STATE OF MISSISSIPPI
AIR POLLUTION CONTROL PERMIT

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Southern Motion Inc, Plant Number 3
1 Fashion Way
Baldwyn, Mississippi
Lee County

has been granted permission to construct air emissions equipment to comply with the emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

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AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued:__________________ **Permit No.: 2340-00052**

SECTION 1. GENERAL CONDITIONS

1.1 This permit is for air pollution control purposes only.

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

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

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

1.2 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 operating without a valid permit pursuant to State Law.

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

1.3 It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(6).)

1.4 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).)

1.5 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 the 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).)

1.6 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).)

1.7 The permit does not convey any property rights of any sort, or any exclusive privilege.

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

1.8 The permittee shall furnish to the Department of Environmental Quality (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).)

1.9 *Design and Construction Requirements:* The stationary source shall be designed and constructed so as to operate without causing a violation of an Applicable Rules and Regulations, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards, and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A(1)-(3).)

1.10 The necessary facilities shall be constructed to prevent any wastes or other products or substances to be placed in a location where they are likely to cause pollution of the air or waters of the State without the proper environmental permits.

(Ref.: Miss. Code Ann. 49-17-29(1) and (2))

1.11 *Fugitive Dust Emissions from Construction Activities:* The construction of the stationary source shall be performed in such a manner so as to reduce fugitive dust emissions from construction activities to a minimum.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A(4).)

1.12 *General Nuisances:* The permittee shall not cause, permit, or allow the emission of particles or any contaminants in sufficient amounts or of such duration from any process as to be injurious to humans, animals, plants, or property, or to be a public nuisance, or create a condition of air pollution.

(a) The permittee shall not cause or permit the handling, transporting, or storage of any material in a manner which allows or may allow unnecessary amounts of particulate matter to become airborne.

(b) When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than that from which it originated or to violate any other provision of 11 Miss. Admin. Code Pt. 2, Ch. 1, the Commission may order such corrected in a way that all air and gases or air and gasborne material leaving the building or equipment are controlled or removed prior to discharge to the open air.

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

1.13 *Right of Entry:* The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives upon presentation of credentials:

(a) To enter at reasonable times 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) 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 contaminants or waste waters, fuel, process material, or other material which affects or may affect emission of air contaminants from any source.

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

1.14 *Permit Modification or Revocation:* After notice and opportunity for a hearing, the Permit Board may modify the permit or revoke it in whole or in part for good cause shown including, but not limited to:

(a) Persistent violation of any of the 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.)

1.15 *Public Record and Confidential Information:* 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)

1.16 *Permit Transfer:* This permit shall not be transferred except upon approval of the Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B.)

1.17 *Severability:* The provisions of this permit are severable. If any provision of the permit, or the application of any provision of the 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).)

1.18 *Permit Expiration:* The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance, if construction is suspended for eighteen (18) months or more, or if construction is not completed within a reasonable time. The DEQ may extend the 18-month period upon a satisfactory showing that an extension is justified.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1)., R. 2.5.C(4)., and R. 5.2.)

1.19 *Certification of Construction:* A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(3).)

1.20 *Beginning Operation:* After certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by 11 Miss. Admin. Code Pt. 2, R. 2.13.G.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).)

1.21 *Application for a Permit to Operate:* The application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).)

1.22 *Operating Under a Permit to Construct:* Upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).)

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

(a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)

(1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through

properly signed contemporaneous operating logs or other relevant evidence the following:

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

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

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

(iv) That within five (5) working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;

(v) That as soon as practicable but no later than 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 in 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 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 11 Miss. Admin. Code Pt. 2, R. 1.2.,occurs during startup or shutdown, see the upset requirements above.

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

1.24 *General Duty:* All air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants.

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

1.25 *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).)

SECTION 2. EMISSION POINT DESCRIPTION

The permittee is authorized to construct and operate, upon certification of construction, air emissions equipment, as described in the following table.

Emission Point	Description
AA-100	Foam Pourline Operations: one (1) slabstock flexible polyurethane foam production line
AA-200a	Forty-four (44) 0.13 MMBtu/hr Natural Gas-Fired Radiant Heaters
AA-200b	Six (6) 0.3 MMBtu/hr Natural Gas-Fired Forced Draft Heaters
AA-300	One (1) 300 HP (0.764 MMBtu/hr) Diesel-Fired (CI) Emergency Fire Pump Engine
AA-301	One (1) 402 HP (1.023 MMBtu/hr) Diesel-Fired (CI) Emergency Generator
AA-400	Foam Bun Marking: buns and foam pieces marked for identification with black spray paint
AA-500	Foam Fabrication Operations: cutting and gluing foam pieces, nine (9) adhesive spray booths equipped with exhaust dry filters
AA-600	Frame Mill: CNC routers, optimizer, rip saw, bandsaw, chop saw, and more woodworking equipment controlled by a baghouse
AA-700	Fiber Manufacturing Line: one (1) manufacturing line
AA-800a	Two (2) 13,208-gallon Polyol Fixed Roof Storage Tanks One (1) 5,284-gallon Polyol Fixed Roof Day Tank
AA-800b	Two (2) 13,208-gallon Toluene Diisocyanate (TDI) Fixed Roof Storage Tanks One (1) 5,284-gallon TDI Fixed Roof Day Tank
AA-800c	One (1) 100-gallon Diesel Fixed Roof Storage Tank One (1) 80-gallon Diesel Fixed Roof Storage Tank
AA-800d	Miscellaneous Day Tanks < 6,000 gallons: One (1) 5,284-gallon Fixed Roof Day Tank Three (3) 2,642-gallon Fixed Roof Day Tanks One (1) 1,321-gallon Fixed Roof Day Tank
AA-800e	Miscellaneous Small Material Tanks < 100 gallons: Fifteen (15) 79.25-gallon Fixed Roof Small Material Storage Tanks
AA-900	One (1) 0.9 MMBtu/hr Natural Gas-Fired Oven
AB-100	One (1) Injection Molding Machine and Regrinder

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. 1.3.A.	3.1	Opacity	≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2	Equivalent Opacity	≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.3	PM (Filterable Only)	$E = 4.1 \times p^{0.67}$
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.4	VOC	≤ 95.0 tpy
		3.5	Individual HAP	≤ 9.0 tpy
		3.6	Total HAP	≤ 24.0 tpy
AA-200a AA-200b AA-300 AA-301 AA-900	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.7	PM (Filterable Only)	≤ 0.6 lb/MMBTU
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.8	SO_2	≤ 4.8 lb/MMBTU
AA-100 AA-500	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 (d) and 40 CFR 63.11415(d), Subpart OOOOOO	3.9	HAP	Applicability
AA-500	40 CFR 63.11416(b) and (e), Subpart OOOOOO	3.10	Methylene Chloride	Prohibited adhesive component
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.11	VOC/HAP	Prohibited from using VOC or HAP as a blowing agent
AA-300 AA-301	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 (d), 63.6590(a)(1)(iii), Subpart ZZZZ	3.12	HAP	Applicability

	40 CFR 63.6604(b), Subpart ZZZZ	3.13	Fuel Requirement	Use only diesel fuel that meets the requirements of 40 CFR 1090.305 for non-road diesel.
	40 CFR 63.6605, Subpart ZZZZ	3.14	General Requirements	Comply over the life of the engine.
				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		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		Emergency Operating Requirements
	40 CFR 63.6625(h), Subpart ZZZZ	3.18	HAP	Minimize the engine's time spent at idle.

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.)

3.2 For the entire facility, the permittee shall not cause, permit, or allow 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 3.1.

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

3.3 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

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

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).)

3.4 For the entire facility, the permittee shall limit Volatile Organic Compound (VOC) emissions to no more than 95.0 tons/year as determined for each consecutive 12-month period on a rolling basis.

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

3.5 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 rolling basis.

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

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

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

3.7 For Emission Points AA-200a, AA-200b, AA-300, AA-301, and AA-900, 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).)

3.8 For Emission Points AA-200a, AA-200b, AA-300, AA-301 and AA-900, 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).)

3.9 For Emission Points AA-100 and AA-500, 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).

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

3.10 For Emission Point AA-500, 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)

3.11 For Emission Point AA-500, 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).)

3.12 For Emission Points AA-300 and AA-301, 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).

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

3.13 For Emission Points AA-300 and AA-301, the permittee shall use diesel fuel that meets the requirements of 40 CFR 1090.305 for non-road diesel fuel.

(a) Maximum sulfur content of diesel fuel ≤ 15 parts per million (ppm)

(b) Maximum cetane index of 40

(c) Maximum aromatic content of 35 volume percent

(Ref.: 40 CFR 63.6604(b), Subpart ZZZZ)

3.14 For Emission Points AA-300 and AA-301, 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 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)

3.15 For Emission Points AA-300 and AA-301, 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 Points AA-300 and AA-301, 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-300, 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 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 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 Points AA-300 and AA-301, 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)

SECTION 4. WORK PRACTICES

Emission Point	Applicable Requirement	Condition Number(s)	Work Practice
AA-300 AA-301	40 CFR 63.6603(a) and 63.6625(i) and Item 4 of Table 2d, Subpart ZZZZ	4.1	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-500 AA-600	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	4.2	Operational Requirement

4.1 For Emission Points AA-300 and AA-301, 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)

4.2 For Emission Points AA-500 and AA-600, the permittee shall operate each baghouse and exhaust fan with dry filters at all times when processing. Should the baghouse(s) and/or exhaust fan(s) with dry filters become non-operational then the respective process shall be shut down immediately, but not as to cause damage to equipment or property or cause further environmental problems. The process shall not start up until such time that the baghouse(s) and/or exhaust fan(s) with dry filters become operational. The permittee shall maintain on hand at all times sufficient equipment as is necessary to repair and/or overhaul the baghouse(s) and/or exhaust fan(s) with dry filters. Maintenance and quality assurance/quality control measures shall be conducted in accordance with the manufacturer's specifications.

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

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	VOC/HAP	Monitoring and Recordkeeping for VOC or HAP containing material used.
AA-300 AA-301	40 CFR 63.6655(a), Subpart ZZZZ	5.3	HAP	Recordkeeping
	40 CFR 63.6655(e)(2), Subpart ZZZZ	5.4		
	40 CFR 63.6655(f)(2), Subpart ZZZZ	5.5		
AA-500	40 CFR 63.11416(f), Subpart OOOOOO	5.6	HAP/ Methylene Chloride	Demonstrate Compliance
	40 CFR 63.11417(b)(3), Subpart OOOOOO	5.7		Recordkeeping
AA-500 AA-600	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.8	PM	Maintenance Recordkeeping
		5.9		Perform EPA Test Method 22 weekly if visual emissions are observed.

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, but is not limited to, 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 the following for each coating, adhesive, solvent, resin, 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, resin or other VOC or HAP material used in each consecutive 12-month period on a rolling basis;

(b) The VOC and HAP content(s) of each coating, adhesive, solvent, resin, 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 an alternate EPA approved test method; and

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

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

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

5.3 For Emission Points AA-300 and AA-301, 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(s) and monitoring equipment; and

(d) Records of actions taken during periods of malfunction to minimize emissions in accordance with Condition 4.1, 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)

5.4 For Emission Points AA-300 and AA-301, the permittee shall keep records of the maintenance conducted on the stationary RICE and after-treatment control device (if any) according to the facility's maintenance plan.

(Ref.: 40 CFR 63.6655(e)(2), Subpart ZZZZ)

5.5 For Emission Points AA-300 and AA-301, 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 operations, including what classified the operation as emergency and how many hours are spent for non-emergency operations.

(Ref.: 40 CFR 63.6655(f)(2), Subpart ZZZZ)

5.6 For Emission Point AA-500, the permittee shall demonstrate compliance with the requirement in Condition 3.10 by maintaining adhesive usage records, Material Safety Data Sheets (MSDS), and engineering calculations.

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

5.7 For Emission Point AA-500, the permittee must maintain records of the information used to demonstrate compliance, as required in Condition 5.8. The permittee must maintain the records for 5 years, with the last years of data retained 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 contain methylene chloride.

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

5.8 For Emission Points AA-500 and AA-600, the permittee shall demonstrate compliance with Condition 4.2 by performing monthly maintenance inspections on the baghouse(s) and exhaust fan(s) with dry filters to ensure the control equipment is operating as designed. A record documenting the date of inspections, the name of the person who performs the inspections, and any maintenance conducted shall be kept at the facility. The record shall include information regarding shut down periods, corrective actions taken, and time the unit(s) were operating without controls.

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

5.9 For Emission Points AA-500 and AA-600, the permittee shall demonstrate compliance with Condition 4.2 by performing EPA Test Method 22 visual observation weekly to determine if visual emissions are observed. Results shall be recorded in log form. The source producing visual emissions shall be shut down in accordance with the manufacturer’s protocols, and corrective actions shall be taken. The emission source(s) shall begin operations once corrective actions have been taken. Records of observations, any maintenance work conducted, and any corrective actions shall be kept in log form.

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

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(a)	Report deviations within five (5) working days
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1(b)	Annual reporting
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1(c)	Certification by a Responsible Official
	11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).	6.1(d)	Notification of beginning actual construction within 15 days
	11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).	6.1(e)	Notification when construction does not begin or is suspended
	11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).	6.1(f)	Certification of completion of construction prior to operation
	11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).	6.1(g)	Notification of changes in construction
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.2	Monitoring report of adhesive, solvent, and other VOC or HAP containing material
AA-500 AA-600	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.3	Annual EPA Test Method 22 Reporting
AA-300 AA-301	40 CFR 63.6650(f), Subpart ZZZZ	6.4	MACT Reporting
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.5	Annual Hours of Operation Report
AA-500	40 CFR 63.11417(b)(2), Subpart OOOOOO	6.6	Notification of Compliance Status

6.1 General Reporting Requirements:

(a) 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).)

(b) Beginning upon issuance of this permit and lasting until issuance or modification of the applicable operating permit, the permittee shall submit reports of any required monitoring by January 31st for the preceding calendar year. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 2.1.C. 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. For any air emissions equipment not yet constructed and/or operating the report shall so note and include an estimated date of commencement of construction and/or startup, whichever is applicable.

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

(c) Any document required by this permit to be submitted to 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).)

(d) Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).)

(e) The permittee must notify DEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).)

(f) Upon the completion of construction or installation of an approved stationary source or modification, and prior to commencing operation, the applicant shall notify the Permit Board that construction or installation was performed in accordance with the approved plans and specifications on file with the Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).)

(g) The Permit Board shall be promptly notified in writing of any change in construction from the previously approved plans and specifications or permit. If the Permit Board determines the changes are substantial, it may require the submission of a new application to construct with "as built" plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an "as built" application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).)

6.2 For the entire facility, the permittee shall submit a monitoring report annually in accordance with Condition 6.1(b) and Condition 5.2. The report shall provide the following:

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

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

(c) The total pounds or gallons of each coating, adhesive, solvent, resin, or other VOC or HAP containing material used in each consecutive 12-month period on a rolling basis; and

(d) The VOC, Individual HAP, and Total HAP emissions for each consecutive 12-month period on a rolling basis.

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

6.3 For Emission Points AA-500 and AA-600, the permittee shall submit annual reports, in accordance with Condition 6.1(b), summarizing the weekly EPA Test Method 22 visual observations of visible emissions or the associated monitoring records.

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

6.4 For Emission Points AA-300 and AA-301, the permittee shall report all deviations as defined in 40 CFR 63, Subpart ZZZZ, in accordance with Condition 6.1(b).

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

6.5 For Emission Points AA-300 and AA-301, the permittee shall submit annual reports, in accordance with Condition 6.1(b), summarizing the hours of operation for the engine. This report shall include how many hours are spent for emergency operations; including what classified the operation as emergency and how many hours are spent for non-emergency operations.

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

6.6 For Emission Point AA-500, 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)