



State of Mississippi



AIR POLLUTION CONTROL PERMIT

Permit To Construct Air Emissions Equipment

THIS CERTIFIES
Comfort Revolution
9 Industrial Road
Belmont, MS
Tishomingo County

has been granted permission to construct air emissions equipment to comply with the emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with 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.

Mississippi Environmental Quality Permit Board

Mississippi Department of Environmental Quality

Issued/Modified: **MAR 26 2014**

Expires:

Permit No. 2640-00061

Agency Interest # 65597

Table of Contents

Subject Item Inventory.....	i
Facility Requirements.....	1
General Information.....	A-1
Other Relevant Documents:	

Permit To Construct Air Emissions Equipment

Comfort Revolution
 Subject Item Inventory
 Permit Number:2640-00061
 Activity ID No.: PER20140001

Subject Item Inventory:

ID	Designation	Description
AI65597		
AREA1	AA-004	Flexible Polyurethane Foam Fabrication Gluing Process
EQPT1	AA-001	Flexible Polyurethane Foam Molding Line, 44 Mold Capacity, MDI
EQPT2	AA-002	Flexible Polyurethane Foam Molding Line, 44 Mold Capacity, MDI
EQPT3	AA-003	Gel Polyurethane Foam Molding Lines, 4 Lines, MDI
EQPT4	AA-005	Space Heaters, Natural Gas-Fired

Subject Item Groups:

ID	Description	Components
GRPT1	Foam Production/Fabrication Sources Subject to 40 CFR 63, Subpart OOOOOO	AREA1 Flexible Polyurethane Foam Fabrication Gluing Process
		EQPT1 Flexible Polyurethane Foam Molding Line, 44 Mold Capacity, MDI
		EQPT2 Flexible Polyurethane Foam Molding Line, 44 Mold Capacity, MDI
		EQPT3 Gel Polyurethane Foam Molding Lines, 4 Lines, MDI

KEY

ACT = Activity

AREA = Area

CONT = Control Device

IA = Insignificant Activity

MAFO = Animal Feeding Operation

RPNT = Release Point

AI = Agency Interest

CAFO = Concentrated Animal Feeding Operation

EQPT = Equipment

IMPD = Impoundment

PCS = PCS

TRMT = Treatment

Permit To Construct Air Emissions Equipment

Comfort Revolution

Subject Item Inventory

Permit Number:2640-00061

Activity ID No.: PER20140001

KEY

WDPT = Withdrawal Point

Permit To Construct Air Emissions Equipment

Comfort Revolution
Facility Requirements
Permit Number:2640-00061
Activity ID No.: PER20140001

Page 1 of 9

AI0000065597:

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		<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">(a) The quantity used (gallons);(b) The percentage of VOCs by weight;(c) The percentage of each individual HAP and total HAP by weight;(d) The density (lbs/gal); <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>For the entire facility, the permittee shall maintain sufficient records to document:</p> <ul style="list-style-type: none">(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;(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;(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 in tons/yr for each consecutive 12-month period. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).]
R-2	<p>The permittee shall maintain copies of all records 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).]</p>

Permit To Construct Air Emissions Equipment

Comfort Revolution
Facility Requirements
Permit Number:2640-00061
Activity ID No.: PER20140001

Page 2 of 9

AI0000065597 (continued):

Submittal/Action Requirements:

Condition No.	Condition
S-1	General Condition: The permittee shall submit certification of construction: Due within thirty (30) days of completion of construction or installation of an approved stationary source or prior to startup, whichever is earlier. The notification shall certify that construction or installation was performed in accordance with the approved plans and specifications. In the event there is any change in construction from the previously approved plans and specifications or permit, the permittee shall promptly notify MDEQ in writing. If MDEQ determines the changes are substantial, MDEQ may require the submission of a new application to construct with "as built" plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an "as built" application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law. [11 Miss. Admin. Code Pt. 2, R. 2.5.D.]
S-2	Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun. [11 Miss. Admin.Code Pt. 2, R.2.5.C(2).]
S-3	The permittee must notify DEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more. [11 Miss. Admin.Code Pt. 2, R.2.5.C(4).]

Narrative Requirements:

General Condition:

Condition No.	Condition
T-1	General Condition: The stationary source shall be designed and constructed so as to operate without causing a violation of any Applicable Rules and Regulations or this permit, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards, and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries. [11 Miss. Admin.Code Pt. 2, R.2.5.A.]
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 necessary facilities shall be constructed so that solids removed in the course of control of air emissions may 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]

Permit To Construct Air Emissions Equipment

Comfort Revolution
Facility Requirements
Permit Number:2640-00061
Activity ID No.: PER20140001

AI0000065597 (continued):

Narrative Requirements:

General Condition:

Condition No.	Condition
T-4	General Condition: The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed except as provided for in Regulation 11 Miss. Admin. Code Pt.2, R. 1.10 "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. [11 Miss. Admin. Code Pt. 2, R. 1.10]
T-5	General Condition: The permittee shall allow the Mississippi Environmental Quality Commission, the Mississippi Environmental Quality Permit Board, MDEQ staff 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]
T-6	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 good cause shown including, but not limited to, the following: 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 any condition that requires either a temporary or permanent reduction or elimination of previously authorized air emissions. [11 Miss. Admin.Code Pt. 2, R.2.2.C.]
T-7	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]
Condition No.	Condition
T-8	General Condition:This permit is for air pollution control purposes only. [11 Miss. Admin.Code Pt. 2, R.2.1.D.]
T-9	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 operating without a valid permit pursuant to State Law. [11 Miss. Admin.Code Pt. 2, R.2.2.B(5).]

Permit To Construct Air Emissions Equipment

Comfort Revolution
Facility Requirements
Permit Number:2640-00061
Activity ID No.: PER20140001

Page 4 of 9

AI0000065597 (continued):

Narrative Requirements:

Condition No.	Condition
T-10	General Condition: It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits. [11 Miss. Admin.Code Pt. 2, R.2.1.D(6).]
T-11	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.1.D(7).]
T-12	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 the 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).]
T-13	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(b).]
T-14	General Condition: The permit does not convey any property rights of any sort, or any exclusive privilege. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(c).]
T-15	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(d).]
T-16	General Condition: This permit shall not be transferred except upon approval of the Permit Board. [11 Miss. Admin.Code Pt. 2, R.2.16.B.]
T-17	General Condition: The provisions of this permit are severable. If any provision of the permit, or the application of any provision of the 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.1.1.D(7).]
T-18	General Condition: The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance or if construction is suspended for eighteen (18) months or more. [11 Miss. Admin.Code Pt. 2, R.2.5.C(1).]

Permit To Construct Air Emissions Equipment

Comfort Revolution
Facility Requirements
Permit Number:2640-00061
Activity ID No.: PER20140001

AI0000065597 (continued):

Narrative Requirements:

Condition No.	Condition
T-19	General Condition: A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee. [11 Miss. Admin.Code Pt. 2, R.2.5.D(3).]
T-20	General Condition: Except as prohibited in 11 Miss. Admin. Code Pt. 2,R. 2.5.D(7) after certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by APC-S-2, Section XIII.G. [11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).]
T-21	General Condition: Except as otherwise specified in 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7), the application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing. [11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).]
T-22	General Condition: Except as otherwise specified in 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7), upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate. [11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).]
T-23	General Condition: For moderate modifications that require contemporaneous enforceable emissions reductions from more than one emission point in order to net out of PSD/NSR, the applicable Title V Permit to Operate or State Permit to Operate must be modified prior to beginning operation of the modified facilities. [11 Miss. Admin.Code Pt. 2, R.2.5.D(7).]

Permit To Construct Air Emissions Equipment

Comfort Revolution
Facility Requirements
Permit Number:2640-00061
Activity ID No.: PER20140001

Page 6 of 9

AI0000065597 (continued):

Narrative Requirements:

Condition No.	Condition
T-24	<p>General Condition: Regarding compliance testing:</p> <p>(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.</p> <p>(b) Compliance testing will be performed at the expense of the permittee.</p> <p>(c) Each emission sampling and analysis report shall include but not be limited to the following:</p> <ol style="list-style-type: none">1. detailed description of testing procedures;2. sample calculation(s);3. results; and4. comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit. [11 Miss. Admin.Code Pt. 2, R.2.6.B(3),(4)&(6).]
T-25	<p>General Condition: The construction of the stationary source shall be performed in such a manner so as to reduce fugitive dust emissions from construction activities to a minimum. [11 Miss. Admin.Code Pt. 2, R.2.5.A(4).]</p>

Permit To Construct Air Emissions Equipment

Comfort Revolution
Facility Requirements
Permit Number:2640-00061
Activity ID No.: PER20140001

EQPT0000000004 (AA-005) Space Heaters, Natural Gas-Fired:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		The maximum opacity from any point source or emissions at any time shall not exceed 40% as determined by EPA Test Method 9, 40 CFR 60, Appendix A. [11 Miss. Admin. Code Pt. 2, R. 1.3.8.B.]
L-2		The maximum permissible emission of ash and/or particulate matter from each 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. [11 Miss. admin. Code Pt. 2, R. 1.3.D(1)(a).]
L-3		The maximum discharge of sulfur oxides from each 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).]

Permit To Construct Air Emissions Equipment

Comfort Revolution
Facility Requirements
Permit Number:2640-00061
Activity ID No.: PER20140001

Page 8 of 9

GRPT0000000001 (GRP-001) Foam Production/Fabrication Sources Subject to 40 CFR 63, Subpart OOOOOO:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		For molded flexible polyurethane foam production lines AA-001, AA-002 and AA-003, permittee must not use a material containing methylene chloride as an equipment cleaner to flush the mixhead or use a material containing methylene chloride elsewhere as an equipment cleaner. [40 CFR 63.11416(c)(1)]
L-2		For molded flexible polyurethane foam production lines AA-001, AA-002 and AA-003, permittee must not use a mold release agent containing methylene chloride. [40 CFR 63.11416(c)(2)]
L-3		For the Flexible Polyurethane Foam Fabrication Gluing Process, AA-004, the permittee must not use any adhesive containing methylene chloride. [40 CFR 63.11416(e)]

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		The permittee may demonstrate compliance with the requirements in 40 CFR 63.11416 (c) and (e) of Subpart OOOOOO using adhesive usage records, Material Safety Data Sheets, and engineering calculations. [40 CFR 63.11416(f)]

Permit To Construct Air Emissions Equipment

Comfort Revolution
Facility Requirements
Permit Number:2640-00061
Activity ID No.: PER20140001

GRPT0000000001 (continued):

Record-Keeping Requirements:

Condition No.	Condition
R-1	<p>For molded flexible polyurethane foam production lines AA-001, AA-002 and AA-003, permittee must have a compliance certification on file with the following statements. This certification must be signed by a responsible official and be re-issued whenever the responsible official changes.</p> <p>“This facility does not use any equipment cleaner to flush the mixhead which contains methylene chloride, or any other equipment cleaner containing methylene chloride in a molded flexible polyurethane foam process in accordance with §63.11416(c)(1).”</p> <p>“This facility does not use any mold release agent containing methylene chloride in a molded flexible polyurethane foam process in accordance with §63.11416(c)(2).” [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., 40 CFR 63.11417(c)(1)]</p>
R-2	<p>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 5 years, with the last 2 years of data retained on site. The remaining 3 years of data may be maintained off site. [40 CFR 63.11417(d)]</p>

GENERAL INFORMATION

Comfort Revolution
9 Industrial Road
Belmont, MS
Tishomingo County

Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
65597	Comfort Revolution	Official Site Name	3/12/2014	
2814100061	Comfort Revolution	Air-AIRS AFS (MDEQ USE ONLY)	3/18/2014	
264000061	Comfort Revolution	Air-Construction	3/26/2014	

Basin: Tennessee River Basin

Location Description: