

STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Highland MS LLC
County Road 3333
Enterprise, Mississippi
Clarke 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

AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued:_____

Permit No.: 0440-00066

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SECTION 1. GENERAL CONDITIONS

- 1.1. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R.2.5.A.)
- 1.2. Any activities not identified in the application are not authorized by this permit. (Ref.: Miss. Code Ann. 49_17_29 1.b)
- 1.3. 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. (Ref.: Miss. Code Ann. 49_17_29)
- 1.4. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10)
- 1.5. 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. (Ref.: Miss. Code Ann. 49_17_21)
- 1.6. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R.2.2.C.)
- 1.7. 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)
- 1.8. This permit is for air pollution control purposes only. (Ref.: 11 Miss. Admin. Code Pt. 2, R.2.1.D.)
- 1.9. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R.2.2. B(5).)
- 1.10. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R.2.1. D(6).)
- 1.11. 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.2.1.D(7).)
- 1.12. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R.2.2.B(15)(a).)
- 1.13. 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).)
- 1.14. The permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: 11 Miss. Admin. Code Pt. 2, R.2.2. B(15)(c).)
- 1.15. 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).)

- 1.16. This permit shall not be transferred except upon approval of the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R.2.16.B.)
- 1.17. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R.1.1. D(7).)
- 1.18. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R.2.5. C(1).)
- 1.19. A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee. (Ref.: 11 Miss. Admin. Code Pt. 2, R.2.5. D(3).)
- 1.20. 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 11 Miss. Admin. Code Pt. 2, R. 2.13.G. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5. D(4).)
- 1.21. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5. D(5).)
- 1.22. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5. D(6).)

1.23. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R.2.5.D(7).)

1.24. 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:
 - (i) detailed description of testing procedures;
 - (ii) sample calculation(s); results; and
 - (iii) 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)&(6).)

1.25. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R.2.5.A(4).)

1.26. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D.)

- 1.27. Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun. (Ref.: 11 Miss. Admin. Code Pt. 2, R.2.5.C (2).)
- 1.28. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R.2.5. C(4).)

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Beginning upon <ISSUANCE DATE>, the permittee is authorized to construct and operate, upon certification of construction, air emissions equipment as described in the following table:

Emission Point	Description
AA-000	Wood Pellet Manufacturing Process
AA-001	Two Debarkers
AA-002	Wood Chipper
AA-003	3 Storage Piles (1 covered green chip storage pile, 1 radial green chip storage pile, and 1 bark storage pile)
AA-004	2 Green Hammermills (45 tons/hr each)
AA-005	Truck Dump Pit
AA-006	65 MMBTU/Hr bark burner for Pellet Line #1 controlled by a baghouse
AA-007	Scavenge Baghouse for Pellet Line #1 which controls PM from the Pellet Cooler, the Wood Fuel Container (WFC) Cyclones and the two (2) Dry Wood Hammermill (LTC) cyclones
AA-008	65 MMBTU/Hr bark burner for Pellet Line #2 controlled by a baghouse
AA-009	Scavenge Baghouse for Pellet Line #2 which controls PM from the Pellet Cooler, the Wood Fuel Container (WFC) Cyclones and the two (2) Dry Wood Hammermill (LTC) cyclones
AA-010	65 MMBTU/Hr bark burner for Pellet Line #3 controlled by a baghouse
AA-011	Scavenge Baghouse for Pellet Line #3 which controls PM from the Pellet Cooler, the Wood Fuel Container (WFC) Cyclones and the two (2) Dry Wood Hammermill (LTC) cyclones
AA-012	65 MMBTU/Hr bark burner for Pellet Line #4 controlled by a baghouse
AA-013	Scavenge Baghouse for Pellet Line #4 which controls PM from the Pellet Cooler, the Wood Fuel Container (WFC) Cyclones and the two (2) Dry Wood Hammermill (LTC) cyclones
AA-014	Two (2) Pellet Storage Silos
AA-015	Pellet Loadout Area
AA-016	Road Fugitives
AA-017	Fire Pump Engine
AA-018	Emergency Generator

SECTION 3. EMISSION LIMITATIONS & STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
Entire Facility	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity	$\leq 40\%$
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2	Equivalent Opacity	$\leq 40\%$
AA-000	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.3	PM (filterable only)	$E = 4.1p^{0.67}$
	Federally enforceable limit established in Permit to Construct issued <ISSUANCE DATE>	3.4	Pellet Production	$\leq 600,000$ metric tons/yr, for each consecutive 12-months on a rolling basis
	Avoidance of 40 CFR 52.21 and 11 Miss. Admin. Code Pt. 2 R. 2.2.B(10)	3.5	PM/PM ₁₀ /PM _{2.5}	≤ 245.0 tons/yr
			NO _x	≤ 245.0 tons/yr
			CO	≤ 245.0 tons/yr
			VOC	≤ 245.0 tons/yr
	Avoidance of Major Source MACT and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)	3.6	HAPS	≤ 9.9 tons/yr of an individual HAP, or ≤ 24.9 tons/yr of combined HAPs
AA-006, AA-008, AA-010, AA-012	40 CFR 60.40c(a)	3.7	PM/Opacity	Regulatory Applicability
	40 CFR 60.43c(c), (d)	3.8	Opacity	20% (6-minute average), except for one 6-minute period per hour of not more than 27%. This applies except during periods of startup, shutdown, or malfunction.
	40 CFR 60.43c(e)(3)	3.9	PM	0.10 lb/MMBTU heat input
	Avoidance of 40 CFR 52.21 and 11 Miss. Admin. Code Pt. 2 R.2.2.B(10)	3.10	VOC	The permittee shall exhaust all the gases from the pre-dryer, primary dryer, hammermills and pellet presses to the bark burners (AA-006, AA-008, AA-010, and AA-012) at all times the equipment is in operation

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
	11 Miss. Admin Code. Pt. 2. R. 1.4.A(1)	3.11	SO ₂	4.8 lb/MMBTU
AA-007, AA-009, AA-011, AA-013	11 Miss. Admin. Code Pt. 2 R2.2.B(10)	3.12	PM	The permittee shall exhaust all the gases from the pellet coolers, the wood fuel container (WFC) cyclones, and the dry wood hammermill (LTC) cyclones to the Scavenge Baghouses (AA-007, AA-009, AA-011, and AA-013) at all times the equipment is in operation
AA-017, AA-018	40 CFR 63.6585, 40 CFR 63.6590	3.13	HAPs	Regulatory Applicability

3.1. Except as otherwise specified or limited herein, the permittee shall not cause, permit or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial, or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).

- (a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.
- (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.))

3.2. Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.))

3.3. For the wood pellet manufacturing process, AA-000, the permittee shall not cause, permit or allow the emission of particulate matter in total quantities in any one hour, 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

p is the process weight input rate in tons per hour

Where *E* is determined by EPA Test Methods 1-5, 40 CFR 60, Appendix A. (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 1. R. 1.3(F))

- 3.4. For the wood pellet manufacturing process, AA-000, the permittee shall limit pellet production to no more than 600,000 metric tons/yr (MTPY) as determined for each consecutive 12-month period on a rolling monthly basis. (Ref.: 11 Miss. Admin. Code Pt. 2, R.2.2.B(10))
- 3.5. For the wood pellet manufacturing process, AA-000, the permittee shall not discharge or cause the discharge into the atmosphere any emissions which contain PM, PM₁₀, PM_{2.5}, CO, NO_x or VOC in excess of 245.0 tons per year as determined for each consecutive 12-month period on a rolling monthly basis. (Ref.: Avoidance of 40 CFR 52.21, 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10))
- 3.6. For the wood pellet manufacturing process, AA-000, the permittee shall not discharge into the atmosphere any emissions which contain any single hazardous air pollutant (HAP) listed in Section 112 of the Clean Air Act in excess of 9.9 tons per year or any emission which contain a combination of HAPs in excess of 24.9 tons per year. (Ref.: Avoidance of Major Source MACT per 40 CFR 63, 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10))
- 3.7. For the four bark burners, Emission Points AA-006, AA-008, AA-010, and AA-012, the permittee is subject to and shall comply with the applicable provisions of the New Source Performance Standards (NSPS) - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR Part 60 Subpart Dc and the General Provisions, 40 CFR Part 60, Subpart A (Ref.: 40 CFR 60.40c(a))
- 3.8. For the four bark burners, Emission Points AA-006, AA-008, AA-010, AA-012, the permittee shall not discharge or cause the discharge into the atmosphere any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. These standards apply at all times, except during periods of startup, shutdown, or malfunction. (Ref.: 40 CFR 60.43c(c) and (d))
- 3.9. For Emission Points AA-006, AA-008, AA-010, AA-012, the permittee shall not discharge or cause the discharge into the atmosphere any gases that contain particulate matter (PM) in excess of 0.10 lb/MMBTU heat input. (Ref. 40 CFR 60.43c(e)(3))
- 3.10. The permittee shall exhaust all the gases from the pre-dryer, primary dryer, hammermills and pellet presses to the bark burners (AA-006, AA-008, AA-010, AA-012) at all times the equipment is in operation. The permittee shall not operate this equipment if the bark burner is not operating. (Ref.: 11 Miss. Admin Code Pt 2, R. 2.2.B(10))

- 3.11. For Emission Points AA-006, AA-008, AA-010, and AA-012, the maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned 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))
- 3.12. The permittee shall exhaust all the gases from the pellet coolers, the wood fuel container (WFC) cyclones, and the dry wood hammermill (LTC) cyclones to the Scavenge Baghouses (AA-007, AA-009, AA-011, and AA-013) at all times the equipment is in operation. The Permittee shall not operate this equipment if the baghouse is not operating. (Ref.: 11 Miss. Admin Code Pt 2, R. 2.2.B(10))
- 3.13. For Emission Points AA-017 and AA-018, the permittee is subject to and shall comply with the National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ. These engines are new institutional emergency stationary RICE located at an area source of HAP emissions that are required to meet the requirements of this standard by meeting the requirements of 40 CFR Part 60 Subpart IIII, for compression ignition engines or 40 CFR Part 60 Subpart JJJJ for spark ignition engines, as applicable. (Ref.: 40 CFR 63.6585 and 63.6590)

SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.

SECTION 5. MONITORING & RECORDKEEPING REQUIREMENTS

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-000	Recordkeeping-General	Records Retention	5.1	11 Miss. Admin Code Pt. 2, R. 6.3.A(3)(b)(2)
	Opacity/ Equivalent Opacity	Weekly visual observations followed by Method 9 test if visible emissions are observed	5.2	11 Miss. Admin. Code Pt. 2, Ch. 2. R. 2.2.B(10)
	PM, PM ₁₀ , PM _{2.5} , NO _x , CO, VOC	Pellet Production	5.3	11 Miss. Admin. Code Pt. 2, R.2.2.B(10)
	PM, PM ₁₀ , PM _{2.5} , NO _x , CO, VOC	Quantifying of emissions on a monthly and a 12-month rolling total basis	5.4	11 Miss. Admin. Code Pt. 2, R.2.2.B(10)
AA-006 AA-008 AA-010 AA-012	Opacity	Install, calibrate, maintain, and operate a continuous opacity monitoring system (COMS). A COMS will not be required if the facility installs a bag leak detection system.	5.5	40 CFR 60.47c
	PM	Initial performance test within 60 days of reaching maximum production but not later than 180 days after initial startup of the facility	5.6	40 CFR 60.45c(a)
	Fuel	Record and maintain records of the amount of each fuel combusted during the calendar month	5.7	40 CFR 48c(g)(2)
	NO _x /CO	Initial performance test within 60 days of reaching maximum production but not later than 180 days after initial startup of the facility	5.8	11 Miss. Admin. Code Pt. 2, Ch. 2. R.2.B(10)
AA-006 AA-007 AA-008 AA-009 AA-010 AA-011 AA-012 AA-013	PM/PM ₁₀ /PM _{2.5}	Initial performance test within 60 days of reaching maximum production but not later than 180 days after initial startup of the facility	5.9	11 Miss. Admin. Code Pt. 2, Ch. 2. R.2.B(10)
	VOC	Initial performance test within 60 days of reaching maximum production but not later than 180 days after initial startup of the facility	5.10	11 Miss. Admin. Code Pt. 2, Ch. 2. R.2.B(10)
	HAPs (Methanol, Formaldehyde, Acetaldehyde)	Initial Performance test within 60 days of reaching maximum production but not later than 180 days after initial startup of the facility	5.11	11 Miss. Admin. Code Pt. 2, Ch. 2. R.2.B(10)

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-017, AA-018	HAPs	Applicable monitoring and recordkeeping as required by 40 CFR Part 63 Subpart ZZZZ	5.12	40 CFR Part 63 Subpart ZZZZ

- 5.1. The permittee shall maintain on-site records of all required monitoring data and support information required by this permit for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. These records shall be made available for review upon request from DEQ personnel. (Ref.: 11 Miss. Admin Code Pt. 2, R. 6.3.A(3)(b)(2))
- 5.2. For Emission Points AA-005, AA-006, AA-007, AA-008, AA-009, AA-010, AA-011, AA-012, AA-013 and AA-015, the permittee shall perform weekly visual observations of the exhaust stacks and keep records of each observation. These observations may be conducted from a location allowing the observation of multiple emission points simultaneously. If conditions are such that visible emissions are observed, then the permittee shall perform a visible emissions evaluation (VEE) using 40 CFR Part 60, Appendix A, Method 9. If VEE readings cannot be taken using Method 9, the permittee shall note these conditions in the record and provide an explanation of why it was not possible to perform opacity readings/observations. (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 2. R. 2.2.B(10))
- 5.3. For the entire facility (AA-000) the permittee shall determine all necessary production amounts (i.e. pellets produced) on a monthly basis such that the permittee can determine pellets produced in metric tons per month and metric tons per year for each consecutive 12-month period on a rolling monthly basis. (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 2. R. 2.2.B(10))
- 5.4. For the entire facility (AA-000) the permittee shall demonstrate compliance with the limitations established in Condition 3.5, by quantifying emissions from the point sources in the facility on a monthly basis and on a 12-month rolling total basis. For Emission Points requiring performance testing, emissions shall be quantified using the emission factor (lb/ton of pellets produced) established during the performance test and the production data collected from Condition 5.3. (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 2. R. 2.2.B(10))
- 5.5. For Emission Points AA-006, AA-008, AA-010, and AA-012, the permittee shall install, calibrate, maintain, and operate a continuous opacity monitoring system (COMS) for measuring the opacity of emissions discharged to the atmosphere as required in 40 CFR 60.47c. A COMS will not be required if the facility installs a bag leak detection system as required by 40 CFR 60.47c(f)(1) (Ref.: 40 CFR 60.47c)

- 5.6. For Emission Points AA-006, AA-008, AA-010, and AA-012, the permittee shall conduct an initial performance test for Particulate Matter (PM) as required under 40 CFR 60.45c. As required under 40 CFR 60.8, this test shall be conducted within 60 days after achieving the maximum production rate, but not later than 180 days after initial startup of the facility. (Ref.: 40 CFR 60 Subpart Dc.60.45c(a))
- 5.7. For Emission Points AA-006, AA-008, AA-010, and AA-012 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))
- 5.8. For Emission Points AA-006, AA-008, AA-010, and AA-012, the permittee shall perform an initial performance test for NO_x and CO within 60 days of reaching maximum production rate, but not later than 180 days after initial startup of the facility. The permittee shall utilize EPA Reference Method 7 or 7E to measure outlet NO_x concentration and Method 10 to measure outlet CO concentration and should use Method 19 (when applicable) to report the results in lbs/hr, and lbs/ton of pellets produced. The permittee shall monitor the pellet production rate during the performance test. (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 2. R.2.B(10))
- 5.9. For Emission Points AA-006, AA-007, AA-008, AA-009, AA-010, AA-011, AA-012 and AA-013, the permittee shall perform a performance test for PM/PM₁₀/PM_{2.5} and Opacity within 60 days of reaching maximum production rate, but not later than 180 days after initial startup of the facility. This test can be performed in conjunction with the PM test required in Condition 5.6. The PM and Opacity testing shall be performed simultaneously. The permittee shall utilize EPA Reference Methods 1-5 and 9, 40 CFR 60, Appendix A or EPA Approved Oregon Method 8 and EPA Reference Method 201, 201A and 202 and should report the PM/PM₁₀/PM_{2.5} results in lbs/hr and lbs/ton of pellets produced. The permittee shall monitor the pellet production rate during the performance test. (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 2. R.2.B(10))
- 5.10. For Emission Points AA-006, AA-007, AA-008, AA-009, AA-010, AA-011, AA-012 and AA-013, the permittee shall perform an initial performance test for VOC's within 60 days of reaching maximum production rate, but not later than 180 days after initial startup of the facility. The permittee shall utilize EPA Reference Method OTM-26 (Interim VOC Measurement Protocol for the Wood Products Industry – July 2007) to measure outlet VOC concentration and should report the results (WPP1 VOCs) in lbs/hr, and lbs/ton of pellets produced. The permittee shall monitor the pellet production rate during the performance test.

During the initial performance test the permittee shall continuously measure and record the combustion zone temperature for the bark burner. These measurements shall be used to establish the minimum temperature at which the burners must operate so that compliance with the VOC limit can be assured. (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 2. R.2.B(10))

- 5.11. For Emission Points AA-006, AA-007, AA-008, AA-009, AA-010, AA-011, AA-012 and AA-013, the permittee shall perform an initial performance test for HAPs (specifically Methanol, Formaldehyde, and Acetaldehyde) within 60 days of reaching maximum production rate, but not later than 180 days after initial startup of the facility. The permittee shall utilize NCASI Method 99.02 or use EPA Method 308 (for Methanol), EPA Method 316 (for Formaldehyde) or NCASI 98.01 (for Formaldehyde) or SW-846 Method 0011 (for Acetaldehyde) to measure outlet HAP concentrations and should report the results in lbs/hr, and lbs/ton of pellets produced. The permittee shall monitor the pellet production rate during the performance test. (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 2. R.2.B(10))
- 5.12. For Emission Points AA-017 and AA-018, the permittee shall submit reports as required by 40 CFR Part 63 Subpart ZZZZ. (Ref. : 40 CFR Part 63 Subpart ZZZZ)

SECTION 6. REPORTING REQUIREMENTS

Emission Point(s)	Pollutant/Parameter Monitored	Reporting Requirement	Condition Number	Applicable Requirement
AA-000	PM, PM ₁₀ , PM _{2.5} , NO _x , CO, VOC	Notification of Performance Testing	6.1	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)
	PM, PM ₁₀ , PM _{2.5} , NO _x , CO, VOC	Reporting of Test results within 60 days	6.2	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1)
	PM, PM ₁₀ , PM _{2.5} , NO _x , CO, VOC	Reporting of Deviations	6.3	11 Miss. Admin. Code Pt. 2, R.2.2.B(10)
	PM, PM ₁₀ , PM _{2.5} , NO _x , CO, VOC	Semi-Annual Reports	6.4	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1)
	Pellet Production	Reporting of monthly and annual pellet production	6.5	11 Miss. Admin Code Pt. 1, R.2.2.B(11)
	PM, PM ₁₀ , PM _{2.5} , NO _x , CO, VOC	Report of Calculated emissions for compliance with Condition 5.4	6.6	11 Miss. Admin Code Pt. 1, R.2.2.B(11)
AA-017, AA-018	HAPs	Reports as required by 40 CFR Part 63 Subpart ZZZZ	6.7	40 CFR Part 63 Subpart ZZZZ

6.1 For any performance test required by this permit, a written test protocol must be submitted at least thirty (30) days prior to the scheduled test date(s) to ensure that all test methods and procedures are acceptable to MDEQ. If the permittee is proposing an alternative test method not previously approved by EPA, a cover letter indicating such must be attached and submitted with the test protocol. If the initial test protocol is acceptable, subsequent protocols may be waived if these protocols contain no significant changes.

Also, MDEQ must be notified at least ten (10) days prior to the scheduled test date so that an observer may be present to witness the test(s). (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

6.2 For any performance test required by this permit, the permittee shall submit test results to MDEQ within sixty (60) days of completion of the performance test. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1))

6.3 The permittee shall report any deviations from the permit requirements, including deviations attributable to upsets, within five (5) days of the time the deviation began. The report shall describe the nature of the deviation and include the cause of the deviation(s) and any corrective action(s) or preventive measure(s) taken. A copy of the report shall be maintained in accordance with the general recordkeeping provisions outlined in Section 5 of this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(2))

- 6.4 The permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 6.2.E. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)
- 6.5 The permittee shall submit reports of pellets produced in metric tons per month and metric tons per year for each consecutive 12-month period on a rolling monthly basis as required in Condition 6.4.(Ref.: 11 Miss. Admin Code Pt. 1, R.2.2.B(11))
- 6.6 The permittee shall submit reports of calculated PM/PM₁₀/PM_{2.5}, VOC, NO_x, and CO emissions from Condition 5.4 as required in Condition 6.4. (Ref.: 11 Miss. Admin Code Pt. 1, R.2.2.B(11))
- 6.7 For Emission Points AA-017 and AA-018, the permittee shall submit reports as required by 40 CFR Part 63 Subpart ZZZZ. (Ref. : 40 CFR Part 63 Subpart ZZZZ)