

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

**TO OPERATE AIR EMISSIONS EQUIPMENT**

**THIS CERTIFIES THAT**

Carpenter Company  
Tupelo-Lee Industrial Park South, 184 Lipford Drive  
Verona, MS

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:** DEC 12 2013

**Effective Date:** As specified herein.

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

  
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**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Expires:** November 30, 2018

**Permit No.:** 1540-00024

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### **APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT**

#### **OTHER IMPORTANT DOCUMENTS:**

**40 CFR 63: National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)**

**40 CFR 63: National Emissions Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Operation (Area Sources)**

**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 ordinance. 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
AC-002	Flexible polyurethane foam pouring operation exhaust #1 (Ref. No. 1102) vented either to a scrubber (Ref. No. 1112) that is not used for emission rate reduction or directly to the atmosphere
AC-003	Flexible polyurethane foam pouring operation exhaust #2 (Ref. No. 1103) vented either to a scrubber (Ref. No. 1112) that is not used for emission rate reduction or directly to the atmosphere
AC-004	Slab curing room exhaust #1(Ref. No. 1110)
AC-005	Slab curing room exhaust #2 (Ref. No. 1111)
AC-006	Fabrication Process - Polyurethane foam and non-woven fabric are cut to customer satisfaction and assembled as required
AC-007	Emergency diesel-fueled firewater Pump with a rated capacity of 300 horsepower, Stationary RICE, constructed before 6/12/2006
AT-001	10,383 gallon polyol tank (Reference No. T1)
AT-002	10,383 gallon polyol tank (Reference No. T2)
AT-003	12,000 gallon polyol tank (Reference No. T3)
AT-004	12,000 gallon polyol tank (Reference No. T4)
AT-005	12,632 gallon polyol tank (Reference No. T5)
AT-006	12,632 gallon polyol tank (Reference No. T6)
AT-007	18,235 gallon polyol tank (Reference No. T7)
AT-008	18,235 gallon polyol tank (Reference No. T8)
AT-009	18,235 gallon polyol tank (Reference No. T9)
AT-010	18,235 gallon polyol tank (Reference No. T10)
AT-011	18,235 gallon polyol tank (Reference No. T11)
AT-012	18,235 gallon polyol tank (Reference No. T12)
AT-013	18,235 gallon polyol tank (Reference No. T13)
AT-014	18,235 gallon polyol tank (Reference No. T14)
AT-015	18,235 gallon toluene diisocyanate tank (Reference No. T15)
AT-016	125,583 gallon toluene diisocyanate tank (Reference No. T16)
AT-017	125,583 gallon polyol tank (Reference No. T17)

Emission Point	Description
AT-018	6,073 gallon polyol tank (Reference No. T18)
AT-019	6,073 gallon fire retardant tank (Reference No. T19)
AT-020	12,000 gallon fire retardant tank (Reference No. T20)
AT-021	12,632 gallon silicone tank (Reference No. T21)
AT-022	10,931 gallon reserve tank (Reference No. T22)
AT-023	10,931 gallon reserve tank (Reference No. T23)
AT-024	18,235 gallon polyol tank (Reference No. T24)
AT-025	18,235 gallon polyol tank (Reference No. T25)
AT-026	18,235 gallon diphenylmethane diisocyanate tank (Reference No. T26)
AT-027	8,555 gallon carbon dioxide / refrigerated liquid tank (Reference No. T27)
AT-028	10,000 gallon diesel fuel #2 tank (Reference No. T28)
AT-029	2,286 gallon melamine/polyol fire retardant (Reference No. T28)
AT-030	350 gallon methylformate tank (Reference No. T29)
AT-031	2000 gallon n-pentane tank (Reference No. T31)

## 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
Facility-wide	Federally Enforceable Title V Operating Permit issued on May 19, 2004, & modified on June 14, 2011 & 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)	3.B.1	HAP	9.9 tons/year for any individual HAP & 24.9 tons/year for combined total HAP
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1)	3.B.2	PM (filterable only)	$E = 4.1p^{0.67}$
AC-002 thru AC-006	Federally Enforceable Title V Operating Permit issued on May 19, 2004 & 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)	3.B.3	VOC	105 TPY
AT-016 and AT-017	§60.110b(a) & §60.116b(a), (b), & (d)	3.B.4	VOC	Emission standards are not applicable, only recordkeeping requirements (see Paragraph 5.B.2 & 5.B.3)
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)	3.B.5	Blowing agent restriction	Usage of volatile organic HAP containing blowing agent is prohibited.
AC-002 thru AC-006	40 CFR 63, Subpart OOOOOO (§63.11414(b))	3.B.6	HAP	Applicability
	40 CFR 63, Subpart OOOOOO (§63.11416(b)(2) & (e))			Usage of methylene chloride is prohibited.
AC-007	40 CFR 63. Subpart ZZZZ (§63.6603(a) and Table 2d)	3.B.7	HAP	Change oil and filter every 500 hours of operation or annually; inspect spark plugs every 1,000 hours of operation or annually; and inspect all hoses and belts every 500 hours of operation or annually.
	40 CFR 63. Subpart ZZZZ (§63.6605(b))	3.B.8		Operate and maintain sources in a manner consistent with safety and good air pollution control practices for minimizing emissions.

3.B.1 In order to maintain hazardous air pollutants (HAPs) below major source status, the  
6377 PER20130001

permittee is limited to facility-wide emission limitations of 24.9 tons per year of total HAPs and 9.9 tons per year of individual HAP.

(Ref: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10), Federally Enforceable Operating Permit issued on May 19, 2004, & modified on June 14, 2011)

- 3.B.2 Except as otherwise specified, no person shall 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 The permittee shall not emit more than 105 TPY of Volatile Organic Compounds (VOCs) in any consecutive 12 month period.

(Ref: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10) & Federally Enforceable Operating Permit issued on May 19, 2004)

- 3.B.4 For Emission Points AT-016 & AT-017, the permittee is subject to and shall comply with 40 CFR 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels).

The permittee shall store only toluene diisocyanate in tank AT-016 and the Polyol in tank AT-017. The permittee shall not be authorized to substitute any other volatile organic material in place of the permitted substances listed for each of the above tanks subject to Subpart Kb.

(Ref.: §60.110b(a) & §60.116b(a), (b), & (d))

- 3.B.5 The permittee is prohibited from using any blowing agent containing volatile organic HAP in any of their processes operated at the facility.

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

- 3.B.6 The facility is subject to the National Emission Standards for Hazardous Air Pollutants from  
6377 PER20130001



Flexible Polyurethane Foam Production and Fabrication Area Sources, 40 CFR Part 63, Subpart OOOOOO and all applicable requirements contained in the General Provisions, 40 CFR 63, Subpart A as summarized in Table 1 of Subpart OOOOOO. This facility is an affected source per §63.11414(b) of the rule. The affected source under this standard is the collection of all equipment and activities necessary to produce and fabricate flexible polyurethane foam in accordance with §63.11416(b)(2) & (e) of Subpart OOOOOO.

- a. The permittee shall be prohibited from using material containing methylene chloride for any purpose in any of their slabstock flexible foam production processes.
- b. The permittee must not use any adhesive containing methylene chloride in any of their flexible polyurethane foam fabrication processes.

(Ref: §63.11414(b)(1) & (4), §63.11416(b)(2) & (e))

- 3.B.7 Emission Point AC-007 is subject to the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ. AC-007 is an existing, emergency RICE located at an area source.

Beginning on May 3, 2013, the permittee must comply with the following requirements except during periods of startup:

- (1) Change oil and filter every 500 hours of operation or annually, whichever comes first, or utilize the oil analysis program under 63.6625(i) to extend the oil change requirement;
- (2) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first;
- (3) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

The permittee may utilize an oil analysis program in order to extend the specified oil change requirement in (1) above, provided the analysis analyzes the parameters identified in §63.6625(i) of Subpart ZZZZ.

(Ref. §63.6603(a) and Table 2d of Subpart ZZZZ)

- 3.B.8 For Emission Point AC-007, the permittee shall operate and maintain the engine, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.

(Ref. §63.6605(b))

**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 <sub>2</sub>	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 Rule 6.2.E of these regulations.

(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**

5.B.1 The permittee shall maintain sufficient records to document:

- a) Identification of the Polyol, Non-Reactive Amine Catalyst(s) or other VOC or HAP containing material used, and the total pounds of Polyol and each catalyst used on a monthly basis and in any consecutive 12-month period.
- b) The VOC and HAP content(s) of the Polyol, Non-Reactive Amine Catalyst(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. The permittee can use manufacturer-supplied information in the form of material safety data sheet (MSDS) and/or specification sheets to determine product VOC and HAP content(s).
- c) The density of the Polyol, Non-Reactive Amine Catalyst(s) or other VOC or HAP containing material.
- d) The emission rates in tons/year for VOCs from AC-002 through AC-006, and the individual HAP and combined total HAPs for the entire facility including tank emissions 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 the Mississippi Department of Environmental Quality (MDEQ) personnel.

(Ref: Federally Enforceable Operating Permit issued on May 19, 2004 and modified on June 14, 2011)

5.B.2 For Emission Points AT-016 and AT-017, the permittee shall, for the life of each storage vessel, keep readily accessible records showing the dimension of each storage vessel and an analysis showing the capacity of each storage vessel.

(Re.: §60.116b(a) & (b))

- 5.B.3 For Emission Points AT-016 and AT-017, the permittee shall notify the Office of Pollution Control within thirty (30) days when the maximum true vapor pressure of the liquid exceeds 5.2 kPa (0.754 psia).

(Ref.: §60.116b(d)).

Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined in §60.116b(e).

- 5.B.4 For Emission Point AC-007, the permittee shall comply with the following monitoring, operating, and maintenance requirements:

- (a) Operate and maintain the stationary RICE and after-treatment control device (if any) in accordance with the manufacturer's emission-related written instruction or develop a maintenance plan that provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions;
- (b) The permittee must install a non-resettable hour meter, if not already installed;
- (c) During periods of startup, the permittee shall minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

(Ref. §63.6625(e), (f), and (h))

- 5.B.5 For Emission Point AC-007, the permittee shall operate the engine according to the following:

- (a) There is no time limit on the use of the engine during emergency situations;
- (b) The engine may be operated for the purpose of maintenance checks and readiness testing in accordance with recommendations by the vendor, manufacturer, insurance company associated with the engine, or local, State, or Federal government. Such testing is limited to 100 hours per year, except that the engine may be operated for maintenance checks and readiness testing beyond 100 hours per year if required by Federal, State, or local standards. In such case, the permittee shall maintain records of such standards;
- (c) The engine may be operated up to 50 hours per year in non-emergency situations; however, those 50 hours count towards the 100-hour limit in (b) above.

(Ref. §63.6640(f)(1) (i) through (iii))

5.B.6 For Emission Point AC-007, the permittee shall maintain the following records and keep each readily accessible for at least five years after the date of each occurrence:

- (a) All maintenance records that demonstrated the engine was operated and maintained in accordance with the maintenance plan identified in Condition 5.B.4(a);
- (b) The hours of operation of the engine recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation, including what classified the event as an emergency, and how many hours are non-emergency operations.

(Ref. §63.6655(e) and (f) and 63.6660(b) and (c))

5.B.7 The permittee may demonstrate compliance with the requirements of §63.11416(b)(2) and (e) using adhesive usage records, Material Safety Data Sheets, and engineering calculations.

(Ref.: §63.11416(f))

C. Specific Reporting Requirements

5.C.1 The permittee shall submit semi-annual reports in accordance with Conditions 5.A.4 providing:

- a) Identification of the Polyol, Non-Reactive Amine Catalyst(s) or other VOC or HAP containing material used. The permittee can use generic descriptions for reporting purposes to identify these chemical products used in polyurethane foam manufacturing process.
- b) The VOC and HAP content(s) of Polyol, Non-Reactive Amine Catalyst(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. The permittee can use manufacturer-supplied information in the form of material safety data sheet (MSDS) and/or specification sheets to determine product VOC and HAP content(s).
- c) The maximum daily and total pounds of the Polyol, Non-Reactive Amine Catalyst(s) or other VOC or HAP containing material used in any consecutive 12-month period.
- d) The total VOC emission rate for AC-002 through AC-006, the emission rate of each individual HAP and the total HAP emission rate for the entire facility in tons/year for each consecutive 12-month period.

(Ref: Federally Enforceable Operating Permit issued on May 19, 2004 and modified on June 14, 2011)



- 5.C.2 The permittee shall certify as part of annual certification of compliance in accordance with Condition 4.2 that no other blowing agent is used other than those approved by MDEQ for the previous operating year, which are CO<sub>2</sub>, pentane and methyl formate.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(5))

## **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
NMVOC	Non-Methane Volatile Organic Compounds
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM <sub>10</sub>	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 <sub>2</sub>	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound