s) of the upset; (ii) the source was at the time being properly operated; (iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (iv) the permittee submitted notice of the upset to the DEQ within five (5) working days of the time the upset began which contained a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.
- (b) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.
- (c) This provision is in addition to any upset provision contained in any applicable requirement. [11 Miss. Admin.Code Pt. 2, R.1.10.]

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AI0000002178 (continued):

Narrative Requirements:

[11 Miss. Admin.Code Pt. 2, R.2.8.]

Condition	
No.	Condition
T-23	General Condition: Startups and Shutdowns (a) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows: (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above; (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit. (b) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof. (c) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply. [11 Miss. Admin.Code Pt. 2, R.1.10.]
T-24	General Condition: Maintenance (a) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following: (i) the permittee can identify the need for the maintenance; (ii) the source was at the time being properly operated; (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (iv) the permittee submitted notice of the maintenance to MDEQ within five (5) working days of the time the maintenance began or such other times as allowed by MDEQ, which contained a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken. (b) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof. (c) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. [11 Miss. Admin.Code Pt. 2, R.1.10.]
T-25	General Condition: 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.

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GRPT0000000001 Operations Subject to 40 CFR Subpart XXXXXX:

<u> </u>		·
Condition No.	Parameter	Condition
L-1		40 CFR Part 63 Subpart XXXXXX:
		The permittee is subject to 40 CFR Part 63 Subpart XXXXXX National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories because the permittee operates an area source that is primarily engaged in operations in the Fabricated Structural Metal Manufacturing source category.
		The permittee is specifically subject to the Metal Finishing Hazardous Air Pollutant (MFHAP) Provisions as described in 40 CFR 63.11514(b)(1), (2), and (5), for the Dry Abrasive Blasting Operations, Machining Operations, and Welding Operations. A MFHAP is any material that contains cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal), and contains manganese in amounts greater than or equal to 1.0 percent by weight (as the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material. [40 CFR 63.11514(a), 40 CFR 63.11514(b)(1-2,5)]
L-2		DRY ABRASIVE BLASTING STANDARDS:
		The permittee shall comply with the requirements in paragraph(s) following, for each dry abrasive blasting operation that uses materials that contain or have the potential to emit MFHAP.
		(1) The permittee operates an abrasive blasting chamber that is totally enclosed and unvented, as defined in 40 CFR Part 63.11522, and the permittee shall implement management practices to minimize emissions of MFHAP. These management practices are the practices specified in paragraphs (i) and (ii) below.
		(i) The permittee shall minimize dust generation during emptying of abrasive blasting enclosures. (ii) The permittee shall operate all equipment associated with dry abrasive blasting operations according to the manufacturer's instructions. [40 CFR 63.11516 (a)(1)]

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GRPT0000000001 (continued):

Condition		
No.	Parameter	Condition
L-3		MACHINING STANDARDS:
		The permittee shall implement management practices to minimize emissions of MFHAP as specified in paragraphs (1) and (2) below for each machining operation that uses materials that contain or have the potential to emit MFHAP.
		(1) The permittee shall take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable.
		(2) The permittee shall operate all equipment associated with machining according to manufacturer's instructions. [40 CFR 63.11516(b)]

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GRPT0000000001 (continued):

Condition No.	Parameter	Condition
L-4		WELDING STANDARDS:
		The permittee shall comply with the following for each welding operation that uses materials that contain MFHAP or have the potential to emit MFHAP. This requirement does not apply when the welding operation does not use any materials containing MFHAP or does not have the potential to emit MFHAP.
		(1) The permittee shall operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions. The permittee shall demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the capture and control devices, as specified by the requirements found in Group 1 Condition R-1(4) of this permit/(40 CFR 63.11519(c)(4)).
		(2) The permittee shall implement one or more of the management practices specified in paragraphs (i) through (v) below to minimize emissions of MFHAP, as practicable, while maintaining the required welding quality through the application of sound engineering judgment.
		 (i) Use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW) also called metal inert gas welding (MIG)). (ii) Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates. (iii) Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation. (iv) 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. (v) Use a welding fume capture and control system, operated according to the manufacturer's specifications. [40 CFR 63.11516(f)(1-2)]

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GRPT0000000001 (continued):

Limitation Requirements:

- T		
Condition No.	Parameter	Condition
L-5		WELDING STANDARDS (continued):
		The permittee uses 2,000 pounds or more per year of welding rod containing one or more MFHAP (calculated on a rolling 12-month basis), and must demonstrate that management practices or fume control measures are being implemented by complying with the requirements in paragraphs (3) through (8) below.
		(3) Tier 1 compliance requirements.
		The permittee shall perform visual determinations of welding fugitive emissions as specified in Group 1 Condition M-1(b) of this permit/(40 CFR Part 63.11517(b)), at the primary vent, stack, exit, or opening from the building containing the welding operations. The permittee must keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in Group 1 Condition R-1(2) of this permit/(40 CFR Part 63.11519(c)(2)).
		(4) Requirements upon initial detection of visible emissions.
		If visible fugitive emissions are detected during any visual determination required in paragraph (3) above, the permittee shall comply with the requirements in paragraphs (i) and (ii) below.
		(i) Perform corrective actions that include, but are not limited to, inspection of welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with Group 1 Condition L-4(2) of this permit/(40 CFR Part 63.11516(f)(2)). After completing such corrective actions, the permittee must perform a follow-up inspection for visible fugitive emissions in accordance with Group 1 Condition M-1(a) of this permit/(40 CFR Part 63.11517(a)), at the primary vent, stack, exit, or opening from the building containing the welding

operations.

(ii) Report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, and submit with your annual certification and compliance report as required by Group 1 Condition S-1(3) of this permit/(40 CFR Part 63.11519(b)(5)). [40 CFR 63.11516(f)(3-4)]

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GRPT0000000001 (continued):

Limitation Requirements:

Condition No.	n Parameter	Condition
110.	1 drumeter	Condition
L-6		WELDING STANDARDS (continued):
		(5) Tier 2 requirements upon subsequent detection of visible emissions.
		If visible fugitive emissions are detected more than once during any consecutive 12 month period (notwithstanding the results of any follow-up inspections), you shall comply with paragraphs (i) through (iv) below.
		(i) Within 24 hours of the end of the visual determination of fugitive emissions in which visible fugitive emissions were detected, the permittee shall conduct a visual determination of emissions opacity, as specified in Group 1 Condition M-1(c) of this permit/(40 CFR Part 63.11517(c)), at the primary vent, stack, exit, or opening from the building containing the welding operations.
		(ii) In lieu of the requirement of paragraph (3) found on the previous page, to perform visual determinations of fugitive emissions with EPA Method 22, the permittee shall perform visual determinations of emissions opacity in accordance with Group 1 Condition M-2 of this permit/(40 CFR Part 63.11517(d)), using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
		(iii) The permittee shall keep a record of each visual determination of emissions opacity performed in accordance with paragraphs (i) or (ii) above, along with any subsequent corrective action taken, in accordance with the requirements in Group 1 Condition R-1(3) of this permit/(40 CFR Part 63.11519(c)(3)).
		(iv) The permittee shall report the results of all visual determinations of emissions opacity performed in accordance with paragraphs (i) or (ii) above, along with any subsequent corrective action taken, and submit with your annual certification and compliance report as required by Group 1 Condition S-1(4) of this permit/(40 CFR Part 63.11519(b)(6)).
		(6) Requirements for opacities less than or equal to 20 percent but greater than zero.

For each visual determination of emissions opacity performed in accordance with paragraph (5) above for which the average of the six-minute average opacities recorded is 20 percent or less but greater than zero, the permittee shall perform corrective actions, including inspection of all welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with Group 1 Condition L-4(2) of this permit/(40 CFR Part 63.11516(f)(2)). [40 CFR 63.11516(f)(5-6)]

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GRPT0000000001 (continued):

Condition	on	
No.	Parameter	Condition
L-7		WELDING STANDARDS (continued):
		(7) Tier 3 requirements for opacities exceeding 20 percent.
		For each visual determination of emissions opacity performed in accordance with paragraph (5), found on the previous page, for which the average of the six-minute average opacities recorded exceeds 20 percent, the permittee shall comply with the requirements in paragraphs (i) through (v) below.

- (i) The permittee shall submit a report of exceedence of 20 percent opacity, along with your annual certification and compliance report, as specified in Group 1 Condition S-1(5) of this permit/(40 CFR Part 63.11519(b)(8)), and according to the requirements of Group 1 Condition S-1(1) of this permit/(40 CFR Part 63.11519(b)(1)).
- (ii) Within 30 days of the opacity exceedence, the permittee shall prepare and implement a Site-Specific Welding Emissions Management Plan, as specified in paragraph (8), found on the following page. If the permittee has already prepared a Site-Specific Welding Emissions Management Plan in accordance with this paragraph, the permittee shall prepare and implement a revised Site-Specific Welding Emissions Management Plan within 30 days.
- (iii) During the preparation (or revision) of the Site-Specific Welding Emissions Management Plan, the permittee shall continue to perform visual determinations of emissions opacity, beginning on a daily schedule as specified in Group 1 Condition M-2 of this permit/(40 CFR Part 63.11517(d)), using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
- (iv) The permittee shall maintain records of daily visual determinations of emissions opacity performed in accordance with paragraph (iii) above, during preparation of the Site-Specific Welding Emissions Management Plan, in accordance with the requirements in Group 1 Condition S-1(6) of this permit/(40 CFR Part 63.11519(b)(9)).
- (v) The permittee shall include these records in your annual certification and compliance report, according to the requirements of Group 1 Condition S-1(1) of this permit/(40 CFR Part 63.11519(b)(1)). [40 CFR 63.11516(f)(7)]

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GRPT0000000001 (continued):

Limitation Requirements:

Condition		
No.	Parameter	Condition
L-8		WELDING STANDARDS (continued):
		(8) Site-Specific Welding Emissions Management Plan (SSWEMP).
		The Site-Specific Welding Emissions Management Plan shall comply with the requirements in paragraphs (i) through (iii) below
		(i) Site-Specific Welding Emissions Management Plan shall contain the information in paragraphs (A) through (F) below.
		 (A) Company name and address; (B) A list and description of all welding operations which currently comprise the welding affected source; (C) A description of all management practices and/or fume control methods in place at the time of the opacity exceedence; (D) A list and description of all management practices and/or fume control methods currently employed for the welding affected source; (E) A description of additional management practices and/or fume control methods to be implemented pursuant to paragraph (ii) below, and the projected date of implementation; and (F) Any revisions to a Site-Specific Welding Emissions Management Plan shall contain copies of all previous plan entries, pursuant to paragraphs (D) and (E) above. (ii) The Site-Specific Welding Emissions Management Plan shall be updated annually to contain current information, as required by paragraphs (A) through (C) above, and submitted with your annual certification and compliance report, according to the requirements of Group 1 Condition S-1(1) of this permit/(40 CFR Part 63.11519(b)(1)).

this permit/(40 CFR Part 63.11519(c)(12)). [40 CFR 63.11516(f)(8)]

(iii) The permittee shall maintain a copy of the current Site-Specific Welding Emissions Management Plan in the permittee's records in a readily-accessible location for inspector review, in accordance with the requirements in Group 1 Condition R-1(6) of

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GRPT0000000001 (continued):

Monitoring Requirements:

Condition No. Parameter Condition		Condition
NO.	r ai ailietei	Condition
M-1		Visual determination of fugitive emissions. [40 CFR Part 63.11517(a)] (a) Visual determination of fugitive emissions shall be performed according to the procedures of EPA Method 22, of 40 CFR part

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

Visual determination of fugitive emissions, graduated schedule. [40 CFR Part 63.11517(b)]

- (b) Visual determinations of fugitive emissions shall be performed in accordance with paragraph (a) of above and according to the schedule in paragraphs (1) through (4) below.
- (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 EPA Method 22 tests, performed in accordance with paragraph (1) above for 10 days of work day operation of the process, the permittee may decrease the frequency of EPA Method 22 testing to once every five days of operation of the process (one calendar week). If visible fugitive emissions are detected during these tests, the permittee shall resume EPA Method 22 testing of that operation once per day during each day that the process is in operation, in accordance with paragraph (1) above.
- (3) Monthly Method 22 Testing. If no visible fugitive emissions are detected in four consecutive weekly EPA Method 22 tests performed in accordance with paragraph (2) above, the permittee may decrease the frequency of EPA Method 22 testing to once per 21 days of operation of the process (one calendar month). If visible fugitive emissions are detected during these tests, the permittee shall resume weekly EPA Method 22 in accordance with paragraph (2) above.
- (4) Quarterly Method 22 Testing. If no visible fugitive emissions are detected in three consecutive monthly EPA Method 22 tests performed in accordance with paragraph (3) above, the permittee may decrease the frequency of EPA Method 22 testing to once per 60 days of operation of the process (3 calendar months). If visible fugitive emissions are detected during these tests, the permittee shall resume monthly EPA Method 22 in accordance with paragraph (3) above.

Visual determination of emissions opacity for welding Tier 2 or 3. [40 CFR Part 63.11517(c)]

(c) Visual determination of emissions opacity shall be performed in accordance with the procedures of EPA Method 9, of 40 CFR part 60, Appendix A-4, and while the affected source is operating under normal conditions. The duration of the EPA Method 9 test shall be thirty minutes. [40 CFR 63.11517(a-c)]

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GRPT0000000001 (continued):

Monitoring Requirements:

Condition No.	on Parameter	Condition
M-2		Visual determination of emissions opacity for welding Tier 2 or 3, graduated schedule. [40 CFR Part 63.11517(d)] (d) The permittee shall perform visual determination of emissions opacity in accordance with Group 1 Condition M-1(c) of this permit/ (40 CFR Part 63.11517(c)) and according to the schedule in paragraphs (1) through (5) below. (1) Daily Method 9 testing for welding, Tier 2 or 3. Perform visual determination of emissions opacity once per day during each day that the process is in operation. (2) Weekly Method 9 testing for welding, Tier 2 or 3. If the average of the six minute opacities recorded during any of the daily consecutive EPA Method 9 tests performed in accordance with paragraph (1) above does not exceed 20 percent for 10 days of operation of the process, the permittee may decrease the frequency of EPA Method 9 testing to once per five days of consecutive work day operation. If opacity greater than 20 percent is detected during any of these tests, the permittee shall resume testing every day of operation of the process according to the requirements of paragraph (1) above. (3) Monthly Method 9 testing for welding Tier 2 or 3. If the average of the six minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed in accordance with paragraph (2) above does not exceed 20 percent for four consecutive weekly tests, the permittee may decrease the frequency of EPA Method 9 testing to once per every 21 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any monthly test, the permittee shall resume testing every five days of operation of the process according to the requirements of paragraph (2) above. (4) Quarterly Method 9 testing for welding Tier 2 or 3. If the average of the six minute opacities recorded during any of the consecutive monthly tests, the permittee may decrease the frequency of EPA Method 9 testing to once per every 120 days of operation of the process. If visible emissions opacity greater than 20

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GRPT0000000001 (continued):

Record-Keening Requirements.

Record-Keeping Requirements:				
Condition No.	Condition			
R-1	The permittee shall collect and keep records of the data and information specified in paragraphs (1) through (7) below, according to the requirements in paragraph (8) below. (1) Maintain information specified in paragraphs (i) and (ii) below for each affected source. (i) Each notification and report that the permittee submitted to comply with this subpart, and the documentation supporting each notification and report. (ii) Records of the applicability determinations according to Group 1 Condition L-1/(40 CFR Part 63.11514(b)(1-2) and (5)), listing equipment included in its affected source, as well as any changes to that and on what date they occurred, shall be maintained for 5 years and be made available for inspector review at any time. (2) Maintain a record of the information specified in paragraphs (i) through (iii) below for each affected source which performs visual determination of fugitive emissions; in accordance with Group 1 Condition M-1(a)/(40 CFR Part 63.11517(a)). (i) The date and results of every visual determination of fugitive emissions performed after the corrective actions. (3) Maintain a record of the information specified in paragraphs (i) through (iii) below for each affected source which performs visual determination of emissions opacity in accordance with Group 1 Condition M-1(c)/(40 CFR Part 63.11517(c)). (i) The date of every visual determination of fugitive emissions opacity in accordance with Group 1 Condition M-1(c)/(40 CFR Part 63.11517(c)). (ii) The average of the six-minute opacities measured by the test; and (iii) The average of the six-minute opacities measured by the test; and (iii) A description of any corrective action taken subsequent to the test. (4) Maintain a record of the manufacturer's specifications for the control devices used to comply with Group 1 Conditions L-2 through L-8/(40 CFR Part 63.11516). (5) The permittee shall maintain a record of each visual determination of emissions opacity performed during the preparation (or revision) of a Site-Specific W			

(i) The records shall be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1).

(8) The permittee's records shall be maintained according to the following requirements:

(ii) As specified in 40 CFR 63.10(b)(1), the permittee shall keep each record for 5 years following the date of each occurrence, measurement, corrective action, report, or record.

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

(iii) The permittee shall keep each record on-site for at least 2 years after the date of each occurrence, measurement, corrective action, report, or record according to 40 CFR 63.10(b)(1). The permittee shall keep the records off-site for the remaining 3 years. [40 CFR 63.11519(c)(1-4)(11-13)(15)]

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Submittal/Action Requirements:

above. [40 CFR 63.11519(b)(1-2)(4-6)(8-9)]

Condition No.	Condition
S-1	The permittee shall prepare and submit annual reports for each affected source and shall comply with the following reporting requirements: (1) Each annual report, including exceedance reports if one has occurred, shall cover the subsequent annual reporting period from January 1 through December 31, and shall be prepared and submitted no later than January 31. (2) The annual report shall contain the following information: (i) Company name and address;
	(ii) 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 (iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31. Note that the information reported for the 12 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation. (3) The annual report shall contain the information specified in paragraphs (i) through (iii) below for each affected source which performs visual determination of fugitive emissions in accordance with Group 1 Condition M-1(a)/(40 CFR 63.11517(a)). (i) The date of every visual determination of fugitive emissions which resulted in detection of visible emissions; (ii) A description of the corrective actions taken subsequent to the test; and (iii) The date and results of the follow-up visual determination of fugitive emissions performed after the corrective actions.
	(4) The annual report shall contain the information specified in paragraphs (i) through (iii) below for each affected source which performs visual determination of emissions opacity in accordance with Group 1 Condition M-1(c)/(40 CFR 63.11517(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. (5) As required by Group 1 Condition L-7(i)/(40 CFR 63.11516(f)(7)(i)), the permittee shall prepare an exceedence report whenever the average of the six-minute average opacities recorded during a visual determination of emissions opacity exceeds 20 percent. This report shall be submitted along with the annual report according to the requirements in paragraph (1) above, and shall contain the following information:
	 (i) The date on which the exceedence occurred; and (ii) The average of the six-minute average opacities recorded during the visual determination of emissions opacity. (6) The permittee shall submit a copy of the records of daily visual determinations of emissions recorded in accordance with Group 1 Condition L-7(iv)/(40 CFR 63.11516(f)(7)(iv)), "Tier 3 requirements for opacities exceeding 20 percent," and a copy of the SSWEMP and any subsequent revisions to the plan pursuant to

Group 1 Condition L-8 (40 CFR 63.11516(f)(8)), along with the annual certification and compliance report, according to the requirements in paragraph (1)

GENERAL INFORMATION

Southern Metals Company of Mississippi Inc 144 Doncurt Drive Laurel, MS Jones County

Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
2178	Southern Metals Company of Mississippi, Inc.	Official Site Name	10/16/1998	
2806700083	Southern Metals Company of Mississippi	Air-AIRS AFS	10/12/2000	
MSR000003335	Southern Metals Company of Mississippi, Inc.	Hazardous Waste-EPA ID	9/9/1996	
136000083	Southern Metals Company of Mississippi, Inc.	Air-Synthetic Minor Operating	10/16/1998	10/1/2003
2178	Southern Metals Company of Mississippi, Inc.	No Exposure Certification	6/17/2003	6/16/2008
136000083	Southern Metals Company of Mississippi, Inc.	Air-Synthetic Minor Operating	1/6/2004	12/31/2008
136000083	Southern Metals Company of Mississippi Inc	Air-Synthetic Minor Operating	2/4/2010	1/31/2015
MSR002181	Southern Metals Company of Mississippi Inc	GP-Baseline	4/14/2014	9/28/2015
136000083	Southern Metals Company of Mississippi Inc	Air-Synthetic Minor Operating	5/26/2015	4/30/2020

Basin: Pascagoula River Basin

Location Description: PG- Plant Entrance (General). Data collected by J. Dewayne Headrick on 10/25/2005.

GENERAL INFORMATION