

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

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

THIS CERTIFIES THAT

BrandSafway Solutions LLC, Moss Point
10005 Old Stage Road
Moss Point, Jackson 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: February 1, 2021

Permit No.: 1280-00146

Effective Date: As specified herein.

Expires: January 31, 2026

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 Mississippi Administrative Code, Title 11, Part 2, Chapter 2, Rule 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 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 [a]ny 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 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 Mississippi Administrative Code, Title 11, Part 2 Chapter 3 – “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 Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 1.10. – “Provisions for Upsets, Start-Up, and Shutdowns”.

(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, start-ups, 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) Start-ups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.)
 - (1) Start-ups 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 start-ups 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for start-ups 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 start-up 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 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 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, as described in the following table.

Emission Point	Description
AA-100	Facility-Wide [BrandSafway Solutions LLC, Moss Point]
AA-001	Abrasive Blasting Operations [consists of two (2) non-enclosed abrasive blasting areas (equipment is blasted within a 3-sided shrouded area) and blasting stockpiles]
AA-002	Surface Coating Operations [consists of a non-enclosed spray painting area and a paint air drying building]
AA-003	Miscellaneous Metalworking Operations [consists of (but not limited to) grinding, buffing, drilling, machining, and welding]
AA-004	500-Gallon Diesel Storage Tank

SECTION 3 EMISSION LIMITATIONS AND STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limitation / Standard
AA-100 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.1	Opacity	≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.2	PM	$E = 4.1(p^{0.67})$
	11 Miss. Admin. Code Pt. 2, R.1.3.C.	3.3	Any Contaminant	General Nuisance Provisions
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.4	VOCs	99.0 tpy (Rolling 12-Month Total)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.5	HAPs	9.0 tpy (Individual) 24.0 tpy (Total) (Rolling 12-Month Totals)
	11 Miss. Admin. Code Pt.2, R. 2.2.B(10). (PSD Avoidance Limit)	3.6	PM (filterable only)	249.0 tpy (Rolling 12-Month Total)
	11 Miss. Admin. Code Pt.2, R. 2.2.B(10).	3.7	PM ₁₀ / PM _{2.5} (filterable + condensable)	99.0 tpy (Rolling 12-Month Totals)

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

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

3.2 For Emission Point AA-100 (Facility-Wide), the permittee shall not allow the emission of particulate matter (PM) in total quantities in any one (1) 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. Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs.

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

- 3.3 For Emission Point AA-100 (Facility-Wide), the permittee shall not cause or allow the emission of particles or any contaminants in sufficient amounts or of such duration from any process as to be injurious to humans, animals, plants, or property, or to be a public nuisance, or create a condition of air pollution.

The permittee shall not cause or permit the handling, transporting, or storage of any material in a manner which allows or may allow unnecessary amounts of particulate matter to become airborne.

When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than from which it originated or to violate any other provision of this regulation, the Commission may order such corrected in a way that all air and gases or air and gas-borne material leaving the building or equipment are controlled or removed prior to discharge to the open air.

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

- 3.4 For Emission Point AA-100 (Facility-Wide), the permittee shall limit the emission of volatile organic compounds (VOCs) to no more than 99.0 tons per year (tpy) on a rolling 12-month total basis.

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

- 3.5 For Emission Point AA-100 (Facility-Wide), the permittee shall limit the emission of hazardous air pollutants (HAPs) to no more than 9.0 tons per year (tpy) for any individual HAP and no more than 24.0 tpy for total combined HAPs on a rolling 12-month total basis.

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

- 3.6 For Emission Point AA-100 (Facility-Wide), the permittee shall limit the emission of particulate matter (PM; filterable only) to no more than 249.0 tons per year (tpy) on a rolling 12-month total basis.

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

- 3.7 For Emission Point AA-100 (Facility-Wide), the permittee shall limit the respective emission of particulate matter less than 10 microns in diameter (PM₁₀; filterable + condensable) and particulate matter less than 2.5 microns in diameter (PM_{2.5}; filterable + condensable) to no more than 99.0 tons per year (tpy) on a rolling 12-month total basis.

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

SECTION 4
WORK PRACTICE STANDARDS

“THIS SECTION WAS INTENTIONALLY LEFT BLANK SINCE NO WORK PRACTICE STANDARDS APPLY TO THIS PERMIT ACTION.”

SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Monitoring / Recordkeeping Requirement
AA-001 AA-002	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain Records For a Minimum of Five (5) Years
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2	VOCs HAPs PM / PM ₁₀ / PM _{2.5}	Calculate and Record the Emission of Each Pollutant (Monthly & Rolling 12-Month Totals)
AA-001	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.3	PM / PM ₁₀ / PM _{2.5} HAPs	Monitor and Record the Quantity of Each Abrasive Blast Medium Used (Monthly)
AA-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.4	VOCs HAPs	Maintain Information on Coatings, Adhesives, Solvents, or Other VOC / HAP-Containing Materials

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

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

5.2 For Emission Points AA-001 and AA-002, the permittee shall calculate and record the respective emission of volatile organic compounds (VOCs), each individual hazardous air pollutant (HAP), all combined HAPs, particulate matter (PM; filterable only), particulate matter less than 10 microns in diameter (PM₁₀; filterable + condensable), and particulate matter less than 2.5 microns in diameter (PM_{2.5}; filterable + condensable) in tons based on a monthly basis and on a rolling 12-month total basis.

Unless otherwise specified herein, the permittee shall include all reference data utilized to validate the calculated emissions (e.g. operational data, applicable emission factors, engineering judgement determinations, etc.).

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

5.3 For Emission Point AA-001, the permittee shall monitor and record the quantity of each abrasive blast medium used on a monthly basis. Additionally, the permittee shall maintain documentation for each abrasive blast medium that details the respective material composition (including the weight percent content of any metal hazardous air pollutant).

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

- 5.4 For Emission Point AA-002, the permittee shall maintain sufficient records to document the following information for each coating, adhesive, solvent, or other material that contains a volatile organic compound (VOC) or hazardous air pollutant (HAP) used on a monthly basis:
- (a) The product name or identification;
 - (b) The volume used;
 - (c) The VOC and/or HAP weight percent content. A description of the method used to determine the VOC and HAP content shall accompany this data;
 - (d) The density (in pounds per gallon); and
 - (e) The solids content (as applicable).

When determining the VOC and HAP content, the permittee may utilize data supplied by the manufacturer or an analysis by EPA Test Method 311 (found in Appendix A of 40 CFR Part 63). The permittee shall maintain all of the source documentation that contains the information used in the recordkeeping required by this condition.

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

SECTION 6 REPORTING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Reporting Requirement
AA-100 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	Report Permit Deviations Within Five (5) Working Days
		6.2	Submit a Certified Annual Monitoring Report
		6.3	All Documents Submitted to the MDEQ Shall be Certified By a Responsible Official

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. The 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 For Emission Point AA-100 (Facility-Wide), the permittee shall submit a certified annual monitoring report (AMR) 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. This report shall provide the information outlined in Conditions 5.2 through 5.4 of this permit.

(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).)