**State of Mississippi**

# FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL PERMIT

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

**THIS CERTIFIES**

Quality Manufacturing Group
2171 Highway 98 East
Columbia, MS
Marion 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**

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**Mississippi Department of Environmental Quality**

Issued/Modified: FEB 2 7 2012

Expires: JAN 3 1 2017

Permit No. 1740-00054

Agency Interest # 56726

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# Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Quality Manufacturing Group
Subject Item Inventory
Permit Number:1740-00054
Activity ID No.: PER20110001

## Subject Item Inventory:

| ID | Designation | Description |
|---|---|---|
| AI56726 | | Manufacturer of fabricated metal products. |
| AREA1 | AA-001 | Metal Working Operations (Including, but not limited to cutting; forming; welding.) |
| AREA2 | AA-002 | Abrasive Blasting Operations |
| AREA3 | AA-003 | Surface Coating Operations |
| EQPT1 | AA-004 | Tank Storage (Including, but not limited to gasoline; diesel.) |
| EQPT2 | AA-005 | Fuel Burning Equipment (Including, but not limited to space heat; air makeup heat.) |

**KEY**

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

## AI0000056726 Manufacturer of fabricated metal products.:

### Limitation Requirements:

| 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. [APC-S-1 , 3.2] |
| 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. [APC-S-1 , 3.4(a)(1)] |
| L-3 | | 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. [APC-S-1 , 4.1(a)] |
| L-4 | | For the entire facility, the permittee shall limit volatile organic compound (VOC) emissions to no more than 99.0 tons per year as determined for each consecutive 12-month period. [APC-S-2 , II.B.10] |
| L-5 | | For the entire facility, the permittee shall limit hazardous air pollutant (HAP) emissions to no more than 9.90 tons per year of any single HAP and no more than 24.90 tons per year of total combined HAP as determined for each consecutive 12-month period. [APC-S-2 , II.B.10] |
| L-6 | | For the entire facility, the permittee shall limit total particulate matter (PM) emissions to no more than 99.0 tons per year as determined for each consecutive 12-month period. [APC-S-2 , II.B.10] |
| L-7 | | For the entire facility, the permittee is subject to and shall comply with 40 CFR Part 63, Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants for Area Sources for Nine Metal Fabrication and Finishing Source Categories, specifically 40 CFR 63.11514(a)(2) - Fabricated Metal Products. [40 CFR 63.11514(a)(2)] |

**AI0000056726 (continued):**

## Limitation Requirements:

| Condition No. | Parameter | Condition |
|---|---|---|
| L-8 | | The permittee is subject to the Metal Finishing Hazardous Air Pollutant (MFHAP) provisions described in 40 CFR 63.11514(b), for abrasive blasting operations, machining operations, surface coating operations, and welding operations (i.e. 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, is considered to be MFHAP). [40 CFR 63.11514(b)] |

## Monitoring Requirements:

| Condition No. | Parameter | Condition |
|---|---|---|
| M-1 | | For the entire facility, the permittee shall determine the following for each coating, adhesive, solvent, or other VOC or HAP containing material used:<br><br>(a) quantity used (gal);<br><br>(b) the percentage of VOC by weight;<br><br>(c) the percentage of HAP by weight; and<br><br>(d) the density (lb/gal).<br><br>The permittee may utilize data supplied by the manufacturer, or analysis of VOC and HAP content by EPA Test Method 311, 40 CFR Part 63, Appendix A, respectively. [APC-S-2 , II.B.11] |
| M-2 | | For the entire facility, the permittee shall determine the quantity of PM producing materials which may include, but is not limited to, abrasive blasting medium consumed, welding wire, electrodes (etc.) consumed, solder, metal, and cutting materials used on a monthly basis and in any consecutive 12-month period. [APC-S-2 , II.B.10] |

**AI0000056726 (continued):**

## Monitoring Requirements:

| Condition No. | Parameter | Condition |
|---|---|---|
| M-3 | | For the entire facility, for each affected source subject to visual fugitive emissions monitoring, 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. [40 CFR 63.11517(a)] |
| M-4 | | For the entire facility, for each affected source subject to visual fugitive emissions monitoring, visual determinations of fugitive emissions shall be performed in accordance with 40 CFR 63.11517(a) and according to paragraphs (a) through (d) of this condition.<br><br>(a) Daily Method 22 Testing. Perform visual determinations of fugitive emissions once per day, on each day the process is in operation, during operation of the process.<br><br>(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) of this condition 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 (a) of this condition.<br><br>(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) of this condition, the permittee shall 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 (b) of this condition.<br><br>(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) of this condition, 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 (c) of this condition. [40 CFR 63.11517(b)] |

**AI0000056726 (continued):**

## Record-Keeping Requirements:

| Condition No. | Condition |
|---|---|
| R-1 | For the entire facility, the permittee shall maintain sufficient records to document:<br><br>(a) identification of each coating, adhesive, solvent or other VOC or HAP containing material used, and the total gallons of each coating and each solvent used on a monthly basis and in any consecutive 12-month period;<br><br>(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; and<br><br>(c) the density of each coating, adhesive, solvent or other VOC or HAP containing material. [APC-S-2 , II.B.10] |
| R-2 | For the entire facility, the permittee shall maintain sufficient records to document:<br><br>(a) the quantity of PM producing materials which may include, but is not limited to, abrasive blasting medium consumed, welding wire, electrodes (etc.) consumed, solder, metal, and cutting materials used on a monthly basis and in any consecutive 12-month period; and<br><br>(b) PM emissions in tons per year for any consecutive 12-month period. [APC-S-2 , II.B.10] |
| R-3 | 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. [APC-S-2 , II.B.10] |

**AI0000056726 (continued):**

## Record-Keeping Requirements:

| Condition No. | Condition |
|---|---|
| R-4 | For the entire facility, the permittee shall collect and keep records of the data and information specified in paragraphs (a) through (k) of this condition, according to the requirements in paragraph (l) of this condition.<br><br>(a) General compliance and applicability records. Maintain information specified in paragraphs (a)(1) through (2) of this condition for each affected source.<br><br>(1) each notification and report submitted to comply with this subpart, and the documentation supporting each notification and report.<br>(2) records of the applicability determinations as in 40 CFR 63.11514(b)(1) through (5), 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.<br><br>(b) Visual determination of fugitive emissions records. Maintain a record of the information specified in paragraphs (b)(1) through (3) of this condition for each affected source which performs visual determination of fugitive emissions in accordance with 40 CFR 63.11517(a).<br><br>(1) the date and results of every visual determination of fugitive emissions;<br>(2) a description of any corrective action taken subsequent to the test; and<br>(3) the date and results of any follow-up visual determination of fugitive emissions performed after the corrective actions<br><br>(c) Visual determination of emissions opacity records. Maintain a record of the information specified in paragraphs (c)(1) through (3) of this condition for each affected source which performs visual determination of emissions opacity in accordance with 40 CFR 63.11517(c).<br><br>(1) the date of every visual determination of emissions opacity;<br>(2) the average of the six-minute opacities measured by the test; and<br>(3) a description of any corrective action taken subsequent to the test.<br><br>(d) maintain a record of the manufacturer's specifications for the control devices used to comply with 40 CFR 63.11516.<br><br>(e) Spray paint booth filter records. Maintain a record of the filter efficiency demonstrations and spray paint booth filter maintenance activities, performed in accordance with 40 CFR 63.11516(d)(1)(ii) and (iii).<br><br>(f) waterspray booth or water curtain efficiency tests. Maintain a record of the water curtain efficiency demonstrations performed in accordance with 40 CFR 63.11516(d)(1)(ii). [40 CFR 63.11519(c)] |

**AI0000056726 (continued):**

## Record-Keeping Requirements:

| Condition No. | Condition |
|---|---|
| R-5 | (g) HVLP or other high transfer efficiency spray delivery system documentation records. Maintain documentation of HVLP or other high transfer efficiency spray paint delivery system, in compliance with 40 CFR 63.11516(d)(3). This documentation must include the manufacturer's specifications for the equipment and any manufacturer's operation instructions. If the permittee has obtained written approval for an alternative spray application system in accordance with 40 CFR 63.11516(d)(2), the permittee shall maintain a record of that approval along with documentation of the demonstration of equivalency.<br><br>(h) HVLP or other high transfer efficiency spray delivery system employee training documentation records. Maintain certification that each worker performing spray painting operations has completed the training specified in 40 CFR 63.11516(d)(6), with the date the initial training and the most recent refresher training was completed.<br><br>(i) Visual determination of emissions opacity performed during the preparation (or revision) of the Site-Specific Welding Emissions Management Plan. The permittee shall maintain a record of each visual determination of emissions opacity performed during the preparation (or revision) of a Site-Specific Welding Emissions Management Plan, in accordance with 40 CFR 63.11516(f)(7)(iii).<br><br>(j) Site-Specific Welding Emissions Management Plan. If the permittee has been required prepare a plan in accordance with 40 CFR 63.11516(f)(7)(iii), the permittee shall maintain a copy of your current Site-Specific Welding Emissions Management Plan in your records and it must be readily available for inspector review.<br><br>(k) Manufacturer's instructions. If the permittee complies with 40 CFR Part 63, Subpart XXXXXX by operating any equipment according to manufacturer's instruction, the permittee shall keep these instructions readily available for inspector review.<br><br>(l) Welding Rod usage. If the permittee operates a new or existing welding affected source which is not required to comply with the requirements of 40 CFR 63.11516(f)(3) through (8) because it uses less than 2,000 pounds per year of welding rod (on a rolling 12-month basis), the permittee shall maintain records demonstrating the welding rod usage on a rolling 12-month basis. [40 CFR 63.11519(c)] |

**AI0000056726 (continued):**

## Record-Keeping Requirements:

| Condition No. | Condition |
|---|---|
| R-6 | (m) the permittee's records shall be maintained according to the requirements in paragraphs (m)(1) through (3) of this condition.<br><br>(1) the permittee's records shall be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.<br>(2) 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.<br>(3) the permitee 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 may keep the records off-site for the remaining 3 years. [40 CFR 63.11519(c)] |

## Submittal/Action Requirements:

| Condition No. | Condition |
|---|---|
| S-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:<br><br>(a) identification of each coating, adhesive, solvent or other VOC or HAP containing material used;<br><br>(b) the VOC and HAP content(s) of each coating, adhesive, solvent, or other VOC or HAP containing material used;<br><br>(c) the total gallons of each coating, adhesive, solvent or other VOC or HAP containing material used in any consecutive 12-month period; and<br><br>(d) the total VOC emission rate, the emission rate of each individual HAP and the total HAP emission rate in tons per year based on a consecutive 12-month period. [APC-S-2 , II.B.11] |

**AI0000056726 (continued):**

## Submittal/Action Requirements:

| Condition No. | Condition |
|---|---|
| S-2 | 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:<br><br>(a) the quantity of PM producing materials which may include, but is not limited to, abrasive blasting medium consumed, welding wire, electrodes (etc.) consumed, solder, metal, and cutting materials used; and<br><br>(b) the PM emission rate in tons per year based on a consecutive 12-month period. [APC-S-2 , II.B.11] |
| S-3 | All reports shall be submitted no later than 30 days from the annual period ending December 31. [APC-S-2 , II.B.11] |
| S-4 | The permittee shall report any exceedance of limitations outlined in this permit to the MDEQ no later than ten (10) days following the end of the month in which the exceedance occurred and shall report the cause of the exceedance and the action(s) taken and/or to be taken to correct it. [APC-S-2 , II.B.11] |

**AI0000056726 (continued):**

## Submittal/Action Requirements:

| Condition No. | Condition |
|---|---|
| S-5 | For the entire facility, the permittee shall comply with the following reporting requirements for determining compliance with 40 CFR 63, Subpart XXXXXX:<br><br>(a) Initial notification. The permittee shall submit the Initial Notification no later than 120 calendar days following issuance of this permit. The Initial Notification shall provide the information specified in paragraphs (a)(1) through (4) of this condition.<br><br>(1) the name, address, phone number and e-mail address of the owner and operator;<br>(2) the address (physical location) of the affected source;<br>(3) an identification of the relevant standard (i.e., 40 CFR Part 63, Subpart XXXXXX); and<br>(4) a brief description of the type of operation. For example, a brief characterization of the types of products (e.g., aerospace components, sports equipment, etc.), the number and type of processes, and the number of workers usually employed.<br><br>(b) Notification of compliance status. The permittee shall submit a notification of compliance status no later than 120 calendar days following issuance of this permit. The permittee is required to submit the information specified in paragraphs (b)(1) through (3) of this condition with the notification of compliance status.<br><br>(1) the company's name and address;<br>(2) a statement by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all relevant standards and other requirements of this subpart; and<br>(3) the date of the notification of compliance status. [40 CFR 63.11519(a), 40 CFR 63.9(b)] |

**AI0000056726 (continued):**

## Submittal/Action Requirements:

| Condition No. | Condition |
|---|---|
| S-6 | For the entire facility, the permittee shall comply with the following reporting requirements for determining compliance with 40 CFR Part 63, Subpart XXXXXX:<br><br>(a) the permittee shall prepare and submit annual certification and compliance reports for each affected source according to the requirements of paragraphs (b) through (f) of this condition.<br><br>(b) the permittee shall prepare and submit each annual certification and compliance report according to the dates specified in paragraphs (b)(1) through (3) of this condition. 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.<br><br>(1) the first annual certification and compliance report shall cover the first annual reporting period which begins the day after the compliance date and ends on December 31.<br>(2) each subsequent annual certification and compliance report shall cover the subsequent semiannual reporting period from January 1 through December 31.<br>(3) each annual certification and compliance report shall be prepared and submitted no later than January 31 and kept in a readily-accessible location for inspector review. If an exceedance has occurred during the year, each annual certification and compliance report shall be submitted along with the exceedance reports, and postmarked or delivered no later than January 31.<br><br>(c) General requirements. The annual certification and compliance report shall contain the information specified in paragraphs (c)(1) through (3) of this condition, and the information specified in paragraphs (d) and (e) of this condition that is applicable to each affected source.<br><br>(1) company name and address;<br>(2) 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<br>(3) 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. [40 CFR 63.11519(b)] |

**AI0000056726 (continued):**

## Submittal/Action Requirements:

| Condition No. | Condition |
|---|---|
| S-7 | (d) Visual determination of fugitive emissions requirements. The annual certification and compliance report shall contain the information specified in paragraphs (d)(1) through (3) of this condition for each affected source which performs visual determination of fugitive emissions in accordance with 40 CFR 63.11517(a).<br><br>(1) the date of every visual determination of fugitive emissions which resulted in detection of visible emissions;<br>(2) a description of the corrective actions taken subsequent to the test; and<br>(3) the date and results of the follow-up visual determination of fugitive emissions performed after the corrective actions.<br><br>(e) Visual determination of emissions opacity requirements. The annual certification and compliance report shall contain the information specified in paragraphs (e)(1) through (3) of this condition for each affected source which performs visual determination of emissions opacity in accordance with 40 CFR 63.11517(c).<br><br>(1) the date of every visual determination of emissions opacity;<br>(2) the average of the six-minute opacities measured by the test; and<br>(3) a description of any corrective action taken subsequent to the test.<br><br>(f) Exceedances of 20 percent opacity for welding affected sources. As required by 40 CFR 63.11516(f)(7)(i), the permittee shall prepare an exceedance report whenever the average of the six-minute average opacities recorded during a visual determination of emissions opacity exceeds 20 percent. This report shall be submitted along with the annual certification and compliance report according to the requirements in paragraph (a) of this condition, and shall contain the information in paragraphs (f)(1) and (2) of this condition.<br><br>(1) the date on which the exceedance occurred; and<br>(2) the average of the six-minute average opacities recorded during the visual determination of emissions opacity.<br><br>(g) Site-specific Welding Emissions Management Plan reporting. The permittee shall submit a copy of the records of daily visual determinations of emissions recorded in accordance with 40 CFR 63.11516(f)(7)(iv), and a copy of the Site-Specific Welding Emissions Management Plan and any subsequent revisions to the plan pursuant to 40 CFR 63.11516(f)(8), along with the annual certification and compliance report, according to the requirements in paragraph (a) of the previous condition. [40 CFR 63.11519(b)] |
| S-8 | 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. [APC-S-2 II.B(11)] |

**AI0000056726 (continued):**

## Submittal/Action Requirements:

| Condition No. | Condition |
|---|---|
| S-9 | 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. [APC-S-2 II.B(10)] |

## Narrative Requirements:

| 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. [APC-S-2 V.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)] |
| T-4 | General Condition: Any diversion from or bypass of collection and control facilities is prohibited except as provided for in Regulation APC-S-1, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. [APC-S-1 Section 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. [APC-S-2 X] |
| 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:<br>(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<br>(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] |

**AI0000056726 (continued):**

## Narrative Requirements:

| Condition No. | Condition |
|---|---|
| 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:<br>(a) Violation of any terms or conditions of this permit<br>(b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or<br>(c) A change in any condition that required either a temporary or permanent reduction or elimination of authorized air emissions. [APC-S-2 II.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. [APC-S-2 II.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] |
| 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. [APC-S-2 II.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. [APC-S-2 II.B(7)] |
| T-12 | General Condition: This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board. [APC-S-2 XVI.B] |
| T-13 | General Condition: This permit is for air pollution control purposes only. [APC-S-2 I.D(1)] |
| T-14 | General Condition: This permit is a Federally-approved permit to operate a synthetic minor source as described in Regulation APC-S-2, Section IV.D. [APC-S-2 IV.D] |

**AI0000056726 (continued):**

## Narrative Requirements:

| Condition No. | Condition |
|---|---|
| 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. [APC-S-2 I.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. [APC-S-2 II.B(15)d] |
| T-17 | General Condition: This permit does not authorize a modification as defined in APC-S-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:<br>(a) routine maintenance, repair, and replacement;<br>(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;<br>(c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;<br>(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;<br>(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 52.51, or under regulations approved pursuant to Subpart I or 40 CFR 51.166; or<br>(f) any change in ownership of the stationary source" [APC-S-2 I.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. [APC-S-2 II.B(15)a] |

**AI0000056726 (continued):**

## Narrative Requirements:

| Condition No. | Condition |
|---|---|
| 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. [APC-S-2 IX] |
| 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. [APC-S-2 II.B(5)] |
| T-21 | General Condition: Emergencies<br>(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.<br>(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.<br>(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 MDEQ 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.<br>(d) In any enforcement proceeding, the permittee seeking to establish the occurrence of any emergency has the burden of proof.<br>(e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein [APC-S-2 II.B(10)] |

**AI0000056726 (continued):**

## Narrative Requirements:

| Condition No. | Condition |
|---|---|
| T-22 | General Condition: Upsets<br>(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.<br>(b) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.<br>(c) This provision is in addition to any upset provision contained in any applicable requirement. [APC-S-1 Section 10] |
| T-23 | General Condition: Startups and Shutdowns<br>(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.<br>(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.<br>(c) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply. [APC-S-1 Section 10] |

**AI0000056726 (continued):**

## Narrative Requirements:

| Condition No. | Condition |
|---|---|
| T-24 | General Condition: Maintenance<br>(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.<br>(b) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.<br>(c) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. [APC-S-1 Section 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. [APC-S-2 VIII] |

## AREA0000000001 (AA-001) Metal Working Operations (Including, but not limited to cutting; forming; welding.):

### Limitation Requirements:

| Condition No. | Parameter | Condition |
|---|---|---|
| L-1 | | For Emission Point AA-001, the permittee shall implement management practices, as stated in this condition, to minimize emissions of MFHAP 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.<br><br>(a) the permittee shall take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and<br><br>(b) the permittee shall operate all equipment associated with machining according to manufacturer's instructions. [40 CFR 63.11516(b)] |

**AREA0000000001 (continued):**

## Limitation Requirements:

| Condition No. | Parameter | Condition |
|---|---|---|
| L-2 | | For Emission Point AA-001, the permitee shall comply with the requirements, as stated in this condition, for each welding operation that uses materials that contain MFHAP or has the potential to emit MFHAP. If the welding affected source uses 2,000 pounds or more per year of welding rod containing one or more MFHAP (calculated on a rolling 12-month basis), the permittee shall demonstrate that management practices or fume control measures are being implemented by complying with the requirements in paragraphs (c) through (h) of this condition. The requirements in paragraphs (a) through (h) of this condition 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.<br><br>(a) the permittee shall operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions. The permittee shall demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the capture and control devices, in accordance with 40 CFR 63.11519(c)(4).<br><br>(b) the permittee shall implement one or more of the management practices specified below to minimize emissions of MFHAP, as practicable, while maintaining the required welding quality through the application of sound engineering judgment.<br><br>(1) use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW) - also called metal inert gas welding (MIG));<br>(2) use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates;<br>(3) use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation;<br>(4) optimize welding process variables (e.g., electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated; and<br>(5) use a welding fume capture and control system, operated according to the manufacturer's specifications.<br><br>(c) Tier 1 compliance requirements for welding. The permittee shall perform visual determinations of welding fugitive emissions in accordance with 40 CFR 63.11517(b), at the primary vent, stack, exit, or opening from the building containing the welding operations. The permittee shall keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in 40 CFR 63.11519(c)(2). [40 CFR 63.11516(f)] |

**AREA0000000001 (continued):**

## Limitation Requirements:

| Condition No. | Parameter | Condition |
|---|---|---|
| L-3 | | (d) Requirements upon initial detection of visible emissions from welding. If visible fugitive emissions are detected during any visual determination required in paragraph (c) of this condition, the permittee shall comply with the requirements as stated below:<br><br>(1) 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 paragraph (b) of this condition. After completing such corrective actions, the permittee shall perform a follow-up inspection for visible fugitive emissions in accordance with 40 CFR 63.11517(a), at the primary vent, stack, exit, or opening from the building containing the welding operations.<br>(2) 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 in accordance with 40 CFR 63.11519(b)(5).<br><br>(e) 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), the permittee shall comply with the requirements as stated below:<br><br>(1) 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, in accordance with 40 CFR 63.11517(c), at the primary vent, stack, exit, or opening from the building containing the welding operations.<br>(2) in lieu of the requirement of paragraph (c) of this condition to perform visual determinations of fugitive emissions with EPA Method 22, the permittee shall perform visual determinations of emissions opacity in accordance with 40 CFR 63.11517(d), using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.<br>(3) the permittee shall keep a record of each visual determination of emissions opacity performed in accordance with paragraphs (e)(1) or (2) of this condition, along with any subsequent corrective action taken, in accordance with the requirements in 40 CFR 63.11519(c)(3).<br>(4) the permittee shall report the results of all visual determinations of emissions opacity performed in accordance with paragraphs (e)(1) or (2) of this condition, along with any subsequent corrective action taken, and submit with the annual certification and compliance report as required by 40 CFR 63.11519(b)(6). [40 CFR 63.11516(f)] |

**AREA0000000001 (continued):**

## Limitation Requirements:

| Condition No. | Parameter | Condition |
|---|---|---|
| L-4 | | (f) 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 (e) of this condition 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 paragraph (b) of this condition.<br><br>(g) Tier 3 requirements for opacities exceeding 20 percent. For each visual determination of emissions opacity performed in accordance with paragraph (e) of this condition for which the average of the six-minute average opacities recorded exceeds 20 percent, the permittee shall comply with the requirements as stated below:<br><br>(1) the permittee shall submit a report of exceedance of 20 percent opacity, along with the annual certification and compliance report, in accordance with 40 CFR 63.11519(b)(8) and according to the requirements of 40 CFR 63.11519(b)(1).<br>(2) within 30 days of the opacity exceedance, the permittee shall prepare and implement a Site-Specific Welding Emissions Management Plan, as specified in paragraph (h) of this condition. If the permitee 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.<br>(3) 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 in accordance with 40 CFR 63.11517(d), using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.<br>(4) the permittee shall maintain records of daily visual determinations of emissions opacity performed in accordance with paragraph (g)(3) of this condition, during preparation of the Site-Specific Welding Emissions Management Plan, in accordance with 40 CFR 63.11519(b)(9).<br>(5) the permittee shall include these records in the annual certification and compliance report, in accordance with 40 CFR 63.11519(b)(1). [40 CFR 63.11516(f)] |

**AREA0000000001 (continued):**

## Limitation Requirements:

| Condition No. | Parameter | Condition |
|---|---|---|
| L-5 | | (h) Site-Specific Welding Emissions Management Plan. The Site-Specific Welding Emissions Management Plan shall comply with the requirements as stated below:<br><br>(1) Site-Specific Welding Emissions Management Plan shall contain the following information in the paragraphs below:<br>(i) company name and address;<br>(ii) a list and description of all welding operations which currently comprise the welding affected source;<br>(iii) a description of all management practices and/or fume control methods in place at the time of the opacity exceedance;<br>(iv) a list and description of all management practices and/or fume control methods currently employed for the welding affected source;<br>(v) a description of additional management practices and/or fume control methods to be implemented pursuant to paragraph (g)(2) of this condition, and the projected date of implementation; and<br>(vi) any revisions to a Site-Specific Welding Emissions Management Plan shall contain copies of all previous plan entries, pursuant to paragraphs (h)(1)(iv) and (v) of this condition.<br>(2) the Site-Specific Welding Emissions Management Plan shall be updated annually to contain current information, as required by paragraphs (h)(1)(i) throught (iii) of this condition, and submitted with the annual certification and compliance report, in accordance with 40 CFR 63.11519(b)(1).<br>(3) the permittee shall maintain a copy of the current Site-Specific Welding Emissions Management Plan in the records in a readily-accessible location for inspector review, in accordance with 40 CFR 63.11519(c)(12). [40 CFR 63.11516(f)] |

## Monitoring Requirements:

| Condition No. | Parameter | Condition |
|---|---|---|
| M-1 | | For Emission Point AA-001, 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(c)] |

**AREA0000000001 (continued):**

## Monitoring Requirements:

| Condition No. | Parameter | Condition |
|---|---|---|
| M-2 | | For Emission Point AA-001, the permittee shall perform visual determination of emissions opacity in accordance with the previous condition in accordance with the schedule in paragraphs (a) through (e) of this condition.<br><br>(a) 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.<br><br>(b) Weekly Method 9 testing for welding. Tier 2 or 3. If the avreage of the six minute opacities recorded during any of the daily consecutive EPA Method 9 tests peformed in accordance with paragraph (a) of this condition 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 may resume testing every day of operation of the process according to the requirements of paragraph (a) of this condition.<br><br>(c) 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 (b) of this condition 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 (b) of this condition.<br><br>(d) Quarterly 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 (c) of this condition 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 shall resume testing every 21 days (month) of operation of the process according to the requirements of paragraph (c) of this condition.<br><br>(e) Return to Method 22 testing for welding. Tier 2 or 3. 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 paragraph (c) of this condition does not exceed 20 percent, the permittee may resume EPA Method 22 testing as in paragraphs (c) and (d) of Condition M-5 on page 12 of the permit. In lieu of this, the permittee may elect to continue performing EPA Method 9 tests in accordance with paragraphs (c) and (d) of this condition. [40 CFR 63.11517(d)] |

## AREA0000000002 (AA-002) Abrasive Blasting Operations:

### Limitation Requirements:

| Condition No. | Parameter | Condition |
|---|---|---|
| L-1 | | For Emission Point AA-002, the permittee shall comply with the requirements, as stated in this condition, for each dry abrasive blasting operation that uses materials that contain MFHAP or has the potential to emit MFHAP. These requirements do not apply when abrasive blasting operations are being performed that do not use any materials containing MFHAP or do not have the potential to emit MFHAP.<br><br>(a) the permittee shall implement management practices specified below for dry abrasive blasting of objects performed in totally enclosed and unvented blast chambers for minimizing emissions of MFHAP.<br><br>(1) minimize dust generation during emptying of abrasive blasting enclosures; and<br>(2) operate all equipment associated with dry abrasive blasting operations according to the manufacturer's instructions.<br><br>(b) the permittee shall comply with the requirements specified below for dry abrasive blasting affected sources which consists of a dry abrasive blasting operation which has a vent allowing any air or blast material to escape. 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 below.<br><br>(1) capture emissions and vent them to a filtration control device. The permittee shall operate the filtration control device according to manufacturer's instructions, and demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices, as specified by 40 CFR 63.11519(c)(4).<br>(2) implement the management practices specified below to minimize emissions of MFHAP.<br>(i) take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable;<br>(ii) enclose dusty abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive materials; and<br>(iii) operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions. [40 CFR 63.11516(a)] |

**AREA0000000002 (continued):**

## Limitation Requirements:

| Condition No. | Parameter | Condition |
|---|---|---|
| L-2 | | (c) if the permittee owns or operates a new or existing dry abrasive blasting affected source which consists of a dry abrasive blasting operation which is performed on objects greater than 8 feet (2.4 meters) in any one dimension, the permittee shall implement management prectices to minimize emissions of MFHAP, as specified in paragraph (c)(1) of this condition, instead of the practices required by paragraph (b) of this condition. The permittee shall demonstrate that management practices are being implemented by complying with the requirements in paragraphs (c)(2) through (4) of this condition.<br><br>(1) management practices for dry abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension are specified below.<br>(i) take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable;<br>(ii) enclose abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive material;<br>(iii) operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions;<br>(iv) do not reuse dry abrasive blasting media unless contaminants (i.e., any material other then the base metal, such as paint residue) have been removed by filtration or screening, and the abrasive material conforms to its original size; and<br>(v) whenever practicable, switch from high particulate matter (PM)-emitting blast media (e.g., sand) to low PM-emitting blast media (e.g., crushed glass, specular hematite, steel shot, aluminum oxide), where PM is a surrogate for MFHAP.<br><br>(2) perform visual determinations of fugitive emissions, in accordance with 40 CFR 63.11517(b), as stated below, as applicable.<br>(i) for abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension that is performed outdoors, the permittee shall perform visual determinations of fugitive emissions at the fenceline or property border nearest to the outdoor dry abrasive blasting operation.<br>(ii) for abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension that is performed indoors, the permittee shall perform visual determinations of fugitive emissions at the primary vent, stack, exit, or opening from the building containing the abrasive blasting operation. [40 CFR 63.11516(a)] |

**AREA0000000002 (continued):**

## Limitation Requirements:

| Condition No. | Parameter | Condition |
|---|---|---|
| L-3 | | (3) keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with 40 CFR 63.11519(c)(2).<br><br>(4) if visible emissions are detected, perform corrective actions until the visible fugitive emissions are eliminated, at which time the permittee shall comply with the requirements below.<br>(i) perform a follow-up inspection for visible fugitive emissions in accordance with 40 CFR 63.11517(a).<br>(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, with the annual certification and compliance report in accordance with 40 CFR 63.11519(b)(5). [40 CFR 63.11516(a)] |

## AREA0000000003 (AA-003) Surface Coating Operations:

### Limitation Requirements:

| Condition No. | Parameter | Condition |
|---|---|---|
| L-1 | | For Emission Point AA-003, the permittee shall implement the management practices, as stated below, when a spray-applied paint that contains MFHAP is being applied. These requirements do not apply when spray-applied paints that do not contain MFHAP are being applied.<br><br>(a) Standards for spray painting for MFHAP control. All spray-applied painting of objects must meet the requirements of paragraphs (a)(1) through (3) of this condition. These requirements do not apply to affected sources located at Fabricated Structural Metal Manufacturing facilities, as described in Table 1, "Description of Source Categories Affected by this Subpart," or affected sources that spray paint objects greater than 15 feet (4.57 meters), that are not spray painted in spray booths or spray rooms.<br><br>(1) spray booths or spray rooms must have a full roof, at least two complete walls, and one or two complete side curtains or other barrier material so that all four sides are covered. The spray booths or spray rooms must be ventilated so that air is drawn into the booth and leaves only through the filter. The roof may contain narrow slots for connecting fabricated products to overhead cranes, and/or for cords or cables.<br>(2) all spray booths or spray rooms must be fitted with a type of filter technology that is demonstrated to achieve at least 98 percent capture of MFHAP. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992" (incorporated by reference, see 40 CFR 63.14). The test coating for measuring filter efficiency shall be a high-solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-High Volume Low Pressure) air atomized spray gun operating at 40 psi air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement.<br>(3) the permittee shall perform regular inspection and replacement of the filters in all spray booths or spray rooms according to the manufacturer's instructions, and maintain documentation of these activities, in accordance with 40 CFR 63.11519(c)(5).<br>(4) as an alternative compliance requirement, spray booths or spray rooms equipped with a water curtain, called "waterwash" or "waterspray" booths or spray rooms that are operated and maintained according to the manufacturer's specifications and that achieve at least 98 percent control of MFHAP, may be used in lieu of the spray booths or spray rooms requirements of paragraphs (a)(1) through (3) of this condition. [40 CFR 63.11516(d)] |

**AREA0000000003 (continued):**

## Limitation Requirements:

| Condition No. | Parameter | Condition |
|---|---|---|
| L-2 | | (b) Standards for spray painting application equipment of all objects painted for MFHAP control. All paints applied via spray-applied painting must be applied with a high-volume, low-pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated to achieve transfer efficiency comparable to one of these spray gun technologies for a comparable operation, and for which written approval has been obtained from the Administrator. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's "Spray Equipment Transfer Efficient Test Procedure for Equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficiency Spray Guns, September 26, 2002", Revision 0 (incorporated by reference, see 40 CFR 63.14).<br><br>(c) Spray system recordkeeping. You must maintain documentation of the HVLP or other high transfer efficiency spray paint delivery methods, in accordance with 40 CFR 63.11519(c)(7).<br><br>(d) Spray gun cleaning. All cleaning of paint spray guns must be done with either non-HAP gun cleaning solvents, or in such a manner that an atomized mist of spray gun cleaning solvent and paint residue is not created outside of a container that collects the used gun cleaning solvent. Spray gun cleaning may be done with, for example, by hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of thse non-atomizing methods may also be used<br><br>(e) Spray painting worker certification. All workers performing painting must be certified that they have completed training in the proper spray application of paints and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in paragraph (f) of this condition. The spray application of paint is prohibited by persons who are not certified as having completed the training described in paragraph (f) of this condition. The requirements of this paragraph do not apply to the students of an accredited painting training program who are under the direct supervision of an instructor who meets the requirements of this paragraph. The requirements of this paragraph do not apply to operators of robotic or automated painting operations. [40 CFR 63.11516(d)] |

**AREA0000000003 (continued):**

## Limitation Requirements:

| Condition No. | Parameter | Condition |
|---|---|---|
| L-3 | | (f) Spray painting training program content. Each owner or operator of an affected spray painting affected source must ensure and certify that all new and existing personnel, including contact personnel, who spray apply paints are trained in the proper application of paints as required by paragraph (e) of this condition. The training program must include, at a minimum, the items listed in paragraphs (f)(1) through (3) of this condition.<br><br>(1) a list of all current personnel by name and job description who are required to be trained;<br>(2) hands-on, or in-house or external classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in paragraphs (f)(2)(i) through (iv) of this condition.<br>(i) spray gun equipment selection, set up, and operation, including measuring paint viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.<br>(ii) spray technique for different types of paints to improve transfer efficiency and minimize paint usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.<br>(iii) routine spray booth and filter maintenance, including filter selection and installation.<br>(iv) environmental compliance with the requirements of this subpart.<br>(3) a description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Alternatively, owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in paragraph (f)(2) of this condition are not required to provide the initial training required by that paragraph to these painters. [40 CFR 63.11516(d)] |

**AREA0000000003 (continued):**

## Limitation Requirements:

| Condition No. | Parameter | Condition |
|---|---|---|
| L-4 | | (g) Records of spray painting training. The permittee shall maintain records of employee training certification for use of HVLP or other high transfer efficiency spray paint delivery methods in accordance with 40 CFR 63.11519(c)(8).<br><br>(h) Spray painting training dates. As required by paragraph (e) of this condition, all new and existing personnel at an affected spray painting affected source, including contract personnel, who spray apply paints must be trained by the dates specified in paragraphs (h)(1) and (2) of this condition.<br><br>(1) if the permittee's source is a new source, all personnel must be trained and certified no later than 180 days after startup or 180 days after hiring, whichever is later. Training that was completed within 5 years prior to the date training is required, and that meets the requirements specified in paragraph (f)(2) of this condition, satisifies this requirement and is valid for a period not to exceed 5 years after the date the training is completed.<br>(2) if the permittee's source is an existing source, all personnel must be trained and certified no later than July 25, 2011, or 180 days after hiring, whichever is later. Worker training that was completed within 5 years prior to the date training is required, and that meets the requirements specified in paragraph (f)(2) of this condition, satisfies this requirement and is valid for a period not to exceed 5 years after the date the training is completed.<br><br>(i) Duration of training validity. Training and certification will be valid for a period not to exceed 5 years after the date the training is completed. All personnel must receive refresher training that meets the requirements of this section and be re-certified every 5 years. [40 CFR 63.11516(d)] |

# GENERAL INFORMATION

Quality Manufacturing Group
2171 Highway 98 East
Columbia, MS
Marion County

## Alternate/Historic Identifiers

| ID | Alternate/Historic Name | User Group | Start Date | End Date |
|---|---|---|---|---|
| 56726 | Quality Manufacturing Group | Official Site Name | 11/30/2011 | |
| 2809100054 | Quality Manufacturing Group | Air-AIRS AFS | 11/30/2011 | |
| 174000054 | Quality Manufacturing Group | Air-Synthetic Minor Operating | 2/27/2012 | 1/31/2017 |

**Basin:** Yazoo River Basin

**Location Description:**