

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

PERMIT

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

THIS CERTIFIES THAT

Roura Acquisition, Inc. – Roura Material Handling, Inc.
100 South Industrial Park Road
Holly Springs, Marshall County, Mississippi

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

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: JAN 09 2019

Permit No.: 1780-00030

Effective Date: As specified herein.

Expires: December 31, 2023

SECTION 1

A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
2. This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.4.D.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.4.D.)
3. Any activities not identified in the application are not authorized by this permit.
(Ref.: Miss. Code Ann. 49-17-29 1.b)
4. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(5).)
5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(7).)
6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(15)(a).)
7. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(15)(c).)
8. The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:

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

(Ref.: Miss. Code Ann. 49-17-21)

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

(Ref.: Miss. Code Ann. 49-17-39)

10. Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(7).)

11. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.(7).)

12. This permit does not authorize a modification as defined in 11 Miss. Admin. Code Pt. 2, Ch. 2., "*Permit Regulations for the Construction and/or Operation of Air Emission Equipment*". A modification may require a Permit to Construct and a modification of this permit. "Modification" is defined as "Any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

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

- (c) Use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
- (d) Use of an alternative fuel or raw material by a stationary source which:
 - (1) The source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, or 40 CFR 51.166; or
 - (2) The source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, or 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 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I or 40 CFR 51.166; or
- (f) Any change in ownership of the stationary source.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.C.(15).)

B. GENERAL OPERATIONAL CONDITIONS

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.10.)

2. Any diversion from or bypass of collection and control facilities is prohibited, except as provided for in 11 Miss. Admin. Code Pt. 2, R. 1.10., "*Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants*".

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

3. Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits.

(Ref.: Miss. Code Ann. 49-17-29 1.a(i and ii))

4. Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.

(a) Upsets

- (1) For an upset defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:
 - (i) An upset occurred and that the source can identify the cause(s) of the upset;
 - (ii) The source was at the time being properly operated;
 - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
 - (iv) That within five (5) working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken; and
 - (v) That as soon as practicable but no later than twenty-four (24) hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
- (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
- (3) This provision is in addition to any upset provision contained in any applicable requirement.
- (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.

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

- (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission

limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.

- (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in 11 Miss. Admin. Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B.(2)(a) through (e).
- (3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

5. Compliance Testing: Regarding compliance testing:

- (a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any “Applicable Rules and Regulations” or this permit and in units of mass per time.
- (b) Compliance testing will be performed at the expense of the permittee.
- (c) Each emission sampling and analysis report shall include but not be limited to the following:
 - (1) Detailed description of testing procedures;
 - (2) Sample calculation(s);
 - (3) Results; and
 - (4) Comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

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

C. PERMIT RENEWAL / MODIFICATION / TRANSFER / TERMINATION

1. For renewal of this permit, the applicant shall make application not less than one hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board. If the applicant submits a timely and complete application pursuant to this paragraph and the Permit Board, through no fault of

the applicant, fails to act on the application on or before the expiration date of the existing permit, the applicant shall continue to operate the stationary source under the terms and conditions of the expired permit, which shall remain in effect until final action on the application is taken by the Permit Board. Permit expiration terminates the source's ability to operate unless a timely and complete renewal application has been submitted.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.8.)

2. The permittee shall furnish to the MDEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the 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 the MDEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

3. The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

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

4. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:
 - (a) Persistent violation of any terms or conditions of this permit.
 - (b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
 - (c) A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

5. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B.)

SECTION 2
EMISSION POINT DESCRIPTION

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

Emission Point	Description
AA-100	Facility-Wide (Roura Acquisition, Inc. – Roura Material Handling, Inc.)
AA-001	Metal Fabrication Operations [includes (but not limited to) Plasma Cutting, Grinding, Bending, Forming, and Welding Actions]
AA-002	Surface Coating Operations
AA-003	Six (6) Natural Gas-Fired Space Heaters [Total Heat Input Capacity: 0.825 MMBTU / Hour]

**SECTION 3
 EMISSION LIMITATIONS AND STANDARDS**

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant(s) / Parameter(s)	Limitation(s) / Standard(s)
AA-100	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity	40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2		
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.3	VOCs	99.0 tpy (Major Source Avoidance Limit)
		3.4	HAPs	9.9 tpy (Individual) 24.9 tpy (Total) (Major Source Avoidance Limit)
AA-001	11 Miss. Admin. Code Pt. 2, R.1.3.F.(1).	3.5	PM	$E = 4.1 (p^{0.67})$
	40 CFR Part 63, Subpart XXXXXX – National Emission Standards for Nine Metal Fabrication and Finishing Source Categories	3.6	MFHAPs	Applicability
	40 CFR 63.11514(a)(2), (b)(2) and (5), (c); Subpart XXXXXX			
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.7	PM MFHAPs	Operational Restriction
3.8		Differential Pressure Range	$1.0 \leq P \leq 5.0$ (inches H ₂ O)	
AA-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.9	MFHAPs	Surface Coating Restriction
AA-003	11 Miss. Admin. Code Pt. 2, R. 1.3.D.(1)(a).	3.10	PM	0.6 pounds per MMBTU heat input
	11 Miss. Admin. Code Pt. 2, R. 1.4.A.(1).	3.11	SO ₂	4.8 pounds per MMBTU heat input

- 3.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial, or waste disposal process which exceeds 40% opacity.

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.A.)

- 3.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Condition 3.1. This shall not apply to vision obscuration caused by uncombined water droplets.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)

- 3.3 For Emission Point AA-100 (Facility-Wide), the permittee shall limit volatile organic compound (VOC) emissions to no more than 99.0 tons per year (tpy) for a rolling consecutive 12-month period.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).; Major Source Avoidance Limit)

- 3.4 For Emission Point AA-100 (Facility-Wide), the permittee shall limit the emission of any individual hazardous air pollutant (HAP) from all applicable emission sources to no more than 9.9 tons per year (tpy) based on a rolling 12-month period. Additionally, the permittee shall limit the total HAP emissions from all applicable emission sources to no more than 24.9 tpy based on a rolling 12-month period.

(Ref.: 11 Miss Admin. Code Pt. 2, R. 2.2.B.(10).; Major Source Avoidance Limit)

- 3.5 For Emission Points AA-001, except as otherwise specified, the permittee shall not cause, permit, or allow the emission of particulate matter (PM) in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship:

$$E = 4.1 (p^{0.67})$$

Where “E” is the emission rate in pounds per hour and “p” is the process weight input rate in tons per hour.

(Ref.: 11 Miss. Admin. Code Pt. 2, R.1.3.F(1).)

- 3.6 Emission Point AA-001, which has the potential to emit metal fabrication hazardous air pollutants (MFHAPs), is subject to and shall comply with the applicable requirements in 40 CFR Part 63, Subpart XXXXXX – National Emission Standards for Nine Metal Fabrication and Finishing Source Categories.

(Ref.: 40 CFR 63.11514(a)(2), (b)(2) and (5), (c); Subpart XXXXXX)

- 3.7 For Emission Point AA-001, the permittee shall not operate perform metal cutting operations without simultaneously operating the dust collector control unit. If the dust collector malfunctions or stops operating, the permittee shall cease metal cutting operations until the dust collector is returned to service.

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

- 3.8 For Emission Point AA-001, the permittee shall operate the dust collector control unit affixed to metal cutting operations within the following differential pressure drop (“P”) range as measured in inches of water (in. H₂O): $1.0 \text{ in. H}_2\text{O} \leq P \leq 5.0 \text{ in. H}_2\text{O}$.

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

- 3.9 For Emission Point AA-002, the permittee shall not utilize a surface coating that contains any of the following materials:

- (a) Cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (wt.%) as the metal;
- (b) Manganese in amounts greater than or equal to 1.0 percent by weight (wt.%) as the metal.

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

- 3.10 For Emission Point AA-003, the emission of ash and/or particulate matter (PM) from each space heater shall not exceed 0.6 pounds per MMBTU per hour heat input.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D.(1)(a).)

- 3.11 For Emission Point AA-003, the maximum discharge of sulfur oxides from each space heater shall not exceed 4.8 pounds (measured as sulfur dioxide or SO₂) per million BTU (MMBTU) heat input.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A.(1).)

**SECTION 4
 WORK PRACTICES**

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant(s) / Parameter(s)	Work Practice(s)
AA-001	40 CFR 63.11516(b); Subpart XXXXXX	4.1	MFHAPs	Implement Management Practices to Minimize Emissions (Machining)
	40 CFR 63.11516(f)(1 – 2); Subpart XXXXXX	4.2		Implement Management Practices to Minimize Emissions (Welding)

- 4.1 For Emission Point AA-001, the permittee shall implement the following management practices to minimize emissions of metal fabrication hazardous air pollutants (MFHAPs) for each machining operation (i.e. milling, drilling, boring, tapping, planing, broaching, sawing, cutting, shaving, shearing, threading, reaming, shaping, slotting, hobbing, and chamfering):
- (a) The permittee shall take the necessary measures to minimize excess dust in the surrounding area to reduce MFHAP emissions (as practicable); and
 - (b) The permittee shall operate all equipment associated with the applicable machining operation(s) according to manufacturer’s instructions.

These requirements do not apply when an applicable machining operation is being performed that does not use any materials containing MFHAPs and does not have the potential to emit MFHAPs.

(Ref.: 40 CFR 63.11516(b); Subpart XXXXXX)

- 4.2 For Emission Point AA-001, the permittee shall demonstrate that the management practices or fume control measures for the welding operation(s) are being implemented by complying with the following requirements:
- (a) The permittee shall operate all equipment, capture, and control devices associated with welding operations according to manufacturer’s instructions;
 - (b) The permittee shall implement one or more of the following management practices to minimize emissions of MFHAPs (as practicable) while maintaining the required welding quality through the application of sound engineering judgement:
 - (1) Use welding processes with reduced fume generation capabilities;
 - (2) Use welding process variations that can reduce fume generation rates;

- (3) Use welding filler metals, shielding gases, carrier gases, or other process materials that are capable of reduced welding fume generation;
- (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
- (5) Use a welding fume capture and control system operated according to the manufacturer's specifications.

These requirements do not apply when welding operations are being performed that do not use any materials containing MFHAPs and do not have the potential to emit MFHAPs.

(Ref.: 40 CFR 63.11516(f)(1 – 2); Subpart XXXXXX)

**SECTION 5
 MONITORING AND RECORDKEEPING REQUIREMENTS**

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant(s) / Parameter(s)	Monitoring / Recordkeeping Requirement(s)	
AA-100	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain Records for a Minimum of 5 Years	
	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.2	VOCs	Monitor and Maintain VOC Emissions	
		5.3	HAPs	Monitor and Maintain HAP Emissions	
AA-001	40 CFR 63.11516(f)(3) and 63.11517(a – b); Subpart XXXXXX	5.4	Opacity	Conduct Visual Determinations of Fugitive Emissions (Welding)	
	40 CFR 63.11516(f)(4); Subpart XXXXXX	5.5		Perform Corrective Actions for Fugitive Emissions	
	40 CFR 63.11516(f)(5) and 63.11517(c – d); Subpart XXXXXX	5.6		Conduct Visual Determinations of Emissions Opacity (Welding)	
	40 CFR 63.11516(f)(6); Subpart XXXXXX	5.7		Perform Corrective Actions for Opacity (0% < Opacity < 20%)	
	40 CFR 11516(f)(7 – 8); Subpart XXXXXX	5.8		Prepare (or Revise) a Site-Specific Welding Emissions Management Plan	
	40 CFR 63.11519(c)(2); Subpart XXXXXX	5.9		Maintain Information Related to Visual Determinations of Fugitive Emissions	
	40 CFR 63.11519(c)(3); Subpart XXXXXX	5.10		Maintain Information Related to Visual Determinations of Emissions Opacity	
	40 CFR 63.11519(c)(4); Subpart XXXXXX	5.11		MFHAPs	Maintain Manufacturer’s Specifications for Control Devices / Materials
	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.12			Record and Maintain Operational Usage / Data (Cutting and Welding)
	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.13		PM MFHAPs	Monitor Differential Pressure Drop Weekly
5.14		Conduct a Monthly Inspection of the Dust Collector			

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant(s) / Parameter(s)	Monitoring / Recordkeeping Requirement(s)
AA-002	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.15	VOCs HAPs	Record and Maintain Surface Coating Usage / Data

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.9.)

5.2 For Emission Point AA-100 (Facility-Wide), the permittee shall demonstrate compliance with the limits established in Condition 3.3 by calculating the emission of volatile organic compounds (VOCs) from all emissions sources at the site in tons per year (tpy) based on a rolling 12-month period. Additionally, unless otherwise specified or limited herein, the permittee shall include all reference data utilized to validate the calculated emissions (applicable emission factors, engineering judgement determinations, etc.).

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

5.3 For Emission Point AA-100 (Facility-Wide), the permittee shall demonstrate compliance with the limits established in Condition 3.4 by calculating the emission of individual and total hazardous air pollutants (HAPs) from all emissions sources at the site in tons per year (tpy) based on a rolling 12-month period. Additionally, unless otherwise specified or limited herein, the permittee shall include all reference data utilized to validate the calculated emissions (applicable emission factors, engineering judgement determinations, etc.).

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

5.4 For Emission Point AA-001, the permittee shall perform visual determinations of welding fugitive emissions as specified by the following procedure at the primary vent, stack, exit, or opening from the building containing the welding operations:

(a) Any visual determination of fugitive emissions must be performed according to the provisions outlined in EPA Test Method 22 of 40 CFR Part 60, Appendix A-7 (i.e. “Method 22”). Additionally, the permittee shall adhere to the following guidelines:

- (1) The permittee must conduct a Method 22 test while welding operations are proceeding and under normal conditions; and
 - (2) The duration of any Method 22 test must be at least fifteen (15) minutes, and visible emissions will be considered present if they are detected for more than six (6) minutes of the 15-min. period.
- (b) Perform a visual determination of fugitive emissions once per day on each day while welding operations are conducted.
- (c) If no visible fugitive emissions are detected in ten (10) consecutive daily Method 22 testing of welding operations and performed in accordance with Sections (a) – (b) of this condition, the permittee may decrease the frequency of Method 22 testing to once every five (5) days of welding operations (i.e. one calendar week).

If visible fugitive emissions are detected during this decreased frequency period, the permittee shall revert to daily Method 22 testing in accordance with Sections (a) – (b) of this condition during each day that welding operations are conducted.

- (d) If no visible emissions are detected in four (4) consecutive weekly Method 22 testing of welding operations and performed in accordance with Section (c) of this condition, the permittee may decrease the frequency of Method 22 testing to once every twenty-one (21) days of welding operations (i.e. one calendar month).

If visible emissions are detected during this decreased frequency period, the permittee shall revert to weekly Method 22 testing in accordance with Section (c) of this condition.

- (e) If no visible emissions are detected in three (3) consecutive monthly Method 22 testing of welding operations and performed in accordance with Section (d) of this condition, the permittee may decrease the frequency of Method 22 testing to once every sixty (60) days of welding operations (i.e. 3 calendar months).

If visible emissions are detected during this this decreased frequency period, the permittee shall revert to monthly Method 22 testing in accordance with Section (d) of this condition.

(Ref.: 40 CFR 63.11516(f)(3) and 40 CFR 63.11517(a – b); Subpart XXXXXX)

5.5 For Emission Point AA-001, upon the initial detection of fugitive emissions as result of a visual determination conducted in accordance with Condition 5.4, the permittee shall implement corrective actions that include (but are not limited to) the following protocol:

- (a) Inspecting welding fume sources; and

- (b) Evaluating the proper operation and effectiveness of the management practices / fume control measures implemented in accordance with Condition 4.2(b).

After completing the mentioned corrective actions, the permittee shall perform a follow-up inspection for visible fugitive emissions in accordance with Condition 5.4(a) at the primary vent, stack, exit, or opening from the building containing the welding operations.

(Ref.: 40 CFR 63.11516(f)(4); Subpart XXXXXX)

- 5.6 For Emission Point AA-001, upon detection of fugitive emissions from more than one visual determination in accordance with Condition 5.4 during any consecutive 12-month period (notwithstanding the results of any follow-up inspections required by Condition 5.5), the permittee shall comply with the following requirements:

- (a) Within twenty-four (24) hours, the permittee shall conduct a visual determination of emissions opacity at the primary vent, stack, exit, or opening from the building containing welding operations.

The visual determination of emissions opacity shall be performed in accordance with the provisions outlined in EPA Test Method 9 of 40 CFR Part 60, Appendix A-4 (i.e. "Method 9"). Additionally, the permittee shall adhere to the following guidelines:

- (1) The permittee must conduct a Method 9 test while welding operations are proceeding and under normal conditions; and
 - (2) The duration of any Method 9 testing shall be thirty (30) minutes.
- (b) In lieu of conducting the procedure outlined in Condition 5.4(b) through (e), the permittee shall perform visual determinations of emissions opacity in accordance with the following schedule:
 - (1) Perform a visual determination of emissions opacity once per day on each day while welding operations are conducted.
 - (2) If the average of the six-minute opacities recorded during ten (10) consecutive daily Method 9 tests of welding operations and performed in accordance with Sections (a) and (b)(1) of this condition does not exceed 20 percent, the permittee may decrease the frequency of Method 9 testing to once per five (5) consecutive days of active welding operations (i.e. one calendar week).

If an opacity greater than 20% is detected during this decreased frequency period, the permittee shall revert to daily Method 9 testing in accordance with Sections (a) and (b)(1) of this condition during each day that welding operations are conducted.

- (3) If the average of the six-minute opacities recorded during four (4) consecutive weekly tests of welding operations and performed in accordance with Part (b)(2) of this condition does not exceed 20%, the permittee may decrease the frequency of Method 9 testing to once per every twenty-one (21) days of active welding operations (i.e. one calendar month).

If an opacity greater than 20% is detected during this decreased frequency period, the permittee shall revert to weekly Method 9 testing in accordance with Section (b)(2).

- (4) If the average of the six-minute opacities recorded during three (3) consecutive monthly tests of welding operations and performed in accordance with Section (b)(3) of this condition does not exceed 20%, the permittee may decrease the frequency of Method 9 testing to once every one hundred twenty (120) days of active welding operations (i.e. one calendar quarter).

If any opacity greater than 20% is detected during this decreased frequency period, the permittee shall revert to monthly Method 9 testing in accordance with Sections (b)(3).

- (5) If the average of the six-minute opacities recorded during two (2) consecutive monthly tests of welding operations and performed in accordance with Part (b)(3) does not exceed 20%, the permittee may revert to monthly Method 22 testing in accordance with Sections (d) and (e) of Condition 5.4

In lieu of reverting to Method 22 testing, the permittee may elect to continue performing Method 9 testing in accordance with Sections (b)(3) and (b)(4) of this condition.

(Ref.: 40 CFR 63.11516(f)(5) and 63.11517(c – d); Subpart XXXXXX)

5.7 For Emission Point AA-001, upon any visual determination of emissions opacity performed in accordance with Condition 5.6 resulting in the average of the six-minute opacities recorded equating 20% or less but greater than zero, the permittee shall implement corrective actions that include (but are not limited to) the following protocol:

- (a) Inspecting welding fume sources; and
- (b) Evaluating the proper operation and effectiveness of the management practices / fume control measures implemented in accordance with Condition 4.2(b).

(Ref.: 40 CFR 63.11516(f)(6); Subpart XXXXXX)

5.8 For Emission Point AA-001, upon any visual determination of emissions opacity performed in accordance with Condition 5.6 resulting in the average of the six-minute opacities recorded exceeding 20%, the permittee shall adhere to the following provisions:

- (a) Within thirty (30) days of the exceeding the referenced opacity limit, the permittee shall prepare and implement a Site-Specific Welding Emissions Management Plan (i.e. "Plan") that must contain the following information:
 - (1) Company name and address;
 - (2) A list and description of all welding operations that are currently utilized;
 - (3) A description of all management practices and/or fume control methods in place at the time of the opacity exceedance;
 - (4) A list and description of all management practices and/or fume control methods currently employed for welding operations;
 - (5) A description of additional management practices and/or fume control methods to be implemented pursuant to triggering this requirement, and the projected date of implementation; and

If the permittee possesses an existing Plan at the time of the opacity exceedance, the permittee shall prepare and implement a revised Plan within 30 days. Any revisions to the Plan must contain copies of all previous plan entries.

- (b) During the preparation (or revision) of the Plan, the permittee shall continue to perform and maintain the visual determinations of emissions opacity beginning on a daily schedule, as specified by Condition 5.6(a) and (b)(1).
- (c) The Plan must be updated annually (if necessary) to contain current information, as specified by Section (a)(1 – 3) of this condition, and maintained on-site for review by the MDEQ personnel at any time.

(Ref.: 40 CFR 11516(f)(7 – 8); Subpart XXXXXX)

5.9 For Emission Point AA-001, the permittee shall record and maintain the following information as it relates to any required visual determination of fugitive emissions (as specified by Condition 5.4) from welding operations:

- (a) The date and results of every visual determination performed;
- (b) A description of any corrective action(s) taken as a result of a conducted visual determination; and

- (c) The date and results of any follow-up visual determination performed after any corrective action(s) has been completed.

(Ref.: 40 CFR 63.11519(c)(2); Subpart XXXXXX)

5.10 For Emission Point AA-001, the permittee shall maintain following information as it relates to any required visual determination of emissions opacity (as specified by Condition 5.6) from welding operations:

- (a) The date of every visual determination of emissions opacity;
- (b) The average of the six-minute opacities measured by the Method 9 test; and
- (c) A description of any corrective action(s) taken as a result of a conducted Method 9 test.

(Ref.: 40 CFR 63.11519(c)(3); Subpart XXXXXX)

5.11 For Emission Point AA-001, the permittee shall maintain a record of the manufacturer's specifications that correspond to any control device / material used to comply with Condition 4.2(b).

(Ref.: 40 CFR 63.11519(c)(4); Subpart XXXXXX)

5.12 For Emission Point AA-001, the permittee shall record and maintain usage data as it pertains to metal cutting operations and welding operations on a rolling 12-month period. Additionally, the permittee shall maintain corresponding information for each operation:

- (a) For Metal Cutting Operations:
 - (1) The total combined hours spent conducting cutting operations from each table;
 - (2) The weight percentage (wt.%) of any metal fabrication hazardous air pollutant (MFHAP) found in the gas fume;
- (b) For Welding Operations:
 - (1) The amount of welding rod / wire (in pounds) consumed;
 - (2) The weight percentage (wt.%) of any metal fabrication hazardous air pollutant (MFHAP) found in the welding rod / wire material.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.13 For Emission Point AA-001, the permittee shall monitor and record the differential pressure drop on the dust collector control unit weekly during active machining operations. If any weekly recording is outside the differential pressure drop range referenced in Condition 3.8, the permittee shall perform the necessary maintenance to return the dust collector to its indicated pressure drop range / normal operation.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.14 For Emission Point AA-001, the permittee shall conduct and record a monthly inspection of the dust collector control unit. If a problem is noted during an inspection, the permittee shall perform the necessary maintenance to ensure operation of the dust collector as originally designed. The permittee shall also maintain sufficient equipment on-site as is necessary to repair the dust collector.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.15 For Emission Point AA-002, the permittee shall monitor and record the monthly usage (in gallons) of any surface coating (e.g. paints; sealants; etc.) that contains either volatile organic compounds (VOCs) or hazardous air pollutants (HAPs). Additionally the permittee shall maintain corresponding documentation on all coatings that display (at a minimum) the following information:

- (a) Product name and identification;
- (b) The density (in pounds per gallon);
- (c) The total quantity (in gallons) of each surface coating used on a rolling 12-month period;
- (d) The weight percentage (wt.%) of volatile organic compound content; and
- (e) The weight percentage (wt.%) of both any individual HAPs and total combined HAPs;

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

**SECTION 6
REPORTING REQUIREMENTS**

Emission Point(s)	Applicable Requirement(s)	Condition Number	Reporting Requirement(s)
AA-100	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.1	Report Permit Deviations Within 5 Working Days
		6.2	Submit Certified Annual Monitoring Report
		6.3	All Documents Submitted to MDEQ Shall be Certified By a Responsible Official
		6.4	Submit Annual Summary of VOC Emissions
		6.5	Submit Annual Summary of HAP Emissions (Individual and Total)
AA-001	40 CFR 63.11519(b)(5 – 6); Subpart XXXXXX	6.6	Submit Annual Summary of Visual Determination Information and Opacity Exceedance Information
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11). 40 CFR 63.11519(b)(9); Subpart XXXXXX	6.7	Submit Site-Specific Welding Emissions Management Plan (if prompted) Submit Annual Notification of Revision(s) to Site-Specific Welding Emissions Management Plan
	40 CFR 63.11519(b)(9); Subpart XXXXXX	6.8	Submit Annual Collection of Daily Visual Determinations of Emissions Opacity
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.9	Submit Annual Summary of Material Usage / Data (Cutting and Welding)
		6.10	Submit Annual Summary of Differential Pressure Drop Range Deviations
		6.11	Submit Annual Summary of the Dust Collector Malfunctioning / Non-Operational Occurrences
AA-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.12	Submit Annual Summary of Surface Coating Usage / Data

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

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

- 6.2 Except as otherwise specified herein, the permittee shall submit a certified annual synthetic minor monitoring report postmarked no later than January 31st of each calendar year for the preceding calendar year. This report shall address any required monitoring specified in the permit. All instances of deviations from permit requirements must be clearly identified in the report. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration.

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

- 6.3 Any document required by this permit to be submitted to the MDEQ shall contain a certification signed by a responsible official stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

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

- 6.4 For Emission Point AA-100 (Facility-Wide), the permittee shall submit an annual report that details volatile organic compound (VOC) emissions based on a rolling 12-month period no later than January 31st of each calendar year for the preceding calendar year. The report shall include all reference data utilized to validate the presented VOC emissions (applicable emission factors, engineering judgement determinations, etc.).

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

- 6.5 For Emission Point AA-100 (Facility-Wide), the permittee shall submit an annual report that details the individual and total hazardous air pollutant (HAP) emissions from the applicable emission sources in tons per year (tpy) based on a rolling 12-month period no later than January 31st each calendar year for the preceding calendar year. The report shall also include a summary of all reference data utilized to validate the presented emissions (applicable emission factors, engineering judgement determinations, etc.).

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

- 6.6 For Emission Point AA-001, the permittee shall submit an annual report that details the following information as it pertains to welding operations no later than January 31st of each calendar year for the preceding calendar year:

(a) Visual Determination of Fugitive Emissions:

- (1) The date of every visual determination of fugitive emissions (as specified by Condition 5.4) that resulted in the detection of visible emissions;

- (2) A description of the corrective action(s) taken subsequent to detecting visible emissions; and
 - (3) The date and results of the follow-up visual determination of fugitive emissions after the corrective action(s).
- (b) Visual Determination of Emissions Opacity:
- (1) The date of every visual determination of emissions opacity (as specified by Condition 5.6);
 - (2) The average of the six-minute opacities as measured the Method 9 testing; and
 - (3) A description of any corrective action(s) taken subsequent to the test.
- (c) Exceedances of 20% Opacity (as determined by Method 9 testing):
- (1) The date on which the exceedance occurred; and
 - (2) The average of the six-minute average opacities recorded during the visual determination of emissions opacity.

(Ref.: 40 CFR 63.11519(b)(5 – 6); Subpart XXXXXX)

- 6.7 For Emission Point AA-001, upon triggering the provisions specified in Condition 5.8(a), the permittee shall submit a copy of the initial (or revised) Site-Specific Welding Emissions Management Plan (i.e. “Plan”) within forty-five (45) days after the noted opacity exceedance that prompted Condition 5.8(a).

Thereafter, the permittee shall submit provide annual notice (in writing) of any revision(s) made to the Plan no later than January 31st of each calendar year for the preceding calendar year. If a revision is made to the Plan during any preceding calendar year, the permittee shall include a copy of the updated Plan with the corresponding notification.

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

(Ref.: 40 CFR 63.11519(b)(9); Subpart XXXXXX)

- 6.8 For Emission Point AA-001, the permittee shall submit on an annual basis the collection of daily visual determinations of emissions opacity recorded as required by Condition 5.8(b) no later than January 31st of each calendar year for the preceding calendar year.

(Ref.: 40 CFR 63.11519(b)(8); Subpart XXXXXX)

- 6.9 For Emission Point AA-001, the permittee shall submit an annual report that summarizes usage data as it pertains to metal cutting operations and welding operations no later than

January 31st of each calendar year for the preceding calendar year. The report shall include the following information for each operation:

(a) For Metal Cutting Operations:

- (1) The total combined hours spent conducting cutting operations from each table based on a rolling 12-month period;
- (2) The weight percentage (wt.%) of any metal fabrication hazardous air pollutant (MFHAP) found in the gas fume;

(b) For Welding Operations:

- (1) The amount of welding rod / wire (in pounds) consumed based on a rolling 12-month period;
- (2) The weight percentage (wt.%) of any metal fabrication hazardous air pollutant (MFHAP) found in the welding rod / wire material.

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

6.10 For Emission Point AA-001, the permittee shall submit an annual report that summarizes all deviations of the differential pressure drop range referenced in Condition 3.8 no later than January 31st of each calendar year for the preceding calendar year.

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

6.11 For Emission Point AA-001, the permittee shall submit an annual report that details any occurrence (and the corresponding duration) of the dust collector control unit malfunctioning and/or becoming non-operational during active machining operations no later than January 31st of each calendar year for the preceding calendar period. The report shall also outline any maintenance action(s) performed to restore the dust collector to its normal manner of operation.

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

6.12 For Emission Point AA-002, the permittee shall submit an annual report that summarizes the following information for any utilized surface coating no later than January 31st of each calendar for the preceding calendar year:

- (a) Product name and identification;
- (b) The density (in pounds per gallon);

- (c) The total quantity (in gallons) of each surface coating used on a rolling 12-month period;
- (c) The weight percentage (wt.%) of volatile organic compound content; and
- (d) The weight percentage (wt.%) of both any individual HAPs and total combined HAPs.

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