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, Mississippi
Winston 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: May 22, 2017 **Permit No.: 2980-00021**

Effective Date: As specified herein.

Expires: April 30, 2022

1913 PER20170001

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 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. 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).)

11. 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).)

12. This permit does not authorize a modification as defined in Regulation 11 Miss. Admin. Code Pt. 2, Ch.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 "Any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

    a. Routine maintenance, repair, and replacement;

    b. Use of an alternative fuel or raw material by reason of an order under Sections 2(a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;

    c. Use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;

    d. Use of an alternative fuel or raw material by a stationary source which:

        (1) The source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or

(2) The source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40CFR 51.66;

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

f. Any change in ownership of the stationary source.

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

2. 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." (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, startups, 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 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 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 EPA or third party enforcement actions.

b. Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.)

(1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups 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 this regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups 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 or this permit and in units of mass per time.

b. Compliance testing will be performed at the expense of the permittee.

c. Each emission sampling and analysis report shall include but not be limited to the following:

(1) Detailed description of testing procedures;

(2) Sample calculation(s);

(3) Results; and

(4) Comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

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

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 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).)

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	**Entire Plate Work Manufacturing Facility**
AA-100	**Abrasive Blasting Operations**
AA-101	One (1) steel shot blaster with a maximum design capacity of 5,500 pounds of steel shot per hour. Emissions from this unit are controlled by two baghouses (AA-101a and AA-101b)
AA-101a	One (1) baghouse with an air inlet flow rate of 10,000 acfm and a cloth area of 3,040 ft^2 used to control the particulate matter emissions from AA-101.
AA-101b	One (1) baghouse with an air inlet flow rate of 5,000 acfm and a cloth area of 1,520 ft^2 used to control the particulate matter emissions from AA-101.
AA-200	**Facility-Wide Metal Working Operations – Including, but not limited to: metal cutting (laser, oxy-acetylene, oxy-methane, plasma), drilling, grinding, and welding**
AA-300	**Facility-Wide Surface Coating Operations – Including, but not limited to: spray can paint, solvents, lubricants, and cutting oils.**
AA-400	**Facility-Wide Fuel Burning Equipment**
AA-401	Various natural gas-fired space heaters with a total, combined maximum heat input of 4.20 MMBTU/hr
AA-500	**Facility-Wide Tank Storage**
AA-501	One (1) 500-gallon diesel storage tank
AA-502	One (1) 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	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limitation/Standard
AA-000	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity	Facility-wide opacity limitations
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2		
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.3	PM (*filterable only*)	$E = 4.1 \cdot p^{0.67}$
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.4	$PM/PM_{10}/PM_{2.5}$ (*filterable only*)	99.0 tpy
AA-100 AA-200	40 CFR Part 63, Subpart XXXXXX (§63.11514(a) and (b)(1, 2, 3 and 5))	3.5	MFHAP	Applicability
AA-200 AA-300	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.6	HAPs	9.0 tpy for any individual HAP 24.0 tpy for all combined HAPs
AA-300	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.7	VOCs	95.0 tpy
AA-400	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.8	PM (*filterable only*)	0.6 lbs/MMBTU/hr or as otherwise limited by facility modification restrictions

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. 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 (AA-000), the permittee shall not allow the emission of particulate matter (PM) in total quantities in any one hour from any manufacturing process, which includes associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship:

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

Where "E" is the emission rate in pounds per hour and "p" is the process weight input in tons per hour. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).)

3.4 For the entire facility (AA-000), the permittee shall limit the emissions of particulate matter (PM), particulate matter with a diameter of 10 microns or less (PM_{10}), and particulate matter with a diameter of 2.5 microns or less ($PM_{2.5}$) to no more than 99.0 tons per year for each consecutive 12-month period on a rolling basis. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

3.5 Emission Points AA-100 and AA-200 include abrasive blasting, machining, dry grinding, and welding operations which use materials which use materials which contain or have the potential to emit metal fabrication HAPs (MFHAPs) and are located at an area source of HAPs. As such, these emissions points are subject to and shall comply with all applicable requirements of 40 CFR Part 63, Subpart XXXXXX – National Emission Standards for Hazardous Air Pollutants Area Source Standard for Nine Metal Fabrication and Finishing Categories. (Ref.: 40 CFR 63.11514(a) and (b)(1, 2, 3, and 5))

3.6 For Emission Points AA-200 and AA-300, the permittee shall limit the emissions of any individual hazardous air pollutant (HAP) from both sources to no more than 9.0 tpy for each consecutive 12-month period on a rolling basis. The permittee shall limit the emissions of all combined HAPs from both sources to no more than 24.0 tpy for each consecutive 12-month period on a rolling basis. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

3.7 For Emission Point AA-300, the permittee shall limit the emissions of volatile organic compounds (VOCs) to no more than 95.0 tons per year for each consecutive 12-month period on a rolling basis. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

3.8 For Emission Point AA-400, the maximum permissible emission of ash and/or particulate matter from each fossil fuel burning installation 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.D(1)(a).)

SECTION 4
WORK PRACTICES

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Work Practice
AA-100	40 CFR 63, Subpart XXXXXX (§63.11516(a)(2))	4.1	MFHAP	Standards for abrasive blasting
AA-200	40 CFR 63, Subpart XXXXXX (§63.11516(b)(1-2))	4.2		Standards for machining
	40 CFR 63, Subpart XXXXXX (§63.11516(c)(1-2))	4.3		Standards for dry grinding and dry polishing with machines
	40 CFR 63, Subpart XXXXXX (§63.11516(f)(1-2))	4.4		Standards for welding
AA-300	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	4.5		Conditional standards for spray painting

4.1 For Emission Point AA-100, the permittee must comply with the requirements in paragraphs (a) and (b) below. Dry abrasive blasting operations for which the items to be blasted exceed 8 feet (2.4 meters) in any dimension, may be performed subject to the requirements in §63.11516(a)(3).

(a) The permittee must capture emissions and vent them to a filtration control device. The permittee must operate the filtration control device according to 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 the requirements in Condition 5.4.

(b) The permittee must implement the management practices to minimize emissions of MFHAP as specified in subparagraphs (i) through (iii) below.

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

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

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

(Ref.: 40 CFR 63.11516(a)(2))

4.2 For Emission Point AA-200, the permittee must implement management practices to minimize emissions of MFHAP as specified in paragraphs (a) and (b) below for each machining operation that uses materials that contain MFHAP or has the potential to emit MFHAP. These requirements do not apply when machining operations are being

performed that do not use any materials containing MFHAP and do not have the potential to emit MFHAP.

(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)(1-2))

4.3 For Emission Point AA-200, the permittee must comply with the requirements of paragraphs (a) and (b) below for each dry grinding and dry polishing with machines operation that uses materials that contain MFHAP or has the potential to emit MFHAP. These requirements do not apply when dry grinding and dry polishing operations are being performed that do not use any materials containing MFHAP and do not have the potential to emit 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 required by Condition 5.4(d).

(b) The permittee must implement management practices to minimize emissions of MFHAP as specified in subparagraphs (i) and (ii) below.

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

(ii) The permittee must operate all equipment associated with the operation of dry grinding and dry polishing with machines, including the filtration control device, according to manufacturer's instructions.

(Ref.: 40 CFR 63.11516(c)(1-2))

4.4 For Emission Point AA-200, the permittee must comply with the requirements in paragraphs (a) and (b) of this section for each welding operation that uses materials that contain MFHAP or has the potential to emit MFHAP. These welding standards do not apply when welding operations are being performed that do not use any materials containing MFHAP or do not have the potential to emit MFHAP.

(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 5.4(d).

(b) The permittee must implement one or more of the management practices specified in subparagraphs (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; and

(v) Use a welding fume capture and control system, operated according to the manufacturer's specifications.

(Ref.: 40 CFR 63.11516(f)(1-2))

4.5 For Emission Point AA-300, in the event that the permittee begins to perform spray-applied painting operations using paints which contain MFHAP, as defined by §63.11514(b)(4), the permittee shall immediately comply with all applicable requirements of §63.11516(d) – *Standards for control of MFHAP in spray painting*. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

SECTION 5
MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Monitoring/Recordkeeping Requirement
AA-000	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain records for a minimum of 5 years.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2	$PM/PM_{10}/PM_{2.5}$ (*filterable only*)	• Monitor and record the amount of $PM/PM_{10}/PM_{2.5}$ producing materials used • Calculate and record the total $PM/PM_{10}/PM_{2.5}$ emissions
AA-100 AA-200	40 CFR 63, Subpart XXXXXX (§63.11517(a) and (b)(1-4))	5.3	MFHAP	Requirements for the visual determination of fugitive emissions
	40 CFR 63, Subpart XXXXXX (§63.11519(c)(1-4), (11-13), and (15))	5.4		Recordkeeping requirements
AA-200	40 CFR 63, Subpart XXXXXX (§63.11517(c))	5.5		Requirements for the visual determination of opacity for welding
	40 CFR 63, Subpart XXXXXX (§63.11516(f)(3-7))	5.6		Tier 1, 2, and 3 compliance requirements for welding
	40 CFR 63, Subpart XXXXXX (§63.11516(f)(8))	5.7		Requirements for developing a Site-Specific Welding Emissions Management Plan
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.8	HAPs	Monitor and maintain monthly records of all HAP containing materials
AA-300	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.9	VOCs HAPs	Monitor and maintain monthly records of all VOC/HAP containing materials

5.1 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. 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.)

5.2 For the entire facility (AA-000), the permittee shall monitor and record the quantity of PM, PM_{10}, and $PM_{2.5}$ producing materials used on a monthly basis and for each consecutive 12-month period on a rolling basis. These materials may include, but are not limited to, abrasive blasting medium, welding wire, electrodes consumed, solder, and cutting materials.

The permittee shall also calculate and record the total particulate emissions, in tons per year, on a monthly basis and for each consecutive 12-month period on a rolling basis. The permittee may utilize data supplied by the manufacturer, analysis of $PM/PM_{10}/PM_{2.5}$

emissions by EPA Test Methods 1-5, found in 40 CFR Part 60, Appendix A, and/or an alternative test method which has been approved by the MDEQ. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.3 For Emission Points AA-100 and AA-200, the permittee must perform any applicable visual determinations of fugitive emissions required by Subpart XXXXXX according to the schedule outlined in paragraphs (a) through (d) below. The determinations must be performed according to the procedures of EPA Method 22, of 40 CFR Part 60, Appendix A-7. The permittee must conduct the EPA Method 22 test while the affected sources are operating under normal conditions. The duration of each EPA Method 22 test must 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.

(a) 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.

(b) Weekly Method 22 Testing - If no visible fugitive emissions are detected in consecutive daily EPA Method 22 tests, performed in accordance with paragraph (a) 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 must resume EPA Method 22 testing of that operation once per day during each day that the process is in operation, in accordance with paragraph (a).

(c) Monthly Method 22 Testing - If no visible fugitive emissions are detected in four consecutive weekly EPA Method 22 tests performed in accordance with paragraph (b) 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 must resume weekly EPA Method 22 in accordance with paragraph (b).

(d) Quarterly Method 22 Testing - If no visible fugitive emissions are detected in three consecutive monthly EPA Method 22 tests performed in accordance with paragraph (c) 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 must resume monthly EPA Method 22 in accordance with paragraph (c).

(Ref.: 40 CFR 63.11517(a) and (b)(1-4))

5.4 For Emission Points AA-100 and AA-200, the permittee must collect and keep records of the data and information specified in paragraphs (a) through (h) below.

(a) General compliance and applicability records - Maintain information specified in subparagraphs (i) and (ii) below for each affected source.

(i) Each notification and report that was submitted to comply with this subpart and the documentation supporting each notification and report.

(ii) Records of applicability determinations listing equipment included in its affected source, as well as any changes to that and on what date they occurred, must be maintained for 5 years and be made available for inspector review at any time.

(b) Visual determination of fugitive emissions records - Maintain a record of the information specified in subparagraphs (i) through (iii) below for each affected source which performs visual determination of fugitive emissions in accordance with Condition 5.3.

(i) The date and results of every visual determination of fugitive emissions;

(ii) A description of any corrective action taken subsequent to the test; and

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

(c) Visual determination of emissions opacity records - Maintain a record of the information specified in subparagraphs (i) through (iii) below for each affected source which performs visual determination of emissions opacity in accordance with Condition 5.5.

(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.

(d) Maintain a record of the manufacturer's specifications for any control devices used to comply with Section 4 of this permit.

(e) Visual determination of emissions opacity performed during the preparation (or revision) of the Site-Specific Welding Emissions Management Plan – The permittee must maintain a record of each visual determination of emissions opacity performed during the preparation (or revision) of a Site-Specific Welding Emissions Management Plan, in accordance with Condition 5.6(i).

(f) Site-Specific Welding Emissions Management Plan - If the permittee has been required to prepare a plan in accordance with Condition 5.6(i), the permittee must maintain a copy of the current Site-Specific Welding Emissions Management Plan in the facility’s records and it must be readily available for inspector review.

(g) Manufacturer's instructions - If the permittee complies with Subpart XXXXXX by operating any equipment according to manufacturer's instruction, the permittee must keep these instructions readily available for inspector review.

(h) Records must be maintained according to the requirements in subparagraphs (i) through (iii) below.

(i) Records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.

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

(iii) The permittee must keep each record on-site for at least 2 years after the date of each occurrence, measurement, corrective action, report, or record according to §63.10(b)(1). The permittee may keep the records off-site for the remaining 3 years.

(Ref.: 40 CFR 63.11519(c)(1-4), (11-13), and (15))

5.5 For Emission Point AA-200, the permittee must perform any required visual determination of emissions opacity 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. (Ref.: 40 CFR 63.11517(c))

5.6 For Emission Point AA-200, in the event that the permittee uses more than 2,000 pounds of welding rod which contains one or more MFHAPs in any consecutive 12-month period on a rolling basis, the permittee shall demonstrate compliance with the "Tier 1" welding requirements, the permittee must perform visual determinations of welding fugitive emissions as specified in Condition 5.3 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 Condition 5.4(b). If visible fugitive emissions are detected during any visual determination, the permittee must comply with the requirements in paragraphs (a) and (b) below.

(a) 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 Condition 4.4(b). After completing such corrective actions, the permittee must perform a follow-up inspection for visible fugitive emissions in accordance with Condition 5.3 at the primary vent, stack, exit, or opening from the building containing the welding operations.

(b) 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 the annual certification and compliance report as required by Condition 6.4(c).

If visible fugitive emissions are detected more than once during any consecutive 12-month period (notwithstanding the results of any follow-up inspections), the permittee must comply with the "Tier 2" welding requirements outlined in paragraphs (c) through (f) below.

(c) Within 24 hours of the end of the visual determination of fugitive emissions in which visible fugitive emissions were detected, the permittee must conduct a visual determination of emissions opacity, Condition 5.5 at the primary vent, stack, exit, or opening from the building containing the welding operations.

(d) In lieu of the requirement to perform visual determinations of fugitive emissions with EPA Method 22, the permittee must perform visual determinations of emissions opacity in accordance with subparagraphs (i) through (v) below using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.

(i) Daily Method 9 Testing - Perform visual determination of emissions opacity once per day during each day that the process is in operation.

(ii) Weekly Method 9 Testing - If the average of the six minute opacities recorded during any of the daily consecutive EPA Method 9 tests performed in accordance with subparagraph (i) 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 must resume testing every day of operation of the process according to the requirements of subparagraph (i) above.

(iii) Monthly Method 9 Testing - If the average of the six minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed in accordance with subparagraph (ii) 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 must resume testing every five days of operation of the process according to the requirements of subparagraph (ii) above.

(iv) Quarterly Method 9 Testing - If the average of the six minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed in accordance with subparagraph (iii) above does not exceed 20 percent for three 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 percent is detected during any quarterly test, the permittee must resume testing every 21 days (month) of operation of the process according to the requirements of subparagraph (iii) above.

(v) Return to Method 22 Testing - If, after two consecutive months of testing, the average of the six minute opacities recorded during any of the monthly EPA Method 9 tests performed in accordance with subparagraph (iii) above does not exceed 20 percent, the permittee may resume EPA Method 22 testing as in Condition 5.3(c) and (d). In lieu of this, the permittee may elect to continue performing EPA Method 9 tests in accordance with subparagraphs (iii) and (iv) above.

(e) The permittee must keep a record of each visual determination of emissions opacity performed in accordance with paragraphs (c) or (d) of this condition,

along with any subsequent corrective action taken, in accordance with the requirements in Condition 5.4(c).

(f) The permittee must report the results of all visual determinations of emissions opacity performed in accordance with paragraphs (c) or (d) of this condition, along with any subsequent corrective action taken, and submit with the annual certification and compliance report as required by Condition 6.4(d).

For each visual determination of emissions opacity performed in accordance with the "Tier 2" requirements, outlined in paragraphs (c) and (d) above, for which the average of the six-minute average opacities recorded is 20 percent or less but greater than zero, the permittee must 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 Condition 4.4(b).

For each visual determination of emissions opacity performed in accordance with the "Tier 2" requirements, outlined in paragraphs (c) and (d) above, for which the average of the six-minute average opacities recorded exceeds 20 percent, the permittee must comply with the "Tier 3" requirements outlined in paragraphs (g) through (k) below.

(g) The permittee must submit a report of exceedance of 20 percent opacity, along with the annual certification and compliance report, as specified in Condition 6.4 and according to the requirements of Condition 6.4(e).

(h) Within 30 days of the opacity exceedance, the permittee must prepare and implement a Site-Specific Welding Emissions Management Plan, as specified in Condition 5.7. If the permittee has already prepared a Site-Specific Welding Emissions Management Plan in accordance with this paragraph, then the permittee must prepare and implement a revised Site-Specific Welding Emissions Management Plan within 30 days.

(i) During the preparation (or revision) of the Site-Specific Welding Emissions Management Plan, the permittee must continue to perform visual determinations of emissions opacity, beginning on a daily schedule as specified in paragraph (d) of this condition using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.

(j) The permittee must maintain records of daily visual determinations of emissions opacity performed in accordance with paragraph (i) of this condition, during preparation of the Site-Specific Welding Emissions Management Plan, in accordance with the requirements in Condition 6.4(f).

(k) The permittee must include these records in the annual certification and compliance report, according to the requirements of Condition 6.4.

(Ref.: 40 CFR 63.11516(f)(3-7))

5.7 For Emission Point AA-200, if the permittee is required to develop a site-specific welding emissions plan, then the emission management plan must comply with the requirements outlined in paragraphs (a) through (c) below.

(a) The Site-Specific Welding Emissions Management Plan must contain the information in subparagraphs (i) through (vi) below.

(i) Company name and address;

(ii) A list and description of all welding operations which currently comprise the welding affected source;

(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 the welding affected source;

(v) A description of additional management practices and/or fume control methods to be implemented pursuant to Condition 5.6(h), and the projected date of implementation; and

(vi) Any revisions to a Site-Specific Welding Emissions Management Plan must contain copies of all previous plan entries, pursuant to subparagraphs (iv) and (v) above.

(b) The Site-Specific Welding Emissions Management Plan must be updated annually to contain current information, as required by subparagraphs (a)(i) through (a)(iii) of this condition, and submitted with the annual certification and compliance report, according to the requirements of Condition 6.4.

(c) The permittee must maintain a copy of the current Site-Specific Welding Emissions Management Plan in the facility records in a readily-accessible location for inspector review, in accordance with the requirements in Condition 5.4(f).

(Ref.: 40 CFR 63.11516(f)(8))

5.8 For Emission Point AA-200, in order to demonstrate compliance with Condition 3.6, the permittee shall monitor and record the following for each welding rod, electrode, or other HAP containing/generating material used:

(a) The identification of each welding rod, electrode, or other HAP containing/generating material used and the total number of pounds of each welding rod, electrode, or other HAP containing/generating material used on a monthly basis and in each consecutive 12-month period on a rolling basis;

(b) The HAP content (in weight percent) of each welding rod, electrode, or other HAP containing/generating material used. A description of the method used to determine the HAP content shall accompany this data;

(c) The HAP emission rate of each individual HAP and all combined HAPs in tons per year for each consecutive 12-month period on a rolling basis.

In the event that the facility uses more than 2,000 pounds of welding rod which contains one or more MFHAP in any consecutive 12-month period on a rolling basis, the permittee must demonstrate that management practices or fume control measures are being implemented by complying with the requirements in Conditions 5.6 and 5.7.

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

5.9 For Emission Point AA-300, in order to demonstrate compliance with Conditions 3.6 and 3.7, the permittee shall monitor and record the following for each coating, adhesive, solvent, or other VOC and/or HAP containing material used:

(a) The identification of each coating, adhesive, solvent, or other VOC/HAP containing material used and the total number of gallons of each coating, adhesive, solvent, or other VOC/HAP containing material was used on a monthly basis and in each consecutive 12-month period on a rolling basis;

(b) The VOC/HAP content (in weight percent) of each coating, adhesive, solvent, or other VOC/HAP containing material. A description of the method used to determine the VOC/HAP content shall accompany this data;

(c) The density (in lb/gal) of each coating, adhesive, solvent, or other VOC/HAP containing material used; and

(d) The total VOC emission rate in tons per year for each consecutive 12-month period on a rolling basis.

(e) The HAP emission rate of each individual HAP and all combined HAPs in tons per year for each consecutive 12-month period on a rolling basis.

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

SECTION 6
REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
AA-000	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	Report permit deviations within five (5) working days.
		6.2	Submit certified annual monitoring report.
		6.3	All documents submitted to MDEQ shall be certified by a Responsible Official.
AA-100 AA-200	40 CFR 63, Subpart XXXXXX (§63.11516(b)(1, 2, 4-6, 8, and 9))	6.4	Reporting requirements
AA-300	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.5	Report MFHAP status change and submit a modification application

6.1 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. 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(11).)

6.2 Except as otherwise specified herein, the permittee shall submit a certified annual synthetic minor monitoring report postmarked no later than 31st of January for the preceding calendar year. This report shall address any required monitoring specified in the permit, specifically the monitoring required by Conditions 5.2, 5.8, and 5.9. This report shall contain sufficient detail as to demonstrate whether or not compliance has been maintained with the emissions limitations outlined in Section 3 of this permit.

All instances of deviations from permit requirements must be clearly identified in the report. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration. (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-001 and AA-002, the permittee must prepare and submit annual certification and compliance reports for each affected source according to the requirements of paragraphs (a) through (f) below.

(a) Dates – The permittee must prepare and submit each annual certification and compliance report according to the dates specified in subparagraphs (i) and (ii) below. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(i) The annual certification and compliance report must cover each subsequent annual reporting period from January 1 through December 31.

(ii) Each annual certification and compliance report must be prepared and submitted no later than January 31 and kept in a readily-accessible location for inspector review. If an exceedance has occurred during the year, each annual certification and compliance report must be submitted along with the exceedance reports, and postmarked or delivered no later than January 31.

(b) General Requirements – The annual certification and compliance report must contain the information specified in subparagraphs (i) through (iii) below and the information specified in paragraphs (c) and (d) of this condition that is applicable to each affected source.

(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.

(c) Visual determination of fugitive emissions requirements – The annual certification and compliance report must contain the information specified in subparagraphs (i) through (iii) below for each affected source which performs visual determination of fugitive emissions in accordance with Condition 5.3.

(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.

(d) Visual determination of emissions opacity requirements – The annual certification and compliance report must contain the information specified in subparagraphs (i) through (iii) below for each affected source which performs visual determination of emissions opacity in accordance with Condition 5.5.

(i) The date of every visual determination of emissions opacity;

(ii) The average of the six-minute opacities measured by the test; and

(iii) A description of any corrective action taken subsequent to the test.

(e) Exceedances of 20 percent opacity for welding affected sources – As required by Condition 5.6(g), the permittee must prepare an exceedance report whenever the average of the six-minute average opacities recorded during a visual

determination of emissions opacity exceeds 20 percent. This report must be submitted along with the annual certification and compliance report according to the requirements of this condition and must contain the information in subparagraphs (i) and (ii) below.

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

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

(f) Site-Specific Welding Emissions Management Plan reporting – The permittee must submit a copy of the records of daily visual determinations of emissions recorded in accordance with Condition 5.6(j) and a copy of the Site-Specific Welding Emissions Management Plan and any subsequent revisions to the plan pursuant to Condition 5.7 along with the annual certification and compliance report, according to the requirements of this condition.

(Ref.: 40 CFR 63.11519(b)(1, 2, 4-6, 8, and 9))

6.5 For Emission Point AA-300, in the event that the permittee begins to perform spray-applied painting operations using paints which contain MFHAP, making it a spray painting affected source as defined by §63.11514(b)(4), the permittee shall submit a notification of the change of operational status and submit an application requesting to modify this operating permit so that it accurately applies the required conditions of 40 CFR Part 63, Subpart XXXXXX. The notification of the change of operating status shall be submitted no later than 15 days following the change in spray painting status, and the modification application shall be submitted no later than 60 days following the change in spray painting status. (Ref.: 11 Miss. Admin. Code, Pt. 2, R. 2.2.B(11).)