

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

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

THIS CERTIFIES THAT

Utility Optimization Group, LLC
6917 Stennis Boulevard
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

Krystal Rudolph

AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: January 12, 2021

Permit No.: 1280-00049

Effective Date: As specified herein.

Expires: December 31, 2025

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 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 (Utility Optimization Group, LLC)
AA-001	Facility-Wide Surface Coating Operations (indoor operations)
AA-002	Facility-Wide Abrasive Blasting Operations (indoor and outdoor operations)
AA-003	Facility-Wide Metal Fabrication Operations (pipe shop and vessel shop)
AA-005	Facility-Wide Miscellaneous Mobile Equipment [includes (but not limited to) air compressors, hand-held metal working equipment, portable blast cabinets, welding cylinders]
AA-006	One (1) 1,000-Gallon Diesel Storage Tank
AA-008	One (1) 250-Gallon Propane Storage Tank
AA-009	Propane-Fired Space Heaters (total rated capacity: 5 MMBTU / hour)

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.A.	3.1	Opacity	≤ 40% (Opacity from Smoke)
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2	Opacity	≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.3	PM	$E = 4.1(p^{0.67})$
	11 Miss. Admin. Code Pt. 2, R. 1.3.C.	3.4	Any Contaminant	General Nuisance Provisions
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.5	PM	0.6 Pounds / MMBTU per Hour
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.6	VOCs	99.0 tpy (Rolling 12-Month Total)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.7	HAPs	9.90 tpy (Individual) 24.90 tpy (Total) (Rolling 12-Month Totals)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.8	PM ₁₀ / PM _{2.5} (filterable + condensable)	99.0 tpy (Rolling 12-Month Totals)
	40 CFR Part 63, Subpart XXXXXX – NESHAP Area Source Standards for Nine Metal Fabrication and Finishing Source Categories 40 CFR 63.11514(a)(3) and and 63.11515(b), Subpart XXXXXX	3.9	HAPs	General Applicability

3.1 For Emission Point AA-100 (Facility-Wide), except as otherwise specified or limited herein, the permittee shall not cause or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process that exceeds forty (40) percent opacity subject to the exceptions provided below:

- (a) Start-up operations may produce emissions, which exceed 40% opacity for up to fifteen (15) minutes per start-up in any one (1) hour and not to exceed three (3) start-ups per stack in any twenty-four (24) hour period.

- (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed sixty (60) percent opacity and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one (1) hour.

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

- 3.2 For Emission Point AA-100 (Facility-Wide), 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 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 not allow the emission of particulate matter 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).)

- 3.4 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.)

- 3.5 For Emission Point AA-100 (Facility-Wide), the maximum permissible emission of ash and/or particulate matter (PM) from any fossil fuel burning installation of less than ten (10) million BTU (MMBTU) per hour heat input 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).)

- 3.6 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) based on a rolling 12-month total.

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

- 3.7 For Emission Point AA-100 (Facility-Wide), the permittee shall limit hazardous air pollutant (HAP) emissions to no more than 9.90 tons per year (tpy) for any single HAP and no more than 24.90 tpy for all HAPs in total based on rolling 12-month totals.

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

- 3.8 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) based on rolling 12-month totals.

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

- 3.9 For Emission Point AA-100 (Facility-Wide), 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 and Subpart A – General Provisions as specified in Table 2 of Subpart XXXXXX.

For purpose of the permit, a material is considered as containing a metal fabrication / finishing hazardous air pollutant (MFHAP) if it contains cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (wt.%) (as the metal) **or** if it contains manganese in amounts greater than or equal to 1.0 wt.% (as the metal).

(Ref.: 40 CFR 63.11514(a)(3) and 63.11515(b), Subpart XXXXXX)

SECTION 4 WORK PRACTICE STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Work Practice
AA-002 AA-005	40 CFR 63.11516(a)(1), Subpart XXXXXX	4.1	MFHAPPs	Requirements for Enclosed Dry Abrasive Blasting Operations
	40 CFR 63.11516(a)(2), Subpart XXXXXX	4.2		Requirements for Vented Dry Abrasive Blasting Operations
	40 CFR 63.11516(a)(3), Subpart XXXXXX	4.3		Requirements for Abrasive Blasting of Objects Greater Than Eight (8) Feet in Any One Dimension
AA-005	40 CFR 63.11516(b), Subpart XXXXXX	4.4	MFHAPs	Requirements for Machining Operations
AA-003 AA-005	40 CFR 63.11516(c), Subpart XXXXXX	4.5	MFHAPs	Requirements for Dry Grinding and Dry Polishing with Machines
AA-003 AA-005	40 CFR 63.11516(f)(1)-(2), Subpart XXXXXX	4.6	MFHAPs	Requirements for Welding Operations
	40 CFR 63.11516(f)(3)-(8), Subpart XXXXXX	4.7		Requirements for Welding Operations Using More Than 2,000 Pounds of Welding Rod Per Year

4.1 For Emission Points AA-002 and AA-005, for a dry abrasive blasting operation consisting of an abrasive blasting chamber that is totally enclosed and unvented (as defined in 40 CFR 63.11522, Subpart XXXXXX), the permittee must implement the management practices in Conditions 4.1 through 4.3 to minimize the emissions of MFHAPs. These requirements do not apply when abrasive blasting operations are being performed that do not use any materials containing MFHAPs or do not have the potential to emit MFHAPs.

- (a) The permittee must minimize dust generation during emptying of abrasive blasting enclosures; and
- (b) The permittee must operate all equipment associated with dry abrasive blasting operations according to the manufacturer's instructions.

(Ref.: 40 CFR 63.11516(a)(1), Subpart XXXXXX)

4.2 For Emission Points AA-002 and AA-005, for a dry abrasive blasting operation that has a vent allowing any air or blast material to escape, the permittee must comply with the following requirements:

- (a) The permittee must capture emissions and vent them to a filtration control device. The permittee must operate the filtration control device according to manufacturer's

instructions and must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices, as specified by the requirements in 40 CFR 63.11519(c)(4), Subpart XXXXXX.

- (b) The permittee must implement the following management practices to minimize emission of MFHAPs:
 - (1) The permittee must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions (as practicable);
 - (2) The permittee must enclose dusty abrasive material storage areas and holding bins, seal chutes, and conveyors that transport abrasive materials; and
 - (3) The permittee must operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions.

(Ref.: 40 CFR 63.11516(a)(2), Subpart XXXXXX)

4.3 For Emission Points AA-002 and AA-005, for dry abrasive blasting operation of objects greater than 8 feet (2.4 meters) in any one dimension, the permittee may implement management practices to minimize the emission of MFHAPs as specified in paragraph (a) of this condition instead of the practices required by Condition 4.2. The permittee must demonstrate that management practices are being implemented by complying with the requirements in (b) through (d) of this condition:

- (a) Management practices for dry abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension are specified below:
 - (1) The permittee must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable;
 - (2) The permittee must enclose abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive material;
 - (3) The permittee must operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions;
 - (4) The permittee must not re-use dry abrasive blasting media unless contaminants (i.e., any material other than the base metal, such as paint residue) have been removed by filtration or screening, and the abrasive material conforms to its original size; and
 - (5) Whenever practicable, the permittee must switch from high particulate matter (PM)-emitting blast media (e.g. sand) to low PM-emitting blast media [e.g. crushed glass, specular hematite, steel shot, aluminum oxide], where PM is a surrogate for MFHAP.

- (b) The permittee must perform visual determinations of fugitive emissions, as specified in Condition 5.5, in accordance with paragraph (1) or (2) (as applicable):
 - (1) For abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension that is performed outdoors, the permittee must perform visual determinations of fugitive emissions at the fence-line or property border nearest to the outdoor dry abrasive blasting operation.
 - (2) For abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension that is performed indoors, the permittee must perform visual determinations of fugitive emissions at the primary vent, stack, exit, or opening from the building containing the abrasive blasting operations.
- (c) The permittee must keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in Condition 5.8(c).
- (d) If visible fugitive emissions are detected, the permittee must perform corrective actions until the visible fugitive emissions are eliminated at which time the permittee must comply with the following requirements:
 - (1) The permittee must perform a follow-up inspection for visible fugitive emissions in accordance with Condition 5.4; and
 - (2) The permittee must report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, with the annual certification and compliance report as required by Condition 6.4(d).

(Ref.: 40 CFR 63.11516(a)(3), Subpart XXXXXX)

4.4 For Emission Point AA-005, for machining operations, the permittee must implement management practices to minimize emissions of MFHAP as specified below. These requirements do not apply when machining operations are being performed that do not use any materials containing MFHAPs and do not have the potential to emit MFHAPs.

- (a) The permittee must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and
- (b) The permittee must operate all equipment associated with machining according to manufacturer's instructions.

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

4.5 For Emission Points AA-003 and AA-005, for dry grinding and dry polishing with machines operations that use materials that contain MFHAPs, the permittee must comply with the requirements below:

- (a) The permittee must capture emissions and vent them to a filtration control device. The permittee must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices, as specified by Condition 5.8(e).
- (b) The permittee must implement management practices to minimize the emission of MFHAPs as specified below:
 - (1) The permittee must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions (as practicable);
 - (2) The permittee must operate all equipment associated with the operation of dry grinding and dry polishing with machines, including the filtration control device, according to manufacturer's instructions.

(Ref.: 40 CFR 63.11516(c), Subpart XXXXXX)

4.6 For Emission Points AA-003 and AA-005, for welding operations, the permittee must comply with the requirements in Conditions 4.6 and 4.7. These requirements do not apply when welding operations are being performed that do not use any materials containing MFHAPs or do not have the potential to emit MFHAPs.

- (a) The permittee must operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions. The permittee must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the capture and control devices, as specified by Condition 5.8(e).
- (b) The permittee must implement one or more of the management practices specified below to minimize the emission of MFHAPs (as practicable) while maintaining the required welding quality through the application of sound engineering judgment:
 - (1) Use welding processes with reduced fume generation capabilities [e.g. gas metal arc welding (GMAW) – also called metal inert gas welding (MIG)];
 - (2) Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates;
 - (3) Use welding filler metals, shielding gases, carrier gases, or other process materials which 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.

(Ref.: 40 CFR 63.11516(f)(1) and (2), Subpart XXXXXX)

4.7 For Emission Points AA-003 and AA-005, for welding operations using 2,000 pounds or more per year of welding rod containing one or more MFHAP (calculated on a rolling 12-month basis), the permittee must demonstrate that management practices or fume control measures are being implemented by complying with the requirements below:

- (a) *Tier 1 compliance requirements for welding:* The permittee must perform visual determinations of welding fugitive emissions as specified in Condition 5.5, at the primary vent, stack, exit, or opening from the building containing the welding operations. The permittee must keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with Condition 5.8(c).
- (b) *Requirements upon initial detection of visible emissions from welding:* If visible fugitive emissions are detected during any visual determination required in paragraph (a) of this condition, the permittee must comply with the requirements below:
 - (1) Perform corrective actions that include, but are not limited to, inspection of welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with Condition 4.6(b). After completing such corrective actions, the permittee must perform a follow-up inspection for visible fugitive emissions in accordance with Condition 5.4, at the primary vent, stack, exit, or opening from the building containing the welding operations.
 - (2) Report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, and submit with the annual certification and compliance report as required by Condition 6.4(d).
- (c) *Tier 2 requirements upon subsequent detection of visible emissions:* If visible fugitive emissions are detected more than once during any consecutive twelve (12) month period (notwithstanding the results of any follow-up inspections), the permittee must comply with the requirements below.
 - (1) Within twenty-four (24) hours of the end of the visual determination of fugitive emissions in which visible fugitive emissions were detected, the permittee must conduct a visual determination of emissions opacity (as specified in Condition 5.6) at the primary vent, stack, exit, or opening from the building containing the welding operations.
 - (2) In lieu of the requirement of paragraph (a) of this condition to perform visual determinations of fugitive emissions with EPA Test Method 22, the permittee must perform visual determinations of emissions opacity in accordance with

Condition 5.7 (using EPA Test Method 9) at the primary vent, stack, exit, or opening from the building containing the welding operations.

- (3) The permittee must keep a record of each visual determination of emissions opacity performed in accordance with paragraphs (c)(1) or (2) of this condition, along with any subsequent corrective action taken, in accordance with Condition 5.8(d).
 - (4) The permittee must report the results of all visual determinations of emissions opacity performed in accordance with paragraphs (c)(1) or (2) of this condition, along with any subsequent corrective action taken, and submit with the annual certification and compliance report as required by Condition 6.4(d).
- (d) *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 (c) of this condition for which the average of the six-minute average opacities recorded is twenty percent (20%) or less but greater than zero, the permittee must perform corrective actions, including inspection of all welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with Condition 4.6(b).
- (e) *Tier 3 requirements for opacities exceeding 20 percent:* For each visual determination of emissions opacity performed in accordance with paragraph (c) of this condition for which the average of the six-minute average opacities recorded exceeds 20%, the permittee must comply with the requirements below.
- (1) The permittee must submit a report of exceedance of 20% opacity, along with the annual certification and compliance report, as specified in Condition 6.4(e).
 - (2) Within thirty (30) days of the opacity exceedance, the permittee must prepare and implement a Site-Specific Welding Emissions Management Plan, as specified in paragraph (f) of this condition.

If the permittee has already prepared a Site-Specific Welding Emissions Management Plan in accordance with this paragraph, the permittee must prepare and implement a revised Site-Specific Welding Emissions Management Plan within 30 days.

- (3) During the preparation (or revision) of the Site-Specific Welding Emissions Management Plan, the permittee must continue to perform visual determinations of emissions opacity, beginning on a daily schedule as specified in Condition 5.7, using EPA Test Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
- (4) The permittee must maintain records of daily visual determinations of emissions opacity performed in accordance with paragraph (e)(3) of this

condition, during preparation of the Site-Specific Welding Emissions Management Plan, in accordance with Condition.6.4(f).

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

- (f) *Site-Specific Welding Emissions Management Plan.* The Site-Specific Welding Emissions Management Plan must comply with the following requirements:
 - (1) The Site-Specific Welding Emissions Management Plan must contain the following information:
 - (i) Company name and address;
 - (ii) A list and description of all welding operations which currently comprise the welding affected source;
 - (iii) A description of all management practices and/or fume control methods in place at the time of the opacity exceedance;
 - (iv) A list and description of all management practices and/or fume control methods currently employed for the welding affected source;
 - (v) A description of additional management practices and/or fume control methods to be implemented pursuant to paragraph (f)(7)(ii) of this section, and the projected date of implementation; and
 - (vi) Any revisions to a Site-Specific Welding Emissions Management Plan must contain copies of all previous plan entries pursuant to Parts (f)(1)(iv) and (v) of this condition.

 - (g) The Site-Specific Welding Emissions Management Plan must be updated annually to contain current information, as required by paragraphs (f)(1)(i) through (iii) of this condition, and submitted with the annual certification and compliance report, according to Condition 6.4.

 - (h) The permittee must maintain a copy of the current Site-Specific Welding Emissions Management Plan in a readily-accessible location for inspector review, in accordance with the requirements Condition 5.8(g).

(Ref.: 40 CFR 63.11516(f)(3) through (8), Subpart XXXXXX)

SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Monitoring / Recordkeeping Requirement
AA-100 (Facility-Wide)	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	Monitoring of Coating, Adhesive, Solvent, or Other VOC- or HAP-Containing Material
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.3	PM ₁₀ / PM _{2.5}	Monitoring of PM ₁₀ / PM _{2.5} Producing Materials
AA-002 AA-003 AA-005	40 CFR 63.11517(a), Subpart XXXXXX	5.4	Opacity	Method for Determining Fugitive Emissions
	40 CFR 63.11517(b), Subpart XXXXXX	5.5		Schedule for Fugitive Emissions Observations
AA-003 AA-005	40 CFR 63.11517(c), Subpart XXXXXX	5.6	Opacity	Method For Determining Opacity For Welding Tier 2 or 3
	40 CFR 63.11517(d), Subpart XXXXXX	5.7		Schedule For Visual Determination of Emissions Opacity
AA-100 (Facility-Wide)	40 CFR 63.11519(c)(1) - (4),(11) – (14), Subpart XXXXXX	5.8	MFHAPs	Recordkeeping

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 Point AA-100 (Facility-Wide), the permittee shall maintain sufficient records to document the following information:

- (a) The quantity and identification of each coating, adhesive, solvent, or other VOC- or HAP-containing material used on a monthly basis and on a rolling 12-month total basis;

- (b) The VOC and HAP weight content of each coating, adhesive, solvent or other VOC or HAP containing material used. A description of the method used to determine the VOC and HAP content shall accompany this data; and
- (c) The density of each coating, adhesive, solvent or other VOC- or HAP-containing material;
- (d) The total VOC emission rate, the emission rate of each individual HAP, and the total HAP emission rate in tons both on a monthly basis and on a rolling 12-month total basis.

The permittee may utilize data supplied by the manufacturer or analysis of VOC and HAP content by EPA Test Method 24 (found in Appendix A of 40 CFR Part 60) and/or EPA Test Method 311 (found in Appendix A of 40 CFR Part 63), respectively.

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

5.3 For Emission Point AA-100 (Facility-Wide), the permittee shall maintain sufficient records to document the following information:

- (a) The quantity of each PM₁₀ / PM_{2.5} producing material, which may include (but is not limited to) abrasive blasting medium, welding wire / electrodes, and coating materials both on a monthly basis and on a rolling 12-month total basis; and
- (b) The total PM₁₀ / PM_{2.5} emission rate (respectively) in tons both on a monthly basis and on a rolling 12-month total basis.

The permittee may utilize data supplied by the manufacturer, or analysis of PM₁₀ / PM_{2.5} emissions by EPA Test Methods 1 through 5 (found in Appendix A of 40 CFR Part 60) and/or an alternate EPA-approved test method(s).

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

5.4 For Emission Points AA-002, AA-003, and AA-005, a visual determination of fugitive emissions must be performed in accordance with the procedures of EPA Test Method 22 (found in Appendix A-7 of 40 CFR Part 60). The permittee must conduct the EPA Test Method 22 test while each noted operation is performed under normal conditions. The duration of each EPA Test Method 22 test must be at least fifteen (15) minutes, and visible emissions will be considered to be present if they are detected for more than six (6) minutes of the 15-minute period.

(Ref.: 40 CFR 63.11517(a), Subpart XXXXXX)

5.5 For Emission Points AA-002, AA-003, and AA-005, the visual determinations of fugitive emissions must be performed in accordance with Condition 5.4 and the following schedule:

- (a) *Daily Method 22 Testing*: Perform visual determination of fugitive emissions once per day, on each day the process is in operation, during operation of the process.
- (b) *Weekly Method 22 Testing*: If no visible fugitive emissions are detected in consecutive daily EPA Test Method 22 tests, performed in accordance with paragraph (a) above for ten (10) days of work day operation of the process, the permittee may decrease the frequency of EPA Test Method 22 testing to once every five (5) days of operation of the process (i.e. one calendar week). If visible fugitive emissions are detected during these tests, the permittee must resume EPA Test Method 22 testing of that operation once per day during each day that the process is in operation in accordance with paragraph (a) above.
- (c) *Monthly Method 22 Testing*: If no visible fugitive emissions are detected in four (4) consecutive weekly EPA Test Method 22 tests performed in accordance with paragraph (b) above, the permittee may decrease the frequency of EPA Test Method 22 testing to once per twenty-one (21) days of operation of the process (i.e. one calendar month). If visible fugitive emissions are detected during these tests, the permittee must resume weekly EPA Test Method 22 in accordance with paragraph (b) above.
- (d) *Quarterly Method 22 Testing*: If no visible fugitive emissions are detected in three (3) consecutive monthly EPA Test Method 22 tests performed in accordance with paragraph (c) above, the permittee may decrease the frequency of EPA Method 22 testing to once per sixty (60) days of operation of the process (i.e. 3 calendar months). If visible fugitive emissions are detected during these tests, the permittee must resume monthly EPA Method 22 in accordance with paragraph (c) above.

(Ref.: 40 CFR 63.11517(b), Subpart XXXXXX)

- 5.6 For Emission Points AA-003 and AA-005, visual determination of emissions opacity for tier 2 or 3 must be performed in accordance with the procedures of EPA Method 9, of 40 CFR part 60, Appendix A-4, and while the affected source is operating under normal conditions. The duration of the EPA Method 9 test shall be thirty minutes.

(Ref.: 40 CFR 63.11517(c), Subpart XXXXXX)

- 5.7 For Emission Points AA-003 and AA-005, the permittee must perform visual determination of emissions opacity in accordance with Condition 5.6 and the following schedule:

- (a) *Daily Method 9 testing for welding, Tier 2 or 3*: Perform visual determination of emissions opacity once per day during each day that the process is in operation.
- (b) *Weekly Method 9 testing for welding, Tier 2 or 3*: If the average of the six-minute opacities recorded during any of the daily consecutive EPA Test Method 9 tests performed in accordance with paragraph (a) above does not exceed 20 percent for ten (10) days of operation of the process, the permittee may decrease the frequency of

EPA Test Method 9 testing to once per five (5) days of consecutive work day operation. If opacity greater than 20 percent is detected during any of these tests, the permittee must resume testing every day of operation of the process in accordance with the requirements of paragraph (a) above.

- (c) *Monthly Method 9 testing for welding Tier 2 or 3:* If the average of the six-minute opacities recorded during any of the consecutive weekly EPA Test Method 9 tests performed in accordance with paragraph (b) above does not exceed 20 percent for four consecutive weekly tests, the permittee may decrease the frequency of EPA Test Method 9 testing to once per every twenty-one (21) days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any monthly test, the permittee must resume testing every five days of operation of the process in accordance with the requirements of paragraph (b) above.
- (d) *Quarterly Method 9 testing for welding Tier 2 or 3:* If the average of the six minute opacities recorded during any of the consecutive weekly EPA Test Method 9 tests performed in accordance with paragraph (c) above does not exceed 20 percent for three consecutive monthly tests, the permittee may decrease the frequency of EPA Test Method 9 testing to once per every one hundred twenty (120) days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any quarterly test, the permittee must resume testing every 21 days (i.e. one month) of operation of the process according to the requirements of paragraph (c) above.
- (e) *Return to Method 22 testing for welding, Tier 2 or 3:* If, after two (2) consecutive months of testing, the average of the six minute opacities recorded during any of the monthly EPA Test Method 9 tests performed in accordance with paragraph (c) above does not exceed 20 percent, the permittee may resume EPA Test Method 22 testing as in paragraphs Condition 5.5(c) and (d). In lieu of this, the permittee may elect to continue performing EPA Test Method 9 tests in accordance with paragraphs (c) and (d) above.

(Ref.: 40 CFR 63.11517(d), Subpart XXXXXX)

5.8 For Emission Point AA-100 (Facility-Wide), the permittee must keep records of the information specified below in accordance with Condition 5.1:

- (a) Each notification and report that the permittee submitted to comply with Subpart XXXXXX, and the documentation supporting each notification and report;
- (b) Records of the applicability determinations, listing equipment included in its affected source, as well as any changes to that and on what date they occurred, must be maintained for five (5) years and be made available for inspector review at any time;
- (c) Records of the date and results of every visual determination of fugitive emissions; a description of any corrective action taken subsequent to the test; and the date and results of any follow-up visual determination of fugitive emissions performed after the corrective actions;

- (d) Records of the date of every visual determination of emissions opacity; and the average of the six-minute opacities measured by the test; and a description of any corrective action taken subsequent to the test;
- (e) Maintain a record of the manufacturer's specifications for the control devices used to comply with Section 4;
- (f) Maintain a record of each visual determination of emissions opacity performed during the preparation (or revision) of a Site-Specific Welding Emissions Management Plan;
- (g) Maintain a copy of the current Site-Specific Welding Emissions Management Plan and it must be readily available for inspector review;
- (h) If the permittee complies with this subpart by operating any equipment according to manufacturer's instruction, the permittee must keep these instructions readily available for inspector review; and
- (i) If the permittee is not required to comply with the requirements of Condition 4.7 because the facility uses less than 2,000 pounds per year of welding rod (on a rolling 12-month basis), the permittee must maintain records demonstrating the welding rod usage on a rolling 12-month basis.

(Ref.: 40 CFR 63.11519(c)(1) - (4), (11) - (14), Subpart XXXXXX)

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
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.2	Submit Certified Annual Monitoring Report
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.3	All Documents Submitted to the MDEQ Shall be Certified by a Responsible Official
	40 CFR 63.11519(b), Subpart XXXXXX	6.4	Submit Annual Monitoring Report

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 Except as otherwise specified herein, the permittee shall submit a certified annual 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 Section 6 of this permit. All instances of deviations from permit requirements must be clearly identified in the report. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration. This report shall provide the information outlined in Conditions 5.2 and 5.3 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).)

6.4 For Emission Point AA-100 (Facility-Wide), the permittee shall submit an annual certification and compliance report for each affected operation covered under Subpart XXXXXX. The report is due annually by January 31st for the preceding calendar year. This report shall provide the following information:

- (a) Company name and address;
- (b) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report; and
- (c) Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31st. Note that the information reported for the twelve (12) months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
- (d) The information specified in Condition 5.8(c) and (d).
- (e) As required by Condition 4.7(e)(1), the permittee must prepare an exceedance report whenever the average of the six-minute average opacities recorded during a visual determination of emissions opacity exceeds 20 percent. This report must be submitted along with the annual certification and compliance report and must contain the date on which the exceedance occurred and the average of the six-minute average opacities recorded during the visual determination of emissions opacity.
- (f) The permittee must submit a copy of the records of daily visual determinations of emissions recorded in accordance with Condition 4.7(e)(4), and a copy of the Site-Specific Welding Emissions Management Plan and any subsequent revisions to the plan in accordance with Condition 4.7(f), along with the annual certification and compliance report.

(Ref.: 40 CFR 63.11519(b), Subpart XXXXXX)