

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

PERMIT

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

THIS CERTIFIES THAT

Toyota Boshoku Mississippi, LLC
1 TB Way
Mantachie, Itawamba County, Mississippi

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with the Federal Clean Air Act and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), the regulations and standards adopted and promulgated thereunder, and the State Implementation Plan for operating permits for synthetic minor sources.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: June 16, 2017

Permit No.: 1240-00034

Modified: AUG 28 2019

Expires: May 31, 2022

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 Regulation 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. Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances.

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

11. 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).)

12. This permit does not authorize a modification as defined in Mississippi Administrative Code, Title 11, Part 2, Chapter 2 – *Permit Regulations for the Construction and/or Operation of Air Emission Equipment*. A modification may require a Permit to Construct and a modification of this permit. “Modification” is defined as 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 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 40CFR 51.66;
- (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 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 3 – *Regulations for the Prevention of Air Pollution Emergency Episodes* for the level of emergency declared.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)

2. Any diversion from or bypass of collection and control facilities is prohibited, except as provided for in Mississippi Administrative Code, Title 11, Part 2, Chapter 1 – *Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants*.

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

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

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

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

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

- (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:
 - (i) An upset occurred and that the source can identify the cause(s) of the upset;
 - (ii) The source was at the time being properly operated;
 - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
 - (iv) That within five (5) working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
 - (v) That as soon as practicable but no later than twenty-four (24) hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
- (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
- (3) This provision is in addition to any upset provision contained in any applicable requirement.
- (4) These upset provisions apply only to enforcement actions by the Commission

and are not intended to prohibit EPA or third party enforcement actions.

- (b) Start-ups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
 - (1) Start-ups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for start-ups and shutdowns are defined by an applicable rule, regulation, or permit.
 - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in Mississippi Administrative Code, Title 11, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for start-ups and shutdowns. Source specific emission limitations or work practice standards established for start-ups and shutdowns are subject to the requirements prescribed in Mississippi Administrative Code, Title 11, Part 2, Rule 1.10.B.(2)(a) through (e).
 - (3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

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

5. *Compliance Testing*: Regarding compliance testing (if applicable):

- (a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any “Applicable Rules and Regulations” or this permit and in units of mass per time.
- (b) Compliance testing will be performed at the expense of the permittee.
- (c) Each emission sampling and analysis report shall include but not be limited to the following:
 - (1) Detailed description of testing procedures;
 - (2) Sample calculation(s);
 - (3) Results; and
 - (4) Comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

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

C. PERMIT RENEWAL / MODIFICATION / TRANSFER / TERMINATION

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

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

2. The permittee shall furnish to the 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

A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

5. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board.

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

**SECTION 2
 EMISSION POINT DESCRIPTION**

The permittee is authorized to operate air emissions equipment, as described in the following table:

EMISSION POINT	DESCRIPTION
AA-000	Facility-Wide (Toyota Boshoku Mississippi, LLC)
AA-100	Facility-Wide Welding Operations [consists of several welding booths throughout the facility – emissions from these booths are controlled using a cartridge dust collector]
AA-200*	Facility-Wide Coating and Cleaning Operations [the majority of the these operations consist of the application of a water-based adhesive and several booths – the emissions from the booths are controlled using dry filters]
AA-500	Urethane Seat Foam Operations [emissions are controlled with a cartridge dust collector]
AA-600	Spray Adhesive Operations [consists of two (2) spray booths – the emissions from the booths are controlled using a dry filter]
AA-700	Plastic Molding Injection Process
AA-800	Facility-Wide Comfort Heating [natural gas-fired space heaters with a combined total capacity of 3.39 MMBTU / Hour]
AA-900	Facility-Wide Storage Tanks
AA-901	Four (4) 7,500-Gallon Polyol Storage Tanks
AA-902	One (1) 8,000-Gallon Methylene Diphenyl Diisocyanate (MDI) Storage Tank
AA-903	One (1) 7,500-Gallon MDI Storage Tank
AA-1000	Facility-Wide Internal Combustion Engines
AA-1001a	855 HP (637.5 kW) Diesel-Fired Emergency Engine [2.05 MMBTU / Hour – manufactured in 2008]
AA-1001b	855 HP (637.5 kW) Diesel-Fired Emergency Engine [2.05 MMBTU / Hour – manufactured in 2008]
AA-1002	110 HP (82 kW) Diesel-Fired Emergency Fire Water Pump Engine [0.279 MMBTU / Hour – manufactured in 2008]

***Note:** AA-200 was initially permitted as a coating and cleaning process; however, due to operational changes, the majority of the process for this emission point now consists of the application of a water-based adhesive. At the request of the facility, this emission point shall remain “Facility-Wide Coating and Cleaning Operations”. This will allow or future operational modifications allowing coating and cleaning to occur without having to modify this permit.

SECTION 3
EMISSION LIMITATIONS AND STANDARDS

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant(s) / Parameter(s)	Limitation(s) / Standard(s)
AA-000	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		
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.3	HAPs	9.0 tpy for Any Individual HAP (Rolling 12-Month Period) 24.0 tpy for Total HAPs (Rolling 12-Month Period)
AA-200 AA-500 AA-600	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.4	VOCs	95.0 tpy (Rolling 12-Month Period)
AA-500 AA-600	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); Subpart OOOOOO	3.5	HAPs	Applicability
	40 CFR 63.11416(c) and (e); Subpart OOOOOO	3.6		Material Usage Restrictions
AA-1001a AA-1001b AA-1002	11 Miss. Admin. Code Pt. 2, R. 1.3.D.(1)(a).	3.7	PM	0.6 Pounds per MMBTU / Hour
	11 Miss. Admin. Code Pt. 2, R. 1.4.A.(1).	3.8	SO ₂	4.8 Pounds / MMBTU
	40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Combustion Engines 40 CFR 60.4200(a)(2)(i) and (ii); Subpart IIII 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines 40 CFR 63.6590(c)(1); Subpart ZZZZ	3.9	HAPs	Applicability

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant(s) / Parameter(s)	Limitation(s) / Standard(s)
AA-1001a AA-1001b AA-1002	40 CFR 60.4207(b); Subpart III	3.10	Fuel Requirement	15 ppm Sulfur Content (Max.) 40 Cetane Index (Min.) or 35% Aromatic Content (Max. – by volume)
	40 CFR 60.4209(a); Subpart III 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.11	Hours of Operation	Non-Resetable Hour Meter Installation Requirement
	40 CFR 60.4211(f)(1–3); Subpart III	3.12	Non-Emergency Operation	100 Hours per Calendar Year (for Each Engine)
AA-1001a AA-1001b	40 CFR 60.4205(b), 60.4202(a)(2), and 40 CFR 60.4206; Subpart III	3.13	NMHC + NO _x	6.4 Grams per Kilowatt-Hour
			CO	3.5 Grams per Kilowatt-Hour
			PM	0.20 Grams per Kilowatt-Hour
			Opacity (Smoke)	20% During Acceleration Mode 15% During Lugging Mode 50% During Peaks in Either Acceleration or Lugging Modes
AA-1002	40 CFR 60.4205(c) – Table 4 and 40 CFR 4206; Subpart III	3.14	NMHC + NO _x	10.5 Grams per Kilowatt-Hour (or 7.8 Grams per Horsepower-Hour)
			CO	5.0 Grams per Kilowatt-Hour (or 3.7 Grams per Horsepower-Hour)
			PM	0.80 Grams per Kilowatt-Hour (or 0.60 Grams per Horsepower-Hour)

3.1 For Emission Point AA-000 (Facility-Wide), except as otherwise specified or limited herein, the permittee shall not cause 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 percent (40%) opacity subject to the exceptions provided below:

- (a) Start-up operations may produce emissions, which exceed 40% opacity for up to fifteen (15) minutes per start-up in any one (1) hour and not to exceed three (3) start-ups per stack in any twenty-four (24) hour period.
- (b) Emissions resulting from soot blowing operations (i.e. ash removal) shall be

permitted provided such emissions do not exceed sixty percent (60%) opacity and provided further that the aggregate duration of such emissions during any 24-hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any 1 hour.

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

- 3.2 For Emission Point AA-000 (Facility-Wide), except as otherwise specified or limited herein, the permittee shall not discharge into the ambient air from any point source or emissions, any contaminant of such opacity as to obscure an observer's view to a degree in excess of forty percent (40%) opacity. This shall not apply to vision obscuration caused by uncombined water droplets.

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

- 3.3 For Emission Point AA-000 (Facility-Wide), the permittee shall limit the emission of any individual hazardous air pollutants (HAP) from all applicable emission sources to no more than 9.0 tons per year (tpy) based on a rolling 12-month period. Additionally, the permittee shall limit the total emission of all HAPs to no more than 24.0 tpy based on a rolling 12-month period.

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

- 3.4 For Emission Points AA-200 (Facility-Wide Coating and Cleaning Operations), AA-500 (Urethane Seat Foam Operations), and AA-600 (Spray Adhesive Operations), the permittee shall limit the total emission of volatile organic compounds (VOCs) to no more than 95.0 tons per year (tpy) based on a rolling 12-month period.

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

- 3.5 Emission Points AA-500 (Urethane Seat Foam Operations) and AA-600 (Spray Adhesive Operations) are subject to and shall comply with all applicable requirements found in 40 CFR Part 63, Subpart OOOOOO – National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources.

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

- 3.6 For Emission Points AA-500 (Urethane Seat Foam Operations) and AA-600 (Spray Adhesive Operations), the permittee shall comply with the following material usage requirements:
- (a) The permittee shall not use a material containing methylene chloride as an equipment cleaner to flush the mix-head or use a material containing methylene chloride elsewhere as an equipment cleaner in a molded flexible polyurethane foam process;

- (b) The permittee shall not use a mold release agent containing methylene chloride in a molded flexible polyurethane foam process; and
- (c) The permittee shall not use any adhesive containing methylene chloride in a flexible polyurethane foam fabrication process.

(40 CFR 63.11416(c) and (e); Subpart OOOOOO)

- 3.7 For Emission Points AA-1001a, AA-1001b, and AA-1002 (Emergency Engines), except as otherwise specified or limited herein, the maximum permissible emission of ash and / or particulate matter (PM) from each referenced emergency engine unit shall not exceed 0.60 pounds per MMBTU per hour heat input.

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

- 3.8 For Emission Points AA-1001a, AA-1001b, and AA-1002 (Emergency Engines), except as otherwise specified or limited herein, the maximum discharge of sulfur oxides from each referenced emergency engine unit shall not exceed 4.8 pounds (measured as sulfur dioxide or SO₂) per MMBTU heat input.

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

- 3.9 Emission Points AA-1001a, AA-1001b, and AA-1002 (Emergency Engines) are subject to and shall comply with all applicable requirements of 40 CFR Part 60, Subpart III – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.

By complying with the applicable requirements of Subpart III, the permittee shall also demonstrate compliance with 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

(Ref.: 40 CFR 60.4200(a)(2)(i – ii); Subpart III and 40 CFR 63.6590(c)(1); Subpart ZZZZ)

- 3.10 For Emission Points AA-1001a, AA-1001b, and AA-1002 (Emergency Engines), the permittee shall only use diesel fuel in each engine that meets the following requirements (on a per-gallon basis):

- (a) A maximum sulfur content of fifteen (15) parts per million (ppm); and
- (b) A minimum cetane index of 40 or a maximum aromatic content of 35 volume percent (vol. %).

(Ref.: 40 CFR 60.4207(b); Subpart III and 40 CFR 80.510(b); Subpart I)

- 3.11 For Emission Points AA-1001a, AA-1001b, and AA-1002 (Emergency Engines), the permittee shall install a non-resettable hour meter on each engine.

(Ref.: 40 CFR 60.4209(a); Subpart III and 11 Miss Admin. Code Pt. 2, R. 2.2.B.(10).)

- 3.12 For Emission Points AA-1001a, AA-1001b, and AA-1002 (Emergency Engines), any operation of an engine for other than emergency operation, maintenance and testing, and operation in non-emergency situations for fifty (50) hours per year, as outlined in Parts (a) through (c) below, is prohibited. If an engine is not operated in accordance with the following provisions, the engine will not be considered an emergency engine under the referenced regulation and shall meet all requirements for a corresponding non-emergency engine:

- (a) There is no time limit on the use of an engine in emergency situations.
- (b) The permittee may operate an engine for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, or the insurance company accompanied with the engine. Maintenance checks and readiness testing of an engine is limited to a maximum of one hundred (100) hours per calendar year. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing. However, a petition is not required if the permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of the engine beyond 100 hours per calendar year.
- (c) The permittee may operate an engine 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. 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 supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(Ref.: 40 CFR 60.4211(f)(1-3); Subpart III)

- 3.13 For Emission Points AA-1001a, AA-1001b, the permittee shall not discharge into the atmosphere any gases that contain the following pollutants in excess of the corresponding emission standards:

- (a) Non-Methane Hydrocarbons + Nitrogen Oxides (NMHC + NO_x): 6.4 grams per kilowatt-hour;
- (b) Carbon Monoxide (CO): 3.5 grams per kilowatt-hour; and
- (c) Particulate Matter (PM): 0.20 grams per kilowatt-hour.

Additionally, the permittee shall not discharge into the atmosphere any smoke exhaust that exceeds the following opacity standards:

- (a) 20 percent (20%) during the acceleration mode;
- (b) 15 percent (15%) during the lugging mode; and
- (c) 50 percent (50%) during the peaks in either the acceleration or lugging modes.

The permittee shall operate / maintain each emergency engine in such a manner to achieve the referenced emission and opacity standards over the entire life of the engine.

(Ref.: 40 CFR 60.4205(b), 40 CFR 60.4202(a)(2), and 40 CFR 60.4206; Subpart IIII)

3.14 For Emission Point AA-1002, the permittee shall not discharge into the atmosphere any gases that contain the following pollutants in excess of the corresponding emission standards:

- (a) Non-Methane Hydrocarbons + Nitrogen Oxides (NMHC + NO_x): 10.5 grams per kilowatt-hour (or 7.8 grams per horsepower-hour);
- (b) Carbon Monoxide (CO): 5.0 grams per kilowatt-hour (or 3.7 grams per horsepower-hour); and
- (b) Particulate Matter (PM): 0.80 grams per kilowatt-hour (or 0.60 grams per horsepower-hour).

The permittee shall operate / maintain the emergency fire water pump engine in such a manner to achieve the referenced emission standards over the entire life of the engine.

(Ref.: 40 CFR 60.4205(c) – Table 4 and 40 CFR 4206; Subpart IIII)

SECTION 4
WORK PRACTICE STANDARDS

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant(s) / Parameter(s)	Work Practice Standard(s)
AA-1001a AA-1001b AA-1002	40 CFR 60.4211(a); Subpart III	4.1	HAPs	Best Management Practices

- 4.1 For Emission Points AA-1001a, AA-1001b, and AA-1002 (Emergency Engines), the permittee shall adhere to the following:
- (a) Operate and maintain each engine and control device (if any) 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 requirements of 40 CFR Parts 89, 94, and / or 1068 (as applicable).

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

SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant(s) / Parameter(s)	Monitoring / Recordkeeping Requirement(s)
AA-000	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).	5.2	HAPs	Demonstrate Compliance with HAP Emission Limits
AA-200 AA-500 AA-600	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.3	VOCs	Demonstrate Compliance with VOC Emission Limit
AA-500 AA-600	40 CFR 63.11416(f); Subpart OOOOOO	5.4	HAPs	Demonstrate Compliance with Work Practice Standards
	40 63.11417(a), (c)(1), and (d); Subpart OOOOOO	5.5		Maintain Compliance Certification and Corresponding Information
AA-1001a AA-1001b AA-1002	40 CFR 60.4214(b); Subpart IIII 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.6	HAPs	Record Hours of Operation (Emergency and Non-Emergency)

5.1 For Emission Point AA-000 (Facility-Wide), except as otherwise specified or limited herein, 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. Supporting information includes all calibration and maintenance records, all original strip-chart recordings or other data from continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to the MDEQ as required by “Applicable Rules and Regulations” or this permit upon request.

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

5.2 For Emission Point AA-000 (Facility-Wide), the permittee shall monitor and record the following information for each material that contains hazardous air pollutants (HAPs) or from each emission source that generates HAPs monthly:

- (a) The identification of the HAP-containing material or the HAP-generating emission source;
- (b) The percentage of each individual HAP and total HAPs by weight (as applicable). A description of the method used to determine this percentage shall accompany this data;

- (c) The total amount of each HAP-containing material used in appropriate units (i.e. gallons, pounds, etc.); and
- (d) The density of each HAP-containing material used in pounds per gallon (as applicable).

Using the required information above, the permittee shall calculate and record the emission rate of each individual HAP and all combined HAPs in tons per year (tpy) both monthly and on a rolling 12-month period. The permittee may use data supplied by the manufacturer to determine the HAP content of a material used. The permittee may also use EPA Test Method 24 (in Appendix A of 40 CFR Part 60), EPA Test Method 311 (in Appendix A of 40 CFR Part 63), and/or an EPA-approved alternative test method to determine the HAP content.

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

5.3 For Emission Points AA-200 (Facility-Wide Coating and Cleaning Operations), AA-500 (Urethane Seat Foam Operations), and AA-600 (Spray Adhesive Operations), the permittee shall monitor and record the following information for each material containing volatile organic compounds (VOCs) or from each emission source that generates VOCs monthly:

- (a) The identification of the VOC-containing material or the VOC-generating emission source;
- (b) The percentage of VOCs by weight. A description of the method used to determine this percentage shall accompany this data;
- (c) The total volume (in gallons) of each VOC-containing material used; and
- (d) The density of each VOC-containing material used in pounds per gallon.

Using the required information above, the permittee shall calculate and record the emission rate of VOCs in tons per year (tpy) both monthly and on a rolling 12-month period. The permittee may use data supplied by the manufacturer to determine the VOC content of a material used. The permittee may also use EPA Test Method 24 (in Appendix A of 40 CFR Part 60), EPA Test Method 311 (in Appendix A of 40 CFR Part 63), and/or an EPA-approved alternative test method to determine the VOC content.

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

5.4 For Emission Points AA-500 (Urethane Seat Foam Operations) and AA-600 (Spray Adhesive Operations), the permittee may demonstrate compliance with the material usage requirements in Condition 3.6 by using adhesive usage records and Material Safety Data Sheets (MSDS).

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

5.5 For Emission Points AA-500 (Urethane Seat Foam Operations) and AA-600 (Spray Adhesive Operations), the permittee shall maintain a written compliance certification that contains the following statements and shall be signed by a responsible official:

- (a) *“This facility does not use any equipment cleaner to flush the mix-head which contains methylene chloride, or any other equipment cleaner containing methylene chloride in a molded flexible polyurethane foam process in accordance with §63.11416(c)(1).”*; and
- (b) *“This facility does not use any mold release agent containing methylene chloride in a molded flexible polyurethane foam process in accordance with §63.11416(c)(2).”*

The permittee shall maintain records of the information used to demonstrate compliance with Condition 5.4. Additionally, the permittee shall maintain records in accordance with Condition 5.1, but the last two (2) years shall be retained on-site while the remaining three (3) years may maintained off-site.

(Ref.: 40 CFR 63.11417(a), (c)(1), and (d); Subpart OOOOOO)

5.6 For Emission Points AA-1001a, AA-1001b, and AA-1002 (Emergency Engines), the permittee shall monitor and record (via a non-resettable hour meter) the hours of operation monthly for each emergency engine during the respective occasions of emergency and non-emergency service. The permittee shall also detail what classified each operational occasion either as an emergency or a non-emergency.

(Ref.: 40 CFR 60.4214(b); Subpart ZZZZ and 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).)

SECTION 6 REPORTING REQUIREMENTS

Emission Point(s)	Applicable Requirement(s)	Condition Number	Reporting Requirement(s)
AA-000	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.1	Submit Documents Certified by a Responsible Official or Duly Authorized Representative
		6.2	Report Deviation from Requirements Within Five (5) Days
		6.3	Submit Annual Summary of Emissions and Corresponding Information
AA-1001a AA-1001b AA-1002	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.4	Submit Annual Report on Hours of Operation (Non-Emergency and Emergency)

6.1 For Emission Point AA-000 (Facility-Wide), any document required by this permit to be submitted to the MDEQ shall contain a certification signed by a responsible official or duly authorized representative 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).)

6.2 For Emission Point AA-000 (Facility-Wide), except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. 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).)

6.3 Except as otherwise specified herein, the permittee shall submit an annual report no later than January 31st of each calendar year for the preceding calendar year that contains the following data:

- (a) The information as specified by Condition 5.2;
- (b) The information as specified by Condition 5.3; and
- (c) 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).)

- 6.4 For Emission Points AA-1001a, AA-1001b, and AA-1002 (Emergency Engines), the permittee shall submit an annual report that details the hours of operation for the engine by January 31st of each calendar year for the preceding calendar year. The report shall document how many hours are spent for emergency operation, what classified the operation as an emergency situation, how many hours are spent for non-emergency operation, and the circumstance(s) for non-emergency operation.

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