

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

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

THIS CERTIFIES THAT

Toyota Boshoku Mississippi LLC
1 TB Way
Mantachie, Mississippi
Itawamba 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. seq., Mississippi Code of 1972), the regulations and standards adopted and promulgated thereunder, and the State Implementation Plan for operating permits for synthetic minor sources.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: June 16, 2017

Permit No.: 1240-00034

Effective Date: As specified herein.

Expires: May 31, 2022

Section 1.

A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
2. This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.4.D. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.4.D.)
3. Any activities not identified in the application are not authorized by this permit. (Ref.: Miss. Code Ann. 49-17-29 1.b)
4. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)
7. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)
8. The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:
 - a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and
 - b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission.

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

9. Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control. (Ref.: Miss. Code Ann. 49-17-39)
10. Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
11. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(7).)
12. This permit does not authorize a modification as defined in Regulation 11 Miss. Admin. Code Pt. 2, Ch.2., "Permit Regulations for the Construction and/or Operation of Air Emission Equipment." A modification may require a Permit to Construct and a modification of this permit. Modification is defined as "Any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:
 - a. Routine maintenance, repair, and replacement;
 - b. Use of an alternative fuel or raw material by reason of an order under Sections 2(a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
 - c. Use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
 - d. Use of an alternative fuel or raw material by a stationary source which:
 - (1) The source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or

- (2) The source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40CFR 51.66;
- e. An increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or
- f. Any change in ownership of the stationary source.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.C(15).)

B. GENERAL OPERATIONAL CONDITIONS

- 1. Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in Regulation, 11 Miss. Admin. Code Pt. 2, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.10.)
- 2. 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." (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)
- 3. Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits. (Ref.: Miss. Code Ann. 49-17-29 1.a(i and ii))
- 4. Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.
 - a. Upsets
 - (1) For an upset defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:

- (i) An upset occurred and that the source can identify the cause(s) of the upset;
 - (ii) The source was at the time being properly operated;
 - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
 - (iv) That within 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
 - (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
- (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
 - (3) This provision is in addition to any upset provision contained in any applicable requirement.
 - (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or thirdparty enforcement actions.

b. Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.)

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

- (3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

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

5. Compliance Testing: Regarding compliance testing:

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

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

C. PERMIT RENEWAL / MODIFICATION / TRANSFER / TERMINATION

- 1. For renewal of this permit, the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board. If the applicant submits a timely and complete application pursuant to this paragraph and the Permit Board, through no fault of the applicant, fails to act on the application on or before the expiration date of the existing permit, the applicant shall continue to operate the stationary source under the terms and conditions of the expired permit, which shall remain in effect until final action on the application is taken by the Permit Board. Permit expiration terminates the source's ability to operate unless a timely and complete renewal application has been submitted. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.8.)
- 2. The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee

may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).)

3. The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).)
4. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:
 - a. Persistent violation of any terms or conditions of this permit.
 - b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
 - c. A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.C.)
5. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B.)

SECTION 2 EMISSION POINT DESCRIPTION

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

Emission Point	Description
AA-000	Entire Automotive Interior Component Manufacturing Facility
AA-100	Facility-Wide Welding Operations – Comprised of several welding booths throughout the facility. Emissions from these booths are controlled using cartridge dust collector.
AA-200*	Facility-Wide Coating and Cleaning Operations – Currently, the majority of the operations under this emission point consist of the application of a water-based adhesive. This emission point is comprised of several booths. Emissions from these booths' exhaust is controlled using dry filters.
AA-500	Urethane Seat Foam Operations – Particulate emissions are controlled with a cartridge dust collector
AA-600	Spray Adhesive Operations – Comprised of one (1) spray booth. Emissions from the booth exhaust are controlled using a dry filter.
AA-700	Plastic Molding Injection Process
AA-800	Facility-Wide Comfort Heating – Natural gas-fired space heaters with a combined total capacity of 3.39 MMBTU/hr
AA-900	Facility-Wide Storage Tanks
AA-901	Four (4) 7,500-gallon Polyol storage tanks
AA-902	One (1) 8,000-gallon Isocyanate storage tank
AA-1000	Facility-Wide Internal Combustion Engines
AA-1001a	One (1) 855 hp (637.5 kW) diesel-fired compression ignition emergency engine
AA-1001b	One (1) 855 hp (637.5 kW) diesel-fired compression ignition emergency engine
AA-1002	One (1) 110 hp (82 kW) diesel-fired fire pump engine

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

SECTION 3 EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
AA-000	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity	Opacity from any point source shall not exceed 40% unless otherwise specified
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2		Visual obscuration caused by uncombined water droplets does not apply to the 40% Opacity limitation.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.3	HAPs	9.0 tpy for any individual HAP 24.0 tpy for all combined HAPs
AA-200 AA-500 AA-600	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.4	VOCs	95.0 tpy
AA-500 AA-600	40 CFR Part 63, Subpart OOOOOO (§63.11414(a), (b)(2), (b)(4) and (d))	3.5	HAPs	Applicability
AA-1001a AA-1001b AA-1002	40 CFR 60, Subpart IIII (§60.4200(a)(2)(i-ii))	3.6	Exhaust Emissions	Applicability
	40 CFR 63, Subpart ZZZZ (§63.6580; §63.6585(a) and (c); and §63.6590(a)(2)(iii) and (c)(1))	3.7		
	40 CFR 60, Subpart IIII (§60.4209(a))	3.8		Install a non-resettable hour meter prior to start-up
	40 CFR 60, Subpart IIII (§40 CFR 60.4211(a)(1-3), (c), and (f)(1-3))	3.9		Emergency engine definition
	40 CFR 60, Subpart IIII (§60.4206)	3.10		Meet emissions standards for the entire life of each engine
	40 CFR 60, Subpart IIII (§60.4207(b) and §80.510(c)(1-2))	3.11	Fuel Requirements	Sulfur content of 15 ppm max., AND Minimum cetane index of 40, OR Maximum aromatic content of 35 volume percent
AA-1001a AA-1001b	40 CFR 60, Subpart IIII (§60.4205(b), §60.4202(a)(2), and §89.112)	3.12	NMHC+NO _x CO PM	• 6.4 g/kW-hr • 3.5 g/kW-hr • 0.20 g/kW-hr
	40 CFR 60, Subpart IIII (§60.4205(b), §60.4202(a)(2), and §89.113(a))	3.13	Opacity	• 20% during acceleration; • 15% during lugging; and • 50% during peaks in either acceleration or lugging

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
AA-1002	40 CFR 60, Subpart IIII (§60.4205(c) and Table 4 to Subpart IIII)	3.14	NMHC+NO _x CO PM	<ul style="list-style-type: none"> • 10.5 g/kW-hr • 5.0 g/kW-hr • 0.80 g/kW-hr

3.1 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.)

3.2 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 Condition 3.1. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)

3.3 For the entire facility (AA-000), the permittee shall limit the emissions of Hazardous Air Pollutants (HAPs) to no more than 9.0 tons per year (tpy) for any individual HAP and 24.0 tpy for all combined HAPs for each consecutive 12-month period on a rolling basis. (Ref.: 11 Miss Admin. Code Pt. 2, R. 2.2.B(10).)

3.4 For Emission Points AA-200, AA-500, and AA-600, the permittee shall limit the emissions of Volatile Organic Compounds (VOCs) to no more than 95.0 tpy for any consecutive 12-month period on a rolling basis. (Ref.: 11 Miss Admin. Code Pt. 2, R. 2.2.B(10).)

3.5 For Emission Points AA-500 and AA-600, the permittee is subject to and shall comply with all applicable requirements of 40 CFR Part 63, Subpart OOOOOO – National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources. (Ref.: 40 CFR 63.11414(a), (b)(2), (b)(4), and (d))

3.6 Emission Points AA-1001a, AA-1001b, and AA-1002 are subject to and shall comply with all applicable requirements of 40 CFR Part 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. (Ref.: 40 CFR 60.4200(a)(2)(i-ii))

- 3.7 Emission Points AA-1001a, AA-1001b, and AA-1002 are subject to and shall comply with all applicable requirements of 40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE).

Emission Points AA-1001a, AA-101b, and AA-1002 are located at an area source of HAPs and were constructed after June 12, 2006, and are therefore considered to be “new stationary RICE”. As such, these engines shall meet the requirements of Subpart ZZZZ by complying with the applicable requirements of 40 CFR Part 60, Subpart IIII. (Ref.: 40 CFR 63.6580; 63.6585(a) and (c); and 63.6590(a)(2)(iii) and (c)(1))

- 3.8 For Emission Points AA-1001a, AA-1001b, and AA-1002, the permittee shall install non-resettable hour meters prior to the start-up of each affected engine. (Ref.: 40 CFR 60.4209(a))
- 3.9 For Emission Points AA-1001a, AA-1001b, and AA-1002, the permittee shall install, operate, and maintain the engines according to the manufacturer’s emission related written instructions, may change only those emissions related settings that are permitted by the manufacturer, and the engines must be certified to meet the emissions limitations contained in Condition 3.13, 3.14, and 3.15.

The permittee shall operate the emergency engines in accordance with (a) through (c) below so that the engines may continue to be considered “emergency engines”. Any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year as described in (a) through (c) below is prohibited.

- (a) There is no time limit on the use of the engines in emergency situations.
- (b) The engines may each be operated for a maximum of 100 hours per calendar year for maintenance checks and readiness testing, provided the tests are recommended by federal, state, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engines. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing, but such a petition is not required if the permittee keeps records indicating that federal, state, or local standards require maintenance and testing of the engines for more than 100 hours per calendar year.
- (c) The engines may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing contained in (b). The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electrical grid or otherwise supply power as part of a financial agreement with another entity. If the source does have a financial agreement with another entity, the 50 hours of non-emergency operation may be used as long as ALL the conditions in 40 CFR 60.4211(f)(3)(i)(A through E) are met.

If the affected engines do not operate in accordance with the requirements in (a) through (c) above, then the engines will not be considered emergency engines and must meet all requirements for non-emergency engines. (Ref.: 40 CFR 60.4211(a)(1-3), (c), and (f)(1-3))

3.10 For Emission Points AA-1001a, AA-1001b, and AA-1002, the permittee must operate and maintain each engine such that it achieves the emissions standards outlined in Conditions 3.13 through 3.15 for the entire life of each engine. (Ref.: 40 CFR 60.4206)

3.11 For Emission Points AA-1001a, AA-1001b, and AA-1002, the permittee shall only use diesel fuel that meets the following requirements:

(a) Sulfur content

- (1) 15 ppm maximum for non-road diesel fuel

(b) Cetane index or aromatic content

- (1) A minimum cetane index of 40; or
(2) A maximum aromatic content of 35 volume percent.

(Ref.: 40 CFR 60.4207(b) and 40 CFR 80.510(c)(1-2))

3.12 For Emission Points AA-1001a and AA-1001b, the permittee shall limit the emission rate of Non-Methane Hydrocarbon + Nitrogen Oxides (NMHC+NO_x) to no more than 6.4 grams per kilowatt-hour (g/kW-hr), the emission rate of Carbon Monoxide (CO) to no more than 3.5 g/kW-hr, and the emission rate of PM to no more than 0.20 g/kW-hr. (Ref.: 40 CFR 60.4205(b), 60.4202(a)(2), and 89.112)

3.13 For Emission Points AA-1001a and AA-1001b, the permittee shall limit the opacity of the exhaust from both engines to no more than 20% during the acceleration mode, 15% during the lugging mode, and 50% during the peaks in either the acceleration or lugging modes. (Ref.: 40 CFR 60.4205(b), 60.4202(a)(2), and 89.113(a))

3.14 For Emission Point AA-1002, the permittee shall limit the emission rate of Non-Methane Hydrocarbon + Nitrogen Oxides (NMHC+NO_x) to no more than 10.5 g/kW-hr, the emission rate of Carbon Monoxide (CO) to no more than 5.0 g/kW-hr, and the emission rate of PM to no more than 0.80 g/kW-hr. (Ref.: 40 CFR 60.4205(c) and Table 4 to Subpart IIII)

SECTION 4 WORK PRACTICES

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Work Practice
AA-500	40 CFR Part 63, Subpart OOOOOO (§63.11416(a) and (c))	4.1	HAPs	Molded foam work practice standards
AA-600	40 CFR Part 63, Subpart OOOOOO (§63.11416(a) and (e))	4.2		Flexible polyurethane foam fabrication work practice standards

- 4.1 For Emission Point AA-500, the permittee shall not use a material containing methylene chloride as an equipment cleaner to flush the mix-head or use a material containing methylene chloride elsewhere as an equipment cleaner in a molded flexible polyurethane foam process. The permittee shall not use a mold release agent containing methylene chloride in a molded flexible polyurethane foam process. (Ref.: 40 CFR 63.11416(a) and (c))
- 4.2 For Emission Point AA-600, the permittee shall not use any adhesive containing methylene chloride in a flexible polyurethane foam fabrication process. (Ref.: 40 CFR 63.11416(a) and (e))

SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
AA-000	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain records for a minimum of 5 years.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2	HAPs	Demonstration of compliance for HAP limits
AA-200 AA-500 AA-600	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.3	VOCs	Demonstration of compliance for VOC limit
AA-500 AA-600	40 CFR Part 63, Subpart OOOOOO (§63.11416(f))	5.4	HAPs	Demonstration of compliance with work practice standards
	40 CFR Part 63, Subpart OOOOOO (§63.11417(a), (c)(1), and (d))	5.5		Compliance certification and recordkeeping requirements
AA-1001a AA-1001b AA-1002	40 CFR 60, Subpart IIII (§40 CFR 60.4214(b))	5.6	Exhaust Emissions	Record the number of hours of operation for each affected engine

5.1 The permittee shall retain all required records, monitoring data, supporting information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.9.)

5.2 For the entire facility (AA-000), the permittee shall monitor and record the following information for each HAP containing material or HAP generating source on a monthly basis:

- (a) The identification of the HAP containing material or HAP generating source;
- (b) The percentage of each individual HAP and total HAPs by weight (as applicable). A description of the method used to determine this percentage shall accompany this data;
- (c) The total amount of each HAP containing material used in appropriate units (i.e. gallons, pounds, etc.); and
- (d) The density of each HAP containing material used, in pounds per gallon (lb/gal) (as applicable).

Using the required information above, the permittee shall calculate and record the emission rate of each individual HAP and all combined HAPs in tons per year for each consecutive 12-month period on a rolling basis. The permittee may use data supplied by the manufacturer to determine the HAP contents of the materials used. The permittee may

also use EPA Test Method 24, EPA Test Method 311, and/or an alternative EPA approved test method to determine the HAP contents. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 5.3 For Emission Points AA-200, AA-500, and AA-600, the permittee shall monitor and record the following information for each VOC containing material or VOC generating source on a monthly basis:

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

Using the required information above, the permittee shall calculate and record the emission rate of VOCs in tons per year for each consecutive 12-month period on a rolling basis. The permittee may use data supplied by the manufacturer to determine the VOC contents of the materials used. The permittee may also use EPA Test Method 24, EPA Test Method 311, and/or an alternative EPA approved test method to determine the VOC contents. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 5.4 For Emission Points AA-500 and AA-600, the permittee may demonstrate compliance with the requirements in Conditions 4.1 and 4.2 by using adhesive usage records and Material Safety Data Sheets. (Ref.: 40 CFR 63.11416(f))

- 5.5 For Emission Points AA-500 and AA-600, the permittee must have a compliance certification on file. This certification must contain the statements in paragraph (a) and (b) below and must be signed by a responsible official.

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

The permittee must maintain records of the information used to demonstrate compliance, as required in Condition 5.4. The permittee must maintain the records for 5 years, with the most recent 2 years of data retained on site. The remaining 3 years of data may be maintained off site. (Ref.: 40 CFR 63.11417(a), (c)(1), and (d))

- 5.6 For Emission Points AA-1001a, AA-1001b, and AA-1002, the permittee shall keep records of the operation of each engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The permittee shall record the time and reason that each engine is being operated. (Ref.: 40 CFR 60.4214(b))

SECTION 6 REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
AA-000	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	Report permit deviations within five (5) working days.
		6.2	Submit certified annual monitoring report.
		6.3	All documents submitted to MDEQ shall be certified by a Responsible Official.

- 6.1 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 6.2 Except as otherwise specified herein, the permittee shall submit a certified annual synthetic minor monitoring report postmarked no later than 31st of January for the preceding calendar year. This report shall include a summary of the monthly monitoring required by Conditions 5.2 and 5.3. This report shall include sufficient detail to demonstrate that the permittee has remained in compliance with the emission limitations outlined in Conditions 3.3, 3.4, and 3.6.
- All instances of deviations from permit requirements must be clearly identified in the report. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 6.3 Any document required by this permit to be submitted to the MDEQ shall contain a certification signed by a responsible official stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)