

**STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
TITLE V PERMIT**

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Innocor Foam Technologies ACP Inc.
1665 South Veterans Boulevard
Tupelo, Mississippi 38804
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 Title V of the Federal Clean Air Act (42 U.S.C.A. § 7401 - 7671) and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

Permit Issued: September 25, 2015

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: August 31, 2020

Permit No.: 1540-00046

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APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT

OTHER IMPORTANT DOCUMENTS:

40 CFR 63, SUBPART III – NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FROM POLYURETHANE FOAM PRODUCTION

40 CFR 63, SUBPART A – GENERAL PROVISIONS

40 CFR 60, SUBPART Kb – STANDARDS FOR PERFORMANCE FOR VOLATILE ORGANIC LIQUID STORAGE VESSELS (INCLUDING PETROLEUM LIQUID STORAGE VESSELS) FOR WHICH CONSTRUCTION, RECONSTRUCTION, OR MODIFICATION COMMENCED AFTER JULY 23, 1984

SECTION 1. GENERAL CONDITIONS

- 1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(a).)
- 1.2 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(b).)
- 1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. 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. 6.3.A(6)(c).)
- 1.4 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(d).)
- 1.5 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 permittee or, for information to be confidential, the permittee shall furnish such records to 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. 6.3.A(6)(e).)
- 1.6 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. 6.3.A(5).)
- 1.7 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.)

- (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).)
 - (b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D(2).)
 - (c) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.)
 - (d) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.C.)
- 1.8 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(8).)

- 1.9 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states 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. 6.2.E.)
- 1.10 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:
- (a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
 - (d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(2).)
- 1.11 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(1).)
- 1.12 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(2).)
- 1.13 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(1).)
- 1.14 Nothing in this permit shall alter or affect the following:
- (a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
 - (b) the liability of an owner or operator of a source for any violation of applicable

requirements prior to or at the time of permit issuance;

- (c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
- (d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(2).)

1.15 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.H.)

1.16 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C(2)., R. 6.4.B., and R. 6.2.A(1)(c).)

1.17 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:

- (a) the changes are not modifications under any provision of Title I of the Act;
- (b) the changes do not exceed the emissions allowable under this permit;
- (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:
 - (1) a brief description of the change(s),
 - (2) the date on which the change will occur,
 - (3) any change in emissions, and
 - (4) any permit term or condition that is no longer applicable as a result of the change;
- (d) the permit shield shall not apply to any Section 502(b)(10) change. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F(1).)

- 1.18 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 11 Miss. Admin. Code Pt. 2, Ch. 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.)
- 1.19 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 11 Miss. Admin. Code Pt. 2, Ch. 2., "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations 11 Miss. Admin. Code Pt. 2, Ch. 6., "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny 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 40 CFR 51.166;
 - (e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or

- (f) any change in ownership of the stationary source."
- 1.20 Any change in ownership or operational control must be approved by the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.D(4).)
- 1.21 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.B(1).)
- 1.22 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.
- (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.
 - (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.
 - (c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.G.)
- 1.23 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to 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 that include information as follows:
 - (1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - (2) the permitted facility was at the time being properly operated;
 - (3) 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
 - (4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain 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 an 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.G.)
- 1.24 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, shutdowns and maintenance.
- (a) Upsets (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.KK.)
 - (1) 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 5 working days of the time the upset began; and
 - (v) the notice of the upset shall contain a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.
 - (2) In any enforcement proceeding, the permittee 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.
- (b) Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.HH. & R. 1.2.CC.)
- (1) 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.
 - (2) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.
 - (3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply.
- (c) Maintenance.

- (1) 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 the DEQ within 5 working days of the time the maintenance began or such other times as allowed by DEQ; and
 - (v) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.
- (2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.
- (3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

1.25 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation 11 Miss Admin. Code Pt. 2, R. 1.8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-000	Flexible Polyurethane Foam Facility
AA-004	Slabstock Flexible Polyurethane Foam Production Line: Includes all portions of the flexible polyurethane foam process from the mixhead to the point in the process where the foam is completely cured. Emissions include VOC and HAP emissions from the foam manufacture (pouring) process which are routed to a stack and five (5) curing stations which are routed to two (2) stacks.
AA-008	22,180 gallon Polyol Storage Tank (Reference No. SW-08)
AA-009	22,180 gallon Polyol Storage Tank (Reference No. SW-09)
AA-010	22,180 gallon TDI Storage Tank equipped with Carbon Adsorption (Reference No. SW-11)
AA-011	22,180 gallon TDI Storage Tank equipped with Carbon Adsorption (Reference No. SW-12)
AA-017	Transfer pumps and other components in diisocyanate service.
AA-018	Flexible Polyurethane Fabrication gluing and bonding operations, booths 1-6. Emissions include VOC emissions from gluing the foam and fiber pieces that have been cut to size. Emissions are routed to one (1) stack.
AA-019	Flexible Polyurethane Fabrication gluing and bonding operations, booths 7-12. Emissions include VOC emissions from gluing the foam and fiber pieces that have been cut to size. Emissions are routed to one (1) stack.
AA-021	Mixing Area where a fire retardant powder (Melamine) is mixed with Polyol and metered into the foam pouring head. The fire retardant powder is stored in 1000 pound super sacks. Particulate matter emissions resulting from this process are vented into the building.
AA-022 through AA-026	Five (5) 12,600 gallon TDI Storage Tanks equipped with Carbon Adsorption
AA-030	3.0 MMBTU/hr Natural Gas fired curing over from Fiber Line process (<i>Insignificant Activity</i>)

SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. Facility-Wide Emission Limitations & Standards

3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).

(a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.

(b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.A.)

3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Paragraph 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)

B. Emission Point Specific Emission Limitations & Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-004	Title V Operating Permit Issued October 11, 2004, and Modified March 23, 2005, September 26, 2005, and March 3, 2008	3.B.1	HAP	Prohibited from using HAP, VOC blowing agent
AA-000	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1)	3.B.2	PM (filterable only)	$E = 4.1p^{0.67}$
AA-008 AA-009	40 CFR 60, Subpart Kb – 40 CFR 60.110b(b)	3.B.3	VOC	Emission standards are not applicable, only recordkeeping requirements (See paragraph 5.B.1)
AA-000	40 CFR 63.1290(a)(1) – Subpart III – National Emission Standard for	3.B.4	HAP	Applicability Only

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
	Hazardous Air Pollutants for Flexible Polyurethane Foam Production			
	40 CFR 63.1290(d), Subpart III	3.B.5	HAP	Operating Requirements
AA-004 AA-010 AA-011 AA-022 through AA-026	40 CFR 63.1294(a), Subpart III	3.B.6	HAP	Storage vessels must be equipped with a carbon adsorption system.
AA-017	40 CFR 63.1294(b), Subpart III	3.B.7	HAP	Pump shall be a sealless pump or a submerged pump system
AA-000 (Equipment leaks from component in diisocyanate service)	40 CFR 63.1294(c), Subpart III	3.B.8	HAP	Leak Detection
	40 CFR 63.1294(d), Subpart III	3.B.9		Delay of Repair
AA-000	40 CFR 63.1297, Subpart III	3.B.10	HAP	Shall not use HAP or HAP based material as an ABA
AA-000	40 CFR 63.1298, Subpart III	3.B.11	HAP	Shall not use HAP or HAP based material as an equipment cleaner

3.B.1 For Emission Point AA-004, the permittee is prohibited from using any HAP or VOC blowing agent.

(Ref.: Title V Operating Permit Issued October 11, 2004, and Modified March 23, 2005, September 26, 2005, and March 3, 2008)

3.B.2 For Emission Point AA-000, except as otherwise specified, 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 the property boundary where the discharge occurs.

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

- 3.B.3 Emission Points AA-008 and AA-009 are subject to 40 CFR 60, Subpart Kb – Standards for Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984. Per §60.110b(b), these tanks are exempt from 40 CFR 60, Subpart A – General Provisions and all provisions of Subpart Kb except for §60.116b(a) and (b), which relate to recordkeeping (expressed as condition 5.B.1).

(Ref.: 40 CFR 60.110(b), Subpart Kb)

- 3.B.4 For Emission Point AA-000, the permittee is subject to and shall comply with the National Emission Standard for Hazardous Air Pollutants for Flexible Polyurethane Foam Production (40 CFR 63, Subpart III) and General Provisions (40 CFR 63, Subpart A).

(Ref.: 40 CFR 63.1290(a)(1), Subpart III)

- 3.B.5 For Emission Point AA-000, the permittee shall comply with the following:

- (1) The emission limitations set forth in 40 CFR 63, Subpart III and the emission limitations referred to in 40 CFR 63, Subpart III shall apply at all times except during periods of non-operation resulting in cessation of the emissions to which 40 CFR 63, Subpart III applies.
- (2) Equipment leak requirements of 40 CFR 63.1294 shall apply at all times except during periods of non-operation in which the lines are drained and depressurized resulting in cessation of the emissions to which the equipment leak requirements apply.
- (3) The permittee shall not shut down items of equipment that are required or utilized for compliance with 40 CFR 63, Subpart III during times when emissions are being routed to such items of equipment if the shutdown would contravene requirements of 40 CFR 63, Subpart III applicable to such items of equipment.
- (4) At all times, the permittee shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements will be based on information available to the MDEQ, which may include, but is not limited to,

monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(Ref.: 40 CFR 63.1290(d), Subpart III)

- 3.B.6 For Emission Points AA-004, AA-010, AA-011, and AA-022 through AA-026, diisocyanate storage vessels shall be equipped with a carbon adsorption system meeting the following requirements (b): The storage vessel shall be equipped with a carbon adsorption system, meeting the monitoring requirements of 40 CFR 63.1303(a), that routes displaced vapors through activated carbon before being discharge to the atmosphere. The permittee shall replace carbon upon indication of breakthrough before the next unloading event.

(Ref.: 40 CFR 63.1294(a), Subpart III)

- 3.B.7 For Emission Point AA-017, each transfer pump in diisocyanate service shall meet the requirements of paragraph (a) or (b):

- (a) The pump shall be a sealless pump; or
- (b) The pump shall be a submerged pump system meeting the following requirements:
 - (1) The pump shall be completely immersed in bis(2-ethylhexyl)phthalate, 2(methyloctyl)phthalate, or another neutral oil,
 - (2) The pump shall be visually monitored weekly to detect leaks,
 - (3) When a leak is detected, it shall be repaired in accordance with the following procedures, except as provided in 40 CFR 63.1294(d).
 - (i) The leak shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected.
 - (ii) A first attempt at repair shall be made no later than 5 calendar days after the leak is detected. First attempts at repair include, but are not limited to, the following practices where practicable.
 - (A) Tightening of packing gland nuts
 - (B) Ensuring that the seal flush is operating at design pressure and temperature.

(Ref.: 40 CFR 63.1294(b), Subpart III)

- 3.B.8 For Emission Point AA-000 (equipment leaks from components in diisocyanate service), if evidence of a leak is found by visual, audible, or any other detection method, it shall be

repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 CFR 63.1294(d). The first attempt at repair shall be made no later than 5 calendar days after each leak is detected.

(Ref.: 40 CFR 63.1294(c), Subpart III)

3.B.9 For Emission Points AA-004, AA-010, AA-011, AA-017, and AA-022 through AA-026, the following delay of repair procedures must be followed:

- (a) Delay of repair of equipment for which leaks have been detected is allowed for equipment that is isolated from the process and that does not remain in diisocyanate service.
- (b) Delay of repair for valves and connectors is also allowed if:
 - (1) The permittee determines that diisocyanate emissions of purged material resulting from immediate repair are greater than the fugitive emissions likely to result from delay or repair, and
 - (2) The purged material is collected and destroyed or recovered in a control device when repair procedures are effected, and
 - (3) Repair is completed as soon as practicable, but not later than 6 months after the leak was detected.
- (c) Delay of repair for pumps is also allowed if repair requires replacing the existing seal design with a sealless pump, and repair is completed as soon as practicable, but not later than 6 months after the leak was detected.

(Ref: 40 CFR 63.1294(d), Subpart III)

3.B.10 For Emissions Point AA-000, the permittee shall not use HAP or HAP-based materials as an auxiliary blowing agent (ABA).

(Ref.: 40 CFR 63.1297, Subpart III)

3.B.11 For Emissions Point AA-000, the permittee shall not use HAP or HAP-based materials as an equipment cleaner.

(Ref.: 40 CFR 63.1298, Subpart III)

C. Insignificant and Trivial Activity Emission Limitations & Standards

Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.C.1	PM	0.6 lbs/MMBTU
11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.C.2	SO ₂	4.8 lbs/MMBTU

- 3.C.1 The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input.

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

- 3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.

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

SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:
- (a) the identification of each term or condition of the permit that is the basis of the certification;
 - (b) the compliance status;
 - (c) whether compliance was continuous or intermittent;
 - (d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
 - (e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(5)(a), (c), & (d).)

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. General Monitoring, Recordkeeping and Reporting Requirements

- 5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.
- 5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:
- (a) the date, place as defined in the permit, and time of sampling or measurements;
 - (b) the date(s) analyses were performed;
 - (c) the company or entity that performed the analyses;
 - (d) the analytical techniques or methods used;
 - (e) the results of such analyses; and
 - (f) the operating conditions existing at the time of sampling or measurement. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(1).)
- 5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information 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 for continuous monitoring instrumentation, and copies of all reports required by the permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(2).)
- 5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 6.2.E. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)
- 5.A.5 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) days of the time the deviation began. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(2).)

5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the DEQ and the EPA.

5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

B. Specific Monitoring and Recordkeeping Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
AA-008 AA-009	40 CFR 60.116b(a) and (b), Subpart Kb	5.B.1	VOC	Storage Vessel Recordkeeping
AA-018 AA-019 AA-028 AA-029	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)	5.B.2	VOC/HAP	Recordkeeping of chemical composition of each adhesive
AA-004 AA-018 AA-019 AA-028 AA-029	Title V Operating Permit issued on September 26, 2005	5.B.3	VOC/HAP	Recordkeeping
AA-010 AA-011 AA-022 through AA- 026	Title V Operating Permit modified March 3, 2008	5.B.4	VOC/HAP	Alternative Monitoring Plan
AA-010 AA-011 AA-022 through AA- 026	40 CFR 63.1303(a) and (b), Subpart III	5.B.5	HAP	Monitoring requirements for storage vessels with carbon adsorption systems
AA-000 (Equipment leaks from components in diisocyanate service)	40 CFR 63.1307(a)(1) and (2), Subpart III	5.B.6	HAP	Storage Vessel Records
	40 CFR 63.1307(b), Subpart III	5.B.7	HAP	Equipment Leak Records
AA-000	40 CFR 63.1307(c), Subpart III	5.B.8	HAP	Recordkeeping for ABA
AA-000	40 CFR 63.1307(d), Subpart III	5.B.9	HAP	Recordkeeping for equipment cleaner

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
AA-000 (Equipment leaks from component in diisocyanate service)	40 CFR 63.1307(e), Subpart III	5.B.10	HAP	Recordkeeping for equipment leaks
	40 CFR 63.1307(h), Subpart III	5.B.11		Malfunction Records
	40 CFR 63.1308(b), Subpart III	5.B.12		Compliance Demonstration
	40 CFR 63.1308(c), Subpart III	5.B.13		

5.B.1 For Emission Points AA-008 and AA-009, the permittee shall, for the life of each storage vessel, keep readily accessible records showing the dimensions of each storage vessel and an analysis showing the capacity of each storage vessel.

(Ref.: 40 CFR 60.116b(a) and (b), Subpart Kb)

5.B.2 For Emission Points AA-018, AA-019, AA-028, and AA-029, the permittee shall keep readily accessible records documenting the chemical composition (HAPs and VOCs) of each adhesive used in the process.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.(A)(3)(a)(2))

5.B.3 For Emission Points AA-004, AA-018, AA-019, AA-028, and AA-029, the permittee shall maintain sufficient records to document:

- (a) Identification of Polyol, Adhesive(s) or other VOC or HAP containing material used, and the total gallons of Polyol and each adhesive used on a monthly basis and in any consecutive 12-month period.
- (b) The VOC and HAP content(s) of the Polyol, Adhesive(s), 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 the Polyol, Adhesive(s), or other VOC or HAP containing material.
- (d) The emission rate in tons per year for VOC, individual HAP, and combined total HAPs based on a 12-month rolling total.
- (e) 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.

(Ref.: Title V Operating Permit issued on September 26, 2005)

5.B.4 For Emission Points AA-010, AA-011, and AA-022 through AA-026, the permittee shall monitor the following:

- (a) The concentration level of the HAP or the organic compounds in the exhaust vent stream (or outlet stream exhaust) from the carbon adsorption system at the frequency specified in (1) or (2) in accordance with (b).
 - (1) The concentration level of HAP or organic compounds shall be monitored during each unloading event, or once per month during an unloading event if multiple unloading events occur in a month.
 - (2) As an alternative to monthly monitoring, the permittee can set the monitoring frequency at an interval no greater than 20 percent of the carbon replacement interval, which is established using a design analysis described below.
 - (i) The design analysis shall consider the vent stream composition, constituent concentration, flow rate, relative humidity, and temperature.
 - (ii) The design analysis shall establish the outlet organic concentration level, the capacity of the carbon bed, and the working capacity of activated carbon used for the carbon bed, and
 - (iii) The design analysis shall establish the carbon replacement interval based on the total carbon working capacity of the carbon adsorption system and the schedule for filling the storage vessel.
- (b) The concentration level of total organic compounds in the exhaust vent stream (or outlet stream exhaust) from the carbon absorption system using 40 CFR 60, Appendix A, Method 25A, reported as propane. The measurement shall be conducted over at least one 5-minute interval during which the storage vessel is being filled.

(Ref.: 40 CFR 63.1303(a) and (b), Subpart III)

5.B.5 For Emission Point AA-000 (equipment leaks from components in diisocyanate service), the permittee shall maintain the following storage vessel records:

- (1) A list of diisocyanate storage vessels, along with a record of the type of control utilized for each storage vessel.
- (2) For storage vessels complying through the use of a carbon adsorption system:

- (i) Records of dates and times when the carbon adsorption system is monitored for carbon breakthrough and the monitoring device reading, when the device is monitored in accordance with 40 CFR 63.1303(a); or
- (ii) Date when the existing carbon in the carbon adsorption system is replaced with fresh carbon.

(Ref.: 40 CFR 63.1307(a)(1) and (2), Subpart III)

5.B.6 For Emission Point AA-000 (equipment leaks from components in diisocyanate service), the permittee shall maintain the following equipment leak records:

- (1) A list of components in diisocyanate service.
- (2) For transfer pumps in diisocyanate service, a record of the type of control utilized for each transfer pump and the date of installation.
- (3) When a leak is detected as specified in 40 CFR 63.1294(b)(2)(ii) and 63.1294(c), the following requirements apply:
 - (i) Leaking equipment shall be identified in accordance with the following:
 - (A) A readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment.
 - (B) The identification on equipment may be removed after it has been repaired.
 - (ii) The following information shall be recorded for leaking components.
 - (A) The operator identification number and the equipment identification number.
 - (B) The date the leak was detected and the dates of each attempt to repair the leak.
 - (C) Repair methods applied in each attempt to repair the leak.
 - (D) The words “repair delayed” and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak.
 - (E) The expected date of the successful repair of the leak if a leak is not repaired within 15 calendar days.
 - (F) The date of successful repair of the leak.
 - (G) The date the identification is removed.

(Ref.: 40 CFR 63.1307(b), Subpart III)

5.B.7 For Emission Point AA-000, the permittee shall maintain a product data sheet for each ABA used that includes the HAP content, in kg of HAP/kg solids (lb HAP/lb solids).

(Ref.: 40 CFR 63.1307(c), Subpart III)

5.B.8 For Emission Point AA-000, the permittee shall maintain a product data sheet for each equipment cleaner used that includes the HAP content, in kg of HAP/kg solids (lb HAP/lb solids).

(Ref.: 40 CFR 63.1307(d), Subpart III)

5.B.9 For Emission Point AA-000, the permittee shall maintain records of each use of a vapor return line during unloading, of any leaks detected during unloading, and of repairs of leaks detected during unloading.

(Ref.: 40 CFR 63.1307(e), Subpart III)

5.B.10 For Emission Point AA-000, the permittee shall maintain the following malfunction records:

- (1) In the event that an affected unit fails to meet an applicable standard, record the number of failures. For each failure, record the date, time and duration of the failure.
- (2) For each failure to meet an applicable standard, record and retain a list of the affected sources or equipment, an estimate of the volume of each regulated pollutant emitted over any emission limit and a description of the method used to estimate the emissions.
- (3) Record actions taken to minimize emissions in accordance with 40 CFR 63.1290(d) and any corrective actions taken to return the affected unit to its normal or usual manner of operation.

(Ref.: 40 CFR 63.1307(h), Subpart III)

5.B.11 For Emission Point AA-000, the permittee shall comply with the following: For slabstock affected sources, failure to meet the requirements contained in 40 CFR 63.1294 shall be considered a violation of this subpart. Violation of each item listed in the paragraphs (1) through (6), as applicable, shall be considered a separate violation.

- (1) For each affected source complying with 40 CFR 63.1294(a) in accordance with 40 CFR 63.1294(a)(1), each unloading event that occurs when the diisocyanate storage vessel is not equipped with a vapor return line from the storage vessel to the tank truck or rail car, each unloading event that occurs when the vapor line is not connected, each unloading event that the vapor line is not inspected for leaks as described in 40 CFR 63.1294(a)(1)(i), each unloading event that occurs after a leak has been detected and not repaired, and each calendar day after a leak is detected, but not repaired as soon as practicable;

- (2) For each affected source complying with 40 CFR 63.1294(a) in accordance with 40 CFR 63.1294(a)(2), each unloading event that the diisocyanate storage vessel is not equipped with a carbon adsorption system, each unloading event (or each month if more than one unloading event occurs in a month) that the carbon adsorption system is not monitored for breakthrough in accordance with 40 CFR 63.1303(a)(3) or (4), and each unloading event that occurs when the carbon is not replaced after an indication of breakthrough;
- (3) For each affected source complying with 40 CFR 63.1294(a) in accordance with 40 CFR 63.1294(a)(2) through the alternative monitoring procedures in 40 CFR 63.1303(a)(2), each unloading event that the diisocyanate storage vessel is not equipped with a carbon adsorption system, each time that the carbon adsorption system is not monitored for breakthrough in accordance with 40 CFR 63.1303(b)(1) or (2) at the interval established in the design analysis, and each unloading event that occurs when the carbon is not replaced after an indication of breakthrough;
- (4) For each affected source complying with 40 CFR 63.1294(b) in accordance with 40 CFR 63.1294(b)(1), each calendar day that a transfer pump in diisocyanate service is not a sealless pump;
- (5) For each affected source complying with 40 CFR 63.1294(b) in accordance with 40 CFR 63.1294(b)(2), each calendar day that a transfer pump in diisocyanate service is not submerged as described in 40 CFR 63.1294(b)(2)(i), each week that the pump is not visually monitored for leaks, each calendar day after 5 calendar days after detection of a leak that a first attempt at repair has not been made in accordance with 40 CFR 63.1294(b)(2)(iii)(B), and the earlier of each calendar day after 15 calendar days after detection of a leak that a leak is not repaired, or a leak is not repaired as soon as practicable, each subsequent calendar day (with the exception of situations meeting the criteria of 40 CFR 63.1294(d));
- (6) For each affected source complying with 40 CFR 63.1294(c), each calendar day after 5 calendar days after detection of a leak that a first attempt at repair has not been made, and the earlier of each calendar day after 15 calendar days after detection of a leak that a leak is not repaired, or if a leak is not repaired as soon as practicable, each subsequent calendar day (with the exception of situations meeting the criteria of 40 CFR 63.1294(d)).

(Ref.: 40 CFR 63.1308(b), Subpart III)

5.B.12 For Emission Point AA-000, failure to meet the requirements contained in 40 CFR 63.1297 and 63.1298, respectively, shall be considered a violation of 40 CFR 63, Subpart III. Violation of each item listed in the following paragraphs shall be considered a separate violation.

- (1) Each calendar day that a HAP ABA or HAP-based material is used as an ABA;

(2) Each calendar day that a HAP-based material is used as an equipment cleaner.

(Ref.: 40 CFR 63.1308(c), Subpart III)

C. Specific Reporting Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Reporting Requirement
AA-004 AA-018 AA-019 AA-028 AA-029	Title V Operating Permit issued September 26, 2005	5.C.1	VOC/HAP	Semi-annual reporting
AA-000	40 CFR 63.1306(d), Subpart III	5.C.2	HAP	Semi-annual reporting
	40 CFR 63.1306(e), Subpart III	5.C.3		Annual compliance certifications
	40 CFR 63.1306(f), Subpart III	5.C.4		Malfunction reports

5.C.1 For Emission Points AA-004, AA-018, AA-019, AA-028, and AA-029, the permittee shall submit semi-annual reports in accordance with Conditions 5.A.4 providing:

- (a) Identification of the Polyol, Adhesive(s) or other VOC or HAP containing material used.
- (b) The VOC and HAP content(s) of Polyol, Adhesive(s) 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 total gallons of the Polyol, Adhesive(s) or other VOC or HAP containing material used in any 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 year for each consecutive 12-month period.

(Ref: Title V Operating Permit issued September 26, 2005)

5.C.2 For Emission Point AA-000, the permittee shall submit a report containing the following information semiannually no later than 60 days after the end of each 180 day period.

- (1) For sources complying with the storage vessel provisions of 40 CFR 63.1294(a) using a carbon adsorption system, unloading events that occurred after breakthrough was detected and before the carbon was replaced.
- (2) Any equipment leaks that were not repaired in accordance with 40 CFR 63.1294(b)(2)(iii) and 63.1294(c).
- (3) Any leaks in vapor return lines that were not repaired in accordance with 40 CFR 63.1294(a)(1)(ii).

(Ref.: 40 CFR 63.1306(d), Subpart III)

5.C.3 For AA-000, the permittee shall submit the following compliance certification annually.

- (1) The compliance certification shall be based on information consistent with that contained in 40 CFR 63.1308, as applicable.
- (2) A compliance certification required pursuant to a state or local operating permit program may be used to satisfy the requirements of this section, provided that the compliance certification is based on information consistent with that contained in 40 CFR 63.1308, and provided that the Administrator has approved the state or local operating permit program under part 70 of this chapter.
- (3) Each compliance certification submitted pursuant to this section shall be signed by a responsible official of the company that owns or operates the affected source.

(Ref.: 40 CFR 63.1306(e), Subpart III)

5.C.4 For Emission Point AA-000, if the permittee fails to meet an applicable standard, slabstock affected sources shall report such events in the next semiannual report. Report the number of failures to meet an applicable standard. For each instance, report the date, time and duration of each failure. For each failure, the report shall include a list of the affected sources or equipment, an estimate of the volume of each regulated pollutant emitted over any emission limit, and a description of the method used to estimate the emissions.

(Ref.: 40 CFR 63.1306(f), Subpart III)

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act – Stratospheric Ozone Protection. The full text of the referenced regulations may be found on-line at <http://ecfr.gpoaccess.gov> under Title 40, or DEQ shall provide a copy upon request from the permittee.

- 7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A – Production and Consumption Controls.
- 7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.
- 7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E – The Labeling of Products Using Ozone-Depleting Substances, for the following containers and products:
 - (a) All containers in which a class I or class II substance is stored or transported;
 - (b) All products containing a class I substance; and
 - (c) All products directly manufactured with a process that uses a class I substance, unless otherwise exempted by this subpart or, unless EPA determines for a particular product that there are no substitute products or manufacturing processes for such product that do not rely on the use of a class I substance, that reduce overall risk to human health and the environment, and that are currently or potentially available. If the EPA makes such a determination for a particular product, then the requirements of this subpart are effective for such product no later than January 1, 2015.
- 7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F – Recycling and Emissions Reduction:
 - (a) Servicing, maintaining, or repairing appliances;
 - (b) Disposing of appliances, including small appliances and motor vehicle air conditioners;
or
 - (c) Refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, persons

selling class I or class II refrigerants or offering class I or class II refrigerants for sale,
and persons purchasing class I or class II refrigerants.

- 7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any acceptable alternative that is listed in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR Part 82, Subpart G – Significant New Alternatives Policy Program. The permittee shall also comply with any use conditions for the acceptable alternative substance.
- 7.6 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart H – Halon Emissions Reduction:
- (a) Any person testing, servicing, maintaining, repairing, or disposing of equipment that contains halons or using such equipment during technician training;
 - (b) Any person disposing of halons;
 - (c) Manufacturers of halon blends; or
 - (d) Organizations that employ technicians who service halon-containing equipment.

APPENDIX A

List of Abbreviations Used In this Permit

11 Miss. Admin. Code Pt. 2, Ch. 1.	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
11 Miss. Admin. Code Pt. 2, Ch. 2.	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
11 Miss. Admin. Code Pt. 2, Ch. 3.	Regulations for the Prevention of Air Pollution Emergency Episodes
11 Miss. Admin. Code Pt. 2, Ch. 4.	Ambient Air Quality Standards
11 Miss. Admin. Code Pt. 2, Ch. 5.	Regulations for the Prevention of Significant Deterioration of Air Quality
11 Miss. Admin. Code Pt. 2, Ch. 6.	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
11 Miss. Admin. Code Pt. 2, Ch. 7.	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lbs/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards For Hazardous Air Pollutants, 40 CFR 61
	or
	National Emission Standards For Hazardous Air Pollutants for Source Categories, 40 CFR 63
NM VOC	Non-Methane Volatile Organic Compounds
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM ₁₀	Particulate Matter less than 10 µm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound