

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

**PERMIT**

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

**THIS CERTIFIES THAT**

FXI Inc  
154 Lipford Road  
Verona, Mississippi  
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**

*Krystal Rudolph*

**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Issued: September 16, 2021**

**Permit No.: 1540-00022**

**Effective Date: As specified herein.**

**Expires: August 31, 2026**

## SECTION 1.

### A. GENERAL CONDITIONS

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

- a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and
- b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission.

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

9. Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control.

(Ref.: Miss. Code Ann. 49-17-39)

10. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(7).)

11. This permit does not authorize a modification as defined in Regulation 11 Miss. Admin. Code Pt. 2, Ch.2., "Permit Regulations for the Construction and/or Operation of Air Emission Equipment." A modification may require a Permit to Construct and a modification of this permit. Modification is defined as "Any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

- a. Routine maintenance, repair, and replacement;
- b. Use of an alternative fuel or raw material by reason of an order under Sections 2(a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
- c. Use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
- d. Use of an alternative fuel or raw material by a stationary source which:

- (1) The source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, or 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 Part 51, Subpart I, or 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 Part 51, Subpart I or 40 CFR 51.166; or
- f. Any change in ownership of the stationary source.

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

**B. GENERAL OPERATIONAL CONDITIONS**

1. Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in Regulation, 11 Miss. Admin. Code Pt. 2, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.10.)

2. Any diversion from or bypass of collection and control facilities is prohibited, except as provided for in 11 Miss. Admin. Code Pt. 2, R. 1.10., "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants."

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

3. Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits.

(Ref.: Miss. Code Ann. 49-17-29 1.a(i and ii))

4. Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.

- a. Upsets

- (1) For an upset defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:
    - (i) An upset occurred and that the source can identify the cause(s) of the upset;
    - (ii) The source was at the time being properly operated;
    - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
    - (iv) That within 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
    - (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
  - (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
  - (3) This provision is in addition to any upset provision contained in any applicable requirement.
  - (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- b. Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
  - (2) Where the source is unable to comply with existing emission limitations

established under the State Implementation Plan (SIP) and defined in this regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).

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

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

5. Compliance Testing: Regarding compliance testing:

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

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

**C. PERMIT RENEWAL / MODIFICATION / TRANSFER / TERMINATION**

1. For renewal of this permit, the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board. If the applicant submits a timely and complete application pursuant to this paragraph and the Permit Board, through no fault of the applicant, fails to act on the application on or before the expiration date of the existing permit, the applicant shall continue to operate the stationary source under the terms and conditions of the expired permit, which shall remain in effect until final action on the application is taken by the Permit Board. Permit expiration terminates the

source's ability to operate unless a timely and complete renewal application has been submitted.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.8.)

2. The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).)

3. The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).)

4. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:
  - a. Persistent violation of any terms or conditions of this permit.
  - b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
  - c. A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

5. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B.)

## SECTION 2. EMISSION POINT DESCRIPTION

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

Emission Point	Description
AA-000	Fifty Seven (57) Storage Tanks
AA-001	16.74 MMBtu/hr Natural gas-fired Boiler Construction Date: November 28, 1989
AA-002	1.26 MMBtu/hr Natural gas-fired Boiler Construction Date: After 1989
AA-003	Variable Pressure Foam (VPR) Production Area
AA-004	0.65 MMBtu/hr (255 HP) Diesel-fired Emergency Fire Protection Pump Construction Date: Before June 12, 2006
AA-005	Parts Cleaning Process Area
AA-006	Foam Fabrication Process Area
Facility Reference	Emission Point AA-000 Storage Tanks
Tank 1A	30,000 gallon Polyol Fixed Roof Storage Tank
Tank 1B	30,000 gallon Polyol Fixed Roof Storage Tank
Tank 2A	6,000 gallon Graft Polyol Fixed Roof Storage Tank
Tank 2B	3,400 gallon Polyol Fixed Roof Storage Tank
Tank 2C	3,400 gallon Polyol Fixed Roof Storage Tank
Tank 3	20,000 gallon Graft Polyol Fixed Roof Storage Tank
Tank 4A	30,000 gallon Toluene Diisocyanate (TDI) Fixed Roof Storage Tank
Tank 4B	3,400 gallon TDI Fixed Roof Storage Tank
Tank 5	100 gallon Additive Fixed Roof Storage Tank
Tank 7	3,000 gallon Surfactant Fixed Roof Storage Tank
Tank 8	100 gallon Additive Fixed Roof Storage Tank
Tank 9	20 gallon Additive Fixed Roof Storage Tank



Facility Reference	Emission Point AA-000 Storage Tanks
Tank 10	100 gallon Additive Fixed Roof Storage Tank
Tank 11	100 gallon Additive Fixed Roof Storage Tank
Tank 12	10,000 gallon Polyol Fixed Roof Storage Tank
Tank 13	3,500 gallon Polyol Fixed Roof Storage Tank
Tank 14	330 gallon Additive Fixed Roof Storage Tank
Tank 15	20 gallon Additive Fixed Roof Storage Tank
Tank 16A	3,000 gallon Methylene Diphenyl Diisocyanate (MDI) Fixed Roof Storage Tank
Tank 16B	6,000 gallon MDI Fixed Roof Storage Tank
Tank 17	330 gallon Additive Fixed Roof Storage Tank
Tank 19	115 gallon Additive Fixed Roof Storage Tank
Tank 20	110 gallon Additive Fixed Roof Storage Tank
Tank 21	100 gallon Additive Fixed Roof Storage Tank
Tank 22	110 gallon Additive Fixed Roof Storage Tank
Tank 23	20 gallon Additive Fixed Roof Storage Tank
Tank 24	115 gallon Additive Fixed Roof Storage Tank
Tank 25	110 gallon Additive Fixed Roof Storage Tank
Tank 27	1,500 gallon Polyol Fixed Roof Storage Tank
Tank 28	3,400 gallon Polyol Fixed Roof Storage Tank
Tank 29A	10,000 gallon Polyol Fixed Roof Storage Tank
Tank 29B	10,000 gallon Polyol Fixed Roof Storage Tank
Tank 30	4,500 gallon Mineral Oil/Caster Oil Fixed Roof Storage Tank
Tank 31	110 gallon Additive Fixed Roof Storage Tank
Tank 33	50 gallon Additive Roof Storage Tank
Tank 35	50 gallon Additive Roof Storage Tank
Tank 37	50 gallon Additive Fixed Roof Storage Tank
Tank 39	50 gallon Additive Fixed Roof Storage Tank

Facility Reference	Emission Point AA-000 Storage Tanks
Tank 41	330 gallon Additive Fixed Roof Storage Tank
Tank 42	330 gallon Additive Fixed Roof Storage Tank
Tank 43	330 gallon Additive Fixed Roof Storage Tank
Tank 44	110 gallon Additive Fixed Roof Storage Tank
Tank 45	100 gallon Additive Fixed Roof Storage Tank
Tank 46	2,500 gallon Polyol Fixed Roof Storage Tank
Tank 47	100 gallon Additive Fixed Roof Storage Tank
Tank 48	10,000 gallon Polyol Fixed Roof Storage Tank
Tank 50	100 gallon Additive Fixed Roof Storage Tank
Tank 53	330 gallon Cross-Linker Fixed Roof Storage Tank
Tank 54A	10,000 gallon Polyol Fixed Roof Storage Tank
Tank 54B	10,000 gallon Polyol Fixed Roof Storage Tank
Tank 56	12,000 gallon Polyol Fixed Roof Storage Tank
Tank 60	1,500 gallon Polyol Fixed Roof Storage Tank
Tank 61	1,500 gallon Polyol Fixed Roof Storage Tank
Tank 62	1,000 gallon Polyol Fixed Roof Storage Tank
Tank 63	20 gallon Additive Fixed Roof Storage Tank
Tank 64	20 gallon Additive Fixed Roof Storage Tank
Tank 65	50 gallon Additive Fixed Roof Storage Tank

### SECTION 3. EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 1.3.A and B.	3.1	Smoke	Opacity shall not exceed 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.2	PM (filterable only)	$E = 4.1p^{0.67}$
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.3	VOC	Emissions shall not exceed 99.0 tpy
			Individual HAP	Emissions shall not exceed 9.0 tpy
			Total HAP	Emissions shall not exceed 24.0 tpy
	40 CFR 63, Subpart OOOOOO  National Emission Standards for Hazardous Air Pollutants for Polyurethane Foam Production and Fabrication Area Sources  40 CFR 63.11414(a)(2), (b)(1) and (4), and (c) and 40 CFR 63.11415(a)	3.4	HAP	Applicability
40 CFR 63.11416(b)(2), (c), (d), Subpart OOOOOO	3.5	Methylene Chloride	Prohibited use of Methylene Chloride	
AA-001	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.6	PM (Filterable Only)	$E = 0.8808 * I^{-0.1667}$
	40 CFR 60, Subpart Dc  Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units  40 CFR 60.40c(a) and 40 CFR 60.41c	3.7	SO <sub>2</sub> PM	General Applicability
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.8	SO <sub>2</sub>	4.8 lb/MMBTU
AA-001 AA-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.9	Fuel Combustion	Shall only combust natural gas.
AA-002 AA-004	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.10	PM (filterable only)	0.6 lb/MMBTU
AA-004	40 CFR 63, Subpart ZZZZ  National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines  40 CFR 63.6580, 40 CFR 63.6585(a), (c), and (d), 40 CFR 63.6590(a)(1)(iii)	3.11	HAP	Applicability

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
AA-004	40 CFR 63.6595(a)(1), 40 CFR 63.6603(a), and Item 4 of Table 2d, Subpart ZZZZ	3.12	HAP	<p>Change oil and filter every 500 hours of operation or annually, whichever comes first.</p> <p>Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.</p> <p>Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.</p>
	40 CFR 63.6605, Subpart ZZZZ	3.13		Good Air Pollution Control Practices
	40 CFR 63.6625(e)(3), Subpart ZZZZ	3.14		Operate and Maintain Maintenance Plan
	40 CFR 63.6625(f), Subpart ZZZZ	3.15		Non-resettable Hour Meter
	40 CFR 63.6625(h), Subpart ZZZZ	3.16		Minimize Engine Idle Time
	40 CFR 63.6625(i), Subpart ZZZZ	3.17		Optional Oil Analysis Program
	40 CFR 63.6640(f)(1), (2), and (4), Subpart ZZZZ	3.18		Emergency Engine Requirements

- 3.1 For the entire facility, the permittee shall not cause, permit, or allow emissions of smoke from any 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) and (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% 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 and B.)

- 3.2 For the entire facility, 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.

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

- 3.3 For the entire facility, the permittee shall limit Volatile Organic Compound (VOC) emissions to no more than 99.0 tpy, individual Hazardous Air Pollutant (HAP) emissions to no more than 9.0 tpy, and total HAP emissions to no more than 24.0 tpy. The permittee shall determine VOC, individual HAP, and total HAP emissions on a monthly basis for each consecutive 12-month period on a rolling basis.

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

- 3.4 For the entire facility, the permittee is subject to and shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources (40 CFR 63, Subpart OOOOOO) and General Provisions (40 CFR 63, Subpart A).

(Ref.: 40 CFR 63.11414(a)(2), (b)(1) and (4), and (c) and 40 CFR 63.11415(a), Subpart OOOOOO)

- 3.5 For the entire facility, the permittee shall not use any material, cleaner, mold release agent, or adhesive containing methylene chloride.

(Ref.: 40 CFR 63.11416(b)(2), (c), (d), Subpart OOOOOO)

- 3.6 For Emission Point AA-001, the maximum amount of ash and/or particulate matter from fossil fuel burning installations equal to or greater than 10 MMBTU/hr input but less than 10,000 MMBTU/hr heat input shall not exceed the emission rate as determined by the following relationship:

$$E = 0.8808 * I^{0.1667}$$

where E is the emission rate in pounds per MMBTU/hr heat input and I is the heat input in millions of BTU per hour

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

- 3.7 For Emission Point AA-001, the permittee is subject to and shall comply with all applicable requirements of the Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60, Subpart Dc) and General Provisions (40 CFR 60, Subpart A).

(Ref.: 40 CFR 60.40c(a) and 40 CFR 60.41c, Subpart Dc)

- 3.8 For Emission Point AA-001 and AA-002, the maximum discharge of sulfur oxides from any fuel burning installation in which fuel is burned primary 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).)

- 3.9 For Emission Point AA-001 and AA-002, the permittee shall only combust natural gas.

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

- 3.10 For Emission Point AA-002 and AA-004, the maximum permissible emission of ash and/or particulate matter for fossil fuel burning installations of less than 10 million BTU per 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).)

- 3.11 For Emission Point AA-004, the permittee is subject to and shall comply with all applicable requirements of the National Emissions Standards for Hazardous Air

Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) and General Provisions (40 CFR 63, Subpart A).

(Ref.: 40 CFR 63.6580, 40 CFR 63.6585(a), (c), and (d), 40 CFR 63.6590(a)(1)(iii), Subpart ZZZZ)

3.12 For Emission Point AA-004, the permittee shall comply with the following requirements:

- (a) Change oil and filter every 500 hours of operation or annually, whichever comes first.
- (b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.
- (c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replaces as necessary.

If the emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required above, the management practice can be delayed until the emergency is over. The management practice should be performed as soon as practicable after the emergency has ended. Sources must report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.

(Ref.: 40 CFR 63.6595(a)(1), 40 CFR 63.6603(a), and Item 4 of Table 2d, Subpart ZZZZ)

3.13 For Emission Point AA-004, the permittee shall be in compliance with all applicable emission limitations, operating limitations, and other requirements of 40 CFR 63, Subpart ZZZZ at all times.

The permittee shall at all times operate and maintain the emergency 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. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by 40 CFR 63, Subpart ZZZZ have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the DEQ which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(Ref.: 40 CFR 63.6605, Subpart ZZZZ)

- 3.14 For Emission Point AA-004, the permittee shall operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or the permittee may develop a maintenance plan which shall provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

(Ref.: 40 CFR 63.6625(e)(3), Subpart ZZZZ)

- 3.15 For Emission Point AA-004, the permittee shall install and maintain a non-resettable hour meter if one is not already installed.

(Ref.: 40 CFR 63.6625(f), Subpart ZZZZ)

- 3.16 For Emission Point AA-004, the permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

(Ref.: 40 CFR 63.6625(h), Subpart ZZZZ)

- 3.17 For Emission Point AA-004, the permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Condition 3.12. The oil analysis shall be performed at the same frequency specified for changing the oil in Condition 3.12. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the permittee shall change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee shall change the oil within 2 business days or before commencing operation, whichever is later. The permittee shall keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

(Ref.: 40 CFR 63.6625(i), Subpart ZZZZ)

- 3.18 For Emission Point AA-004, the permittee shall operate the emergency stationary RICE according to the requirements below. In order for the engine to be considered an



emergency stationary RICE under 40 CFR 63, Subpart ZZZZ, 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.

- (a) There is no time limit on the use of emergency stationary RICE in emergency situations.
- (b) The permittee shall operate the emergency stationary RICE for any combination of the purposes specified below for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by (c) of this condition counts as part of the 100 hours per calendar year allowed. Emergency stationary RICE 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 DEQ 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.
- (c) Emergency stationary RICE located at area sources of HAP 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. The 50 hours per 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.

(Ref.: 40 CFR 63.6640(f)(1), (2), and (4), Subpart ZZZZ)

**SECTION 4.**  
**WORK PRACTICES**

THIS SECTION WAS INTENTIONALLY LEFT BLANK SINCE NO WORK PRACTICE  
STANDARDS APPLY TO THIS PERMIT ACTION

## SECTION 5. MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain records for a minimum of 5 years.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2	VOC HAP	Monitoring and Recordkeeping for VOC and/or HAP containing material used
	40 CFR 63.11416(f), Subpart OOOOOO	5.3	HAP	Keep adhesive usage records, Material Safety Data Sheets, and engineering calculations.
	40 CFR 63.11417(b)(3), (c)(1) and (d), Subpart OOOOOO	5.4		Retain Compliance Certification and Records
AA-001	40 CFR 60.48c(g)(2), Subpart Dc	5.5	Fuel Combusted	Recordkeeping Requirement
AA-004	40 CFR 63.6655(a), Subpart ZZZZ	5.6	HAP	Recordkeeping Requirement
	40 CFR 63.6655(e)(2), Subpart ZZZZ	5.7		Keep Records of the Maintenance
	40 CFR 63.6655(f)(2), Subpart ZZZZ	5.8		Keep Records of the Hours of Operation

5.1 The permittee shall retain all required records, monitoring data, supporting information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to DEQ as required by Applicable Rules and Regulations or this permit upon request.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.9.)

5.2 For the entire facility, the permittee shall determine the following for each coating, adhesive, solvent or other VOC or HAP containing material used and maintain sufficient records to document:

- (a) The identification of each coating, adhesive, solvent or other VOC or HAP containing material and the total gallons of each coating, adhesive, solvent or other VOC or HAP material used on a monthly basis and in each consecutive 12-month period;
- (b) The VOC and HAP content(s) of each coating, adhesive, solvent or other VOC or HAP containing used. A description of the methods used to determine the VOC and HAP content shall accompany this data. 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;
- (c) The density of each coating, adhesive, solvent or other VOC or HAP containing material used;
- (d) The total VOC emission rate, the emission rate of each individual HAP and the total HAP emission rate on a monthly basis and in tons per year for each consecutive 12-month period.

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

5.3 For the entire facility, the permittee shall demonstrate compliance with the requirement in Condition 3.5 by using adhesive usage records, Material Safety Data Sheets, and engineering calculations.

(Ref.: 40 CFR 63.11416(f), Subpart OOOOOO)

5.4 For the entire facility, the permittee must keep a compliance certification on file that the facility is not using any materials or adhesives that contains methylene chloride. The

permittee shall keep records of the information required by Condition 5.3 for 5 years with the last 2 years of data being kept on site. The remaining 3 years of data may be maintained off site.

(Ref.: 40 CFR 63.11417(b)(3), (c)(1) and (d), Subpart OOOOOO)

- 5.5 For Emission Point AA-001, the permittee shall record and maintain records of the amount of each fuel combusted during each calendar month.

(Ref.: 40 CFR 60.48c(g)(2), Subpart Dc)

- 5.6 For Emission Point AA-004, the permittee shall keep the following records:

- (a) A copy of each notification and report submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in 40 CFR 63.10(b)(2)(xiv), Subpart A.
- (b) Records of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment) or the air pollution control and monitoring equipment.
- (c) Records of all required maintenance performed on the air pollution control and monitoring equipment.
- (d) Records of actions taken during periods of malfunction to minimize emissions in accordance with Condition 3.13, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

(Ref.: 40 CFR 63.6655(a), Subpart ZZZZ)

- 5.7 For Emission Point AA-004, the permittee shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE according to the maintenance plan.

(Ref.: 40 CFR 63.6655(e)(2), Subpart ZZZZ)

- 5.8 For Emission Point AA-004, the permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

(Ref.: 40 CFR 63.6655(f)(2), Subpart ZZZZ)

## SECTION 6. REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	Report permit deviations within five (5) working days.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.2	Submit certified annual monitoring report.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.3	All documents submitted to DEQ shall be certified by a Responsible Official.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.4	Reporting Requirement
AA-004	40 CFR 63.6640(b) and 63.6650(a) through (d), Subpart ZZZZ	6.5	Deviation Reporting
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.6	Report Hours of Operation

6.1 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began.

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

6.2 Except as otherwise specified herein, the permittee shall submit a certified annual synthetic minor monitoring report postmarked no later than 31st of January for the preceding calendar year. This report shall address any required monitoring specified in the permit. All instances of deviations from permit requirements must be clearly identified in the report. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration.

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

6.3 Any document required by this permit to be submitted to the DEQ shall contain a certification signed by a responsible official stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

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

6.4 For the entire facility, the permittee shall submit a monitoring report annually in accordance with Condition 6.2. This report shall provide the following:

- (a) The identification of each coating, adhesive, solvent or other VOC or HAP containing material used;
- (b) The VOC and HAP content(s) of each coating, adhesive, solvent, or other VOC or HAP containing material used;
- (c) The total gallons of each coating, adhesive, solvent or other VOC or HAP containing material used in each consecutive 12-month period;

- (d) The total VOC emission rate, the emission rate of each individual HAP and the total HAP mission rate in tons per month and tpy for each consecutive 12-month period.

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

6.5 For Emission Point AA-004, the permittee shall report each instance in which each applicable operating limitation was not met in accordance with Condition 6.2. These deviations shall be reported to the following requirements:

- (a) If there were no deviations from any applicable emission limitations or operating limitations, a statement shall be included that there were no deviations from the emission limitations or operating limitations during the reporting period; or
- (b) If there was a deviation from any emission limitation or operating limitation during the reporting period, then the compliance report shall contain the following information:
  - (1) Company name and address.
  - (2) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.
  - (3) Date of report and beginning and ending dates of the reporting period.
  - (4) The total operating time of the stationary RICE at which the deviation occurred during the reporting period.
  - (5) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
- (c) If there was a malfunction during the reporting period, the compliance report shall include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report shall also include a description of actions taken by the permittee during a malfunction of an affected



source to minimize emissions in accordance with Condition 3.13, including actions taken to correct a malfunction.

(Ref.: 40 CFR Part 63.6640(b) and 63.6650(a) through (d), Subpart ZZZZ)

- 6.6 For Emission Point AA-004, the permittee shall submit an annual report in accordance with Condition 6.2 that contains how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

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