

State of Mississippi



FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL PERMIT

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

THIS CERTIFIES

Roura Material Handling Inc 100 Industrial Park Road South Holly Springs, MS Marshall County

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with the Federal Clean Air Act and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. set., Mississippi Code of 1972), the regulations and standards adopted and promulgated thereunder, and the State Implementation Plan for operating permits for synthetic minor sources.

Mississippi Environmental Quality Permit Board

Mississippi Department of Environmental Quality

Issued/Modified: DEC 1 3 2013

Expires: NOV 3 0 2018

Permit No. 1780-00030

Agency Interest # 1332

Table of Contents

Subject Item Inventory	i
Facility Requirements	1
General Information.	A-
Other Relevant Documents:	

Roura Material Handling Inc Subject Item Inventory Permit Number:1780-00030 Activity ID No.: PER20130001

Subject Item Inventory:

ID	Designation	Description
AI1332		Manufacturer of Self Dumping Hoppers
AREA1	AA-001	Metal Fabrication Operations including but not limited to: Plasma Cutting, Grinding, Bending, Forming, and Welding.
AREA2	AA-002	Surface Coating Operation
EQPT2	AA-003	Natural Gas Fired Space Heaters with a combined total capacity of 1.35 MMBTU/Hr

Subject Item Groups:

ID	Description	Components
GRPT1	Area Source Standards for Nine Metal Fabrication and	AREA1 Metal Fabrication Operations including but not limited to: Plasma Cutting, Grinding, Bending,
	Finishing Source Categories	Forming, and Welding.
		AREA2 Surface Coating Operation

<u>KEY</u>	
ACT = Activity	AI = Agency Interest
AREA = Area	CAFO = Concentrated Animal Feeding Operation
CONT = Control Device	EQPT = Equipment
IA = Insignificant Activity	MAFO = Animal Feeding Operation
PCS = PCS	RPNT = Release Point
TRMT = Treatment	WDPT = Withdrawal Point

Roura Material Handling Inc Facility Requirements Permit Number:1780-00030 Activity ID No.: PER20130001

Page 1 of 23

AI0000001332 Manufacturer of Self Dumping Hoppers:

Limitation Requirements:

Condition		
No.	Parameter	Condition
L-1		The maximum opacity from any point source or emissions at any time shall not exceed 40% as determined by EPA Test Method 9, 40 CFR 60, Appendix A. [11 Miss. Admin. Code Pt. 2, Ch. 1. 3.2]
L-2		The maximum permissible emission of ash and/or particulate matter from each fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input. [11 Miss. Admin. Code Pt. 2, Ch. 1. 3.4(a)1]
L-3		The maximum discharge of sulfur oxides from each fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. [11 Miss. Admin. Code Pt. 2, Ch. 1. 4.1(a)]
L-4		Facility-Wide Emission Limitations The permittee shall limit volatile organic compound (VOC) emissions to no more than 99.0 tons/year (TPY) as determined for each consecutive 12-month period. [11 Miss. Admin. Code Pt. 2, Ch. 2. II.B(10)]
L-5		Facility-Wide Emission Limitations The permittee shall limit hazardous air pollutant (HAP) emissions to no more than 9.9 tons/year (TPY) of any single HAP and no more than 24.9 TPY of total combined HAPs as determined for each consecutive 12-month period. [11 Miss. Admin. Code Pt. 2, Ch. 2. II.B(10)]

Roura Material Handling Inc Facility Requirements Permit Number:1780-00030 Activity ID No.: PER20130001

Page 2 of 23

AI0000001332 (continued):

Monitoring Requirements:

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

Record-Keeping Requirements:

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

R-2 Recordkeeping Requirements

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

Roura Material Handling Inc Facility Requirements Permit Number:1780-00030 Activity ID No.: PER20130001

Page 3 of 23

AI000001332 (continued):

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: (a) The identification of each coating, adhesive, solvent or other VOC or HAP containing material used; (b) The VOC and HAP content(s) of each coating, adhesive, solvent, or other VOC or HAP containing material used; (c) The total gallons of each coating, adhesive, solvent or other VOC or HAP containing material used in each consecutive 12-month period; (d) The total VOC emission rate, the emission rate of each individual HAP and the total HAP emission rate in tons per month and TPY for each consecutive 12-month period. [11 Miss. Admin. Code Pt. 2, Ch. 2. II.B(11)]
S-2	General Condition: Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).]
S-3	Except as otherwise specified herein, the permittee shall Submit a certified annual synthetic minor monitoring report: Due annually, by the 31st of January for preceding calendar year. This report shall address any required monitoring specified in the permit. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).]

Condition No.	Condition
T-1	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49-17-29 1.b]
T-2	General Condition: The permittee shall at all times maintain in good working order and operate as efficiently as possible all air pollution control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit. [11 Miss. Admin. Code Pt. 2, R. 2.5.A.]
T-3	General Condition: Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering state waters without the proper environmental permits. [Miss. Code Ann. 49-17-29 1.a(i and ii)]

Roura Material Handling Inc Facility Requirements Permit Number:1780-00030 Activity ID No.: PER20130001

Page 4 of 23

AI000001332 (continued):

Condition No.	Condition
T-4	General Condition: Any diversion from or bypass of collection and control facilities is prohibited except as provided for in Regulation APC-S-1, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. [11 Miss. Admin. Code Pt. 2, R. 1.10.]
T-5	General Condition: Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule. [11 Miss. Admin. Code Pt. 2, R. 2.10.]
T-6	General Condition: The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials: (a) To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and (b) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission. [Miss. Code Ann. 49-17-21]
T-7	General Condition: After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to: (a) Violation of any terms or conditions of this permit (b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or (c) A change in any condition that required either a temporary or permanent reduction or elimination of authorized air emissions. [11 Miss. Admin. Code Pt. 2, R. 2.2.C.]
T-8	General Condition: This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for this permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of the permit. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).]
T-9	General Condition: Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control. [Miss. Code Ann. 49-17-39]

Roura Material Handling Inc Facility Requirements Permit Number:1780-00030 Activity ID No.: PER20130001

Page 5 of 23

AI000001332 (continued):

Condition	
No.	Condition
T-10	General Condition: The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).]
T-11	General Condition: Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).]
T-12	General Condition: This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board. [11 Miss. Admin. Code Pt. 2, R. 2.16.B.]
T-13	General Condition: This permit is for air pollution control purposes only. [11 Miss. Admin. Code Pt. 2, R. 2.1.D(1).]
T-14	General Condition: This permit is a Federally-approved permit to operate a synthetic minor source as described in Regulation APC-S-2, Section IV.D. [11 Miss. Admin. Code Pt. 2, R. 2.4.D(.)]
T-15	General Condition: The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. [11 Miss. Admin. Code Pt. 2, R. 2.1.D(7).]
T-16	General Condition: The permittee shall furnish to MDEQ within a reasonable time any information MDEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to MDEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to MDEQ along with a claim of confidentiality. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).]

Roura Material Handling Inc Facility Requirements Permit Number:1780-00030 Activity ID No.: PER20130001

Page 6 of 23

AI000001332 (continued):

Condition	
No.	Condition
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: (a) routine maintenance, repair, and replacement;
	(b) use of an alternative fuel or raw material by reason of an order under Sections 2(a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act; (c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
	(d) use of an alternative fuel or raw material by a stationary source which: (i) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or (ii) the source is approved to use under any permit issued under 40 CFR 52.51 or under regulations approved pursuant to 40 CFR 51.166;
	(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 (f) any change in ownership of the stationary source" [11 Miss. Admin. Code Pt. 2, R. 2.1.D(2).]
T-18	General Condition: It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).]
T-19	General Condition: The permittee shall retain all required records, monitoring data, supported information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to MDEQ as required by Applicable Rules and Regulations or this permit upon request. [11 Miss. Admin. Code Pt. 2, R. 2.9.]
T-20	General Condition: The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).]

Roura Material Handling Inc Facility Requirements Permit Number:1780-00030 Activity ID No.: PER20130001

Page 7 of 23

AI000001332 (continued):

Narrative Requirements:

Condition No.	Condition
T-21	General Condition: Emergencies (a) Except as otherwise specified herein, an emergency means any situation arising from sudden and reasonably unforseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a

- (a) Except as otherwise specified herein, an emergency means any situation arising from sudden and reasonably unforseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
- (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.
- (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence as follows:
- (i) an emergency occurred and that the permittee can identify the cause(s) of the emergency; (ii) the permitted facility was at the time being properly operated; (iii) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other
- requirements in the permit; and (iv) the permittee submitted notice of the emergency to 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.
- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of any emergency has the burden of proof.
- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).]

T-22 General Condition: Upsets

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

Roura Material Handling Inc Facility Requirements Permit Number:1780-00030 Activity ID No.: PER20130001

Page 8 of 23

AI0000001332 (continued):

T-25

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

Narrative Requirements:

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

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.

Roura Material Handling Inc Facility Requirements Permit Number:1780-00030 Activity ID No.: PER20130001

Page 9 of 23

GRPT0000000001 (40 CFR Part 63 Subpart XXXXXX) Area Source Standards for Nine Metal Fabrication and Finishing Source Categories:

Narrative Requirements:

Condition No.	Condition
T-1	40 CFR Part 63 Subpart XXXXXX (MACT XXXXXX)
	The permittee is subject to 40 CFR Part 63 Subpart XXXXXX (National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories) because the permittee operates an area source that is primarily engaged in the operations in one of the nine source categories following: Fabricated Metal Products. [40 CFR 63.11514(a)]

T-2 MACT XXXXXX - APPLICABILITY

The provisions of this subpart apply to each existing affected source listed and defined in paragraphs (1) through (4) of this section if you use materials that contain or have the potential to emit metal fabrication or finishing metal HAP (MFHAP), defined to be the compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead. Materials that contain MFHAP are defined to be materials that contain greater than 0.1 percent for carcinogens, as defined by OSHA at 29 CFR 1910.1200(d)(4), and greater than 1.0 percent for noncarcinogens. For the MFHAP, this corresponds to materials that contain cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (of the metal), and materials that contain manganese in amounts greater than or equal to 1.0 percent by weight (of the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material.

- (1) A machining affected source is the collection of all equipment and activities necessary to perform machining operations which use materials that contain or have the potential to emit MFHAP.
- (2) A dry grinding and dry polishing with machines affected source is the collection of all equipment and activities necessary to perform dry grinding and dry polishing with machines operations which use materials that contain or have the potential to emit MFHAP.
- (3) A spray painting affected source is the collection of all equipment and activities necessary to perform spray-applied painting operations using paints which contain MFHAP. A spray painting affected source includes all equipment used to apply cleaning materials to a substrate to prepare it for paint application or to remove dried paint; to apply a paint to a substrate and to dry or cure the paint after application; or to clean paint operation equipment.
- (4) A welding affected source is the collection of all equipment and activities necessary to perform welding operations which use materials that contain or have the potential to emit MFHAP. [40 CFR 63.11514(b)]

Roura Material Handling Inc Facility Requirements Permit Number:1780-00030 Activity ID No.: PER20130001

Page 10 of 23

GRPT0000000001 (continued):

Narrative Requirements:

Condition No.	Condition
T-3	MACT XXXXXX - STANDARDS FOR MACHINING:
	If the permittee operates an existing machining affected source, the permittee shall implement management practices to minimize emissions of MFHAP as specified in paragraph (1) and (2) of this section for each machining operation that uses materials that contain or have the potential to emit MFHAP.
	(1) The permittee shall take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable. (2) The permittee shall operate all equipment associated with machining according to manufacturer's instructions. [40 CFR 63.11516(b)]
T-4	STANDARDS FOR DRY GRINDING AND POLISHING WITH MACHINES:

If the permittee operates an existing dry grinding and dry polishing with machines affected source, the permittee shall comply with the requirements of paragraphs (1) through (3) of this section for each dry grinding and dry polishing with machines operation that uses materials that contain or have the potential to emit MFHAP.

- (1) The permittee shall capture emissions and vent them to a filtration control device. The permittee shall demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices.
- (2) The permittee shall take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable.
- (3) The permittee shall 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. [40 CFR 63.11516(c)]

Roura Material Handling Inc Facility Requirements Permit Number:1780-00030 Activity ID No.: PER20130001

Page 11 of 23

GRPT0000000001 (continued):

Narrative Requirements:

T-5

Condition					
No.	Condition				

MACT XXXXXX - STANDARDS FOR CONTROL OF MFHAP IN SPRAY PAINTING:

If the permittee operates an existing spray painting affected source, the permittee shall implement the management practices in paragraphs (1) through (9) of this section when a spray-applied paint that contains MFHAP is being applied.

- (1) Standards for spray painting for MFHAP control: All spray-applied painting of objects shall meet the requirements of paragraphs (1)(i) through (iii) of this section. These requirements do not apply to affected that spray paint objects greater than 15 feet (4.57 meters), that are not spray painted in spray booths or spray rooms.
- (i) Spray booths or spray rooms shall 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 shall be ventilated so that air is drawn into the booth and leaves only though the filter. The roof may contain narrow slots for connecting fabricated products to overhead cranes, and/or for cords or cables.
- (ii) All spray booths or spray rooms shall 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 shall be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1. 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. Permittee may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement.
- (iii) The permittee shall perform regular inspection and replacement of the filters in all spray booths or spray rooms according to manufacturer's instructions, and maintain documentation of these activities, as detailed in Condition T-17 (4) [40 CFR Part 63.11519(c)(5)].
- (iv) 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 (i) through (iii) of this section.
- (2) Standards for spray painting application equipment of all objects painted for MFHAP control: All paints applied via spray-applied painting shall 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 MDEQ. [40 CFR 63.11516(d)(1)]

Roura Material Handling Inc **Facility Requirements** Permit Number:1780-00030 Activity ID No.: PER20130001

Page 12 of 23

GRPT0000000001 (continued):

Condition No.	Condition
T-6	MACT XXXXXX - STANDARDS FOR CONTROL OF MFHAP IN SPRAY PAINTING CONTINUED:

- (3) Spray system recordkeeping: The permittee shall maintain documentation of the HVLP or other high transfer efficiency spray paint delivery methods, as detailed in Condition T-17 (4) [40 CFR Part 63.11519(c)(7)].
- (4) Spray gun cleaning: All cleaning of paint spray guns shall be done with either non-HAP gun cleaning solvents, or in such a manner that an atomized mist of spray of 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 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, and/or by using a fully enclosed spray gun washer.
- (5) Spray painting worker certification: All workers performing painting shall 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 (6) of this section.
- (6) Spray painting training program content: Each permittee of an affected spray painting affected source shall ensure and certify that all personnel, including contract personnel, who spray apply paints are trained in the proper application of paints. The training program shall include, at a minimum, the items listed in paragraphs (6)(i) through (iii) of this section.
- (i) A list of all current personnel by name and job description who are required to be trained.
- (ii) Hands-on, or in-house or external classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in paragraphs (6)(ii)(A) through (D) of this section.
- (A) Spray gun equipment selection, set up, and operation, including measuring paint viscosity, selecting the proper fluid tip or nozzle, and achieving the proper and the state of t

Roura Material Handling Inc Facility Requirements Permit Number:1780-00030 Activity ID No.: PER20130001

Page 13 of 23

T-7 MACT XXXXXX - STANDARDS FOR CONTROL OF MFHAP IN SPRAY PAINTING CONTINUED:

- (7) 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 as detailed in Condition T-17 (4) [40 CFR Part 63.11519(c)(8)].
- (8) Spray painting training dates: As required by paragraph (a)(5) of this section, all personnel at an affected spray painting affected source, including contract personnel, who spray apply paints shall be trained and certified no later than 180 days after hiring. Worker training that was completed within 5 years prior to the date training is required, and that meets the requirements specified in paragraph (6)(ii) of this section, satisfies this requirement and is valid for a period not to exceed 5 years after the date the training is completed.
- (9) 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 shall receive refresher training that meets the requirements of this section and be re-certified every 5 years. [40 CFR 63.11516(d)(7)-(9)]

T-8 MACT XXXXXX - STANDARDS FOR WELDING:

If the permittee operates an existing welding affected source, the permittee shall comply with the requirements in paragraphs (1) and (2) of this section for each welding operation that uses materials that contain or has the potential to emit MFHAP. If the permittee's 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 (3) through (8).

- (1) The permittee shall operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions. The permittee shall demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the capture and control devices.
- (2) The permittee shall implement one or more of the management practices specified in paragraphs (2)(i) through (v) of this section to minimize emissions of MFHAP, as practicable, while maintaining the required welding quality through the application of sound engineering judgment.
- (i) Use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW) also called metal inert gas welding (MIG)).
- (ii) Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates.
- (iii) Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation.
- (iv) Optimize welding process variables (e.g., electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated.
- (v) Use a welding fume capture and control system, operated according to the manufacturer's specifications.
- (3) Tier 1 compliance requirements for welding: The permittee shall perform visual determinations of welding fugitive emissions as specified in Condition T-12 (b) [40 CFR Part 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 Condition T-17 (1) [40 CFR Part 63.11519(c)(2)]. [40 CFR 63.11516(f)(1)-(3)]

Roura Material Handling Inc Facility Requirements Permit Number:1780-00030 Activity ID No.: PER20130001

Page 14 of 23

GRPT0000000001 (continued):

Narrative Requirements:

Condition		
No.	Condition	

T-9 MACT XXXXXX - STANDARDS FOR WELDING CONTINUED:

- (4) Requirements upon initial detection of visible emissions from welding: If visible fugitive emissions are detected during any visual determination required in paragraph (3) of this section, the permittee shall comply with the requirements in paragraphs (4)(i) and (ii) of this section.
- (i) Perform corrective actions that include, but are not limited to, inspection of welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with paragraph (2) of this section. After completing such corrective actions, the permittee shall perform a follow-up inspection for visible fugitive emissions in accordance with Condition T-12 (a) [40 CFR Part 63.11517(a)], at the primary vent, stack, exit, or opening from the building containing the welding operations.
- (ii) Report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, and submit with the annual certification and compliance report as required by Condition T-15 (6) [40 CFR Part 63.11519(b)(5)].
- (5) Tier 2 requirements upon subsequent detection of visible emissions: If visible fugitive emissions are detected more than once during any consecutive 12 month period (notwithstanding the results of any follow-up inspections), the permittee shall comply with paragraphs (5)(i) through (iv) of this section.
- (i) Within 24 hours of the end of the visual determination of fugitive emissions in which visible fugitive emissions were detected, the permittee shall conduct a visual determination of emissions opacity, as specified in Condition T-13 (c) [40 CFR Part 63.11517(c)], at the primary vent, stack, exit, or opening from the building containing the welding operations.
- (ii) In lieu of the requirement of paragraph (3) of this section to perform visual determinations of fugitive emissions with EPA Method 22, the permittee shall perform visual determinations of emissions opacity in accordance with Condition T-13 (d) [40 CFR Part 63.11517(d)], using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
- (iii) The permittee shall keep a record of each visual determination of emissions opacity performed in accordance with paragraphs (5)(i) or (ii) of this section, along with any subsequent corrective action taken.
- (iv) The permittee shall report the results of all visual determinations of emissions opacity performed in accordance with paragraphs (5)(i) or (ii) of this section, along with any subsequent corrective action taken, and submit with the permittee's annual certification and compliance report. [40 CFR 63.11516(f)(4)-(5)]

Roura Material Handling Inc Facility Requirements Permit Number:1780-00030 Activity ID No.: PER20130001

Page 15 of 23

GRPT0000000001 (continued):

Narrative Requirements:

Condition
No. Condition

T-10 MACT XXXXXX - STANDARDS FOR WELDING CONTINUED:

- (6) Requirements for opacities less than or equal to 20 percent but greater than zero: For each visual determination of emissions opacity performed in accordance with paragraph (5) of this section 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 (2) of this section.
- (7) Tier 3 requirements for opacities exceeding 20 percent: For each visual determination of emissions opacity performed in accordance with paragraph (5) of this section for which the average of the six-minute average opacities recorded exceeds 20 percent, the permittee shall comply with the requirements in paragraphs (7)(i) through (v) of this section.
- (i) The permittee shall submit a report of exceedence of 20 percent opacity, along with the permittee's annual certification and compliance report.
- (ii) Within 30 days of the opacity exceedence, the permittee shall prepare and implement a Site-Specific Welding Emissions Management Plan, as specified in paragraph (8) of this section. If the permittee has already prepared a Site-Specific Welding Emissions Management Plan in accordance with this paragraph, the permittee shall prepare and implement a revised Site-Specific Welding Emissions Management Plan within 30 days.
- (iii) During the preparation (or revision) of the Site-Specific Welding Emissions Management Plan, the permittee shall continue to perform visual determinations of emissions opacity, beginning on a daily schedule as specified in Condition T-13 (d) [40 CFR Part 63.11517(d)], using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
- (iv) The permittee shall maintain records of daily visual determinations of emissions opacity performed in accordance with paragraph (7)(iii) of this section, during preparation of the Site-Specific Welding Emissions Management Plan, in accordance with the requirements in Condition T-16 (6) [40 CFR Part 63.11519(b)(9)].
- (v) The permittee shall include these records in the permittee's annual certification and compliance report. [40 CFR 63.11516(f)(6)-(7)]

Roura Material Handling Inc Facility Requirements Permit Number:1780-00030 Activity ID No.: PER20130001

Page 16 of 23

GRPT0000000001 (continued):

Narrative Requirements:

Condition					
No.	Condition				

T-11 MACT XXXXXX - STANDARDS FOR WELDING CONTINUED:

- (8) Site-Specific Welding Emissions Management Plan: The Site-Specific Welding Emissions Management Plan shall comply with the requirements in paragraphs (8)(i) through (iii) of this section.
- (i) Site-Specific Welding Emissions Management Plan shall contain the information in paragraphs (8)(i)(A) through (F) of this section.
- (A) Company name and address.
- (B) A list and description of all welding operations which currently comprise the welding affected source.
- (C) A description of all management practices and/or fume control methods in place at the time of the opacity exceedence.
- (D) A list and description of all management practices and/or fume control methods currently employed for the welding affected source.
- (E) A description of additional management practices and/or fume control methods to be implemented pursuant to paragraph (7)(ii) of this section, and the projected date of implementation.
- (F) Any revisions to a Site-Specific Welding Emissions Management Plan shall contain copies of all previous plan entries.
- $(ii) \ The \ Site-Specific \ Welding \ Emissions \ Management \ Plan \ shall \ be \ updated \ annually \ to \ contain \ current \ information, \ as \ required \ by \ paragraphs \ (8)(i)(A) \ through \ (B)(i)(A) \ throu$
- (C) of this section, and submitted with the permittee's annual certification and compliance report.
- (iii) The permittee shall maintain a copy of the current Site-Specific Welding Emissions Management Plan in the permittee's records in a readily-accessible location for inspector review. [40 CFR 63.11516(f)(8)]

Roura Material Handling Inc Facility Requirements Permit Number:1780-00030 Activity ID No.: PER20130001

Page 17 of 23

GRPT0000000001 (continued):

Narrative Requirements:

Condition	
No.	Condition

T-12 MACT XXXXXX - MONITORING REQUIREMENTS:

- (a) Visual determination of fugitive emissions, general: 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.
- (b) Visual determination of fugitive emissions, graduated schedule: Visual determinations of fugitive emissions shall be performed in accordance with paragraph (a) of this section and according to the schedule in paragraphs (b)(1) through (4) of this section.
- (1) Daily Method 22 Testing: Perform visual determination of fugitive emissions once per day, on each day the process is in operation, during operation of the process.
- (2) Weekly Method 22 Testing: If no visible fugitive emissions are detected in consecutive daily EPA Method 22 tests, performed in accordance with paragraph (b)(1) of this section 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 (b)(1) of this section.
- (3) Monthly Method 22 Testing: If no visible fugitive emissions are detected in four consecutive weekly EPA Method 22 tests performed in accordance with paragraph (b)(2) of this section, the permittee may decrease the frequency of EPA Method 22 testing to once per 21 days of operation of the process (one calendar month). If visible fugitive emissions are detected during these tests, the permittee shall resume weekly EPA Method 22 in accordance with paragraph (b)(2) of this section.
- (4) Quarterly Method 22 Testing: If no visible fugitive emissions are detected in three consecutive monthly EPA Method 22 tests performed in accordance with paragraph (b)(3) of this section, 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 (b)(3) of this section. [40 CFR 63.11517(a)-(b)]

Roura Material Handling Inc Facility Requirements Permit Number:1780-00030 Activity ID No.: PER20130001

Page 18 of 23

GRPT0000000001 (continued):

Narrative Requirements:

Condition	
No.	Condition

T-13 MACT XXXXXX - MONITORING REQUIREMENTS CONTINUED:

- (c) Visual determination of emissions opacity for welding Tier 2 or 3, general: Visual determination of emissions opacity shall be performed for thirty minutes 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.
- (d) Visual determination of emissions opacity for welding Tier 2 or 3, graduated schedule: The permittee shall perform visual determination of emissions opacity in accordance with paragraph (c) and according to the schedule in paragraphs (d)(1) through (5).
- (1) Daily Method 9 testing, Tier 2 or 3: Perform visual determination of emissions opacity once per day during each day that the process is in operation.
- (2) Weekly Method 9 testing, Tier 2 or 3: If the average of the six minute opacities recorded during any of the daily consecutive EPA Method 9 tests performed in accordance with paragraph (d)(1) does not exceed 20 percent for 10 days of operation, the permittee may decrease the frequency of EPA Method 9 testing to once per five days of consecutive work day operation. If opacity greater than 20 percent is detected during any of these tests, the permittee shall resume testing every day of operation of the process according to paragraph (d)(1) of this section.
- (3) Monthly Method 9 testing, 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 (d)(2) 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 paragraph (d)(2) of this section.
- (4) Quarterly Method 9 testing, 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 (d)(3) 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 paragraph (d)(3) of this section.
- (5) Return to Method 22 testing, 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 (d)(3) does not exceed 20 percent, the permittee may resume EPA Method 22 testing as in paragraphs (b)(3) and (4). In lieu of this, the permittee may elect to continue performing EPA Method 9 tests in accordance with paragraphs (d)(3) and (4). [40 CFR 63.11517(c)-(d)]

Roura Material Handling Inc Facility Requirements Permit Number:1780-00030 Activity ID No.: PER20130001

Page 19 of 23

GRPT0000000001 (continued):

Narrative Requirements:

Condition					
No.	Condition				

T-14 MACT XXXXXX - NOTIFICATIONS TO SUBMIT:

- (1) Initial notification: If the permittee operates an area source in one of the nine metal fabrication and finishing source categories, for an existing source, the permittee was required to have submitted the Initial Notification as required by 40 CFR Part 63.9(b) by July 25, 2011. The permittee's Initial Notification shall provide the information specified in paragraphs (1)(i) through (iv) of this section.
- (i) The name, address, phone number and e-mail address of the permittee.
- (ii) The address (physical location) of the affected source.
- (iii) An identification of the relevant standard (i.e., this subpart).
- (iv) A brief description of the type of operation. For example, a brief characterization of the types of products, the number and type of processes, and the number of workers usually employed.
- (2) Notification of compliance status: If the permittee operates an existing source, the permittee was required to submit a notification of compliance status on or before November 22, 2011. The permittee is required to submit the information specified in paragraphs (2)(i) through (iii) of this section with the permittee's notification of compliance status:
- (i) The permittee's company name and address.
- (ii) 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 the relevant standards and other requirements of this subpart.
- (iii) The date of the notification of compliance status. [40 CFR 63.11519(a)]

Roura Material Handling Inc Facility Requirements Permit Number:1780-00030 Activity ID No.: PER20130001

Page 20 of 23

GRPT0000000001 (continued):

Narrative Requirements:

Condition				
No.	Condition			

T-15 MACT XXXXXX - REPORTS TO SUMBIT:

The permittee shall prepare and submit annual certification and compliance reports for each affected source according to the requirements of paragraphs (1) through (6) of this section.

- (1) Dates: Unless the MDEQ has approved or agreed to a different schedule for submission of reports under 40 CFR Part 63.10(a), the permittee shall prepare and submit each annual certification and compliance report according to the dates specified in paragraphs (1)(i) through (iii) of this section. 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 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.
- (ii) Each subsequent annual certification and compliance report shall cover the subsequent semiannual reporting period from January 1 through December 31.
- (iii) 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 exceedence has occurred during the year, each annual certification and compliance report shall be submitted along with the exceedence reports, and postmarked or delivered no later than January 31.
- (2) General requirements: The annual certification and compliance report shall contain the information specified in paragraphs (2)(i) through (iii).
- (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.
- (iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31. Note that the information reported for the 12 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
- (3) Visual determination of fugitive emissions requirements: The annual certification and compliance report shall contain the information specified in paragraphs (3)(i) through (iii) for each affected source which performs visual determination of fugitive emissions in accordance with Condition T-12 (a) [40 CFR Part 63.11517(a)].
- (i) The date of every visual determination of fugitive emissions which resulted in detection of visible emissions.
- (ii) A description of the corrective actions taken subsequent to the test.
- (iii) The date and results of the follow-up visual determination of fugitive emissions performed after the corrective actions. [40 CFR 63.11519(b)(1)-(5)]

Roura Material Handling Inc Facility Requirements Permit Number:1780-00030 Activity ID No.: PER20130001

Page 21 of 23

GRPT0000000001 (continued):

Condition No.	Condition
T-16	MACT XXXXXX - REPORTS TO SUMBIT CONTINUED:

- (4) Visual determination of emissions opacity requirements: The annual certification and compliance report shall contain the information specified in paragraphs (4)(i) through (iii) for each affected source which performs visual determination of emissions opacity in accordance with Condition T-13 (c) [40 CFR Part 63.11517(c)].
- (i) The date of every visual determination of emissions opacity.
- (ii) The average of the six-minute opacities measured by the test.
- (iii) A description of any corrective action taken subsequent to the test.
- (5) Exceedences of 20 percent opacity for welding affected sources: As required by Condition T-10 (7)(i) [40 CFR Part 63.11516(f)(7)(i)], the permittee shall prepare an exceedence report whenever the average of the six-minute average opacities recorded during a visual determination of emissions opacity exceeds 20 percent. This report shall be submitted along with the permittee's annual certification and compliance report, and shall contain the information in paragraphs (5)(i) and (ii).
- (i) The date on which the exceedence occurred.
- (ii) The average of the six-minute average opacities recorded during the visual determination of emissions opacity.
- (6) 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 Condition T-11 (7)(iv) [40 CFR Part 63.11516(f)(7)(iv)], and a copy of the permittee's Site-Specific Welding Emissions Management Plan and any subsequent revisions to the plan pursuant to Condition T-11 (8) [40 CFR Part 63.11516(f)(8)], along with the permittee's annual certification and compliance report. [40 CFR 63.11519(b)(6)-(9)]

Roura Material Handling Inc Facility Requirements Permit Number:1780-00030 Activity ID No.: PER20130001

Page 22 of 23

GRPT0000000001 (continued):

Narrative Requirements:

Condition No.	Condition			

T-17 MACT XXXXXX - RECORDS TO KEEP:

The permittee shall keep records for each affected source according to the requirements of paragraphs (1) through (8) of this section and shall likewise maintain each notification and report that is submitted to comply with this subpart, and the documentation supporting each notification and report.

- (1) Visual determination of fugitive emissions records: Maintain a record of the information specified in paragraphs (1)(i) through (iii) of this section for each affected source which performs visual determination of fugitive emissions in accordance with Condition T-12 (a) [40 CFR Part 63.11517(a)].
- (i) The date and results of every visual determination of fugitive emissions.
- (ii) A description of any corrective action taken subsequent to the test.
- (iii) The date and results of any follow-up visual determination of fugitive emissions performed after the corrective actions.
- (2) Visual determination of emissions opacity records: Maintain a record of the information specified in paragraphs (2)(i) through (iii) of this section for each affected source which performs visual determination of emissions opacity in accordance with Condition T-13 (a) [40 CFR Part 63.11517(c)].
- (i) The date of every visual determination of emissions opacity.
- (ii) The average of the six-minute opacities measured by the test.
- (iii) A description of any corrective action taken subsequent to the test.
- (3) Maintain a record of the manufacturer's specifications for the control devices used to comply with The Standards for Welding [40 CFR Part 63.11516].
- (4) Spray paint booth records: Maintain a record of the spray paint booth maintenance and activities performed as specified by paragraphs (4) (i) through (iv) in accordance with Condition T-5 (1) [40 CFR Part 63.11516(d)(1)].
- (i) Maintain a record of the filter efficiency demonstrations and spray paint booth filter maintenance activities.
- (ii) Maintain a record of the water curtain efficiency demonstrations performed.
- (iii) Maintain documentation of HVLP or other high transfer efficiency spray paint delivery systems with the manufacturer's specifications for the equipment and any operation instructions included. If the permittee has obtained written approval for an alternative spray application system, it shall maintain a record of that approval along with documentation of the demonstration of equivalency.
- (iv) Maintain certification that each worker performing spray painting operations has completed the training with the date the initial training and the most recent refresher training was completed. [40 CFR 63.11519(c)(1)-(7)]

Roura Material Handling Inc Facility Requirements Permit Number:1780-00030 Activity ID No.: PER20130001

Page 23 of 23

GRPT0000000001 (continued):

Narrative Requirements:

Condition				
No.	Condition			

T-18 MACT XXXXXX - RECORDS TO KEEP CONTINUED:

- (5) 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 Condition T-10 (7) [40 CFR Part 63.11516(f)(7)(iii)]. The permittee shall maintain a copy of the permittee's current plan in the permittee's records and it shall be readily available for inspector review.
- (6) Manufacturer's instructions: If the permittee demonstrates compliance by operating any equipment according to manufacturer's instruction, the permittee shall keep these instructions readily available for inspector review.
- (7) Welding Rod usage: If the permittee operate an existing welding affected source which is not required to comply with the requirements of Condition T-8 thru T-10 (3) thru (8) [40 CFR Part 63.11516(f)(3) (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 permittee's welding rod usage on a rolling 12-month basis.
- (8) The permittee's records shall be maintained according to the requirements in paragraphs (8)(i) through (iii) of this section.
- (i) The permittee's records shall be in a form suitable and readily available for expeditious review, according to 40 CFR Part 63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.
- (ii) The permittee shall keep each record for 5 years following the date of each occurrence, measurement, corrective action, report, or record.
- (iii) The permittee shall keep each record on-site for at least 2 years after the date of each occurrence, measurement, corrective action, report, or record according to 40 CFR Part 63.10(b)(1). The permittee may keep the records off-site for the remaining 3 years. [40 CFR 63.11519(c)(5)-(15)]

GENERAL INFORMATION

Roura Material Handling Inc 100 Industrial Park Road South Holly Springs, MS Marshall County

Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
1332	Roura Material Handling, Inc.	Official Site Name	9/9/2013	
2809300030	Roura Material Handling, Inc.	Air-AIRS AFS	10/12/2000	
178000030	Roura Iron Works, Inc.	Air-Title V Operating	8/15/1997	2/10/1999
178000030	Roura Iron Works, Inc.	Air-Synthetic Minor Operating	2/10/1999	12/3/2003
MSR000359	Roura Iron Works, Inc.	GP-Baseline	11/10/1992	11/1/2000
MSR000359	Roura Iron Works, Inc.	GP-Baseline	11/1/2000	3/10/2006
178000030	Roura Iron Works, Inc.	Air-Synthetic Minor Operating	12/3/2003	11/30/2008
MSR000359	Roura Iron Works, Inc.	GP-Baseline	3/10/2006	2/11/2011
178000030	Roura Iron Works, Inc.	Air-Synthetic Minor Operating	1/6/2009	12/13/2013
MSR000359	Roura Iron Works, Inc.	GP-Baseline	2/11/2011	12/6/2013
1332	Roura Iron Works, Inc.	Historic Site Name	11/10/1992	9/9/2013
MSR000359	Roura Material Handling, Inc.	GP-Baseline	12/6/2013	9/28/2015
178000030	Roura Material Handling Inc	Air-Synthetic Minor Operating	12/13/2013	11/30/2018

Basin: Yazoo River Basin

Location Description: PG- Plant Entrance (General). Data collected by Tiffany Wess on 10/25/2005. Elevation 666 feet.