



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

485 Industrial Drive

Coldwater, MS

Tate 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. 2600-00005

Agency Interest # 9494

*** 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: 2600-00005

Activity ID No.: PER20160001

Subject Item Inventory:

ID	Designation	Description
AREA1	AA-001	Foam Pouring process using Toluene Diisocyanate (TDI) (Ref: EP-1 through EP-13)
AREA2	AA-002	Foam Fabrication Operations: Cutting, Gluing (Ref: EP-20 through EP-28)
AREA3	AA-003	Foam Pouring process using Methylene Diphenyl Diisocyanate (MDI)
EQPT1	AA-004	12,000 gallon 2,4-Toluene Diisocyanate (TDI) Storage Tank constructed prior to July 23, 1984 (Ref: EP-29)
EQPT2	AA-005	12,000 gallon 2,4-Toluene Diisocyanate (TDI) Storage Tank constructed prior to July 23, 1984 (Ref: EP-30)
EQPT3	AA-006	4.03 MMBTU/hr Natural Gas Fired Space Heater - Foam Pouring Area (Ref No.: SH03)
EQPT4	AA-007	0.175 MMBTU/hr Natural Gas Fired Space Heater - Shop Building (Ref No.: SH02)
EQPT5	AA-008	0.20 MMBTU/hr Natural Gas Fired Space Heater - Chemical Storage Room (Ref No.: SH01)
EQPT6	AA-009	10.0 MMBTU/hr Natural Gas Fired Boiler (Ref No.: BO01)
EQPT7	AA-010	Natural Gas-fired Space Heaters (Ref No.: SH04)
EQPT8	AA-011	10,000 gallon MDI Storage Tank
EQPT9	AA-012	10,000 gallon MDI Storage Tank
EQPT10	AA-013	5,000 gallon MDI Day Tank
EQPT13	AA-014	220 hp Diesel Fired Emergency Fire Pump Engine. Installed in 2006. Subject to MACT Subpart ZZZZ.
AI9494		Foam Production and Fabrication

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Innocor Foam Technologies LLC

Subject Item Inventory

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Activity ID No.: PER20160001

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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AREA0000000001 (AA-001) Foam Pouring process using Toluene Diisocyanate (TDI) (Ref: EP-1 through EP-13):

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Methylene Chloride	Methylene Chloride : The permittee is prohibited from using methylene chloride as a blowing agent as well as any material containing methylene chloride must not be used for any purpose in the foam production process (Ref.: Synthetic Minor Operating Permit issued on November 17, 2003). [40 CFR 63.11416]

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AREA0000000002 (AA-002) Foam Fabrication Operations: Cutting, Gluing (Ref: EP-20 through EP-28):

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Methylene Chloride	Methylene Chloride : The permittee must not use any adhesive or material containing methylene chloride in a flexible polyurethane foam fabrication process. [40 CFR 63.11416(e)]

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AREA0000000003 (AA-003) Foam Pouring process using Methylene Diphenyl Diisocyanate (MDI):

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Methylene Chloride	Methylene Chloride : The permittee is prohibited from using methylene chloride as a blowing agent as well as any material containing methylene chloride must not be used for any purpose in the foam production process (Ref.: Synthetic Minor Operating Permit issued on November 17, 2003). [40 CFR 63.11416]

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EQPT0000000013 (AA-014) 220 hp Diesel Fired Emergency Fire Pump Engine. Installed in 2006. Subject to MACT Subpart ZZZZ.:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		The permittee is subject to and shall comply with National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines and General Provisions (40 CFR 63, Subparts ZZZZ and A). [40 CFR 63.6585]
L-2		For an emergency stationary CI RICE 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(Table 2d)]
L-3		The permittee shall operate and maintain the emergency stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop their 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)]
L-4		The permittee shall install a non-resettable hour meter if one is not already installed. [40 CFR 63.6625(f)]
L-5		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, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to the subpart apply. [40 CFR 63.6625(h)]
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EQPT0000000013 (AA-014) 220 hp Diesel Fired Emergency Fire Pump Engine. Installed in 2006. Subject to MACT Subpart ZZZZ.:

Limitation Requirements:

Condition No.	Parameter	Condition
		The permittee shall operate the emergency stationary RICE in accordance with the following requirements: (a) There is no time limit on the use of the emergency stationary RICE in emergency situations (b) The emergency stationary RICE may be operated 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 associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. 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 RICE beyond 100 hours per year. (c) The emergency stationary RICE 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 and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving 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; except that owners and operators may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by the conditions of this requirement, as long as the power provided by the financial arrangement is limited to emergency power. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in the conditions of this requirement, is prohibited. If the engine is not operated according to conditions (a)-(c) in this requirement, the engine will not be considered an emergency engine under the subpart and will need to meet all requirements for non-emergency engines. [40 CFR 63.6640(f)]

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Limitation Requirements:

Condition No.	Parameter	Condition
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Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		For compliance with emission and operating limits, the permittee shall monitor and collect data according to the following: (a) Except for monitor malfunctions, associated repairs, required performance evaluations, and required quality assurance or control activities, the permittee shall monitor continuously at all times that the stationary RICE is operating. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. (b) The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels. The permittee must, however, use all the valid data collected during all other periods. [40 CFR 63.6635]

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EQPT0000000013 (AA-014) 220 hp Diesel Fired Emergency Fire Pump Engine. Installed in 2006. Subject to MACT Subpart ZZZZ.:

Record-Keeping Requirements:

Condition No.	Condition
R-1	The permittee shall keep the following records: (a) A copy of each notification and report that you 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 §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 performance tests and performance evaluations as required in §63.10(b)(2)(viii) (d) Records of all required maintenance performed on the air pollution control and monitoring equipment (e) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [40 CFR 63.6655(a)]
R-2	The permittee shall operate and maintain the emergency stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or develop and follow their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in manner consistent with good air pollution control practice for minimizing emissions. [40 CFR 63.6655(d)]
R-3	The permittee shall keep records of the maintenance conducted on the emergency stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to your the permittee's maintenance plan. [40 CFR 63.6655(e)]
R-4	The permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, the permittee shall keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response. [40 CFR 63.6655(f)]

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EQPT0000000013 (AA-014) 220 hp Diesel Fired Emergency Fire Pump Engine. Installed in 2006. Subject to MACT Subpart ZZZZ.:

Submittal/Action Requirements:

Condition No.	Condition
S-1	The permittee shall report each instance in which the operating limit in Table 2d of the subpart was not met. These instances are deviations from the emission and operating limitations of the subpart. These deviations must be reported according to the requirements in 40 CFR 63.6550. [40 CFR 63.6640(b)]
S-2	The permittee shall submit an annual compliance report covering the annual reporting period from January 1 through December 31. The first compliance report shall be postmarked or delivered no later than January 31 following the end of the first calendar year after the compliance date, and each subsequent report shall be postmarked or delivered no later than January 31. [40 CFR 63.6650(a)]
S-3	The Compliance report shall contain the following information: (a) Company name and address. (b) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report. (c) Date of report and beginning and ending dates of the reporting period. (d) If you had a malfunction during the reporting period, the compliance report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by the permittee during a malfunction of an affected source to minimize emissions in accordance with §63.6605(b), including actions taken to correct a malfunction. (e) The total operating time of the stationary RICE at which the deviation occurred during the reporting period. (f) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. [40 CFR 63.6650(c)]

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AI0000009494 Foam Production and Fabrication:

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 (10 MMBtu/hr) heat input shall not exceed 0.6 pounds per millions Btu per hour heat input. OR The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations equal to or greater than 10 million Btu per hour heat input but less than 10,000 million Btu per hour heat input shall not exceed an emission rate as determined by the relationship $E = 0.8808 \cdot (I)^{-0.1667}$, where E is the emission rate in pounds per million Btu per hour heat input and I is the heat input in millions of Btu per hour. [11 Miss. Admin. Code Pt. 2, R. 1.3(D)(1)(a) and (b).]
L-2	Opacity	Opacity $\leq$ 40 %: (a) No person shall 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 (b) and (c). (b) 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. (c) Emissions resulting from soot blowing operations shall be permitted provided 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-3	Sulfur Dioxide	Sulfur Dioxide: 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. [11 Miss. Admin. Code Pt. 2, R. 1.4(A)(1).]

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Limitation Requirements:

Condition No.	Parameter	Condition
L-4		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-5		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).]

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).]

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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 on a rolling basis; (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 on a rolling basis. Emission factors used to determine VOC/HAP emissions shall be those used in the permit application, or updated factors based on industry testing or provided by the Polyurethane Foam Association. [11 Miss. Admin. Code Pt. 2, R. 2.2(B)(10).]
R-2	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).]

Submittal/Action Requirements:

Condition No.	Condition
S-1	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-2	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).]

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Submittal/Action Requirements:

Condition No.	Condition
S-3	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. [11 Miss. Admin. Code Pt. 2, R. 2.2(B)(11).]

Narrative Requirements:

Condition No.	Condition
T-1	The facility is subject to and shall comply with all applicable requirements contained in the National Emission Standards for Hazardous Air Pollutants from Flexible Polyurethane Foam Production and Fabrication Area Sources, 40 CFR Part 63, Subpart OOOOOO. The affected source under this standard is the collection of all equipment and activities at a flexible polyurethane foam fabrication facility where adhesives are used to bond foam to foam or other substrate. [40 CFR 63.11414]
T-2	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49-17-29 1.b]
T-3	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-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.]

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Narrative Requirements:

Condition No.	Condition
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]
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).]

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Narrative Requirements:

Condition No.	Condition
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).]

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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).]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Innocor Foam Technologies LLC

Facility Requirements

Permit Number: 2600-00005

Activity ID No.:PER20160001

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AI0000009494 Foam Production and Fabrication:

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.]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Innocor Foam Technologies LLC

Facility Requirements

Permit Number: 2600-00005

Activity ID No.:PER20160001

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AI0000009494 Foam Production and Fabrication:

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
485 Industrial Drive
Coldwater, MS
Tate County

Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
9494	Innocor Foam Technologies, LLC	Official Site Name	07/24/2015	
2813700005	Innocor Foam Technologies, LLC	Air-AIRS AFS	10/12/2000	
MSD985967165	MPI Inc, Coldwater	Hazardous Waste-EPA ID	04/06/1998	06/25/2007
260000005	MPI Inc, Coldwater	Air-Construction	07/28/1999	
260000005	MPI Inc, Coldwater	Air-Title V Operating	10/30/1997	10/01/2002
MSR001245	MPI Inc, Coldwater	GP-Baseline	04/03/1996	12/08/2000
MSR000058	MPI Inc, Coldwater	GP-Baseline	07/14/1992	07/14/1992
MSR001245	MPI Inc, Coldwater	GP-Baseline	12/08/2000	12/14/2005
260000005	MPI Inc, Coldwater	Air-Synthetic Minor Operating	11/17/2003	07/20/2007
MSR001245	MPI Inc, Coldwater	GP-Baseline	12/14/2005	07/20/2007
2205	Mpi Incorporated	UST	11/07/1989	
9494	MPI, Inc	Historic Site Name	04/03/1996	07/17/2007
260000005	Advanced Urethane Technologies	Air-Synthetic Minor Operating	07/20/2007	10/31/2008
MSR001245	Advanced Urethane Technologies	GP-Baseline	07/20/2007	11/15/2010
MSD985967165	Advanced Urethane Technologies	Hazardous Waste-EPA ID	07/24/2007	08/06/2015
260000005	Advanced Urethane Technologies	Air-Synthetic Minor Operating	12/04/2008	10/15/2013
MSR001245	Advanced Urethane Technologies	GP-Baseline	11/15/2010	08/04/2015
260000005	Advanced Urethane Technologies	Air-Synthetic Minor Operating	10/15/2013	08/04/2015
9494	Advanced Urethane Technologies	Historic Site Name	07/17/2007	07/24/2015
MSR001245	Innocor Foam Technologies, LLC	GP-Baseline	08/04/2015	01/28/2016
260000005	Innocor Foam Technologies LLC	Air-Synthetic Minor Operating	08/04/2015	09/30/2018
MSD985967165	Innocor Foam Technologies, LLC	Hazardous Waste-EPA ID	08/06/2015	
MSR001245	Innocor Foam Technologies, LLC	GP-Baseline	01/28/2016	10/31/2020

Basin: Yazoo River Basin

*** Draft Permit ***

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GENERAL INFORMATION

Location Description:

PG - Plant Entrance (General) collected by jwhitlock on 04/26/2011 This location is directly outside of the facility's administrative building (in the parking lot).