



## State of Mississippi



### FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL PERMIT

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

#### THIS CERTIFIES

Hickory Springs Manufacturing Company, Verona  
234 CDF Boulevard South Lee Industrial Park  
Verona, MS  
Lee County

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with the Federal Clean Air Act and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. 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**

**Mississippi Department of Environmental Quality**

Issued/Modified: **APR 24 2014**

Expires: **MAR 31 2019**

Permit No. 1540-00102

Agency Interest # 11093

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## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Hickory Springs Manufacturing Company, Verona

Subject Item Inventory

Permit Number:1540-00102

Activity ID No.: PER20130001

### Subject Item Inventory:

ID	Designation	Description
AI11093		
AREA1	AA-001	Flexible Polyurethane Foam Manufacturing Process (Ref.: EP-01 through EP-06)
AREA2	AA-002	Flexible Polyurethane Foam Fabrication Process
EQPT1	AT-004	5,000-Gallon Toluene Diisocyanate (mixed isomers) Storage Tank
EQPT2	AT-005	20,000-Gallon Toluene Diisocyanate (mixed isomers) Storage Tank (constructed prior to July 23, 1984)
EQPT3	AT-006	20,000-Gallon Toluene Diisocyanate (mixed isomers) Storage Tank (constructed prior to July 23, 1984)
EQPT4	AT-007	20,000-Gallon Toluene Diisocyanate (mixed isomers) Storage Tank (constructed prior to July 23, 1984)
EQPT5	AT-008	20,000-Gallon Toluene Diisocyanate (mixed isomers) Storage Tank (constructed prior to July 23, 1984)
EQPT6	AT-009	20,000-Gallon Toluene Diisocyanate (mixed isomers) Storage Tank (constructed prior to July 23, 1984)
EQPT9	AH-000	Natural Gas Fired Space Heaters, Total Rated Capacity not to exceed 20.46 MMBTU/Hr
EQPT28	AA-004	4.8 MMBTU/Hr Natural Gas Process Oven (Ref.: PO-01)
EQPT30	AA-005	0.66 MMBTU/Hr Natural Gas Water Heater (Ref.: WH-01)
EQPT31	AA-006	125 KW (164 HP) Diesel Fueled Foam Pouring Emergency Generator (Ref.: GEN-01)
EQPT32	AA-007	228 KW (300 HP) Diesel Fueled Fire Water Pump (Ref.: GEN-02)

### Subject Item Groups:

ID	Description	Components
GRPT1	TDI (mixed isomers) Storage Tanks (AT-004 to AT-009)	EQPT1 5,000-Gallon Toluene Diisocyanate (mixed isomers) Storage Tank
		EQPT2 20,000-Gallon Toluene Diisocyanate (mixed isomers) Storage Tank (constructed prior to July 23, 1984)
		EQPT3 20,000-Gallon Toluene Diisocyanate (mixed isomers) Storage Tank (constructed prior to July 23, 1984)
		EQPT4 20,000-Gallon Toluene Diisocyanate (mixed isomers) Storage Tank (constructed prior to July 23, 1984)

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ID	Description	Components
GRPT1	TDI (mixed isomers) Storage Tanks (AT-004 to AT-009)	EQPT5 20,000-Gallon Toluene Diisocyanate (mixed isomers) Storage Tank (constructed prior to July 23, 1984)
		EQPT6 20,000-Gallon Toluene Diisocyanate (mixed isomers) Storage Tank (constructed prior to July 23, 1984)

### **KEY**

ACT = Activity

AREA = Area

CONT = Control Device

IA = Insignificant Activity

MAFO = Animal Feeding Operation

RPNT = Release Point

WDPT = Withdrawal Point

AI = Agency Interest

CAFO = Concentrated Animal Feeding Operation

EQPT = Equipment

IMPD = Impoundment

PCS = PCS

TRMT = Treatment

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

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**AI0000011093:**

### Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Particulate Matter	<p>Particulate Matter:</p> <p>For the entire facility, the permittee shall not cause, permit, or allow the emission from any manufacturing process, in any one hour from any point source, particulate matter in total quantities in excess of the amount determined by the relationship <math>E=4.1 \cdot p^{0.67}</math>, where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour. [11 Miss. Admin. Code Pt. 2, R. 1.3.F(1)]</p>
L-2	Particulate Matter	<p>Particulate Matter:</p> <p>The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million Btu per hour (10 MMBtu/hr) heat input shall not exceed 0.6 pounds per millions Btu per hour heat input.</p> <p>OR</p> <p>The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations equal to or greater than 10 million Btu per hour heat input but less than 10,000 million Btu per hour heat input shall not exceed an emission rate as determined by the relationship <math>E = 0.8808 \cdot (I)^{-0.1667}</math>, where E is the emission rate in pounds per million Btu per hour heat input and I is the heat input in millions of Btu per hour. [11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a)-(b)]</p>
L-3	Opacity	<p>Opacity <math>\leq 40\%</math>: (a) No person shall cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in Rule 1.3.A(2) &amp; (3).</p> <p>(b) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.</p> <p>(c) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour. [11 Miss. Admin. Code Pt. 2, R. 1.3.A]</p>

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### AI0000011093 (continued):

#### Limitation Requirements:

Condition No.	Parameter	Condition
L-4	Opacity	Opacity <= 40 %: No person shall 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 Rule 1.3.A(1). This shall not apply to vision obscuration caused by uncombined water droplets. [11 Miss. Admin. Code Pt. 2, R. 1.3.B]
L-5	Sulfur Dioxide	Sulfur Dioxide:  The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. [11 Miss. Admin. Code Pt. 2, R. 1.4.A(1)]
L-6		Facility-Wide Emission Limitations The permittee shall limit volatile organic compound (VOC) emissions to no more than 99.0 tons/year (TPY) as determined for each consecutive 12-month period. [11 Miss. Admin. Code Pt. 2, R.2.2.B(10).]
L-7		Facility-Wide Emission Limitations The permittee shall limit hazardous air pollutant (HAP) emissions to no more than 9.9 tons/year (TPY) of any single HAP and no more than 24.9 TPY of total combined HAPs as determined for each consecutive 12-month period. [11 Miss. Admin. Code Pt. 2, R.2.2.B(10).]

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#### Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		<p>Monitoring Requirements</p> <p>For the entire facility, the permittee shall determine for each coating, adhesive, solvent or other VOC or HAP containing material used:</p> <ul style="list-style-type: none"><li>(a) The quantity used (gallons);</li><li>(b) The percentage of VOCs by weight;</li><li>(c) The percentage of each individual HAP and total HAP by weight;</li><li>(d) The density (lbs/gal);</li></ul> <p>The permittee may utilize data supplied by the manufacturer, or analysis of VOC and HAP content by EPA Test Method 24, 40 CFR 60, Appendix A and/or EPA Test Method 311, 40 CFR 63, Appendix A, and/or an alternate EPA approved test method. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).]</p>

#### Record-Keeping Requirements:

Condition No.	Condition
R-1	<p>Recordkeeping Requirements</p> <p>For the entire facility, the permittee shall maintain sufficient records to document:</p> <ul style="list-style-type: none"><li>(a) The identification of each coating, adhesive, solvent or other VOC or HAP containing material and the total gallons of each coating, adhesive, solvent or other VOC or HAP containing material used on a monthly basis and in each consecutive 12-month period;</li><li>(b) The VOC and HAP content(s) of each coating, adhesive, solvent or other VOC or HAP containing material used. A description of the method used to determine the VOC and HAP content shall accompany this data;</li><li>(c) The density of each coating, adhesive, solvent or other VOC or HAP containing material used;</li><li>(d) The total VOC emission rate, the emission rate of each individual HAP and the total HAP emission rate in tons/yr for each consecutive 12-month period on a rolling basis;</li><li>(e) The TDI emission factors in addition to maximum hourly TDI throughput rate used in determining the VOC/HAP emissions shall be those used in the permit application, or updated factors based on a industry testing or provided by the Polyurethane Foam Association. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).]</li></ul>

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#### Record-Keeping Requirements:

Condition No.	Condition
R-2	Recordkeeping Requirements The permittee shall maintain copies of all records and reports on site for at least five (5) years and shall make them available upon request by Mississippi Department of Environmental Quality (MDEQ) personnel. [11 Miss. Admin. Code Pt. 2, R.2.2.B(10).]

#### Submittal/Action Requirements:

Condition No.	Condition
S-1	Except as otherwise specified herein, the permittee shall Submit a certified semi-annual synthetic minor monitoring report: Due semiannually, by the 30th of January and July for preceding six months. The report shall provide the following: (a) The identification of each coating, adhesive, solvent or other VOC or HAP containing material used; (b) The VOC and HAP content(s) of each coating, adhesive, solvent, or other VOC or HAP containing material used; (c) The total gallons of each coating, adhesive, solvent or other VOC or HAP containing material used in each consecutive 12-month period on a rolling basis; (d) The total VOC emission rate, the emission rate of each individual HAP and the total HAP emission rate in tons per month and TPY for each consecutive 12-month period on a rolling basis; (e) The TDI emission factors in addition to maximum hourly TDI throughput rate used in determining the VOC/HAP emissions shall be those used in the permit application, or updated factors based on a industry testing or provided by the Polyurethane Foam Association. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).]
S-2	General Condition: Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began. [11 Miss. Admin.Code Pt. 2, R.2.2.B(10).]



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### AI0000011093 (continued):

#### Narrative Requirements:

Condition No.	Condition
T-1	The facility is subject to and shall comply with all applicable requirements contained in the National Emission Standards for Hazardous Air Pollutants from Flexible Polyurethane Foam Production and Fabrication Area Sources, 40 CFR Part 63, Subpart OOOOOO. The affected source under this standard is the collection of all equipment and activities necessary to produce slabstock flexible polyurethane foam and is the collection of all equipment and activities found at a flexible polyurethane foam fabrication facility where adhesives are used to bond foam to foam or other substrate. [40 CFR 63.11414]
T-2	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49-17-29 1.b]
T-3	General Condition: The permittee shall at all times maintain in good working order and operate as efficiently as possible all air pollution control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit. [11 Miss. Admin. Code Pt. 2, R. 2.5.A.]
T-4	General Condition: Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering state waters without the proper environmental permits. [Miss. Code Ann. 49-17-29 1.a(i and ii)]
T-5	General Condition: Any diversion from or bypass of collection and control facilities is prohibited except as provided for in 11 Miss. Admin. Code Pt.2, R. 1.10, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", [11 Miss. Admin.Code Pt. 2, R.1.10.]
T-6	General Condition: Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule. [11 Miss. Admin.Code Pt. 2, R.2.10.]
T-7	General Condition: The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials: (a) To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and (b) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission. [Miss. Code Ann. 49-17-21]

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### AI0000011093 (continued):

#### Narrative Requirements:

Condition No.	Condition
T-8	General Condition: After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to: (a) Violation of any terms or conditions of this permit (b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or (c) A change in any condition that required either a temporary or permanent reduction or elimination of authorized air emissions. [11 Miss. Admin.Code Pt. 2, R. 2.2.C.]
T-9	General Condition: This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for this permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of the permit. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(b).]
T-10	General Condition: Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control. [Miss. Code Ann. 49-17-39]
T-11	General Condition: The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(15)(c).]
T-12	General Condition: Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(7).]
T-13	General Condition: This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board. [11 Miss. Admin. Code Pt. 2, R. 2.16.B.]
T-14	General Condition: This permit is for air pollution control purposes only. [11 Miss. Admin.Code Pt. 2, R. 2.1.D(1).]
T-15	General Condition: This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.4.D [11 Miss. Admin.Code Pt. 2, R. 2.4.D.]

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### AI0000011093 (continued):

#### Narrative Requirements:

Condition No.	Condition
T-16	General Condition: The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. [11 Miss. Admin.Code Pt. 2, R. 2.1.D(7).]
T-17	General Condition: The permittee shall furnish to MDEQ within a reasonable time any information MDEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to MDEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to MDEQ along with a claim of confidentiality. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(15)(d).]
T-18	<p>General Condition: This permit does not authorize a modification as defined in 11 Miss. Admin. Code Pt. 2, Ch. 2 "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment". Modification is defined as "Any physical change in or change in the method of operation of a facility which increases actual emissions or potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:</p> <ul style="list-style-type: none"><li>(a) routine maintenance, repair, and replacement;</li><li>(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;</li><li>(c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;</li><li>(d) use of an alternative fuel or raw material by a stationary source which: (i) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or (ii) the source is approved to use under any permit issued under 40 CFR 52.51 or under regulations approved pursuant to 40 CFR 51.166;</li><li>(e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.51, or under regulations approved pursuant to Subpart I or 40 CFR 51.166; or</li><li>(f) any change in ownership of the stationary source" [11 Miss. Admin.Code Pt. 2, R. 2.1.D(2).]</li></ul>
T-19	General Condition: It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(a).]

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### AI0000011093 (continued):

#### Narrative Requirements:

Condition No.	Condition
T-20	General Condition: The permittee shall retain all required records, monitoring data, supported information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to MDEQ as required by Applicable Rules and Regulations or this permit upon request. [11 Miss. Admin.Code Pt. 2, R.2.9.]
T-21	General Condition: The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit. [11 Miss. Admin.Code Pt. 2, R.2.2.B(5).]
T-22	<p>General Condition: Emergencies</p> <p>(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.</p> <p>(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.</p> <p>(c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence as follows: (i) an emergency occurred and that the permittee can identify the cause(s) of the emergency; (ii) the permitted facility was at the time being properly operated; (iii) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and (iv) the permittee submitted notice of the emergency to MDEQ within two (2) working days of the time when emission limitations were exceeded due to the emergency which contained a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(d) In any enforcement proceeding, the permittee seeking to establish the occurrence of any emergency has the burden of proof.</p> <p>(e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein [11 Miss. Admin.Code Pt. 2, R.2.2.B(10).]</p>

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### AI0000011093 (continued):

#### Narrative Requirements:

Condition No.	Condition
T-23	<p>General Condition: Upsets</p> <p>(a) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows: (i) an upset occurred and that the permittee can identify the cause(s) of the upset; (ii) the source was at the time being properly operated; (iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (iv) the permittee submitted notice of the upset to the DEQ within five (5) working days of the time the upset began which contained a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.</p> <p>(c) This provision is in addition to any upset provision contained in any applicable requirement. [11 Miss. Admin.Code Pt. 2, R.1.10.]</p>
T-24	<p>General Condition: Startups and Shutdowns</p> <p>(a) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows: (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above; (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.</p> <p>(c) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply. [11 Miss. Admin.Code Pt. 2, R.1.10.]</p>

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### AI0000011093 (continued):

#### Narrative Requirements:

Condition No.	Condition
T-25	<p>General Condition: Maintenance</p> <p>(a) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following: (i) the permittee can identify the need for the maintenance; (ii) the source was at the time being properly operated; (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (iv) the permittee submitted notice of the maintenance to MDEQ within five (5) working days of the time the maintenance began or such other times as allowed by MDEQ, which contained a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.</p> <p>(c) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. [11 Miss. Admin.Code Pt. 2, R.1.10.]</p>
T-26	<p>General Condition: For renewal of this permit the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board. [11 Miss. Admin.Code Pt. 2, R.2.8.]</p>

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### AREA0000000001 (AA-001) Flexible Polyurethane Foam Manufacturing Process (Ref.: EP-01 through EP-06):

#### Limitation Requirements:

Condition No.	Parameter	Condition
L-1		The permittee shall not use material containing methylene chloride for any purpose in any slabstock flexible foam production process unless the permittee choose to comply with the requirements given in paragraph (b)(1) of §63.11416. [40 CFR 63.11416(b)]
L-2		The permittee may demonstrate compliance with the requirements of §63.11416(b)(2) using adhesive usage records, Material Safety Data Sheets (MSDS), and engineering calculations. [40 CFR 63.11416(f)]

#### Record-Keeping Requirements:

Condition No.	Condition
R-1	The permittee must maintain records of the information used to demonstrate compliance, as required in §63.11416(f). The permittee must maintain the records for five (5) years, with the last two (2) years of data retained on site. The remaining three (3) years of data may be maintained off site. [40 CFR 63.11417(b)(3)]

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### AREA0000000002 (AA-002) Flexible Polyurethane Foam Fabrication Process:

#### Limitation Requirements:

Condition No.	Parameter	Condition
L-1		The permittee shall not use any adhesive containing methylene chloride in a flexible polyurethane foam fabrication process. [40 CFR 63.11416(e)]
L-2		The permittee may demonstrate compliance with the requirements of §63.11416(e) by using adhesive usage records, MSDS, and engineering calculations. [40 CFR 63.11416(f)]

#### Record-Keeping Requirements:

Condition No.	Condition
R-1	The permittee must have a compliance certification on file, signed by a responsible official as defined in §70.2. This certification must contain the following statement. "This facility does not use any adhesive containing methylene chloride on a loop slitter process in accordance with §63.11416(e)" [40 CFR 63.11417(c)(3)]
R-2	A new certification shall be generated whenever the responsible official changes. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]
R-3	The permittee must maintain records of the information used to demonstrate compliance, as required in §63.11416(f). The permittee must maintain the records for five (5) years, with the last two (2) years of data retained on site. The remaining three (3) years of data may be maintained off site. [40 CFR 63.11417(d)]



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### EQPT0000000031 (AA-006) 125 KW (164 HP) Diesel Fueled Foam Pouring Emergency Generator (Ref.: GEN-01):

#### Limitation Requirements:

Condition No.	Parameter	Condition
L-1		<p>For Emission Point AA-006, the permittee must comply with the following except during periods of startup:</p> <ul style="list-style-type: none"><li>(a) Change oil and filter every 500 hours of operation or annually, whichever comes first;</li><li>(b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first;</li><li>(c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.</li></ul> <p>The permittee may utilize an oil analysis program in order to extend the specified oil change requirement in (a) above, provided the analysis analyzes the parameters identified in 40 CFR 63.6625(i). [40 CFR 63.6603(a)]</p>
L-2		<p>For Emission Point AA-006, the permittee shall operate and maintain the RICE 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. [40 CFR 63.6605(b)]</p>

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### EQPT0000000031 (continued):

#### Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		<p>For Emission Point AA-006, the permittee shall comply with the following monitoring, operating, and maintenance requirements:</p> <p>(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;</p> <p>(b) The permittee must install a non-resettable hour meter, if not already installed;</p> <p>(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. [40 CFR 63.6625(e,f, and h)]</p>

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### EQPT0000000031 (continued):

#### Monitoring Requirements:

Condition No.	Parameter	Condition
M-2		<p>For Emission Point AA-006, any operation other than emergency operation, maintenance and testing, emergency demand response and operation in non-emergency situations for 50 hours per year is prohibited.</p> <p>(1) There is no time limit on the use of the engine in emergency situations.</p> <p>(2) The permittee may operate the engine for any combination of the purposes specified in paragraphs (2)(i) through (iii) of this condition for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed in (3) below counts as part of the 100 hours per calendar year.</p> <p>(i) The engine may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.</p> <p>(ii) The engine may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.</p> <p>(iii) The engine may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.</p> <p>(3) The engine may be operated for up to 50 hours per calendar year in non- emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (2) of this condition. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [40 CFR 63.6640(f)]</p>

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### EQPT0000000031 (continued):

#### Record-Keeping Requirements:

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Condition No.	Condition
R-1	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 demonstrate the engine was operated and maintained in accordance with the maintenance plan; (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. [40 CFR 63.6655(e), 40 CFR 63.6655(f)]

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#### Narrative Requirements:

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Condition No.	Condition
T-1	For Emission Point AA-006, the permittee is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ). Emission Point AA-005 is an existing emergency stationary RICE located at an area source under NESHAP Subpart ZZZZ and as such must meet the applicable requirements of this part. [40 CFR 63.6585, 40 CFR 63.6590(a)(1)(iii)]

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### EQPT0000000032 (AA-007) 228 KW (300 HP) Diesel Fueled Fire Water Pump (Ref.: GEN-02):

#### Limitation Requirements:

Condition No.	Parameter	Condition
L-1		<p>For Emission Point AA-007, the permittee shall comply with the following emission standards in Table 4 to Subpart IIII of 40 CFR Part 60, for Carbon Monoxide (CO), Particulate Matter (PM) and Non-Methane HydroCarbon + Nitrogen oxide (NMHC+NOX):</p> <p>CO: 3.5 g/KW-hr (2.6 g/HP-hr) PM: 0.54 g/KW-hr (0.40 g/HP-hr) NMHC+NOx: 10.5 g/KW-hr (7.8 g/HP-hr). [40 CFR 60.4205(c)]</p>
L-2		<p>The permittee must operate and maintain the engine according to the manufacturer's written instructions or procedures developed by the permittee that are approved by the engine manufacturer over the entire life of the engine. In addition, the permittee may only change those settings that are permitted by the manufacturer. [40 CFR 60.4206, 40 CFR 60.4211(a)]</p>
L-3		<p>For Emission Point AA-007, the permittee must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel. In accordance with 40 CFR 80.510(b), engines must use a fuel that meets the following: 1) a maximum sulfur content of 15 ppm or less and 2) either a minimum cetane index of 40 or a maximum aromatic content of 35 percent by volume. [40 CFR 60.4207(b)]</p>

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### EQPT0000000032 (continued):

#### Limitation Requirements:

Condition No.	Parameter	Condition
L-4		<p>For Emission Point AA-007, any operation other than emergency operation, maintenance and testing, emergency demand response and operation in non-emergency situations for 50 hours per year is prohibited.</p> <p>(1) There is no time limit on the use of the engine in emergency situations.</p> <p>(2) The permittee may operate the engine for any combination of the purposes specified in paragraphs (2)(i) through (iii) of this condition for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed in (3) below counts as part of the 100 hours per calendar year.</p> <p>(i) The engine may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.</p> <p>(ii) The engine may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §60.17), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.</p> <p>(iii) The engine may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.</p> <p>(3) The engine may be operated for up to 50 hours per calendar year in non- emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (2) of this condition. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [40 CFR 60.4211(f)]</p>

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### EQPT0000000032 (continued):

#### Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		For Emission Point AA-007, the permittee shall install a non-resettable hour meter. [40 CFR 60.4209(a)]
M-2		<p>For Emission Point AA-007, the permittee must demonstrate compliance with the emission standards specified in condition "L-1" on page 17 of 20 of this permit according to one of the following methods:</p> <p>(1) Purchasing an engine certified according to 40 CFR part 89 or 40 CFR part 94, as applicable, for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's specifications.</p> <p>(2) Keeping records of performance test results for each pollutant for a test conducted on a similar engine. The test must have been conducted using the same methods specified in this subpart and these methods must have been followed correctly.</p> <p>(3) Keeping records of engine manufacturer data indicating compliance with the standards.</p> <p>(4) Keeping records of control device vendor data indicating compliance with the standards.</p> <p>(5) Conducting an initial performance test to demonstrate compliance with the emission standards according to the requirements specified in §60.4212, as applicable. [40 CFR 60.4211(b)]</p>

#### Record-Keeping Requirements:

Condition No.	Condition
R-1	For Emission Point AA-007, the permittee must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The permittee must record the time of operation of the engine and the reason the engine was in operation during that time. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]

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### EQPT0000000032 (continued):

#### Narrative Requirements:

Condition No.	Condition
T-1	For Emission Point AA-007, the permittee is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (i.e., the "RICE MACT"), 40 CFR Part 63, Subpart ZZZZ. Emission Point AA-004 meets the definition of a new affected source at an area source under NESHAP Subpart ZZZZ and must meet the requirements of this part by meeting the requirements of 40 CFR Part 60, Subpart IIII for compression ignition engines. No further requirements apply for such engines under NESHAP Subpart ZZZZ. [40 CFR 63.6585, 40 CFR 63.6590(c)]
T-2	For Emission Point AA-007, the permittee is subject to and shall comply with the applicable requirements of the New Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines (CI ICE) (40 CFR Part 60, Subpart IIII) and shall comply with the General Provisions (40 CFR Part 60, Subpart A) as required in Table 8 to NSPS Subpart IIII. [40 CFR 60.4200(a)]



## GENERAL INFORMATION

Hickory Springs Manufacturing Company, Verona  
234 CDF Boulevard South Lee Industrial Park  
Verona, MS  
Lee County

### Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
11093	Hickory Springs Manufacturing Company	Official Site Name	7/28/1998	
2808100102	Hickory Springs Manufacturing Co, Verona	Air-AIRS AFS	10/12/2000	
MSD050243476	Hickory Springs Manufacturing Company, Verona	Hazardous Waste-EPA ID	10/12/2000	
154000102	Hickory Springs Manufacturing Company, Verona	Air-Synthetic Minor Operating	7/28/1998	7/1/2003
154000102	Hickory Springs Manufacturing Company, Verona	Air-Title V Operating	10/30/1997	7/28/1998
MSR001647	Hickory Springs Manufacturing Company, Verona	GP-Baseline	10/6/2003	12/27/2005
154000102	Hickory Springs Manufacturing Company, Verona	Air-Synthetic Minor Operating	2/25/2004	1/5/2009
MSR001647	Hickory Springs Manufacturing Company, Verona	GP-Baseline	12/27/2005	3/28/2011
154000102	Hickory Springs Manufacturing Company, Verona	Air-Synthetic Minor Operating	1/5/2009	12/31/2013
MSR001647	Hickory Springs Manufacturing Company, Verona	GP-Baseline	3/28/2011	9/28/2015
154000102	Hickory Springs Manufacturing Company, Verona	Air-Synthetic Minor Operating	4/24/2014	3/31/2019

**Basin:** Tombigbee River Basin

**Location Description:**PG - Plant Entrance (General). Collected by David Burchfield on 9/21/01. Elevation: 307ft. Comments: Air 1540-00102.  
Haz Waste MSD050243476. Imported from I-sys