STATE OF MISSISSIPPI
AND FEDERALLY ENFORCEABLE
AIR POLLUTION CONTROL

PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT AT A SYNTHETIC MINOR SOURCE

THIS CERTIFIES THAT

Future Foam Inc
1665 South Veterans Boulevard
Tupelo, Mississippi
Lee County

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with the Federal Clean Air Act and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. 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

Becky Simonson

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: December 29, 2023
Modified: April 15, 2025 **Permit No.: 1540-00046**

Effective Date: As specified herein.

Expires: November 30, 2028

Section 1.

A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only.

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

2. This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.4.D.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.4.D.)

3. Any activities not identified in the application are not authorized by this permit.

   (Ref.: Miss. Code Ann. 49-17-29 1.b)

4. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)

5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.

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

6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.

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

7. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

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

8. The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:

a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and

b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission.

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

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

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

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

a. Routine maintenance, repair, and replacement;

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

c. Use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;

d. Use of an alternative fuel or raw material by a stationary source which:

(1) The source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, or 40 CFR 51.166; or

(2) The source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, or 40 CFR 51.166;

e. An increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I or 40 CFR 51.166; or

f. Any change in ownership of the stationary source.

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

B. GENERAL OPERATIONAL CONDITIONS

1. Should the Executive Director of the Mississippi Department of Environmental Quality 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 Regulation, 11 Miss. Admin. Code Pt. 2, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared.

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

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

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

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

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

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

   a. Upsets

(1) For an upset defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:

(i) An upset occurred and that the source can identify the cause(s) of the upset;

(ii) The source was at the time being properly operated;

(iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;

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

(1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.

(2) Where the source is unable to comply with existing emission limitations

established under the State Implementation Plan (SIP) and defined in this regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).

(3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

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

5. Compliance Testing: Regarding compliance testing:

a. The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.

b. Compliance testing will be performed at the expense of the permittee.

c. Each emission sampling and analysis report shall include but not be limited to the following:

(1) Detailed description of testing procedures;

(2) Sample calculation(s);

(3) Results; and

(4) Comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

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

C. PERMIT RENEWAL / MODIFICATION / TRANSFER / TERMINATION

1. For renewal of this permit, the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board. If the applicant submits a timely and complete application pursuant to this paragraph and the Permit Board, through no fault of the applicant, fails to act on the application on or before the expiration date of the existing permit, the applicant shall continue to operate the stationary source under the terms and conditions of the expired permit, which shall remain in effect until final action on the application is taken by the Permit Board. Permit expiration terminates the

source's ability to operate unless a timely and complete renewal application has been submitted.

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

2. The permittee shall furnish to MDEQ within a reasonable time any information MDEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to MDEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to MDEQ along with a claim of confidentiality. 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	Facility Reference	Description
AA-000	----	Flexible Polyurethane Foam Facility – Subject to MACT OOOOOO
AA-004	----	Slabstock Flexible Polyurethane Foam Production Line: Includes all portions of the flexible polyurethane foam process from the mixhead to the point in the process where the foam is completely cured.
AA-008	SW-08	23,689-gallon Polyol Fixed Roof Storage Tank Maximum true vapor pressure less than 15 kPa (2.18 psia) Construction Date: 1991
AA-010	SW-11	23,689-gallon Toluene Diisocyanate (TDI) Fixed Roof Storage Tank equipped with Carbon Adsorption Maximum true vapor pressure less than 15 kPa (2.18 psia) Construction Date: 1980
AA-011	SW-12	23,689-gallon TDI Fixed Roof Storage Tank equipped with Carbon Adsorption Maximum true vapor pressure less than 15 kPa (2.18 psia) Construction Date: 1980
AA-018	----	Flexible Polyurethane Fabrication gluing and bonding operations. Fabricated pieces of foam are glued together at one (1) open-sided gluing station. Uses non-VOC/HAP adhesives.
AA-022 AA-023 AA-024 AA-025 AA-026	SE-01 SE-02 SE-03 SE-04 SE-05	Five (5) 13,965-gallon TDI Fixed Storage Tanks equipped with Carbon Adsorption
AA-030	----	3.2 MMBTU/hr Natural gas-fired curing oven from Fiber Line process
AA-031	----	300 hp Diesel Fired (CI) Emergency Fire Pump – Manufacturing in 2003. Subject to MACT ZZZZ.
AA-032	----	Fiber Manufacturing Line equipped with a Dust Collection System
AA-033	----	Welding Operations (Maintenance)
AA-034	----	Foam Ink Marking Operations
AA-035	----	Parts Washing Operations
AA-036	----	4.185 MMBTU/hr Natural gas-fired Boiler
AA-037	----	One (1) 0.144 MMBtu/hr Natural gas-fired Space Heater
AA-038	----	Four (4) 0.15 MMBtu/hr Natural gas-fired Space Heaters

Emission Point	Facility Reference	Description
AA-039	SW-01 SW-02 SW-03	Three (3) 23,689-gallon Polyol Fixed Roof Storage Tank Maximum true vapor pressure less than 15 kPa (2.18 psia) Constructed/Modification Date: Prior to 1984
AA-041	SW-05	14,529-gallon Polyol Fixed Roof Storage Tank
AA-042	SW-06	23,689-gallon Polyol Fixed Roof Storage Tank Maximum true vapor pressure less than 15 kPa (2.18 psia) Construction Date: 1980
AA-043	SW-07	6,332-gallon TDI, Methylene Diphenyl Diisocyanate (MDI), Polyol, Mineral Oil, or Additive Storage Tank
AA-044	SW-13	1,176-gallon Hot Water Storage Tank
AA-045	SW-14	1,176-gallon Cold Water Storage
AA-046	SE-06	7,382-gallon TDI, MDI, Polyol, Mineral Oil, or Additive Storage Tank
AA-047	SE-10	6,758-gallon Polyol Storage Tank
AA-048	LG SE-01	30,469-gallon Polyol Fixed Roof Storage Tank Maximum true vapor pressure less than 15 kPa (2.18 psia) Construction Date: 2021
AA-049	LG SE-02 LG SE-03 LG SE-04 LG SE-05 LG SE-06 LG SE-07 LG SE-08 LG SE-11 LG SE-12 LG SE-13 LG SE-14 LG SE-15 LG SE-16 LG SE-19 LG SE-20 LG SE-21 LG SE-22 LG SE-23 LG SE-24	Nineteen (19) 30,469-gallon Polyol Fixed Roof Storage Tanks Maximum true vapor pressure less than 15 kPa (2.18 psia) Construction Date: 2021
AA-050	LG SE-09 LG SE-10	Two (2) 30,469-gallon Polyol Fixed Roof Storage Tanks Maximum true vapor pressure less than 15 kPa (2.18 psia) Construction Date: 2021
AA-051	LG SE-17 LG SE-18	Two (2) 30,469-gallon Polyol Fixed Roof Storage Tanks Maximum true vapor pressure less than 15 kPa (2.18 psia) Construction Date: 2021

Emission Point	Facility Reference	Description
AA-052	LG SE-25 LG SE-26 LG SE-34	Three (3) 30,469-gallon MDI Fixed Roof Storage Tanks Controlled by Three (3) Carbon Adsorption Drums Maximum true vapor pressure less than 15 kPa (2.18 psia) Construction Date: 2021
AA-053	LG SE-33	21,151-gallon MDI Storage Tank (Process) Controlled by Carbon Adsorption Drum Maximum true vapor pressure less than 15 kPa (2.18 psia) Construction Date: 2021
AA-054	LG SE-27 LG SE-28 LG SE-29 LG SE-30 LG SE-31 LG SE-32 LG SE-35 LG SE-36 LG SE-37 LG SE-38 LG SE-39 LG SE-40	Twelve (12) 30,469-gallon TDI Fixed Roof Storage Tanks Controlled by Four (4) Carbon Adsorption Drums Maximum true vapor pressure less than 15 kPa (2.18 psia) Construction Date: 2021
AA-055	----	3.2 MMBtu/hr Natural gas-fired Curing Oven
AA-056	----	Fiber Manufacturing Line Controlled by Dust Collection System
AA-058	----	Two (2) 0.25 MMBtu/hr Natural gas-fired HVAC Units
AA-059	----	124.07 hp (0.32 MMBtu/hr) Emergency Generator Natural gas-fired Spark Ignition 4-Stroke Reciprocating Internal Combustion Engine with Controller Manufactured Date: After January 1, 2009 EPA Certified Engine
AA-060	SM SE-01	1,435-gallon Polyol/Additive Fixed Roof Storage Tank Maximum true vapor pressure less than 15 kPa (2.18 psia) Construction Date: 2000

SECTION 3
EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limitation/Standard
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 1.3.A and B.	3.1	Opacity	≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.2	PM (Filterable Only)	$E = 4.1 \times p^{0.67}$
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.3	VOC	≤ 99.0 tons/year
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.4	Individual HAP	≤ 9.0 tons/year
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.5	Total HAP	≤ 24.0 tons/year
	40 CFR 63, Subpart OOOOOO -- National Emission Standards for Hazardous Air Pollutants for Polyurethane Foam Production and Fabrication Area Sources 40 CFR 63.11414(a), (b)(1) and (4), and (c) and 40 CFR 63.11415(a) and (b)	3.6	HAP	Applicability
	40 CFR 63.11416(b) and (e), Subpart OOOOOO	3.7	Methylene Chloride	No Methylene Chloride allowed
AA-004	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.8	VOC/HAP	Prohibited from using VOC or HAP as a blowing agent
AA-030 AA-031 AA-036 AA-037 AA-038 AA-055 AA-058 AA-059	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.9	PM (Filterable Only)	≤ 0.6 lb/MMBTU
AA-030 AA-036 AA-037 AA-038 AA-055 AA-058	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.10	SO_2	≤ 4.8 lb/MMBTU
AA-031 AA-059	40 CFR 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines) 40 CFR 63.6580, 63.6585(a), (c) and 63.6590(a)(1)(iii), 63.6590(a)(2)(iii), 63.6590(c)(1), Subpart ZZZZ	3.11	HAP	Applicability

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limitation/Standard
AA-031	40 CFR 63.6603(a) and 63.6625(i) and Item 4 of Table 2d, Subpart ZZZZ	3.12	Work Practice Standards	Change oil and filter every 500 hours of operation or annually, whichever comes first. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
AA-031	40 CFR 63.6604(b), Subpart ZZZZ	3.13	Fuel	Shall use Diesel fuel that meets the requirements in 40 CFR 1090.305 for non-road diesel.
	40 CFR 63.6605, Subpart ZZZZ	3.14	General Requirements	Compliance at all times
			Good Air Pollution Control Practices	Operate and maintain the engines in a manner consistent with safety and good air pollution control practices for minimizing emissions.
	40 CFR 63.6625(e)(3), Subpart ZZZZ	3.15	General Requirements	Operate according to manufacturer's emission-related written instructions or develop maintenance plan
	40 CFR 63.6625(f), Subpart ZZZZ	3.16	Hours of Operation	Install a non-resettable hour meter
	40 CFR 63.6640(f)(1), (2), and (4), Subpart ZZZZ	3.17	Hours of Operations	Emergency Use Standards
AA-059	40 CFR 60, Subpart JJJJ (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines) 40 CFR 60.4230(a)(4)(iv), Subpart JJJJ	3.18	NO_x CO VOC	Applicability
	40 CFR 60.4233(d), Table 1 and 60.4234, Subpart ZZZZ	3.19	NO_x + HC	Emissions shall not exceed 10 g/HP-hr
			CO	Emissions shall not exceed 387 g/HP-hr
	40 CFR 60.4237(c), Subpart JJJJ	3.20	Hours of Operation	Install and Maintain a Non-resettable Hour Meter
	40 CFR 60.4243(b)(1), Subpart JJJJ	3.21	Operations	Purchase a Certified Engine
	40 CFR 60.4243(d), Subpart JJJJ	3.22	Hours of Operation	Emergency Use Standards

3.1 For the entire facility, the permittee shall not cause, permit, or allow emissions of smoke from any point source into the open air from any manufacturing, industrial, commercial

or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) and (b).

(a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups 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 60% 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 hour.

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

3.2 For the entire facility, no person shall cause, permit, or allow the emission of particulate matter in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship,

$E = 4.1 \times {}^{0.67}$,

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

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

3.3 For the entire facility, the permittee shall limit Volatile Organic Compound (VOC) emissions to no more than 99.0 tons/year as determined for each consecutive 12-month period on a monthly rolling basis.

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

3.4 For the entire facility, the permittee shall limit Individual Hazardous Air Pollutant (HAP) emissions to no more than 9.0 tons/year as determined for each consecutive 12-month period on a monthly rolling basis.

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

3.5 For the entire facility, the permittee shall limit Total Hazardous Air Pollutant (HAP) emissions to no more than 24.0 tons/year as determined for each consecutive 12-month period on a monthly rolling basis.

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

3.6 For the entire facility, the permittee is subject to and shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Polyurethane Foam Production and Fabrication Area Sources (40 CFR 63, Subpart

OOOOOO) and the General Provisions (40 CFR 63, Subpart A). The permittee shall be in compliance at all times.

(Ref.: 40 CFR 63.11414(a), (b)(1) and (4), and (c) and 40 CFR 63.11415(a) and (b), Subpart OOOOOO)

3.7 For the entire facility, the permittee shall not use any material or adhesive that contains methylene chloride at the facility.

(Ref.: 40 CFR 63.11416(b) and (e), Subpart OOOOOO)

3.8 For Emission Point AA-004, the permittee is prohibited from using any VOC or HAP containing blowing agent.

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

3.9 For Emission Points AA-030, AA-031, AA-036, AA-037, AA-038, AA-055, AA-058, and AA-059, the maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations shall not exceed 0.6 pounds per million BTU per hour heat input.

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

3.10 For Emission Points AA-030, AA-036, AA-037, AA-038, AA-055, and AA-058, the maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.

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

3.11 For Emission Points AA-031 and AA-059, the permittee is subject to and shall comply with all applicable requirements of National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) and the General Provisions (40 CFR 63, Subpart A).

Emission Point AA-031 is an existing stationary RICE at an area source of HAP. Emission Point AA-059 is a new emergency stationary RICE and is subject to 40 CFR 60, Subpart JJJJ. Emission Point AA-059 will comply with Subpart ZZZZ by complying with 40 CFR 60, Subpart JJJJ.

(Ref.: 40 CFR 63.6580, 63.6585(a) and (c), 63.6590(a)(1)(iii), 63.6590(a)(2)(iii), 63.6590(c)(1), Subpart ZZZZ)

3.12 For Emission Point AA-031, the permittee shall comply with the management practice requirements below.

(a) Change oil and filter every 500 hours of operation or annually, whichever comes first.

(b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.

(c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement listed above. The oil analysis must be performed at the same frequency specified above for changing the oil. The analysis program shall contain the information contained in 40 CFR 63.6625(i). The permittee shall keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in this condition, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated.

(Ref.: 40 CFR 63.6603(a) and 63.6625(i) and Item 4 of Table 2d, Subpart ZZZZ)

3.13 For Emission Point AA-031, the permittee shall use diesel fuel that meets the requirements in 40 CFR 1090.305 for non-road diesel fuel.

(Ref.: 40 CFR 6604(b), Subpart ZZZZ)

3.14 For Emission Point AA-031, the permittee shall comply with the following:

(a) Be in compliance with the emission limitations, operating limitations, and other requirements in Subpart ZZZZ that apply at all times.

(b) Operate and maintain the engine in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to MDEQ which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(Ref.: 40 CFR 63.6605, Subpart ZZZZ)

3.15 For Emission Point AA-031, the permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to

the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

(Ref.: 40 CFR 63.6625(e)(3), Subpart ZZZZ)

3.16 For Emission Point AA-031, the permittee shall install a non-resettable hour meter if one is not already installed.

(Ref.: 40 CFR 63.6625(f), Subpart ZZZZ)

3.17 For Emission Point AA-031, the permittee shall operate the emergency stationary RICE according to the requirements below. In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year is prohibited.

(a) There is no time limit on the use of emergency stationary RICE in emergency situations.

(b) The permittee shall operate the emergency stationary RICE for any combination of the purposes specified below for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by (c) of this condition counts as part of the 100 hours per calendar year allowed. Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition MDEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.

(c) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(Ref.: 40 CFR 63.6640(f)(1), (2), and (4), Subpart ZZZZ)

3.18 For Emission Point AA-059**,** the permittee is subject to and shall comply with all applicable requirements of the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (40 CFR 60, Subpart JJJJ) and General Provisions (40 CFR 60, Subpart A).

(Ref.: 40 CFR 60.4230(a)(4)(iv), Subpart JJJJ)

3.19 For Emission Point AA-059, the permittee shall limit Nitrogen Oxide plus Hydrocarbon (NO_x + HC) emissions to 10 grams per horsepower-hour (g/HP-hr) and Carbon Monoxide (CO) emissions to 387 g/HP-hr. The permittee shall operate and maintain the stationary SI RICE, so the engine achieves these emission standards over the entire life of the engine.

(Ref.: 40 CFR 60.4233(d), Table 1, and 60.4243, Subpart JJJJ)

3.20 For Emission Point AA-059, the permittee shall install and maintain a non-resettable hour meter upon startup of the emergency engine.

(Ref.: 40 CFR 60.4237(c), Subpart JJJJ)

3.21 For Emission Point AA-059, the permittee shall purchase, operate, and maintain an engine certified to the emissions standards in Condition 3.B.19 (40 CFR 60.4233(d) and Table 1, Subpart JJJJ) for the same engine class and maximum engine power.

(Ref.: 40 CFR 60.4243(b)(1), Subpart JJJJ)

3.22 For Emission Point AA-059, the permittee shall operate the emergency stationary ICE according to the requirements below. In order for the engine to be considered an emergency stationary ICE under 40 CFR 60, Subpart JJJJ, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (a) through (c) below, is prohibited. If the permittee does not operate the engine according to the requirements in paragraphs (a) through (c), the engine will not be considered an emergency engine under 40 CFR 60, Subpart JJJJ and shall meet all requirements for non-emergency engines.

(a) There is no time limit on the use of emergency stationary ICE in emergency situations.

(b) The permittee may operate the emergency stationary ICE for maintenance checks and readiness testing for a maximum of a 100 hours per calendar year, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition MDEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of each engine beyond 100 hours per calendar year.

(c) The permittee may operate the emergency stationary ICE for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing.

(Ref.: 40 CFR 60.4243(d), Subpart JJJJ)

SECTION 4
WORK PRACTICES

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

SECTION 5
MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	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 5 years.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2	VOC/HAP	Monitoring and Recordkeeping for VOC or HAP containing material used
	40 CFR 63.11416(f), Subpart OOOOOO	5.3	HAP	Compliance Demonstration
	40 CFR 63.11417 (a) and (b)(2)-(3), Subpart OOOOOO	5.4		Recordkeeping
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.5	Opacity	Weekly visible observations for visible emissions
AA-031	40 CFR 63.6625(h), Subpart ZZZZ	5.6	HAP	Minimize the engine's time spent at idle
	40 CFR 63.6655(a), Subpart ZZZZ	5.7		Recordkeeping
	40 CFR 63.6655(e), Subpart ZZZZ	5.8		
	40 CFR 63.6655(f), Subpart ZZZZ	5.9		
AA-059	40 CFR 60.4243(a), Subpart JJJJ	5.10	Maintenance	Keep Records of Maintenance Conducted
	40 CFR 60.4245(a), Subpart JJJJ	5.11		Notification and Maintenance Recordkeeping
	40 CFR 60.4245(b), Subpart JJJJ	5.12	Emergency Usage	Hourly Usage 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 MDEQ as required by Applicable Rules and Regulations or this permit upon request.

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

5.2 For the entire facility, the permittee shall determine the following for each coating, adhesive, solvent or other VOC or HAP containing material used and maintain sufficient records to document:

(a) The identification of each coating, adhesive, solvent or other VOC or HAP containing material and the total gallons of each coating, adhesive, solvent or

other VOC of HAP material used on a monthly basis and in each consecutive 12-month period;

(b) The VOC and HAP content(s) of each coating, adhesive, solvent or other VOC or HAP containing used. A description of the methods used to determine the VOC and HAP content shall accompany this data. The permittee may utilize data supplied by the manufacturer, or analysis of VOC and HAP content by EPA Test Method 24, 40 CFR 60, Appendix A and/or EPA Test Method 311, 40 CFR 63, Appendix A, and/or an alternate EPA approved test method;

(c) The density of each coating, adhesive, solvent or other VOC or HAP containing material used;

(d) The total VOC emission rate, the emission rate of each individual HAP and the total HAP emission rate in tons/year for each consecutive 12-month period.

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

5.3 For the entire facility, the permittee shall demonstrate compliance with the requirement in Condition 3.7 by using adhesive usage records, Material Safety Data Sheets, and engineering calculations.

(Ref.: 40 CFR 63.11416(f), Subpart OOOOOO)

5.4 For the entire facility, the permittee shall keep records of the information required by Condition 5.3 for 5 years with the last 2 years of data being kept on site. The remaining 3 years of data may be maintained off site. Also, the permittee must keep a compliance certification on file that the facility is not using any materials or adhesives that contains methylene chloride.

(Ref.: 40 CFR 63.11417 (a) and (b)(2)-(3), Subpart OOOOOO)

5.5 For the entire facility, the permittee shall perform weekly visual observations of emissions. If any visible emissions are detected, the permittee shall take corrective action as expeditiously as practicable. Further, the permittee shall maintain a record and/or a log documenting all visual observations/tests, the nature and cause of any visible emissions, any corrective action(s) taken to prevent or minimize the emissions, and the date and time when visible emission observations were conducted.

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

5.6 For Emission Point AA-031, the permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

(Ref.: 40 CFR 63.6625(h), Subpart ZZZZ)

5.7 For Emission Point AA-031, the permittee shall keep the following records:

(a) A copy of each notification and report submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in 40 CFR 63.10(b)(2)(xiv).

(b) Records of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment) or the air pollution control and monitoring equipment.

(c) Records of all required maintenance performed on the air pollution control and monitoring equipment.

(d) Records of actions taken during periods of malfunction to minimize emissions in accordance with Condition 3.12(b) (40 CFR 63.6605(b), Subpart ZZZZ), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

(Ref.: 40 CFR 63.6655(a), Subpart ZZZZ)

5.8 For Emission Point AA-031, the permittee shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan.

(Ref.: 40 CFR 63.6655(e), Subpart ZZZZ)

5.9 For Emission Point AA-031, the permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

(Ref.: 40 CFR 63.6655(f), Subpart ZZZZ)

5.10 For Emission Point AA-059, the permittee shall demonstrate compliance with Condition 3.21 (40 CFR 60.4243(b)(1), Subpart JJJJ) by keeping records of conducted maintenance in accordance with the manufacturer's emission-related written instructions. The permittee shall meet the requirements as specified in 40 CFR 1068, Subparts A through D, as they apply. If the permittee adjusts the engine settings according to and consistent with the manufacturer's instructions, the stationary SI internal combustion engine will not be considered out of compliance.

If the permittee does not operate and maintain the certified stationary SI internal combustion engine and control device according to the manufacturer's emission-related written instructions, the engine will be considered a non-certified engine, and the permittee shall demonstrate compliance according to 40 CFR 63.4243(a)(2)(i), Subpart JJJJ.

(Ref.: 40 CFR 60.4243(a)(1) and (2), Subpart JJJJ)

5.11 For Emission Point AA-059, the permittee shall keep the following records:

(a) All notifications submitted to comply with 40 CFR 60, Subpart JJJJ and all documentation supporting any notification.

(b) Maintenance conducted on the engine.

(c) If the stationary SI internal combustion engine is a certified engine, documentation from the manufacturer that the engine is certified to meet the

emission standards and information as required in 40 CFR parts 1048, 1054, and 1060, as applicable.

(d) If the stationary SI internal combustion engine is not a certified engine or is a certified engine operating in a non-certified manner and subject to Condition 5.10 (40 CFR 60.4243(a)(2), Subpart JJJJ), documentation that the engine meets the emission standards.

(Ref.: 40 CFR 60.4245(a), Subpart JJJJ)

5.12 For Emission Point AA-059, the permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

(Ref.: 40 CFR 60.4245(b), Subpart JJJJ)

SECTION 6
REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
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 certified annual monitoring report.
		6.3	All documents submitted to MDEQ shall be certified by a Responsible Official.
		6.4	Annual VOC and HAP Emissions
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.5	Coatings Reporting
	40 CFR 63.11417(b)(2), Subpart OOOOOO	6.6	Notification of Compliance Status
AA-031	40 CFR 63.6650(f), Subpart ZZZZ	6.7	MACT Reporting
AA-031 AA-059	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.8	Annual Hours of Operation 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. Said report shall be made within five (5) working days of the time the deviation began.

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

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

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

6.3 Any document required by this permit to be submitted to 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 the entire facility, the permittee shall submit annual compliance reports of the VOC and HAP emissions for each calendar month and each consecutive 12-month period, in accordance with Condition 6.2.

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

6.5 For the entire facility, the permit shall submit a monitoring report annually in accordance with Condition 6.2. This report shall provide the following:

(a) The identification of each coating, adhesive, solvent or other VOC or HAP containing material used;

(b) The VOC and HAP content(s) of each coating, adhesive, solvent, or other VOC or HAP containing material used;

(c) The total gallons of each coating, adhesive, solvent or other VOC or HAP containing material used in each consecutive 12-month period;

(d) The total VOC emission rate, the emission rate of each individual HAP and the total HAP mission rate in tons per month and tpy for each consecutive 12-month period.

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

6.6 For the entire facility, the permittee shall submit a Notification of Compliance Status report no later than 180 days after the issuance date of this permit. The report must contain a certification signed by the responsible official that states the following: “This facility uses no material containing methylene chloride for any purpose on any slabstock flexible foam process.”

(Ref.: 40 CFR 63.11417(b)(2), Subpart OOOOOO)

6.7 For Emission Point AA-031, the permittee shall report all deviations as defined in 40 CFR 63, Subpart ZZZZ, in accordance with Condition 6.2.

(Ref.: 40 CFR 63.6650(f), Subpart ZZZZ)

6.8 For Emission Points AA-031 and AA-059, the permittee shall submit annual reports, in accordance with Condition 6.2, summarizing the hours of operation for the engine. This report shall include how many hours are spent for emergency operation; including what classified the operation as emergency and how many hours are spent for non-emergency operation.

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