

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

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

**THIS CERTIFIES THAT**

Ashley Furniture Industries Inc, Verona Facility  
108 Lipford Road  
Verona, 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**

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**AUTHORIZED SIGNATURE  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Issued:** January 21, 2021

**Permit No.:** 1540-00050

**Effective Date:** As specified herein.

**Expires:** December 31, 2025

**Modified:**

Draft/Proposed [7/16/2021]

**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 the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ 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 DEQ 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.

<b>Emission Point</b>	<b>Description</b>
AA-001	Two (2) Slabstock Foam Fabrication Production Lines including mixing and curing
AA-002	149 hp natural gas-fired Emergency Generator (prior to June 2006)
AA-003	422 hp diesel-fired Emergency Fire Pump (2021)
AA-004	Ten (10) 0.2 MMBTU/hr, natural gas-fired space heaters and Five (5) 0.039 MMTBTU/hr, natural gas-fired space heaters
AA-005	Tanks including Four (4) 12,600-gallon methylene diphenyl diisocyanate (MDI) Tanks and Three (3) 21,000-gallon toluene diisocyanate (TDI) Tanks
AA-006	Foam Fabrication Area

### SECTION 3 EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Construction Permit issued October 15, 2020, and modified <b>DATE</b>	3.1	VOC	≤ 99.0 tpy
		3.2	HAP	≤ 24.0 tpy of total HAP, ≤ 9.9 tpy of single HAP
	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.3	Opacity	≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.4	Equivalent Opacity	≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.5	PM/PM <sub>10</sub> (filterable only)	$E = 4.1 \times p^{0.67}$
	40 CFR 63, Subpart OOOOOO (National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources) 40 CFR 63.11414(a), Subpart OOOOOO	3.6	HAP	Applicability
	40 CFR 63.11416(e), Subpart OOOOOO	3.7		Use of methylene chloride is prohibited.
AA-002 AA-003 AA-004	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.8	PM/PM <sub>10</sub> (filterable only)	≤ 0.6 lbs/MMBTU
AA-004	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.9	SO <sub>2</sub>	≤ 4.8 lbs/MMBTU
AA-002 AA-003	40 CFR 63, Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines) 40 CFR 63.6585(a) and (c), and 40 CFR 63.6590(c), Subpart ZZZZ	3.10		Applicability
AA-002	40 CFR 63.6603(a) and Item 5 of Table 2d, Subpart ZZZZ	3.11	HAP	Maintenance schedule
	40 CFR 63.6605, Subpart ZZZZ	3.12		General Requirements
	40 CFR 63.6625(e)(3), Subpart ZZZZ	3.13		Manufacturer's instructions
	40 CFR 63.6625(h), Subpart ZZZZ	3.14		Minimize time spent at idle
	40 CFR 63.6625 (f), Subpart ZZZZ	3.15		Install and maintain non-resettable hour meter
	40 CFR 63.6640(f), Subpart ZZZZ	3.16		Emergency Engine Requirements
AA-003	40 CFR 60, Subpart IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines)	3.17	NMHC + NO <sub>x</sub> and PM	Applicability



	40 CFR 60.4200(a)(2)(ii), Subpart III			
	40 CFR 60.4205(c) and Table 4, and 60.4206, Subpart III	3.18	NMHC + NO <sub>x</sub>	≤ 4.0 g/KW-hr (3.0 g/HP-hr)
			PM	≤ 0.20 g/KW-hr (0.15 g/HP-hr)
	40 CFR 60.4207(b), Subpart III	3.19	Fuel	Diesel fuel standard
	40 CFR 60.4209(a), Subpart III	3.20	Hours of Operation	Install and maintain non-resettable hour meter
	40 CFR 60.4211(a), Subpart III	3.21	Operation	Manufacturer's instructions
	40 CFR 60.4211(c), Subpart III	3.22		Purchase a certified engine
	40 CFR 60.4211(f), Subpart III	3.23		Emergency Engine Requirements

3.1 For the entire facility, the permittee shall not emit more than 99.0 tons per year (tpy) of volatile organic compounds (VOC), as determined for each consecutive 12-month period on a rolling monthly basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Construction Permit issued October 15, 2020, and modified **DATE**)

3.2 For the entire facility, the permittee shall not emit more than 24.0 tons per year (tpy) of total combined hazardous air pollutants (HAPs) and no more than 9.0 tons per year (tpy) of any single hazardous air pollutant (HAP) as determined for each consecutive 12-month period.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Construction Permit issued October 15, 2020, and modified **DATE**)

3.3 For the entire facility, except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial, or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided below.

(a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one-hour period 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 any one hours.

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

3.4 For the entire facility, except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Condition 3.3. This shall not apply to vision obscuration caused by uncombined water droplets.

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

- 3.5 For the entire facility, except as otherwise specified, the permittee shall not 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

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

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

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

- 3.6 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 Flexible Polyurethane Foam Production Foam Production and Fabrication Area Sources (40 CFR 63, Subpart OOOOOO) and the General Provisions as specified in Table 1 (40 CFR 63, Subpart A).

(Ref.: 40 CFR 63.11414(a), Subpart OOOOOO)

- 3.7 For the entire facility, the permittee shall not use any adhesive containing methylene chloride.

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

- 3.8 For Emission Points AA-002, AA-003, and AA-004, the permittee shall not exceed the maximum permissible emission rate of ash and/or particulate matter of 0.6 pounds per million BTU per hour heat input from fossil fuel burning installations of less than 10 million BTU per hour heat input.

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

- 3.9 For Emission Point AA-004, the permittee shall not exceed the maximum discharge of sulfur oxides of 4.8 pounds (measured as sulfur dioxide) per million BTU heat input from fuel burning installations in which the fuel is burned to produce heat or power by indirect heat transfer.

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

- 3.10 For Emission Points AA-002 and AA-003, the permittee is subject to and shall comply with all applicable requirements of the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) and the General Provisions as specified in Table 8 (40 CFR 63, Subpart A). For Emission Point AA-003, the permittee shall meet the criteria of this subpart by meeting the requirements of 40 CFR 60, Subpart IIII, and no further requirements of 40 CFR 63, Subpart ZZZZ, shall apply to the engine.

(Ref.: 40 CFR 63.6585(a) and (c), and 40 CFR 63.6590(c), Subpart ZZZZ)

- 3.11 For Emission Point AA-002, the permittee shall comply with the following requirements:
- (a) Change oil and filter every 500 hours of operation or annually, whichever comes first;
  - (b) Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and

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

The permittee may extend the specified oil changes requirements of (a) above by utilizing the oil analysis program outlined in 40 CFR 63.6625(j), Subpart ZZZZ. If an engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practices according to the schedule in (a)-(c) above, 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), 40 CFR 63.6625(j) and Item 5 of Table 2d, Subpart ZZZZ)

- 3.12 For Emission Point AA-002, the permittee must be in compliance with the emission limitations, operating limitations, and other requirements of 40 CFR 63, Subpart ZZZZ, that apply at all times. At all times the permittee must operate and maintain the sources, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to DEQ 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)

- 3.13 For Emission Point AA-002, 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)

- 3.14 For Emission Point AA-002, 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)

- 3.15 For Emission Point AA-002, the permittee shall install, operate, and maintain a non-resettable hour meter.

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

- 3.16 For Emission Point AA-002, the permittee shall operate the emergency stationary RICE according to the following paragraph to be considered an emergency stationary RICE. Any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described below, is prohibited. If the permittee does not operate the engines according to

the requirements below, the engine will not be considered an emergency engine and must meet all the applicable requirements for non-emergency engines of 40 CFR 63, Subpart ZZZZ.

- (a) There is no time limit on the use of emergency stationary RICE in emergency situations.
- (b) The permittee may operate an engine for maintenance checks and readiness testing for a maximum of 100 hours per calendar year provided 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 insurance company associated with an engine. The permittee may petition the DEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating the federal, state, or local standards require maintenance testing of an engine beyond 100 hours per calendar year. Any operation for non-emergency situations as allowed in paragraph (c) counts as part of the 100 hours per calendar year allowed by this paragraph.
- (c) The emergency stationary RICE 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 provided in paragraph (b) of this condition. Except as provided in 40 CFR 63.6640(f)(4)(i) and (ii), Subpart ZZZZ, 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), Subpart ZZZZ)

- 3.17 For Emission Point AA-003, the permittee is subject to and shall comply with all applicable requirements of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (40 CFR 60, Subpart IIII) and the General Provisions (40 CFR 63, Subpart A).

(Ref.: 40 CFR 60.4200(a)(2)(ii), Subpart IIII)

- 3.18 For Emission Point AA-003, the permittee shall limit emissions in accordance with the following:

- (a) Non-methane hydrocarbons (NMHC) and nitrogen oxides (NO<sub>x</sub>) to no more than 3.0 g/HP-hr (or 4.0 g/KW-hr); and
- (b) Particulate matter (PM) to no more than 0.15 g/HP-hr (or 0.2 g/KW-hr).

The permittee shall achieve these emission standards over the entire life of the engine

(Ref.: 40 CFR 60.4205(c), 60.4206 and Table 4, Subpart IIII)

- 3.19 For Emission Point AA-003, the permittee shall use diesel fuel that meets the requirements of 40 CFR 1090.305 for nonroad diesel fuel.

(Ref.: 40 CFR 60.4207(b), Subpart IIII)

- 3.20 For Emission Point AA-003, the permittee shall install, operate, and maintain a non-resettable hour meter.  
(Ref.: 40 CFR 60.4209(a), Subpart III)
- 3.21 For Emission Point AA-003, the permittee shall comply with the following:
- (a) Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission related instructions;
  - (b) Change only those emission-related settings that are permitted by the manufacturer; and
  - (c) Meet the requirements of 40 CFR 89, 94, and/or 1068, as they apply.
- (Ref.: 40 CFR 60.4211(a), Subpart III)
- 3.22 For Emission Point AA-003, the permittee shall purchase an engine certified to the emission standards in Condition 3.18. The engine must be installed and configured according to the manufacturer's emission-related specifications.  
(Ref.: 40 CFR 60.4211(c), Subpart III)
- 3.23 For Emission Point AA-003, the permittee must operate the emergency stationary ICE according to the requirements below. In order for the engine to be considered an emergency stationary ICE, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described below, is prohibited. If you do not operate the engine according to the requirements below, the engine will not be considered an emergency engine and must 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 an engine for maintenance checks and readiness testing for a maximum of 100 hours per calendar year provided 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 insurance company associated with an engine. The permittee may petition the DEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating the federal, state, or local standards require maintenance testing of an engine beyond 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (c) counts as part of the 100 hours per calendar years allowed by this paragraph.
  - (c) Emergency stationary ICE 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 provided in paragraph (b) of this condition. Except as provided in paragraph 40 CFR 60.4211(f)(3)(i), Subpart III, the 50 hours per calendar 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 60.4211(f), Subpart III)

**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
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), as established in the Construction Permit issued October 15, 2020, and modified <b>DATE</b>	5.2	VOC and HAP	Monitoring
		5.3		Recordkeeping
	40 CFR 63, Subpart OOOOOO (National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources) 40 CFR 63.11416(f), Subpart OOOOOO	5.4	Methylene Chloride	Demonstrate compliance
AA-002	40 CFR 63, Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines) 40 CFR 63.6660, Subpart ZZZZ	5.5	Operation and Maintenance	Recordkeeping
	40 CFR 63.6655(a), (d), and (e), Subpart ZZZZ	5.6		
	40 CFR 63.6655(f), Subpart ZZZZ	5.7	Hours of Operation	Monitoring and Recordkeeping
AA-003	40 CFR 60, Subpart IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines) 40 CFR 60.4214(b), Subpart IIII	5.8		Emergency and non-emergency use
	40 CFR 60.4211(g), Subpart IIII	5.9	Operation and Maintenance	Recordkeeping

5.1 For the entire facility, 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 DEQ 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 for each coating, adhesive, solvent, or other VOC or HAP containing material used:

- (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 or HAP containing material used on a monthly basis and in each consecutive 12-monthly period;



- (b) The VOC and HAP content(s) of each coating, adhesive, solvent, or other VOC or HAP containing material 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 24.
- (c) The density of each coating, adhesive, solvent, or other VOC or HAP containing material used;

The permittee shall use the given parameters to determine, VOC, individual HAP, and total HAP emissions on a monthly basis and for each consecutive 12-month period on a rolling basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)., as established in the Construction Permit issued October 15, 2020, and modified **DATE**)

5.3 For the entire facility, the permittee shall maintain sufficient record 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 or HAP containing material used ton a monthly basis and in each consecutive 12-month period;
- (b) The VOC and/or HAP content(s) of each coating, adhesive, solvent, or other VOC or HAP containing material used with a description of the method used to determine the VOC and/or HAP content;
- (c) The density of each coating, adhesive, solvent, or other VOC or HAP containing material used; and
- (d) The total VOC emission rate, the emission rate of each individual HAP, and the total HAP emission rate in tons per year on a monthly basis and for each consecutive 12-month period on a rolling basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)., as established in the Construction Permit issued October 15, 2020, and modified **DATE**)

5.4 For the entire facility, the permittee shall demonstrate compliance with Condition 3.7 by using adhesive records, Materials Safety Data Sheets, and engineering calculations.

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

5.5 For Emission Point AA-002, the permittee shall comply with the following:

- (a) Records must be in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1), Subpart A.
- (b) As specified in 40 CFR 63.10(b)(1), records must be kept for five (5) years following the date of each occurrence measurement, maintenance, corrective action, report, or record.
- (c) Keep each record readily accessible in hard copy or electronic form for at least five (5) years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to 40 CFR 63.10(b)(1).

(Ref.: 40 CFR 63.6660, Subpart ZZZZ)

- 5.6 For Emission Point AA-002, the permittee shall maintain the records below:
- (a) A copy of each notification and report submitted to comply with 40 CFR 63, Subpart ZZZ.
  - (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 actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
  - (d) The maintenance plan as required by Condition 3.13.
  - (e) Records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after control device (if any) according to the maintenance plan.
- (Ref.: 40 CFR 63.6655(a), (d), and (e), Subpart ZZZZ)
- 5.7 For Emission Point AA-002, 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)
- 5.8 For Emission Point AA-003, the permittee must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The permittee must record the time of operation of the engine and the reason the engine was in operation during that time.
- (Ref.: 40 CFR 60.4214(b), Subpart III)
- 5.9 For Emission Point AA-003, if the permittee does not install, configure, operate, and maintain the engine according to the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee shall demonstrate compliance by keeping a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, the permittee must conduct an initial performance test to demonstrate compliance with the emission standards within one (1) year of startup, or within one (1) year after an engine is no longer installed, configured, operated, and maintained in accordance with manufacturer's emission-related written instructions, or within one (1) year after emission-related settings are changed in a way that is not permitted by the manufacturer.
- (Ref.: 40 CFR 60.4211(g)(2), Subpart III)

## SECTION 6 REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
Facility Wide  AA-002 AA-003  AA-003	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)., as established in the Construction Permit issued October 15, 2020, and modified <b>DATE</b>	6.1	Report deviations within five (5) days.
		6.2	Submit certified annual monitoring report.
		6.3	All documents submitted to MDEQ shall be certified by a responsible official.
		6.4	Monitoring report for adhesive, solvent, or other VOC or HAP containing materials.
		6.5	Certification statement
		6.6	Report hours of operation
		6.7	Emissions testing
AA-002	40 CFR 63, Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines)  40 CFR 63.6640(b) and 63.6650(a) through (d), Subpart ZZZZ	6.8	Deviation reporting

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)., as established in the Construction Permit issued October 15, 2020, and modified **DATE**)

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)., as established in the Construction Permit issued October 15, 2020, and modified **DATE**)

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)., as established in the Construction Permit issued October 15, 2020, and modified **DATE**)

6.4 The permittee shall submit an annual monitoring report 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/or HAP(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; and
- (d) The total VOC emission rate, the emission rate of each individual HAP, and the total HAP emission rate in tons per month and tons per year for each consecutive 12-month period.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)., as established in the Construction Permit issued October 15, 2020, and modified **DATE**)

- 6.5 The permittee shall include in the certified annual report required by Condition 6.2 a certification statement that states that the facility has not used any substance that contains methylene chloride at the facility.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)., as established in the Construction Permit issued October 15, 2020, and modified **DATE**)

- 6.6 For Emission Points AA-002 and AA-003, the permittee shall submit annual reports in accordance with Condition 6.2 summarizing the hours of operation for the engine in the calendar year. This report shall also include which hours were for emergency use and which were for non-emergency use.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)., as established in the Construction Permit issued October 15, 2020, and modified **DATE**)

- 6.7 For Emission Point AA-003, if the permittee is required to conduct the emissions testing in Condition 5.9, the permittee shall submit a report to DEQ within 60 days of testing.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)., as established in the Construction Permit issued October 15, 2020, and modified **DATE**)

- 6.8 For Emission Point AA-002, the permittee shall report each instance in which each of the applicable operating limitations in Conditions 3.11 and 3.16 were not met in accordance with Condition 6.2. These deviations shall be reported according to the following requirements:

- (a) If there were no deviations from any applicable operating limitations, a statement shall be included that there were no deviations from the emission limitations or operating limitations during the reporting period; or
- (b) If there was a deviation from any operating limitation during the reporting period, then the compliance report shall contain the following information:
  - (1) Company name and address.
  - (2) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.
  - (3) Date of report and beginning and ending dates of the reporting period.

- (4) The total operating time of the stationary RICE at which the deviation occurred during the reporting period.
  - (5) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
- (c) If there was a malfunction during the reporting period, the compliance report shall include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report shall also include a description of actions taken by the permittee during a malfunction of an affected source to minimize emissions, including actions taken to correct a malfunction.

(Ref.: 40 CFR Part 63.6640(b) and 63.6650(a) through (d), Subpart ZZZZ)