

STATE OF MISSISSIPPI AND FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL

PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT AT A
SYNTHETIC MINOR SOURCE

THIS CERTIFIES THAT

FXI Inc. - Baldwyn
North Lee Industrial Park East
976 Highway 45
Baldwyn, 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

AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: April 21, 2021

Modified: DATE

Permit No.: 1540-00135

Effective Date: As specified herein.

Expires: March 31, 2026

Section 1.

A. GENERAL CONDITIONS

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
2. This permit is a Federally-approved permit to operate a synthetic minor source as described in 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.

Emission Point	Description
AA-001	Flexible Polyurethane Foam (Molding) Production Line
AA-002	Foam Fabrication Operations (Main Building)
AA-003	Flexible Polyurethane Foam (Slabstock) Production
AA-004	Foam Fabrication Operations (OEM Building)
AA-005	Fuel Burning Equipment – Space Heaters
AA-006	Toluene Diisocyanate (TDI) and Methylene Diphenyl Diisocyanate (MDI) Storage Tanks (Six 12,000 Gallon Tanks total, three TDI and three MDI)
AA-007	Miscellaneous Storage Tanks
AA-008	265 HP Diesel-Fired Emergency Fire Water Pump
AA-009	250 HP Diesel-Fired Emergency Fire Water Pump
AA-010	Parts Cleaning
AA-011	Pillow Grinding
AA-012	30,000 gallon TDI Fixed Roof Storage Tank Maximum true vapor pressures are less than 15 kPa (2.17 psia)
AA-013	30,000 gallon TDI Fixed Roof Storage Tank Maximum true vapor pressures are less than 15 kPa (2.17 psia)
AA-014	30,000 gallon TDI Fixed Roof Storage Tank Maximum true vapor pressures are less than 15 kPa (2.17 psia)
AA-015	30,000 gallon TDI Fixed Roof Storage Tank Maximum true vapor pressures are less than 15 kPa (2.17 psia)
AA-016	30,000 gallon TDI Fixed Roof Storage Tank Maximum true vapor pressures are less than 15 kPa (2.17 psia)
AA-017	30,000 gallon TDI Fixed Roof Storage Tank Maximum true vapor pressures are less than 15 kPa (2.17 psia)

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).	3.1	VOC	99.0 tpy
			Total HAP	24.0 tpy
			Individual HAP	9.0 tpy
	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.2	Opacity	40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.3	Opacity	Equivalent Opacity
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.4	PM/PM ₁₀ (Filterable only)	E = 4.1p ^{0.67}
	40 CFR Part 63, Subpart OOOOOO National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources 40 CFR 63.11414(a)(2), (b)(4), and (d), Subpart OOOOOO	3.5	CH ₂ Cl ₂	General Applicability
40 CFR 63.11416, Subpart OOOOOO	3.6	Permittee shall not use methylene chloride		
AA-005	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.7	SO ₂	Emissions shall not exceed 4.8 lbs/MMBtu
AA-008 AA-009	40 CFR Part 63, Subpart ZZZZ National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines 40 CFR 63.6585, 63.6590(a)(1)(iii) and (2)(iii), and 63.6590(c)(1), Subpart ZZZZ	3.8	VOC HAP	General Applicability
	11 Miss. Admin. Code, Pt.2, R.1.3.D.(1)(a)	3.9	PM/PM ₁₀ (Filterable only)	Shall not exceed 0.6 lbs/MMBtu

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
AA-008	40 CFR 63.6605, Subpart ZZZZ	3.10	VOC HAP	Minimize Emissions and Continuous Compliance
	40 CFR 63.6625(f), Subpart ZZZZ	3.11		Install non-resettable hour meter
	40 CFR 63.6640(f), Subpart ZZZZ	3.12		Limit non-emergency operations < 100 hours per year
AA-009	40 CFR Part 60, Subpart III Standards of Performance for Stationary Compression Ignition Internal Combustion Engines 40 CFR 60.4200(a)(1)(ii), Subpart III	3.13	VOC HAP	General Applicability
	40 CFR 60.4205(c), Subpart III	3.14		Emission Limitations
	40 CFR 60.4206, Subpart III	3.15		Continuous Compliance
	40 CFR 60.4207(b), Subpart III	3.16	Fuel Requirement	Shall combust only diesel fuel oil
	40 CFR 60.4209(a), Subpart III	3.17	Monitoring Requirement	Install non-resettable hour meter
	40 CFR 60.4211(b), Subpart III	3.18	VOC HAP	Purchase certified engine
	40 CFR 60.4211(f), Subpart III	3.19		Limit non-emergency operations < 100 hours per year

3.1. The permittee shall limit the emissions of each criteria pollutant and hazardous air pollutants (HAPs) from the facility to less than the following amounts, in tons per year for each rolling 12-month period:

Pollutant	Emissions (tpy)
VOC	99.0
Total HAPs	24.0
Individual HAPs	9.5

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

3.2. 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. 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.

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

- 3.3. 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 3.2. This shall not apply to vision obscuration caused by uncombined water droplets.

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

- 3.4. 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

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

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).)

- 3.5. For the entire facility, the permittee is subject to and shall comply with the 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).

(Ref.: 40 CFR 63.11414(a)(2), (b)(4), and (d) and 40 CFR 11415(d), Subpart OOOOOO.)

- 3.6. For the entire facility, the permittee shall use no material containing methylene chloride for any purpose.

(Ref.: 40 CFR 63.11416(b)(2), 40 CFR 63.11416(c), 40 CFR 63.11416(e), Subpart OOOOOO.)

- 3.7. For Emission Point AA-005, the permittee shall not discharge sulfur oxides from any fuel burning installation in which fuel is burned primarily to produce heat or power by

indirect heat transfer in excess of 4.8 pounds per MMBTU heat input (measured as sulfur dioxide).

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

- 3.8. For Emission Points AA-008 and AA-009, the permittee is subject to and shall comply with all applicable requirements of 40 CFR Part 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. Emission Point AA-008 is an emergency, compression ignition (CI), fire pump installed prior to 2004 located at an area source of HAPs. Emission Point AA-009 is a new RICE located at an area source of HAPs. Therefore, compliance with 40 CFR Part 63, Subpart ZZZZ shall be achieved by meeting all applicable requirements of 40 CFR Part 60, Subpart IIII. No further requirements apply for such engines under NESHAP Subpart ZZZZ.

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

- 3.9. For Emission Points AA-008 and AA-009, the maximum permissible emission of ash and/or particulate matter from fossil fuel-burning installations of less than 10 million BTU per hour heat input 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. Emission Point AA-008, the permittee shall be in compliance with the operating limitations and other applicable requirements of this permit at all times. The permittee shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safe 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 by Subpart ZZZZ have been achieved.

(Ref.: 40 CFR 63.6605, Subpart ZZZZ.)

- 3.11. For Emission Point AA-008, the permittee shall install a non-resettable hour meter if one is not already installed.

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

- 3.12. For Emission Point AA-008, the permittee shall operate the emergency stationary engine according to the requirements cited below. In order for the engine to be considered an emergency stationary engine, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described below, is prohibited. If the engine is not operated according to these requirements, the

engine will not be considered an emergency engine under Subpart ZZZZ and shall meet all requirements for non-emergency engines.

- (a) There is no time limit on the use of emergency stationary RICE in emergency situations.
- (b) The engine 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 DEQ 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 engine beyond 100 hours per calendar year.
- (c) The permittee may operate the emergency RICE 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 63.6640(f) and 63.6675, Subpart ZZZZ.)

- 3.13. For Emission Point AA-009, the permittee is subject to and shall comply with all applicable conditions of Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart III. Emission Point AA-009 is a new, emergency, Compression Ignition (CI), stationary, Internal Combustion Engine (ICE) located at an area source of Hazardous Air Pollutants (HAPs).

(Ref.: 40 CFR 60.4200(a)(1)(ii), Subpart III.)

- 3.14. For Emission Point AA-009, the permittee shall meet the following emission standards:

Pollutant	Emissions (g/HP-hr)
NMHC + NO _x	3.0
PM	0.15

(Ref.: 40 CFR 60.4205(c), Table 4, Subpart III.)

- 3.15. For Emission Point AA-009, the permittee shall operate and maintain the engine so that it meets the emission standards in Condition 3.14 for the entire life of the engine.

(Ref.: 40 CFR 60.4206, Subpart III.)

- 3.16. For Emission Point AA-009, the permittee shall use diesel fuel that meets the requirements of 40 CFR 1090.305 for non-road diesel fuel.

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

- 3.17. For Emission Point AA-009, the permittee shall install a non-resettable hour meter, if one is not already installed.

(Ref.: 40 CFR 60.4209(a), Subpart III.)

- 3.18. For Emission Point AA-009, the permittee shall purchase an engine certified according to 40 CFR 89 or 94 to meet the emission standards in Condition 3.14.

(Ref.: 40 CFR 60.4211(b), Subpart III.)

- 3.19. For Emission Point AA-009, the permittee shall operate the engine according to the following:

- (a) There is no operating limit on the use of the engine during an emergency situation;
- (b) The engine may be operated for a maximum of 100 hours per year 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 owner or operator may petition 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 that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year. Any operation for non-emergency situations as allowed by (c) of this section counts as part of the 100 hours per calendar year allowed;
- (c) The engine 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 as provided in (b).

(Ref.: 40 CFR 60.4211(f), Subpart III.)

SECTION 4 WORK PRACTICES

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Work Practice
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)	4.1	VOC HAP	Operate all equipment as efficiently as possible and perform routine maintenance
AA-008	40 CFR 63.6603(a), Subpart ZZZZ	4.2	VOC HAP	Operational Requirement
	40 CFR 63.6625(e)(3), Subpart ZZZZ	4.3		
	40 CFR 63.6625(h), Subpart ZZZZ	4.4		
AA-009	40 CFR 60.4206, Subpart III 40 CFR 60.4211(a), Subpart III	4.5	VOC HAP	Operational Requirement

4.1. For the entire facility, in order to minimize the emissions of air pollutants, the permittee shall operate all air emissions equipment as efficiently as possible. Furthermore, the permittee shall perform routine maintenance on all air emissions equipment such that the equipment may be operated in an efficient manner.

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

4.2. For Emission Point AA-008, the permittee shall:

- (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

As per 40 CFR 63.6625(i), the permittee also has the option of utilizing an oil analysis program in order to extend the above specified oil change requirement. The oil analysis must be performed at the same frequency specified for changing the oil. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content.

If the engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practices according to the schedule listed in (a)–(c) above, or if performing the work practice on the required schedule would otherwise pose

an unacceptable risk under Federal, State, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The work 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 Item 4 of Table 2d, Subpart ZZZZ.)

4.3. For Emission Point AA-008, the permittee shall:

- (a) Operate and maintain the stationary RICE according to the manufacturer's emission related operation and maintenance instructions; or
- (b) Develop and follow 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), Item 9 of Table 6, Subpart ZZZZ.)

4.4. For Emission Point AA-008, 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.)

4.5. For Emission Point AA-009, the permittee shall operate and maintain the engine according to the manufacturer's written instructions or procedures developed by the permittee that are approved by the engine manufacturer, over the entire life of the engine. In addition, the permittee may only change those settings that are permitted by the manufacturer.

(Ref.: 40 CFR 60.4206, and 40 CFR 60.4211(a), Subpart III.)

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 5 years.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2	Fuel	Keep records of type and quantity of fuels combusted
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	5.3	VOC HAP	Recordkeeping Requirement
	40 CFR 63.11416(f), Subpart OOOOOO	5.4	CH ₂ Cl ₂	Continuous compliance
	40 CFR 63.11417(b)(3), Subpart OOOOOO			
	40 CFR 63.11417(b)(3), (c), and (d), Subpart OOOOOO	5.5		Maintain on-site records
40 CFR 63.11417(c)(1), Subpart OOOOOO	5.6	Compliance Certification		
AA-008	40 CFR 63.6640(f), Subpart ZZZZ	5.7	Recordkeeping	Maintain hours of operation
	40 CFR 63.6655(a)(1), (2), and (5), and (e)(3), Subpart ZZZZ	5.8		Recordkeeping Requirement
AA-009	40 CFR 60.4211(a), Subpart IIII	5.9	HAP	Continuous compliance
	40 CFR 60.4214(b), Subpart IIII	5.10		Recordkeeping Requirement

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 DEQ as required by Applicable Rules and Regulations or this permit upon request. These records shall be made readily available upon inspection or request by the Office of Pollution Control.

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

5.2. For the entire facility, the permittee shall monitor and record the type and quantity of each fuel used in each stationary combustion source.

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

- 5.3. 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 or HAP containing 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 material used. A description of the method 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/yr for each consecutive 12-month period on a rolling basis.

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

- 5.4. For the entire facility, the permittee shall demonstrate compliance with the requirement in Condition 3.6 by using adhesive usage records, Material Safety Data Sheets, and engineering calculations.

(Ref.: 40 CFR 63.11416(f) and 63.11417(b)(3), Subpart OOOOOO.)

- 5.5. For the entire facility, the permittee shall keep records of the information required by Condition 5.4 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. The certification file required by Condition 5.6 shall be kept on site at all times.

(Ref.: 40 CFR 63.11417 (b)(3) (c) and (d), Subpart OOOOOO.)

- 5.6. For the entire facility, the permittee shall have a compliance certification on file. This certification must contain the following statements and must be signed by a responsible official. The certification shall state the following:

- (a) “This facility uses no material containing methylene chloride for any purpose on any slabstock flexible foam process.”
- (b) “This facility does not use any equipment cleaner to flush the mixhead which contains methylene chloride, or any other equipment cleaner containing methylene chloride in a molded polyurethane foam process in accordance with 40 CFR 63.11416(c)(1).”
- (c) “This facility does not use any mold release agent containing methylene chloride in a molded flexible polyurethane foam process in accordance with 40 CFR 63.11416(c)(2).”

(Ref.: 40 CFR 63.11417(b)(2) and (3), 63.11417(c)(1) and 63.11417(d), Subpart OOOOOO.)

- 5.7. For Emission Point AA-008, the permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter required in Condition 3.11. The owner or operator 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)(2), Subpart ZZZZ.)

- 5.8. For Emission Point AA-008, the permittee shall maintain the following records and keep each readily accessible for at least five years after the date of each occurrence:

- (a) A copy of each notification and report submitted to comply with 40 CFR 63, Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status that was 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 actions taken during periods of malfunction to minimize emissions in accordance with Condition 3.10, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
- (d) Records of the maintenance conducted on the stationary RICE in order to demonstrate that the engine and after-treatment control device (if any) was operated and maintained according to the maintenance plan required in Condition 4.3.

(Ref.: 40 CFR 63.6655(a)(1), (2), and (5), and (e)(3), Subpart ZZZZ)

- 5.9. For Emission Point AA-009, the permittee shall comply with the following:
- (a) Operate and maintain the stationary CI ICE according to the manufacturer's emission-related written instructions;
 - (b) Change only those emission-related settings that are permitted by the manufacturer; and
 - (c) Meet the applicable requirements of 40 CFR 89, 94 and/or 1068.

(Ref.: 40 CFR 60.4211(a), Subpart III.)

- 5.10. For Emission Point AA-009, the permittee shall keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter required in Condition 3.17. The owner 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.)

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.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.2	Submit certified annual monitoring report.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.3	All documents submitted to DEQ shall be certified by a Responsible Official.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.4	Submit annual VOC/HAP containing material report.
AA-008	40 CFR 63.6640(b) and 63.6650(a) through (d), Subpart ZZZZ	6.5	Report deviations
AA-008 AA-009	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.6	Report hours of operation

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 the DEQ 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 a monitoring report due annually by the 31st of January for the preceding calendar year. This report shall be in accordance with Condition 6.2 and 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 emission rate in tons per month and ton/yr for each consecutive 12-month period for the entire facility.

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

- 6.5. For Emission Point AA-008, the permittee shall submit a report in accordance with Condition 6.2 of each instance in which an applicable operating limitation in Condition 4.2 was not met. These deviations shall be reported according to the following requirements:
- (a) If there were no deviations from any applicable emission limitations or 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 emission limitation or 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 63.6640(b) and 63.6650(a) through (d), Subpart ZZZZ.)

- 6.6. For Emission Points AA-008 and AA-009, the permittee shall submit a summary report in accordance with Condition 6.2 of the hours of operation that includes all the information required by Conditions 5.7 and 5.10.

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