



State of Mississippi



FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL PERMIT

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

THIS CERTIFIES

Innocor Foam Technologies LLC

976 Highway 45

North Lee Industrial Park East

Baldwyn, MS

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. set., 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

Mississippi Department of Environmental Quality

Issued/Modified:

Expires:

Permit No. 1540-00135

Agency Interest # 18910

*** Draft Permit ***

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Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Innocor Foam Technologies LLC

Subject Item Inventory

Permit Number: 1540-00135

Activity ID No.: PER20160001

Subject Item Inventory:

ID	Designation	Description
EQPT3	AA-001	Flexible Polyurethane Foam (Molding) Production Lines with carbon adsorption
AREA2	AA-002	Foam Fabrication Operations (Main Building)
EQPT1	AA-003	Flexible Polyurethane Foam (Slabstock) Production
AREA1	AA-004	Foam Fabrication Operations (OEM Building)
EQPT4	AA-005	Fuel Burning Equipment - Space Heaters
EQPT2	AA-006	TDI and MDI Storage Tanks (six 12,000 gallon tanks)
EQPT5	AA-007	Miscellaneous Storage Tanks
EQPT6	AA-008	265 hp Diesel-Fired Emergency Fire Water Pump
EQPT7	AA-009	250 hp Diesel-Fired Emergency Fire Water Pump. Manufactured in 2013 and subject to NSPS Subpart IIII.
AI18910		Flexible Polyurethane Foam and Fabricated Foam Products

Receiving Stream Relationships:

Subject Item	Relationship	Receiving Stream
AI 18910 Flexible Polyurethane Foam and Fabricated Foam Products	Discharges Into	Campbelltown Creek

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KEY

ACT = Activity

AREA = Area

CONT = Control Device

IA = Insignificant Activity

MAFO = Animal Feeding Operation

RPNT = Release Point

WDPT = Withdrawal Point

AI = Agency Interest

CAFO = Concentrated Animal Feeding Operation

EQPT = Equipment

IMPD = Impoundment

PCS = PCS

TRMT = Treatment

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EQPT0000000004 (AA-005) Fuel Burning Equipment - Space Heaters:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Particulate Matter	Particulate Matter: 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. [11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a)]
L-2	Sulfur Dioxide	Sulfur Dioxide: The maximum discharge of sulfur dioxides 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. [11 Miss. Admin. Code Pt. 2, R. 1.4.A(1)]

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EQPT0000000006 (AA-008) 265 hp Diesel-Fired Emergency Fire Water Pump:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		The permittee shall: (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 (c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. [40 CFR 63.6603(a), 40 CFR 63_Subpart ZZZZ.Table 2d]

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		The permittee shall operate and maintain the stationary RICE 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. [40 CFR 63.6625(e)]
M-2		The permittee shall install a non-resettable hour meter if one is not already installed. [40 CFR 63.6625(f)]
M-3		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. [40 CFR 63.6625(h)]
M-4		The permittee shall operate the emergency stationary RICE according to the following: (a) There is no time limit on the use of emergency stationary RICE in emergency situations, (b) Maintenance checks and readiness testing is limited to 100 hours per year, (c) May be operated up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance testing. [40 CFR 63.6640(f)(1)]

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EQPT0000000006 (AA-008) 265 hp Diesel-Fired Emergency Fire Water Pump:

Record-Keeping Requirements:

Condition No.	Condition
R-1	The permittee shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate it was operated and maintained according to the maintenance plan. [40 CFR 63.6655(e)]
R-2	The permittee shall keep records of the hours of operations of the engine that is recorded through the non-resettable hour meter and document how many hours are spent for emergency operation and non-emergency operation. [40 CFR 63.6655(f)]

Narrative Requirements:

Condition No.	Condition
T-1	The permittee is subject to and shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart ZZZZ and the General Provisions, 40 CFR 63, Subpart A. [40 CFR 63]

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EQPT0000000007 (AA-009) 250 hp Diesel-Fired Emergency Fire Water Pump. Manufactured in 2013 and subject to NSPS Subpart IIII.:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		For Emission Point AA-009, the permittee shall comply with the emission standards in table 4 to NSPS Subpart IIII, for all pollutants. The permittee shall meet the following emission standards: NMHC + NO _x – 3.0(g/HP-hr) PM – 0.15 (g/HP-hr). [40 CFR 60.4205(c), 40 CFR 60_Subpart IIII.Table 4]
L-2		For Emission Point AA-009, the permittee shall use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel. [40 CFR 60.4207(b)]

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		For Emission Point AA-009, the permittee shall operate and maintain the stationary Compression Ignition (CI) Internal Combustion Engine (ICE) that achieves the emission standards as required in 40 CFR 60.4205(c) over the entire life of the engine. [40 CFR 60.4206]
M-2		For Emission Point AA-009, the permittee shall install a non-resettable hour meter prior to startup of the engine. [40 CFR 60.4209(a)]
M-3		For Emission Point AA-009, the permittee shall comply with the following: (1) Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions; (2) Change only those emission-related settings that are permitted by the manufacturer; and (3) Meet the requirements of 40 CFR parts 89, 94 and/or 1068, as they apply. [40 CFR 60.4211(a)]
M-4		For Emission Point AA-009, the permittee shall comply by purchasing an engine certified to the emission standards in 40 CFR 60.4205(c) for the same model year and maximum (or in the case of fire pumps, NFPA nameplate) engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications. [40 CFR 60.4211(c)]

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EQPT0000000007 (AA-009) 250 hp Diesel-Fired Emergency Fire Water Pump. Manufactured in 2013 and subject to NSPS Subpart IIII.:

Monitoring Requirements:

Condition No.	Parameter	Condition
M-5		For Emission Point AA-009, the permittee shall operate the emergency stationary ICE according to the following requirements. In order for the engine to be considered an emergency stationary ICE, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in the following paragraphs, is prohibited. If you do not operate the engine according to the requirements in the following paragraphs, the engine will not be considered an emergency engine and must meet all requirements for non-emergency engines. (1) There is no time limit on the use of emergency stationary ICE in emergency situations. (2) You may operate your emergency stationary ICE for any combination of the purposes specified in paragraphs (i) through (iii) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (3) counts as part of the 100 hours per calendar year allowed by this paragraph. (i) Emergency stationary ICE 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 the Administrator 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 ICE beyond 100 hours per calendar year. (ii) Emergency stationary ICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §60.17), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3. (iii) Emergency stationary ICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency. (3) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (2). Except as provided in paragraph (i), the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. (i) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with

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EQPT0000000007 (AA-009) 250 hp Diesel-Fired Emergency Fire Water Pump. Manufactured in 2013 and subject to NSPS Subpart IIII.:

Monitoring Requirements:

Condition No.	Parameter	Condition
		another entity if all of the following conditions are met: (A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator; (B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region. (C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines. (D) The power is provided only to the facility itself or to support the local transmission and distribution system. (E) The permittee identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standard. [40 CFR 60.4

Narrative Requirements:

Condition No.	Condition
T-1	For Emission Point AA-009, the permittee is subject to and shall comply with all applicable requirements of New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines (40 CFR 60, Subpart IIII) and General Provisions (40 CFR 60, Subpart A). [40 CFR 60.4200(a)(2)(ii)]
T-2	For Emission Point AA-009, the permittee is subject to and shall comply with all applicable requirements of National Emission Standards for Hazardous Air Pollutants from Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ). The permittee shall meet the requirements of this subpart by complying with the applicable requirements in 40 CFR 60, Subpart IIII. [40 CFR 63.6590(c)]

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AI0000018910 Flexible Polyurethane Foam and Fabricated Foam Products:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Particulate Matter	Particulate Matter: The permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided 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 providing such emissions do not exceed 60 percent 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. [11 Miss. Admin. Code Pt. 2, R. 1.3.A]
L-2	Particulate Matter	Particulate Matter: 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 L-1. This shall not apply to vision obscuration caused by uncombined water droplets. [11 Miss. Admin. Code Pt. 2, R. 1.3.B]
L-3	Particulate Matter	Particulate Matter: The permittee shall not cause, permit, or allow the emission of particulate matter in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship: $E = 4.1p^{0.67}$ where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour. Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond property boundary where the discharge occurs. [11 Miss. Admin. Code Pt. 2, R. 1.3.F(1)]
L-4		For Emission Points AA-001, AA-002, AA-003, and AA-004, the permittee shall use no material containing methylene chloride for any purpose in any slabstock flexible foam production process, in a molded flexible polyurethane foam process, or in a flexible polyurethane foam fabrication process. [40 CFR 63.11416(b)(2)), 40 CFR 63.11416(c)(2), 40 CFR 63.11416(e)]

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AI0000018910 Flexible Polyurethane Foam and Fabricated Foam Products:

Limitation Requirements:

Condition No.	Parameter	Condition
L-5		Facility-Wide Emission Limitations The permittee shall limit volatile organic compound (VOC) emissions to no more than 99.0 tons/year (TPY) as determined for each consecutive 12-month period. [11 Miss. Admin. Code Pt. 2, R.2.2.B(10).]
L-6		Facility-Wide Emission Limitations The permittee shall limit hazardous air pollutant (HAP) emissions to no more than 9.9 tons/year (TPY) of any single HAP and no more than 24.9 TPY of total combined HAPs as determined for each consecutive 12-month period. [11 Miss. Admin. Code Pt. 2, R.2.2.B(10).]
L-7		Facility-Wide Emission Limitations The permittee shall limit volatile organic compound (VOC) emissions to no more than 99.9 tons/year (TPY) as determined for each consecutive 12-month period. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]
L-8		For Emission Point AA-001, the permittee shall route all emissions to the carbon adsorption system. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]

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AI0000018910 Flexible Polyurethane Foam and Fabricated Foam Products:

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		Monitoring Requirements For the entire facility, the permittee shall determine for each coating, adhesive, solvent or other VOC or HAP containing material used: (a) The quantity used (gallons); (b) The percentage of VOCs by weight; (c) The percentage of each individual HAP and total HAP by weight; (d) The density (lbs/gal); 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. [11 Miss. Admin. Code Pt. 2, R.2.2.B(11).]
M-2		For Emission Point AA-001, the permittee shall visibly monitor the condition of the carbon adsorption systems on a regular basis by: (1) Maintaining written records documenting the weekly inspection of the control systems and any maintenance on the system. (2) Monitoring for breakthrough on at least a semi-annual basis. (3) Maintaining on-site replacement materials and replacing the carbon within 24 hours of breakthrough. (4) If breakthrough occurs during molding or curing operations, the operation will be ceased immediately if possible, or otherwise as soon as the process activity is complete, so that the carbon can be replaced. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]

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AI0000018910 Flexible Polyurethane Foam and Fabricated Foam Products:

Record-Keeping Requirements:

Condition No.	Condition
R-1	Recordkeeping Requirements For the entire facility, the permittee shall 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; (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. [11 Miss. Admin. Code Pt. 2, R.2.2.B(10).]
R-2	For Emission Points AA-001, AA-002, AA-003, and AA-004, the permittee shall have a compliance certification on file by the compliance date. This certification must contain the following statements and must be signed by a responsible official. (1) For a molded foam affected source: (i) "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)". (ii) "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)". [40 CFR 63.11417(c)(1)]
R-3	Recordkeeping Requirements The permittee shall maintain copies of all records and reports on site for at least five (5) years and shall make them available upon request by Mississippi Department of Environmental Quality (MDEQ) personnel. [11 Miss. Admin. Code Pt. 2, R.2.2.B(10).]

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Record-Keeping Requirements:

Condition No.	Condition
R-4	Recordkeeping Requirements For the entire facility, the permittee shall maintain sufficient records to document that the emissions from all of the emission points remain below the emission limitations. For emission Points AA-001, AA-002, AA-003, AA-004, and AA-006, the permittee shall 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; (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. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]

Submittal/Action Requirements:

Condition No.	Condition
S-1	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 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 TPY for each consecutive 12-month period. [APC-S-2 II.B(11)]

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AI0000018910 Flexible Polyurethane Foam and Fabricated Foam Products:

Submittal/Action Requirements:

Condition No.	Condition
S-2	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.2.B(10).]
S-3	Except as otherwise specified herein, the permittee shall Submit a certified annual synthetic minor monitoring report: Due annually, by the 31st of January for preceding calendar year. This report shall address any required monitoring specified in the permit. [11 Miss. Admin.Code Pt. 2, R.2.2.B(11).]
S-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 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) VOC and HAP emission rate and calculations from Emission Points AA-001 and AA-003; (e) The total VOC emission rate, the emission rate of each individual HAP and the total HAP emission rate in tons per month and TPY for each consecutive 12-month period for the entire facility. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]

Narrative Requirements:

Condition No.	Condition
T-1	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49-17-29 1.b]
T-2	General Condition: The permittee shall at all times maintain in good working order and operate as efficiently as possible all air pollution control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit. [11 Miss. Admin. Code Pt. 2, R. 2.5.A.]
T-3	For Emission Points AA-001, AA-002, AA-003, and AA-004, the permittee is subject to and shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources, 40 CFR 63, Subpart OOOOOO and the General Provisions, 40 CFR 63, Subpart A. [40 CFR 63]

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Narrative Requirements:

Condition No.	Condition
T-4	General Condition: 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. [Miss. Code Ann. 49-17-29 1.a(i and ii)]
T-5	General Condition: 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", [11 Miss. Admin.Code Pt. 2, R.1.10.]
T-6	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.10.]
T-7	General Condition: 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. [Miss. Code Ann. 49-17-21]
T-8	General Condition: 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) 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 any condition that required either a temporary or permanent reduction or elimination of authorized air emissions. [11 Miss. Admin.Code Pt. 2, R. 2.2.C.]
T-9	General Condition: This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for this 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 condition of the permit. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(b).]
T-10	General Condition: 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. [Miss. Code Ann. 49-17-39]

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AI0000018910 Flexible Polyurethane Foam and Fabricated Foam Products:

Narrative Requirements:

Condition No.	Condition
T-11	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(15)(c).]
T-12	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(7).]
T-13	General Condition: This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board. [11 Miss. Admin. Code Pt. 2, R. 2.16.B.]
T-14	General Condition: This permit is for air pollution control purposes only. [11 Miss. Admin.Code Pt. 2, R. 2.1.D(1).]
T-15	General Condition: 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 [11 Miss. Admin.Code Pt. 2, R. 2.4.D.]
T-16	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R. 2.1.D(7).]
T-17	General Condition: The permittee shall furnish to MDEQ within a reasonable time any information MDEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to MDEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to MDEQ along with a claim of confidentiality. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(15)(d).]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Innocor Foam Technologies LLC

Facility Requirements

Permit Number: 1540-00135

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AI0000018910 Flexible Polyurethane Foam and Fabricated Foam Products:

Narrative Requirements:

Condition No.	Condition
T-18	General Condition: This permit does not authorize a modification as defined in 11 Miss. Admin. Code Pt. 2, Ch. 2 "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment". Modification is defined as "Any physical change in or change in the method of operation of a facility which increases actual emissions or 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: (i) 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 (ii) the source is approved to use under any permit issued under 40 CFR 52.51 or under regulations approved pursuant to 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 52.51, or under regulations approved pursuant to Subpart I or 40 CFR 51.166; or (f) any change in ownership of the stationary source" [11 Miss. Admin.Code Pt. 2, R. 2.1.D(2).]
T-19	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(a).]
T-20	General Condition: The permittee shall retain all required records, monitoring data, supported information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to MDEQ as required by Applicable Rules and Regulations or this permit upon request. [11 Miss. Admin.Code Pt. 2, R.2.9.]
T-21	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.2.B(5).]

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AI0000018910 Flexible Polyurethane Foam and Fabricated Foam Products:

Narrative Requirements:

Condition No.	Condition
T-22	General Condition: Emergencies (a) Except as otherwise specified herein, an emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error. (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met. (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence as follows: (i) an emergency occurred and that the permittee can identify the cause(s) of the emergency; (ii) the permitted facility was at the time being properly operated; (iii) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and (iv) the permittee submitted notice of the emergency to MDEQ within two (2) working days of the time when emission limitations were exceeded due to the emergency which contained a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of any emergency has the burden of proof. (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein [11 Miss. Admin.Code Pt. 2, R.2.2.B(10).]
T-23	General Condition: Upsets (a) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows: (i) an upset occurred and that the permittee can identify the cause(s) of the upset; (ii) the source was at the time being properly operated; (iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (iv) the permittee submitted notice of the upset to the DEQ within five (5) working days of the time the upset began which contained a description of the upset, any steps taken to mitigate emissions, and corrective actions taken. (b) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof. (c) This provision is in addition to any upset provision contained in any applicable requirement. [11 Miss. Admin.Code Pt. 2, R.1.10.]

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Innocor Foam Technologies LLC

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AI0000018910 Flexible Polyurethane Foam and Fabricated Foam Products:

Narrative Requirements:

Condition No.	Condition
T-24	General Condition: Startups and Shutdowns (a) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows: (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above; (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit. (b) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof. (c) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply. [11 Miss. Admin.Code Pt. 2, R.1.10.]
T-25	General Condition: Maintenance (a) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following: (i) the permittee can identify the need for the maintenance; (ii) the source was at the time being properly operated; (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (iv) the permittee submitted notice of the maintenance to MDEQ within five (5) working days of the time the maintenance began or such other times as allowed by MDEQ, which contained a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken. (b) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof. (c) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. [11 Miss. Admin.Code Pt. 2, R.1.10.]
T-26	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.8.]

GENERAL INFORMATION

Innocor Foam Technologies LLC
976 Highway 45
North Lee Industrial Park East
Baldwyn, MS
Lee County

Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
I8910	Innocor Foam Technologies, LLC	Official Site Name	07/24/2015	
MSR103043	Advanced Innovations East	GP-Construction	04/12/2004	06/01/2005
I8910	Advanced Innovations East	No Exposure Certification	07/23/2007	09/12/2011
I8910	Advanced Innovations East	Historic Site Name	04/01/2004	10/04/2010
I54000135	Advanced Innovations East, LLC	Air-Synthetic Minor Operating	11/15/2010	08/04/2015
2808100135	Innocor Foam Technologies, LLC	Air-AIRS AFS	10/04/2010	
MSR002047	Advanced Innovations East, LLC	GP-Baseline	10/03/2011	08/04/2015
MSR000105163	Advanced Innovations East, LLC	Hazardous Waste-EPA ID	11/10/2011	05/05/2015
MSR000105163	Innocor Foam Technologies, Inc.	Hazardous Waste-EPA ID	05/05/2015	
I8910	Advanced Innovations East, LLC	Historic Site Name	10/04/2010	07/24/2015
MSR002047	Innocor Foam Technologies, LLC	GP-Baseline	08/04/2015	01/28/2016
I54000135	Innocor Foam Technologies LLC	Air-Synthetic Minor Operating	08/04/2015	10/31/2015
MSR002047	Innocor Foam Technologies, LLC	GP-Baseline	01/28/2016	10/31/2020
I54000135	Innocor Foam Technologies LLC	Air-Synthetic Minor Operating	07/26/2016	06/30/2021

Basin: Tombigbee River Basin

*** Draft Permit ***