

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

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

THIS CERTIFIES THAT

**C. L. Dews and Sons Foundry and Machinery Company, Inc.
1600 Edwards Street
Hattiesburg, Forrest 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: October 5, 2021

Permit No.: 0800-00008

Effective Date: As Specified Herein.

Modified: November 8, 2022

Expires: September 30, 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 (MDEQ) 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 MDEQ Office of Pollution Control.

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

10. 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).)

11. 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
 - (1) 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 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 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 – “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 – 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 (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) For an upset, 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 in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) Start-ups and shutdowns are part of normal source operation. Emission limitations apply during start-ups 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 start-ups and shutdowns are subject to the requirements prescribed in Mississippi Administrative Code, Title 11, Part 2, Rule 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 (as applicable):

- (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-000	Facility-Wide (C. L. Dews and Sons Foundry and Machinery Company, Inc.)
AB-001	3.0 MMBTU / Hour Heat Treating Furnace No. 1
AB-002	3.0 MMBTU / Hour Heat Treating Furnace No. 2
AB-003	0.4 MMBTU / Hour Natural Gas-Fired Ladle Pre-Heater
AB-004	Five (5) Natural Gas-Fired Space Heaters (No. 8 – No. 12; total heat input: 0.00023 MMBTU / hour)
AC-001	Welding and Machinery Operations
AC-002	Steel Shot Blasting Operations [emissions are controlled by one (1) baghouse]
AC-004	Grinding Building
AC-005	Machining and Tooling Operations
AC-006	Wood Working Operations
AC-007a	Electric Induction Furnace No. 1
AC-007b	Electric Induction Furnace No. 2
AC-008	Sand Reclamation Operations [sand is recovered from Foundry Operations and stripped of binder material; emissions are controlled by a baghouse]
AC-011	Foundry Operations
AC-012	Sand Blasting Operations [intermittent; conducted outside]
AC-013	500-Gallon Diesel Storage Tank
AC-014a	Surface Coating Operations (Small)
AC-014b	Surface Coating Operations (Large)

SECTION 3
EMISSION LIMITATIONS AND STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limitation / Standard
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity (smoke)	40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2	Opacity	
	11 Miss. Admin. Code Pt. 2, R. 1.3.C.	3.3	All Pollutants	General Nuisance Clause
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). <i>(Major Source Avoidance Limits)</i>	3.4	HAPs	9.0 tpy (Individual) 24.0 tpy (Total) (12-Month Rolling Totals)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). <i>(Title V Avoidance Limits)</i>	3.5	VOCs	99.0 tpy (12-Month Rolling Total)
	40 CFR Part 63, Subpart ZZZZZ – National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries Area Sources 40 CFR 63.10880(a) and (b)(1), Subpart ZZZZZ	3.6	HAPs	General Applicability
	40 CFR 63.10881(d)(1)(i) and 63.10890(h), Subpart ZZZZZ	3.7		Large Foundry Applicability
AB-001 through AB-004	11 Miss. Admin. Code Pt. 2, R. 1.3.D.(1)(a).	3.8	PM	0.6 Pounds / MMBTU per Hour
AC-002 AC-008	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.9	PM ₁₀ / PM _{2.5}	Operational Requirement
AC-012	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.10	PM / PM ₁₀	Operational Requirement

3.1 For Emission Point AA-000 (Facility-Wide), except as otherwise specified herein, the permittee shall not cause or allow the emission of smoke from a point source into the open air that exceeds forty percent (40%) opacity from any process on-site.

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

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

- 3.2 For Emission Point AA-000 (Facility-Wide), unless otherwise specified herein, the permittee shall not discharge into the ambient (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.)

- 3.3 For Emission Point AA-000 (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.

Additionally, the permittee shall not cause 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 that from which it originated or to violate any other provision of this regulation, the MDEQ 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 Points AA-000 (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 based on a rolling 12-month total and no more than 24.0 tpy of all HAPs in total based on a rolling 12-month total.

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

- 3.5 For Emission Point AA-000 (Facility-Wide), the permittee shall limit the emission of volatile organic compounds (VOCs) to no more than 99.0 tons per year (tpy) for based on a 12-month rolling total.

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

- 3.6 For Emission Point AA-000 (Facility-Wide), the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 63, Subpart ZZZZZ – National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries Area Sources.

For the purpose of this permit, the permittee is an area source of hazardous air pollutants (HAPs) that operates as an “existing small foundry”.

(Ref.: 40 CFR 63.10880(a) and (b)(1), Subpart ZZZZZ)

- 3.7 For Emission Point AA-000 (Facility-Wide), if the annual metal melt production exceeds 20,000 tons during the preceding calendar year, the permittee shall comply with the requirements applicable to a large foundry no later than two (2) years after notifying the MDEQ (as required by Condition 6.5) that the annual metal melt production exceeded 20,000 tons.

If the permittee is reclassified as a large foundry, the permittee shall comply with the applicable requirements for a large foundry for at least three (3) years before potentially reclassifying as a small foundry (even if the annual metal melt production falls under 20,000 tons). After 3 years, the permittee may classify as a small foundry provided the annual metal melt production for the preceding calendar year was 20,000 tons or less.

If permittee reclassifies as a small foundry, the permittee shall submit a notification in accordance with Condition 6.5 and shall comply with the applicable requirements for a small foundry no later than the date of the notification. However, if the annual metal melt production exceeds 20,000 tons during a subsequent year, the permittee shall submit a notification in accordance with Condition 6.5 and shall comply with the applicable requirements for a large foundry no later than the date of notification.

(Ref.: 40 CFR 63.10881(d)(1)(i), (2), and 63.10890(h), Subpart ZZZZZ)

- 3.8 For Emission Points AB-001 through AB-004, except as otherwise specified or limited herein, the maximum emission of ash and/or particulate matter (PM) from each furnace or heater unit 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).)

- 3.9 For Emission Points AC-002 and AC-008, the permittee shall operate each baghouse at all times during active associated operations to minimize the emission of filterable particulate matter. If the event that a baghouse malfunctions or becomes non-operational, the permittee shall cease activity at the applicable operation until the baghouse returns to service.

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

- 3.10 For Emission Point AC-012, the permittee shall limit conducting sand blasting operations outside of a building to no more than eight hundred (800) hours per year based on a 12-month rolling total.

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

SECTION 4 WORK PRACTICE STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Work Practice
AA-000 (Facility-Wide)	40 CFR 63.10885(a), Subpart ZZZZ	4.1	HAPs	Metallic Scrap Management Program
	40 CFR 63.10886, Subpart ZZZZZ	4.2		Binder Chemical Formulation Requirement

4.1 For Emission Point AA-000 (Facility-Wide), the permittee shall adhere to the following work practices to minimize the emission of HAPs:

- (a) *Metallic scrap management program*: For each segregated metallic scrap storage area, bin, or pile, the permittee shall comply with the materials acquisition requirements outlined in either paragraph (1) or (2) of this condition. The permittee must keep a copy of the material specifications on-site and readily available to all personnel with material acquisition duties, and provide a copy to each of the permittee’s scrap providers.

The permittee may have certain scrap subject to paragraph (a)(1) and other scrap subject to paragraph (a)(2) provided the metallic scrap remains segregated until charge make-up.

- (1) *Restricted metallic scrap*: The permittee shall prepare and operate at all times in accordance with written material specifications for the purchase and use of only metal ingots, pig iron, slitter, or other materials that do not include post-consumer automotive body scrap, post-consumer engine blocks, post-consumer oil filters, oily turnings, lead components, chlorinated plastics, or free liquids.

For the purpose of this permit, “free liquids” is defined as any material that fails the paint filter test outlined in EPA Test Method 9095B [“Paint Filter Liquids Test” (revision 2), November 2004]. The requirements for no free liquids do not apply if the permittee can demonstrate that the free liquid is water that resulted from scrap exposure to rain. Any post-consumer engine blocks, post-consumer oil filters, or oily turnings that are processed and/or cleaned (to the extent practicable) such that the materials do not include lead components, mercury switches, chlorinated plastics, or free organic liquids can be included in this certification.

- (2) *General iron and steel scrap*: The permittee shall prepare and operate at all times in accordance with written material specifications for the purchase and use of only iron and steel scrap that has been depleted (to the extent practicable) of organics and metal HAPs in the charge materials used by the iron and steel

foundry. The materials specifications must include (at a minimum) the following information (as applicable):

- (i) Except as provided in sub-paragraph (a)(2)(ii), specifications for metallic scrap materials charged to a scrap preheater or metal melting furnace to be depleted (to the extent practicable) of the presence of used oil filters, chlorinated plastic parts, accessible lead-containing components (such as batteries and wheel weights), and a program to ensure the scrap materials are drained of free liquids.
- (ii) For scrap charged to a cupola metal melting furnace that is equipped with an afterburner, specifications for metallic scrap materials to be depleted (to the extent practicable) of the presence of chlorinated plastics, accessible lead-containing components (such as batteries and wheel weights), and a program to ensure the scrap materials are drained of free liquids.

(Ref.: 40 CFR 63.10885(a), Subpart ZZZZZ)

- 4.3 For Emission Point AA-000 (Facility-Wide), , the permittee shall use a binder chemical formulation that does not use methanol as a specific ingredient of the catalyst formulation for each furfuryl alcohol warm box mold or core making line. However, this requirement does not apply to the resin portion of the binder system.

(Ref.: 40 CFR 63.10886, Subpart ZZZZZ)

SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Monitoring / Recordkeeping Requirement
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain Records For a Minimum of Five (5) Years.
	40 CFR 63.10885(b)(4) and 63.10886, Subpart ZZZZZ	5.2	HAPs	Recordkeeping Requirements
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.3	VOCs	Calculate and Record Emissions (Monthly and 12-Month Rolling Total)
		5.4	HAPs	Monitor Surface Coating Usage and Specifications (Monthly)
AC-001	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.5	HAPs	Monitor the Amount of Iron Produced and Welding Electrode / Medium Consumed
AC-002 AC-008	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.6	PM / PM ₁₀ / PM _{2.5}	Perform an Inspection of Each Baghouse Weekly
		5.7	Opacity	Perform a Visual Emissions Observation Weekly
AC-008	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.8	PM / PM ₁₀ / PM _{2.5}	Monitor the Pressure Drop Across the Baghouse Weekly
AC-012	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.9	PM / PM ₁₀ / PM _{2.5}	Monitor the Hours of Sand Blasting Outside

5.1 For Emission Point AA-000 (Facility-Wide), 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-000 (Facility-Wide), the permittee shall record and maintain records on the following items:

- (a) Documentation supporting the initial notification of applicability and the notification of compliance status.
- (b) Documentation for all written materials specifications.
- (c) Documentation that demonstrates compliance with the requirements for restricted metallic scrap and/or for the use of general scrap.

- (d) Documentation that demonstrate the scrap does not contain motor vehicle scrap;
- (e) Documentation that demonstrates the binder chemical formulation does not contain methanol as a specific ingredient for the catalyst formulation for each furfuryl alcohol warm box or core making line. These records shall be the material safety data sheet (provided that it contains the appropriate information), a certified product data sheet, or a manufacturer's HAP data sheet.
- (f) Documentation that demonstrates the annual quantity and composition of each HAP-containing chemical binder or coating material used to make molds and cores. These records shall be copies of purchasing records, material safety data sheets, or other documentation that provides information on the binder or coating materials used.
- (g) Documentation that demonstrates the metal melt production for each calendar year.
- (h) Documentation that certifies scrap does not contain motor vehicle scrap for each scrap provider, contract, or shipment.

(Ref.: 40 CFR 63.10885(b)(4) and 63.10886, Subpart ZZZZZ)

- 5.3 For Emission Point AA-000 (Facility-Wide), the permittee shall calculate and record the respective emission of VOCs, each individual HAP, and all HAPs in total in tons both on a monthly and rolling 12-month total basis.

Unless otherwise specified herein, the permittee shall maintain records of all reference data utilized to validate calculated emissions (i.e. operational data, the applicable emission factors presented in the corresponding application and engineering judgement determinations).

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

- 5.4 For Emission Point AA-000 (Facility-Wide), the permittee shall monitor and maintain the following information for each coating, adhesive, solvent, or other VOC- or HAP-containing material used on a monthly basis:

- (a) The product name or identification;
- (b) The quantity (in gallons);
- (c) The VOC content and the individual HAP content by weight. The permittee may utilize data supplied by the either the manufacturer or an analysis of VOC / HAP content as outlined in an applicable EPA test method (i.e. EPA Test Method 24, EPA Test Method 311, and/or an alternative EPA-approved test method); and
- (d) The density (in pounds per gallon).

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

- 5.5 For Emission Point AC-001, the permittee shall monitor and maintain the amount (in pounds) and type of each welding electrode and/or medium consumed on a monthly basis. The permittee shall also maintain documentation for each welding electrode and/or medium that details the individual metal HAP content.

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

- 5.6 For Emission Points AC-002 and AC-008, the permittee shall perform an inspection that evaluates the performance capability of each baghouse on a weekly basis. If a problem is noted during an inspection, the permittee shall perform the necessary maintenance to ensure operation as originally designed. Additionally, the permittee shall maintain on-site (to the extent practicable) sufficient components as is necessary to repair a baghouse.

The permittee shall maintain documentation that details the date / time of each inspection the results of each inspection, any problem that is experienced, any maintenance (either corrective or preventative) performed to return a baghouse to operation as originally designed, and the duration in which a baghouse is non-operational due to malfunction.

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

- 5.7 For Emission Points AC-002 and AC-008, the permittee shall perform a visual emissions observation in accordance with EPA Test Method 22 on the exhaust of each baghouse on a weekly basis. Each observation shall be conducted for a period of six (6) consecutive minutes during daylight hours and during representative operating conditions.

If visible emissions are detected during an observation, the permittee shall immediately perform a visible emissions evaluation (VEE) in accordance with EPA Test Method 9. In the event that a VEE is required but cannot be conducted, the permittee shall record a written explanation as to why it was not possible to perform the VEE.

The permittee shall maintain documentation that details the date and time of each observation / evaluation, the full name (in print) of the individual conducting the observation / evaluation, the information specified by EPA Test Method 22 and/or EPA Test Method 9, the results of each observation / evaluation, and any corrective actions taken to prevent or minimize emissions as a result of an evaluation.

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

- 5.8 For Emission Point AC-008, the permittee shall monitor and record the differential pressure drop (in inches of water) across each baghouse during active corresponding operations weekly. If a monitored recording is outside the differential pressure drop range outlined by the manufacturer's specifications / recommendations, the permittee shall perform and record necessary maintenance to return the baghouse to normal operation.

Additionally, the permittee shall maintain documentation for each baghouse that details the recommended differential pressure drop range specified by the respective manufacturer.

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

- 5.8 For Emission Points AC-002 and AC-008, the permittee shall perform weekly a visual emissions observation in accordance with EPA Test Method 22. Each observation shall be conducted for a period of six (6) consecutive minutes during daylight hours and during representative operating conditions.

If visible emissions are detected during an observation, excluding condensed water vapor, the permittee shall immediately perform a visible emissions evaluation (VEE) in accordance with EPA Test Method 9. In the event that a VEE is required but cannot be conducted, the permittee shall record a written explanation as to why it was not possible to perform the VEE.

The permittee shall maintain all documentation and information specified by EPA Test Method 22 and/or EPA Test Method 9, any corrective actions taken to prevent or minimize emissions as a result of the evaluation, and the date / time when each observation / evaluation was conducted

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

- 5.9 For Emission Point AC-012, the permittee shall monitor and maintain the hours in which sand blasting operations are performed outside of a building on a monthly basis.

(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-000 (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 MDEQ Shall be Certified By a Responsible Official
	40 CFR 63.10881(d)(1), Subpart <i>ZZZZZ</i>	6.4	Reporting Requirements

6.1 For Emission Point AA-000 (Facility-Wide), 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 (AMR) postmarked no later than January 31 of each year for the preceding calendar year. If the permit was reissued or modified during the course of the preceding calendar year, the AMR shall address each version of 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.

Each AMR shall contain the following information (at a minimum):

- (a) For each coating, adhesive, solvent, or other VOC- or HAP-containing material used in a rolling 12-month total basis:
 - (1) The product name or identification;
 - (2) The VOC and/or HAP content (in weight percent);
 - (3) The total volume used (in gallons);
 - (4) The density (in pounds per gallon)

- (b) The total emission of VOCs, each individual HAP, and all HAPs in total in tons on both a monthly and rolling 12-month total basis;
- (c) The amount (in tons) of iron produced on both a monthly and total calendar year basis;
- (d) The number of hours in which sand blasting operations are performed outside of a building on both a monthly and rolling 12-month total basis;
- (e) The amount (in pounds), type, and HAP content (in weight percent) of each welding electrode and/or medium consumed on both a monthly and rolling 12-month total basis;
- (f) Any occurrence when a required visible emission evaluation (VEE) was not conducted and an explanation as to why each VEE was not performed; and
- (g) Any maintenance action(s) performed on a baghouse and any periods of time (including date and duration) in which a baghouse was non-operational.

(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-000 (Facility-Wide), the permittee shall submit a notification to the MDEQ on the reclassification of the foundry (i.e. from “small to “large” or from “large to small”) within thirty (30) days after meeting the noted thresholds specified in Condition 3.7.

(Ref.: 40 CFR 63.10881(d)(1) and (2), Subpart ZZZZZ)