

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

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

THIS CERTIFIES THAT

Wade Services Inc.
500 Eastview Drive
Laurel, Mississippi
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. seq., Mississippi Code of 1972), the regulations and standards adopted and promulgated thereunder, and the State Implementation Plan for operating permits for synthetic minor sources.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: March 6, 2017

Permit No.: 1360-00143

Expires: February 28, 2022

SECTION 1

A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only.
[Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.]
2. This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.1.D
[Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.]
3. Any activities not identified in the application are not authorized by this permit.
[Ref.: Miss. Code Ann. 49-17-29 1.b]
4. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit.
[Ref.: 11 Miss. Admin. Code Pt. 2, R.2.2.B(5).]
5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.
[Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).]
6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.
[Ref.: 11 Miss. Admin. Code Pt. 2, R.2.2.B(15)(a).]
7. The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).]
8. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges.
[Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).]

9. The permittee shall furnish to the DEQ within a reasonable time any information the DEQ 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 DEQ 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 DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

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

[Ref.: Miss. Code Ann. 49-17-29]

11. The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:

- a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and
- b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission.

[Ref.: Miss. Code Ann. 49-17-21]

12. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:

- a. Persistent violation of any terms or conditions of this permit.
- b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
- c. A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission

[Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.C.]

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

[Ref.: Miss. Code Ann. 49-17-39]

14. Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances.
[Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).]
15. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board.
[Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B.]
16. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby.
[Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(7).]
17. The permittee shall furnish to MDEQ within a reasonable time any information MDEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to MDEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to MDEQ along with a claim of confidentiality.
[Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).]
18. This permit does not authorize a modification as defined in Regulation 11 Miss. Admin. Code Pt. 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 and "Any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:
 - a. routine maintenance, repair, and replacement;
 - b. use of an alternative fuel or raw material by reason of an order under Sections 2(a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
 - c. use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
 - d. use of an alternative fuel or raw material by a stationary source which:

- 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 52.21 or under regulations approved pursuant to 40CFR 51.66;
- e. an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or
- f. any change in ownership of the stationary source.”

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

B. GENERAL OPERATIONAL CONDITIONS

1. The permittee shall at all times maintain in good working order and operate as efficiently as possible all air pollution control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit.

[11 Miss. Admin. Code Pt. 2, R. 2.5.A.]

2. Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee’s previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in Regulation, 11 Miss. Admin. Code Pt. 2, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared.

[Ref.: 11 Miss. Admin. Code Pt. 2, R.2.10.]

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

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

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

[Ref.: 11 Miss. Admin. Code Pt. 2, R.2.9.]

5. The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed except as provided for in 11 Miss. Admin. Code Pt. 2, R. 1.10., "Air Emission Regulations for the Prevention and Control of Air Contaminants."

[Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.]

6. Compliance Testing: Regarding compliance testing:
- i) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.
 - ii) Compliance testing will be performed at the expense of the permittee.
 - iii) Each emission sampling and analysis report shall include but not be limited to the following:
 - detailed description of testing procedures;
 - sample calculation(s);
 - results; and
 - comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

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

C. GENERAL SUBMITTAL REQUIREMENTS

1. For renewal of this permit, the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board.

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

SECTION 2
EMISSION POINT DESCRIPTION

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

Emission Point	Description
AA-001	Surface Coating Operation (Paint Booth and Curing Oven)
AA-002	Wood Working Operation (Wood Trimming and Product Assembly)
AB-000	Facility Wide Metal Working Operation
AB-001	Welding Operation; Manufactured by ESAB & Miller Welding Machines; Model: 353 CV, CP 300, CP 301; Model Year: 2006
AB-002	One (1) Plasma Arc Cutting Table; Manufactured by Koike Aronson; Model Year: MGM 3100; Model Year: 2006
AB-003	Grinding and Sanding Operation
AC-000	Facility Wide Fuel Burning Equipment
AC-001	Two (2) 2.0 MMBtu/hr Natural Gas-fired Air Handling Units; Manufactured by Carolina Virginia Spray Booth Inc.; Model Year: 2006; Semi Down Draft; Burner type: Atmospheric Inspirator; Design Controls: Discharge Dampers; Dry filters; Model Year: 2006
AC-004	One (1) 0.8 MMBtu/hr Natural Gas-fired Curing Oven; New York blower; Manufactured by Weather-Rite; Model Year: 2006; Model No.: TOT 221 VTL Outdoor; Burner Type: Atmospheric Inspirator; Model Year: 2006
AC-005	One (1) 0.38 MMBtu/hr Natural Gas-fired Cleaning and Phosphatizing Pressure Washer; 2400 psi; Manufactured by Fremont Industries; Model Year: 2005; Model No.: 1024; Model Year: 2006
AD-000	Facility Wide Storage Tanks
AD-001	One (1) 1,000 Gallon Diesel Fuel Storage Tank; Horizontal Tank with a Low Pressure Relief Cap used to store off road diesel fuel; Model Year: 2006
AD-002	One (1) 300 Gallon Diesel Fuel Storage Tank; Horizontal, Fixed Roof Tank used to store No. 2 Ultra Low Sulfur Diesel Dyed; Model Year: 2006

SECTION 3
EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity	Opacity from any point source shall not exceed 40% unless otherwise specified
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2		Visual obscuration caused by uncombined water droplets does not apply to the 40% Opacity limitation.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.3	VOCs	99.0 tpy
		3.4	HAPs	9.9 tpy of any single HAP; 24.9 tpy of total combined HAPs
	11 Miss. Admin. Code Pt. 2, R. 1.3.6(a).	3.5	PM	$E = (4.1)^*(p^{0.67})$
AC-001, AC-004, AC-005	11 Miss. Admin. Code Pt. 2, R. 1.3.4(a)(1).	3.6	PM	PM shall not exceed 0.6 pounds per million BTU per hour heat input
	11 Miss. Admin. Code Pt. 2, R. 1.4.1(a).	3.7	SO ₂	SO ₂ shall not exceed 4.8 pounds per million BTU heat input

3.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).

(a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.

[Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.A.]

3.2 Except as otherwise specified or limited herein, 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 as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Condition 3.1. This shall not apply to vision obscuration caused by uncombined water droplets.

[Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.]

3.3 For the entire facility, the permittee shall limit the emissions of Volatile Organic Compounds (VOCs) to no more than 99.0 tpy, for each consecutive 12-month period on a rolling basis.

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

- 3.4 For the entire facility, the permittee shall limit hazardous air pollutant (HAP) emissions to no more than 9.9 tpy of any single HAP and no more than 24.9 tpy of total combined HAPs, for each consecutive 12-month period on a rolling basis.

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

- 3.5 For the entire facility, the permittee 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 $E = (4.1) \cdot (p^{0.67})$, where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour.

[Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.6(a).]

- 3.6 For Emission Points AC-000, AC-001, AC-004, and AC-005, the maximum permissible emission of 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.

[Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.4(a)(1).]

- 3.7 For Emission Points AC-000, AC-001, AC-004, and AC-005, the maximum discharge of sulfur dioxide 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.

[Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.1(a).]

**SECTION 4
WORK PRACTICES**

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
AC-001, AC-004, AC-005	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	4.1	PM	Operate fuel burning equipment according to manufacturer's recommendations
AD-001, AD-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B(2).	4.2	Tank Emissions	Operate tanks efficiently to minimize the amount of air contaminants released

4.1 For Emission Points AC-000, AC-001, AC-004, and AC-005, the permittee shall operate and maintain the fuel burning equipment according to the manufacturer's emission-related written instructions and change only those emission-related settings that are permitted by the manufacturer.

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

4.2 For Emission Points AD-000, AD-001, and AD-002, the permittee shall operate all storage tanks as efficiently as possible to provide the maximum reduction of the release of air contaminants.

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

SECTION 5
MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.1	VOCs	Monitor each coating, adhesive, solvent or other VOC or HAP containing material(s)
			HAPs	
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	5.2	VOCs	Maintain records of each coating, adhesive, solvent, or other VOC and HAP containing material(s) and total VOC and HAP (individual and combined) emission rates
			HAPs	

5.1 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.

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

5.2 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 period on a rolling basis;
- (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 total HAP emission rate, and the emission rate of each individual HAP in tpy for each consecutive 12-month period on a rolling basis.

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.

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

SECTION 6
REPORTING AND SUBMITTAL REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	Submittal of annual report
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	6.2	Reporting of deviations

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

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

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

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