

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

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Quitman Pellets, LLC
252 Hickory Street
Quitman, Clarke County, Mississippi

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with Title V of the Federal Clean Air Act (42 U.S.C.A. § 7401 - 7671) and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

Permit Issued: May 16, 2022

Effective Date: As Specified Herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

Krystal Rudolph

AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: April 30, 2027

Permit No.: 0440-00063

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SECTION 1. GENERAL CONDITIONS

1.1 The permittee must comply with all conditions of this permit. Any permit non-compliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(6)(a).)

1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(6)(b).)

1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(6)(c).)

1.4 Prior to its expiration, this permit may be reopened in accordance with the provisions listed below.

(a) This permit shall be reopened and revised under any of the following circumstances:

(1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of three (3) or more years. Such a reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.

(2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

(3) The Permit Board or the EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.

(4) The Administrator or the Permit Board determines that the permit must be

revised or revoked to assure compliance with the applicable requirements.

- (b) Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.
- (c) Re-openings shall not be initiated before a notice of such intent is provided to the Title V source by the Mississippi Department of Environmental Quality (MDEQ) at least thirty (30) days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.G.)

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(6)(e).)

- 1.6 This permit does not convey any property rights of any sort, or any exclusive privilege.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(6)(d).)

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

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

- 1.8 The permittee shall pay to the MDEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order, which shall be issued in accordance with the procedure outlined in Mississippi Administrative Code, Title 11, Part 2, Chapter 6 – “Air Emissions Operating Permit Regulations for Purposes of Title V of the Federal Clean Air Act”.

- (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the

applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g. air emission factors); or other approaches such as engineering calculations (e.g. estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A.(2).)

- (b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A.(2).)

- (c) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.(2).)

- (d) The fee shall be due September 1 of each year. By July 1 of each year, the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the MDEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.)

- (e) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.C.)

- 1.9 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(8).)

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)

- 1.11 The permittee shall allow the MDEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to perform the following:

- (a) Enter upon the permittee's premises where a Title V source is located, emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (d) As authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

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

- 1.12 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere.

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

- 1.13 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970.

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

- 1.14 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F.(1).)

- 1.15 Nothing in this permit shall alter or affect the following:
- (a) The provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
 - (b) The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - (c) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
 - (d) The ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act.

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

- 1.16 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan.

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

- 1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V Operating Permit (TVOP). If the permittee submits a timely and complete application, the failure to have a TVOP is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply (if subsequent to the completeness determination) the permittee fails to submit by the deadline specified in writing by the MDEQ any additional information identified as being needed to process the application.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C.(2)., R. 6.4.B., and R. 6.2.A.(1)(c).)

- 1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:

- (a) The changes are not modifications under any provision of Title I of the Act;
- (b) The changes do not exceed the emissions allowable under this permit;
- (c) The permittee provides the Administrator and the Department with written notification in advance of the proposed changes [at least seven (7) days, or such other timeframe as provided in other regulations for emergencies] and the notification includes the following:
 - (1) A brief description of the change(s);
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.
- (d) The permit shield shall not apply to any Section 502(b)(10) change.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F.(1).)

- 1.19 Should the Executive Director of the MDEQ 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 3 – “Regulations for the Prevention of Air Pollution Emergency Episodes” – for the level of emergency declared.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)

- 1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Mississippi Administrative Code, Title 11, Part 2, Chapter 2 – “Permit Regulations for the Construction and/or Operation of Air Emissions Equipment” – and may require modification of this permit in accordance with Mississippi Administrative Code, Title 11, Part 2, Chapter 6 – “Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act”.

“Modification” is defined as [a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

- (a) Routine maintenance, repair, and replacement;
- (b) Use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
- (c) Use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
- (d) Use of an alternative fuel or raw material by a stationary source which:
 - (1) The source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51, 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).)

1.21 Any change in ownership or operational control must be approved by the Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.D(4).)

1.22 This permit is a Federally-approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.B.(1).)

1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvi-cultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up

operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or an Emergency Air Pollution Episode Alert imposed by the Executive Director of the MDEQ and must meet the following buffer zones.

- (a) Open burning without a forced-draft air system must not occur within five hundred (500) yards of an occupied dwelling.
- (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within fifty (50) yards of an occupied dwelling.
- (c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator.

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

1.24 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies:

- (a) Except as otherwise specified herein, an “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include non-compliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
- (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in Part (c) following are met.
- (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
 - (1) An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of the emergency the permittee took all reasonable steps to

minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

- (4) The permittee submitted notice of the emergency to the MDEQ within two (2) working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

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

1.25 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, start-ups, and shutdowns.

- (a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
 - (1) For an upset, 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 five (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 non-compliance, and the corrective actions taken and;
 - (v) That as soon as practicable but no later than twenty-four (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) Start-ups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) Start-ups and shutdowns are part of normal source operation. Emission limitations apply during start-ups and shutdowns unless source specific emission limitations or work practice standards for start-ups 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for start-ups and shutdowns. Source specific emission limitations or work practice standards established for start-ups and shutdowns are subject to the requirements prescribed in Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 1.10.B.(2)(a) through (e).
 - (3) Where an upset as defined in Rule 1.2 occurs during start-up or shutdown, see the upset requirements above.

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

- 1.26 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M as adopted by reference in Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 1.8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.8.)

- 1.27 Regarding compliance testing (if applicable):

- (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).)

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

EMISSION POINT	DESCRIPTION
AA-000	Facility-Wide (Mohegan Renewable Energy MS, LLC)
AA-201	Green Wood Hammermill and Green Wood Silo [emissions are routed to the Wood Chip Dryer]
AA-202 (formerly Emission Point AC-001)	Wood Chip Rotary Dryer (Facility Ref. No. WC1) with multi-clone (Facility Ref. No. WB1);
AA-203	Three (3) White Chip Hammermills and one (1) Wood Fuel Hammermill [emissions from each hammermill are routed to a corresponding baghouse and then the Wood Chip Dryer]
AA-204	Dry Wood Silos [emissions routed to the White Chip Hammermill]
AA-205 (formerly Emission Point AC-002)	Wood Fuel Storage Bin with Bag Filter (Facility Ref. No. BF11)
AA-206 (formerly Emission Point AC-001)	75 MMBTU / Hour Wood Dust Burner [emissions routed to Wood Chip Dryer]
AA-207 (formerly Emission Point AC-007)	Four (4) Small Pellet Mills (Facility Ref. No. PM1 – PM5) and One (1) Associated Pellet Cooler [emissions are routed to a bag filter (Facility Ref. No. BF2)]
AA-208 (formerly Emission Point AC-003)	Three (3) Large Pellet Mills (Facility Ref. Nos. LPM1- LPM5) with One (1) Large Pellet Cooler [emissions are routed to a baghouse (Facility Ref. No. BF-12)]

SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. FACILITY-WIDE EMISSION LIMITATIONS & STANDARDS

3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process that exceeds forty (40) percent opacity subject to the following exceptions:

- (a) Start-up operations may produce emissions, which exceed 40% opacity for up to fifteen (15) minutes per start-up in any one (1) hour and not to exceed three (3) start-ups per stack in any twenty-four (24) hour period.
- (b) Emissions resulting from soot blowing operations (i.e. ash removal) shall be permitted provided such emissions do not exceed sixty (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 (1) hour.

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

3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause or allow the discharge into the ambient air from any point source any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity equivalent to that provided in Condition 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets.

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

3.A.3 The permittee shall not cause or allow the emission of particles or any contaminants in sufficient amounts or of such duration from any process as to be injurious to humans, animals, plants, or property, or to be a public nuisance, or create a condition of air pollution.

- (a) The permittee shall not cause or permit the handling, transporting, or storage of any material in a manner, which allows or may allow unnecessary amounts of particulate matter to become airborne.
- (b) When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than that from which it originated or to violate any other provision of 11 Miss. Admin. Code Pt. 2, Ch. 1, the Commission may order such corrected in a way that all air and gases or air and gas-borne material leaving the building or equipment are controlled or removed prior to discharge to the open air.

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

B. EMISSION POINT SPECIFIC EMISSION LIMITATIONS & STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-000	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.B.1	PM (filterable)	E = 4.1 (p ^{0.67})
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10), as established in Permit to Construct issued December 9, 2010 <i>(MACT Avoidance Limits)</i>	3.B.2	HAPs	24.90 tpy (Total) 9.0 tpy (Individual) (Rolling 12-Month Totals)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10), as established in Permit to Construct issued December 9, 2010 <i>(PSD Avoidance Limits)</i>	3.B.3	NO _x	249.0 tpy (Rolling 12-Month Total)
			CO	249.0 tpy (Rolling 12-Month Total)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10), as established in Permit to Construct issued June 6, 2014 and modified February 25, 2021 <i>(PSD Avoidance Limits)</i>	3.B.3	PM (filterable)	249.0 tpy (Rolling 12-Month Total)
			PM ₁₀ / PM _{2.5} (filterable + condensable)	249.0 tpy (Rolling 12-Month Totals)
			VOCs	249.0 tpy (Rolling 12-Month Total)
11 Miss. Admin. Code Pt. 2, R. 2.2.B(10), as established in Permit to Construct issued June 6, 2014 and modified February 25, 2021	3.B.4	Softwood Usage Restriction	≤ 85% (by Weight)	
AA-201 AA-203 AA-205 AA-206	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10), as established in Permit to Construct issued February 25, 2021	3.B.5	PM / PM ₁₀ / PM _{2.5}	Emissions Control Requirement
AA-202 AA-203 AA-205 AA-207 AA-208	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10), as established in Permit to Construct issued February 25, 2021	3.B.6	PM / PM ₁₀ / PM _{2.5}	Operate Air Pollution Control Devices During Active Operations
AA-202 AA-207 AA-208	40 CFR Part 64 – Compliance Assurance Monitoring (CAM) 40 CFR 64.2(a); CAM	3.B.7	PM / PM ₁₀ / PM _{2.5}	General Applicability
AA-206	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10), as established in Permit to Construct issued February 25, 2021	3.B.8	Fuel Source Restriction	Combust Uncontaminated Wood Waste and Natural Gas

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-207 AA-208	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Permit to Construct issued February 25, 2021	3.B.9	Wood Pellet Production	130,000 ODT / Year (Rolling 12-Month Total)

- 3.B.1 For Emission Point AA-000 (Facility-Wide), except as otherwise specified herein, the permittee shall not allow the emission of particulate matter in total quantities in any one (1) hour from any manufacturing process (which includes any associated stacks, vents, outlets, or combination thereof) to exceed the amount determined by the relationship:

$$E = 4.1 (p^{0.67})$$

Where “E” is the emission rate in pounds per hour and “p” is the process weight input rate in tons per hour. Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs.

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

- 3.B.2 For Emission Point AA-000 (Facility-Wide), the permittee shall limit the emission of all hazardous air pollutants (HAPs) in total to no more than 24.90 tons per year (tpy) and each individual HAP to no more than 9.0 tpy from all applicable emission sources based on rolling 12-month totals.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Permit to Construct issued December 9, 2010 – MACT Avoidance Limits)

- 3.B.3 For Emission Point AA-000 (Facility-Wide), the permittee shall limit the total emission of nitrogen oxides (NO_x), particulate matter (PM; filterable), particulate matter less than 10 microns (µm) in diameter (PM₁₀; filterable + condensable), particulate matter less than 2.5 µm in diameter (PM_{2.5}; filterable + condensable), volatile organic compounds (VOCs), and carbon monoxide (CO) from all applicable emission sources to no more than 249.0 tons per year (tpy) for each pollutant based on a rolling 12-month total.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Permit to Construct issued December 9, 2010 – PSD Avoidance Limits)

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Permit to Construct issued June 6, 2014 and modified February 25, 2021 – PSD Avoidance Limits)

- 3.B.4 For Emission Point AA-000 (Facility-Wide), the permittee shall limit the total quantity of softwood utilized to no more than eighty-five (85) weight percent (wt.%) of all wood processed based on a rolling 12-month period.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Permit to Construct issued June 6, 2014 and modified February 25, 2021)

- 3.B.5 For Emission Points AA-201 (Green Wood Hammermill / Green Wood Silo), AA-203 (White Chip / Wood Fuel Hammermills), AA-205 (Wood Fuel Storage Bin), and AA-206 (Wood Dust Burner), the permittee shall direct emissions generated by the noted process equipment to the Wood Chip Rotary Dryer (i.e. Emission Point AA-202) at all times.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Permit to Construct issued February 25, 2021)

- 3.B.6 For Emission Points AA-202 (Wood Chip Rotary Dryer), AA-203 (White Chip / Wood Fuel Hammermills), AA-205 (Wood Fuel Storage Bin), AA-207 (Small Pellet Mills / Pellet Cooler), and AA-208 (Large Pellet Mills / Pellet Cooler), the permittee shall operate the air pollution control device(s) that correspond with each noted process equipment at all times during active operations. In the event that a control device fails or becomes non-operational, the permittee shall cease operations at the associated process equipment until such time that the control device is returns to full operation.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Permit to Construct issued February 25, 2021)

- 3.B.7 For Emission Points AA-002, AA-207, and AA-208, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 64 – Compliance Assurance Monitoring (CAM).

(Ref.: 40 CFR 64.2(a); Compliance Assurance Monitoring)

- 3.B.8 For Emission Point AA-206 (Wood Dust Burner), the permittee shall only combust uncontaminated wood waste or natural gas as a fuel source in the burner.

For the purpose of this permit, “*uncontaminated wood waste*” is defined as any by-product generated from the processing of harvested timber to produce wood pellets (bark, green wood chips, dried wood chips, sawdust, wood pellets that do not meet customer specifications, etc.) that does not possess an artificial coating or residue.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Permit to Construct issued February 25, 2021)

- 3.B.9 For Emission Points AA-207 (Small Pellet Mills / Pellet Cooler) and AA-208 (Large Pellet Mills / Pellet Cooler), the permittee shall limit the total production of wood pellets to no more than 130,000 oven-dried tons (ODT) per year based on a rolling 12-month total.

For the purpose of this permit, an “*oven-dried ton*” equates to a ton of wood at zero percent (0%) moisture.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Permit to Construct issued February 25, 2021)

C. INSIGNIFICANT AND TRIVIAL ACTIVITY EMISSION LIMITATIONS & STANDARDS

Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.C.1	PM	0.6 lbs. / MMBTU
11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.C.2	SO ₂	4.8 lbs. / MMBTU

3.C.1 The maximum permissible emission of ash and/or particulate matter (PM) from a fossil fuel burning installation of less than ten (10) million BTU (MMBTU) per hour heat input shall not exceed 0.6 pounds per MMBTU per hour heat input.

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

3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per MMBTU heat input.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)

D. WORK PRACTICE STANDARDS

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

SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions (including emission limitations, standards, or work practices) by January 31 of each year for the preceding calendar year. If the permit was reissued or modified during the course of the preceding calendar year, the compliance certification shall address each version of the permit. Each compliance certification shall include the following:
- (a) The identification of each term or condition of the permit that is the basis of the certification;
 - (b) The compliance status;
 - (c) Whether compliance was continuous or intermittent;
 - (d) The method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
 - (e) Such other facts as may be specified as pertinent in specific conditions elsewhere in this permit.

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

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. GENERAL MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS

5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:

- (a) The date, place as defined in the permit, and time of sampling or measurements;
- (b) The date(s) analyses were performed;
- (c) The company or entity that performed the analyses;
- (d) The analytical techniques or methods used;
- (e) The results of such analyses; and
- (f) The operating conditions existing at the time of sampling or measurement.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(1).)

5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(2).)

5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 of each year 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 6, Rule 6.2.E.

For applicable periodic reporting requirements in 40 CFR Parts 60, 61, and 63, the permittee shall comply with the deadlines in this condition for reporting conducted on a semi-annual basis. Additionally, any required quarterly reports shall be submitted by the end of the month following each calendar quarter (i.e., April 30, July 31, October 31, and January 31), and any required annual reports shall be submitted by January 31 following each calendar year.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)

(Ref.: 40 CFR 60.19(c), 61.10(g), and 63.10(a)(5); Subpart A)

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(2).)

- 5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the MDEQ and the EPA.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

- 5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

- 5.A.8 Unless otherwise specified in Section 4, the monitoring, testing, recordkeeping, and reporting requirements of Section 5 herein supersede the requirements of any preceding Permit to Construct and/or Operate upon permit issuance.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

B. SPECIFIC MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Monitoring / Recordkeeping Requirement
AA-000	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.B.1	Recordkeeping	Maintain Records for a Minimum of Five (5) Years
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.B.2	PM / PM ₁₀ / PM _{2.5}	Implement and Maintain a Dust Management Plan
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.3	NO _x PM / PM ₁₀ / PM _{2.5} VOCs CO HAPs	Calculate the Total Emission of Each Pollutant (Monthly and Rolling 12-Month Period)
		5.B.4	Wood Type (Softwood and Hardwood)	Monitor the Quantity of Each Wood Type Used in Wood Pellet Production (Monthly and Rolling 12-Month Period)
AA-202 AA-205 AA-207 AA-208	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.5	Opacity	Conduct Weekly Emission Observations / Evaluations
AA-202 AA-207 AA-208	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.B.6	PM (filterable) PM ₁₀ / PM _{2.5} (filterable + condensable) HAPs VOCs	Conduct Routine Performance Testing
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.7	NO _x PM / PM ₁₀ / PM _{2.5} CO VOCs HAPs	Establish / Revise Site-Specific Emission Factors
	40 CFR 64.3(a), (b), and 64.6(c); CAM	5.B.8	Pressure Drop	<i>CAM Requirements:</i> Daily Monitoring of Pressure Drop
	40 CFR 64.7(b) and (c); CAM	5.B.9	Operation & Maintenance	Operation and Maintenance Requirements for Monitoring System(s)
	40 CFR 64.7(d); CAM	5.B.10	Corrective Action	Corrective Action Response to an Excursion/ Exceedance of a CAM Indicator

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Monitoring / Recordkeeping Requirement
AA-202 AA-207 AA-208	40 CFR 64.8, CAM	5.B.11	QIP	Develop a Quality Improvement Plan (QIP) (Upon Request)
	40 CFR 64.9(b), CAM	5.B.12	CAM Records	Record and Maintain CAM Records (As Specified)
AA-203 AA-205 AA-207 AA-208	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.13	PM / PM ₁₀ / PM _{2.5} (filterable only)	Conduct a Weekly Inspection on Each Control Device
AA-203 AA-205	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.14	PM / PM ₁₀ / PM _{2.5} (filterable only)	Evaluate the Pressure Drop for Each Control Device Daily
AA-206	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.15	PM / PM ₁₀ / PM _{2.5} NO _x CO VOCs HAPs	Monitor and Record the Consumption of Each Fuel Source
AA-207 AA-208	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.16	Wood Pellets	Monitor the Total Production (Monthly and Rolling 12-Month Total)

5.B.1 For Emission Point AA-000 (Facility-Wide), except as otherwise specified or limited herein, 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. Supporting information includes all calibration and maintenance records, all original strip-chart recordings or other data from continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to the MDEQ as required by “Applicable Rules and Regulations” of this permit upon request.

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

5.B.2 For Emission Point AA-000 (Facility-Wide), the permittee shall implement and maintain a “Dust Management Plan” that details the procedures for operating and maintaining applicable emission sources to minimize the emission of fugitive particulate matter (PM, PM₁₀, and PM_{2.5}).

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

5.B.3 For Point AA-000 (Facility-Wide), the permittee shall calculate and record the total emission of nitrogen oxides (NO_x), particulate matter (PM), particulate matter less than 10 microns (µm) in diameter (PM₁₀), particulate matter less than 2.5 µm in diameter (PM_{2.5}), volatile organic compounds (VOCs), carbon monoxide (CO), each individual hazardous air pollutant (HAP), and all HAPs combined in tons from all sources that can

reasonably emit the pollutant(s) in tons on both a monthly and on a rolling 12-month total basis in accordance with the following specifications:

- (a) Upon approval of the site-specific emission factors, the permittee shall calculate and record emissions from the Wood Chip Rotary Dryer (Emission Point AA-202) and the Small Pellet Mills / Pellet Cooler (Emission Point AA-207) using collected production data, collected parametric monitoring data, and site-specific emission factors established in accordance with Condition 5.B.7.
- (b) For all other emission sources when determining compliance with the emission limitations specified in Conditions 3.B.2 and 3.B.3, the permittee shall maintain actual applicable data (e.g. throughput, etc.) and use the emission factors established in the Permit to Construct modification application received on May 22, 2020 to determine actual emissions.
- (c) Unless otherwise specified herein, the permittee shall maintain records of all reference data utilized to validate calculated emissions (operational data, applicable emission factors, engineering judgement determinations, performance test results, etc.).

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

- 5.B.4 For Point AA-000 (Facility-Wide), the permittee shall demonstrate compliance with the softwood usage restriction outlined in Condition 3.B.7 by monitoring and recording the quantity of softwood and hardwood used as a feedstock in short-tons on both a monthly and rolling 12-month total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

- 5.B.5 For Emission Points AA-202 (Wood Chip Rotary Dryer), AA-205 (Wood Fuel Storage Bin), AA-207 (Small Pellet Mills / Pellet Cooler), and AA-208 (Large Pellet Mills / Pellet Cooler), the permittee shall perform and record a weekly visible emission observation in accordance with EPA Test Method 22 on the exhaust of each noted point source during daylight hours and during representative operating conditions.

If visible emissions are detected during an observation period from a point source, the permittee shall then perform and record a visible emission evaluation (VEE) in accordance with EPA Test Method 9 on the point source. In the event that a VEE is required but cannot be conducted on a point source, the permittee shall record a written explanation as to why it was not possible to perform the VEE.

The permittee shall maintain all documentation and information specified by EPA Test Method 22 and/or EPA Test Method 9, any corrective actions taken to prevent or minimize emissions because of an evaluation, and the date / time when each observation / evaluation was conducted.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

5.B.6 For Emission Points AA-202 (Wood Chip Rotary Dryer), AA-207 (Small Pellet Mills / Pellet Cooler), and AA-208 (Large Pellet Mills / Pellet Cooler), the permittee shall conduct routine performance testing on the exhaust of each noted point source to evaluate the emission of PM (filterable), PM₁₀ (filterable + condensable), PM_{2.5} (filterable + condensable), VOCs, methanol, acetaldehyde, and formaldehyde no later than twenty-five (25) months after the previously completed performance test and in accordance with the following requirements:

- (a) All performance testing shall be conducted accordance with applicable EPA-approved test methods found in Appendix A of 40 CFR Part 60, Appendix M of 40 CFR Part 51, or Appendix A of 40 CFR Part 63, or an alternative test method approved by the EPA prior to the testing event.
- (b) The permittee shall conduct a minimum of three (3) separate test runs for a performance stack test that each last for at least one (1) hour.
- (c) *For Emission Point AA-202:* The permittee shall monitor and record hourly throughput data on the wood chips dried during each run of a performance test.
- (d) *For Emission Points AA-207 and AA-008:* The permittee shall monitor and record hourly throughput data in oven-dried tons (ODT) of wood pellets produced during each run of a performance test.

The permittee shall utilize both the test results and applicable throughput data collected during a testing event to create site-specific emission factors in pounds per oven-dried ton (lbs. / ODT) in accordance with Condition 5.B.7. If the converted results exceed any of the already approved site-specific emission factors, the permittee **shall** submit the new emission factors in accordance with Condition 5.C.4. If the converted results are lower than the approved site-specific emission factors, the permittee **may** submit the new emission factors in accordance with Condition 5.C.4.

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

5.B.7 For Emission Points AA-202 (Wood Chip Rotary Dryer), AA-207 (Small Pellet Mills / Pellet Cooler), and AA-208 (Large Pellet Mills / Pellet Cooler), the permittee shall utilize both the test results and applicable throughput data collected during a performance test completed in accordance with Conditions 5.B.6 to determine site-specific emission factors for PM, PM₁₀, PM_{2.5}, VOCs, NO_x, CO, methanol, acetaldehyde, and formaldehyde in pounds per oven-dried ton (lbs. / ODT). The permittee shall establish these emission factors in accordance with the following specifications:

- (a) For each noted point source, the permittee shall establish a site-specific VOC emission factor for each control system based on EPA OTM-26:

$$EF_{VOC} = \frac{(\bar{M}_{VOC(as\ propane)} + \bar{M}_{Methanol} + \bar{M}_{Formaldehyde} + \bar{M}_{Acetaldehyde}) - 0.65(\bar{M}_{Methanol})}{\bar{M}_{Throughput}}$$

Where:

- EF_{VOC} is the site-specific emission factor for VOCs in lbs. / ODT;
- $\bar{M}_{VOC(as\ propane)}$ is the average mass flow rate of volatile organic compound (as propane) emissions from applicable performance testing in lbs. / hour as determined by EPA Test Method 25A;
- $\bar{M}_{Methanol}$ is the average mass flow rate of methanol emissions from applicable performance testing in lbs. / hour;
- $\bar{M}_{Formaldehyde}$ is the average mass flow rate of formaldehyde emissions from applicable performance testing in lbs. / hour;
- $\bar{M}_{Acetaldehyde}$ is the average mass flow rate of acetaldehyde emissions from applicable performance testing in lbs. / hour; and
- $\bar{M}_{Throughput}$ is the average throughput rate of applicable material (i.e. wood chips dried or wood pellets produced) during performance testing in ODT / hour.

- (b) *For Emission Point AA-202:* All site-specific emission factors shall be based on the pounds of pollutant per ODT of wood chips dried.
- (c) *For Emission Points AA-207 and AA-008:* All site-specific emission factors shall be based on the pounds of pollutant per unit throughput in ODT / hour.

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

- 5.B.8 For Emission Points AA-202 (Wood Chip Rotary Dryer), AA-207 (Small Pellet Mills / Pellet Cooler), and AA-208 (Large Pellet Mills / Pellet Cooler), the permittee shall monitor and record the differential pressure drop across the multi-clone and each baghouse daily in accordance with the CAM Plan found in Appendix B.

(Ref.: 40 CFR 64.3(a), (b), and 64.6(c); Compliance Assurance Monitoring)

- 5.B.9 For Emission Points AA-002 (Wood Chip Rotary Dryer), AA-207 (Small Pellet Mills / Pellet Cooler), and AA-208 (Large Pellet Mills / Pellet Cooler), the permittee shall comply with the following requirements for the monitoring required by the approved CAM Plan found in Appendix B:

- (a) *Proper Maintenance:* The permittee shall maintain the monitoring, including (but not limited to) maintaining necessary parts for routine repairs of the monitoring equipment at all times.

- (b) *Continued Operation:* Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities [including calibration checks and required zero and span adjustments (as applicable)], the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used [including in data averaging and calculations or in fulfilling a minimum data availability requirement, (as applicable)].

The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(Ref.: 40 CFR 64.7(b) and (c); Compliance Assurance Monitoring)

- 5.B.10 For Emission Points AA-202 (Wood Chip Rotary Dryer), AA-207 (Small Pellet Mills / Pellet Cooler), and AA-208 (Large Pellet Mills / Pellet Cooler), upon detecting an excursion or exceedance, the permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

The response shall include minimizing the period of any start-up, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused start-up or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

Determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include (but is not limited to) monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(Ref.: 40 CFR 64.7(d); Compliance Assurance Monitoring)

- 5.B.11 For Emission Points AA-202 (Wood Chip Rotary Dryer), AA-207 (Small Pellet Mills / Pellet Cooler), and AA-208 (Large Pellet Mills / Pellet Cooler), in addition to the excursion threshold outlined in the CAM Plan, the MDEQ may require the permittee to develop and implement a Quality Improvement Plan (QIP) containing the elements specified in 40 CFR 64.8(b).

The QIP shall be developed and implemented within one hundred eighty (180) days of written notification from MDEQ that a QIP is required. The MDEQ may require the permittee make reasonable changes to the QIP if the QIP fails to address the cause of the control device performance problem or fails to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The implementation of a QIP shall not excuse the permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that applies.

(Ref.: 40 CFR 64.8; Compliance Assurance Monitoring)

- 5.B.12 For Emission Points AA-202 (Wood Chip Rotary Dryer), AA-207 (Small Pellet Mills / Pellet Cooler), and AA-208 (Large Pellet Mills / Pellet Cooler), the permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written QIP required pursuant to Condition 5.B.11 and any activities undertaken to implement a QIP, data used to document the adequacy of monitoring, and monitoring maintenance or corrective actions, as applicable.

As applicable, records of monitoring data and monitoring performance data should include date and time, who performed the analysis, analytical techniques or methods used, results and operating conditions at the time of the sampling or measurement. These records may be maintained in hard copy form or electronically, provided they are available for expeditious inspection and review.

(Ref.: 40 CFR 64.9(b); Compliance Assurance Monitoring)

- 5.B.13 For Emission Points AA-203 (White Chip Hammermills / Wood Fuel Hammermill), AA-205 (Wood Fuel Storage Bin), AA-207 (Small Pellet Mills / Pellet Cooler), and AA-208 (Large Pellet Mills / Pellet Cooler), the permittee shall conduct a weekly inspection of the each baghouse / bag filter. Additionally, maintenance shall be performed as necessary to maintain proper operation of each baghouse / bag filter at all times.

The permittee shall maintain documentation that details the date / time each inspection is performed, any noted problem experienced, any maintenance (either corrective or preventative) performed to return a device to operation as originally designed, and any periods of time (including date and duration) in which a device was non-operational during active operations. Additionally, the permittee shall maintain on-site sufficient equipment and/or parts (as practicable feasible) to conduct any necessary repairs.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

- 5.B.14 For Emission Points AA-203 (White Chip Hammermills / Wood Fuel Hammermill) and AA-205 (Wood Fuel Storage Bin), the permittee shall monitor and record the pressure drop across each baghouse and bag filter daily in inches of water (in. H₂O). If a monitored pressure drop is outside the manufacturer's recommended range for the baghouse, the

permittee shall conduct and record any corrective measures taken to return the baghouse to the recommended pressure drop range.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

- 5.B.15 For Emission Point AA-206 (Wood Dust Burner), the permittee shall monitor and record the amount (either in pounds or cubic feet) of each fuel source combusted in the burner on a monthly basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

- 5.B.16 For Emission Points AA-207 (Small Pellet Mills / Pellet Cooler) and AA-208 (Large Pellet Mills / Pellet Cooler), the permittee shall monitor and record the total production of wood pellets in oven-dried tons (ODT) both on a monthly and rolling 12-month total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

C. SPECIFIC REPORTING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Reporting Requirement
AA-000	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.1	PM / PM ₁₀ / PM _{2.5} VOCs HAPs CO NO _x	Submit Semi-Annual Report on Emissions and Operational Data
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.C.2		Submit the Site-Specific Emission Factors for Review
AA-202 AA-207 AA-208	11 Miss. Admin. Code Pt. 2, R. 2.6.B(5).	5.C.3	PM / PM ₁₀ / PM _{2.5} VOCs HAPs	Submit Performance Testing Protocol Submit 10-Day Notification of Performance Testing Event
	11 Miss. Admin. Code Pt. 2, R. 2.6.B(6). and R. 2.2.B(11).	5.C.4	CO NO _x	Submit Performance Testing Results
	40 CFR 64.9(a); CAM	5.C.5	CAM Reporting	Semi-Annual Reporting Requirements
	40 CFR 64.7(e); CAM	5.C.6	CAM Modification	Promptly Notify the MDEQ of Failure to Achieve Limit/Standard though No Excursion or Exceedance Was Indicated by Approved Monitoring

5.C.1 For Emission Point AA-000 (Facility-Wide), the permittee shall submit a semi-annual monitoring report (SMR) in accordance with Condition 5.A.4 that details the following information:

- (a) The total emission of PM, PM₁₀, PM_{2.5}, VOCs, NO_x, CO, each individual HAP, and all combined HAPs from all applicable emission sources in tons both on a monthly and rolling 12-month total basis;
- (b) The weight percent (wt.%) of the total softwood and hardwood utilized as feedstock in short-tons both on a monthly basis and on a rolling 12-month total basis;
- (c) The total wood pellet production throughput in oven-dried tons (ODT) both on a monthly basis and rolling 12-month total basis; and
- (d) A summary of any revision(s) made to the “Dust Management Plan.”

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)

5.C.2 For Emission Points AA-202 (Wood Chip Rotary Dryer) AA-207 (Small Pellet Mills /

Pellet Cooler), and AA-208 (Large Pellet Mills / Pellet Cooler), the permittee shall submit the site-specific emission factors established in accordance with Condition 5.B.8 for review by the MDEQ no later than sixty (60) days after completing a performance test required by Condition 5.B.6. In the future, should the permittee want to modify the approved site-specific emission factors to account for additional testing, the permittee shall submit a written request with supporting data to the MDEQ for review.

With exception of the emission factors approved initially, which shall be applied from the time of start-up forward, any future modification of an emission factor shall become effective on the month specified in the MDEQ approval. The MDEQ retains the right to modify the site-specific emission factors based on additional performance testing.

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

- 5.C.3 For Emission Points AA-202 (Wood Chip Rotary Dryer), AA-207 (Small Pellet Mills / Pellet Cooler), and AA-208 (Large Pellet Mills / Pellet Cooler), the permittee shall submit a written performance test protocol for the testing required by Conditions 5.B.6 that details the procedures and test methods to be implemented during the actual testing event no later than thirty (30) days prior to the intended testing date.

The permittee shall notify the MDEQ in writing at least ten (10) days prior to the intended testing date so that a representative from the MDEQ may be afforded the opportunity to observe the stack testing.

If deemed necessary by the MDEQ, a conference may be required prior to the intended testing date to discuss the proposed test methods and procedures outlined in the performance testing protocol.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B(5).)

- 5.C.4 For Emission Points AA-202 (Wood Chip Rotary Dryer), AA-207 (Small Pellet Mills / Pellet Cooler), and AA-208 (Large Pellet Mills / Pellet Cooler), the permittee shall submit the results from any conducted performance test no later than sixty (60) days after completing the actual test. The report (at a minimum) shall include the information specified in Condition 1.27(c) and the following information:

- (a) Applicable parametric monitoring data that corresponds to a specified pollutant(s) and supporting documentation;
- (b) The average weight percent softwood processed during each test run;
- (c) The hourly wood chip or pellet throughput data for a point source(s) during each test run;
- (d) The moisture content data for wood chips dried during a performance test; and
- (e) A comparison of current results [noting the average pollutant emission rate and the average applicable throughput] with any prior results from the previous five (5)

years.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B(6). and R. 2.2.B(11).)

5.C.5 For Emission Points AA-202 (Wood Chip Rotary Dryer), AA-207 (Small Pellet Mills / Pellet Cooler), and AA-208 (Large Pellet Mills / Pellet Cooler), the permittee shall submit a semi-annual monitoring report in accordance with Condition 5.A.4 with the following information (as applicable):

- (a) Summarized information on the number, duration, and cause [including an unknown cause, if applicable] of excursions or exceedances (as applicable) and the corrective actions taken;
- (b) Summarized information on the number, duration, and cause [including unknown cause (if applicable)] for monitor downtime incidents [other than downtime associated with zero and span or other daily calibration checks (if applicable)];
- (c) A description of the actions taken to implement a QIP during the reporting period as specified in Condition 5.B.11. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances.

(Ref.: 40 CFR 64.9(a); Compliance Assurance Monitoring)

5.C.6 For Emission Points AA-202 (Wood Chip Rotary Dryer), AA-207 (Small Pellet Mills / Pellet Cooler), and AA-208 (Large Pellet Mills / Pellet Cooler), if the permittee identifies a failure to achieve compliance with the emission limitation or standard for which the approved CAM monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes.

Such a modification may include (but is not limited to) reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or monitoring additional parameters.

(Ref.: 40 CFR 64.7(e); Compliance Assurance Monitoring)

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act – Stratospheric Ozone Protection. The full text of the referenced regulations may be found on-line at <http://www.ecfr.gov/> under Title 40, or DEQ shall provide a copy upon request from the permittee.

- 7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A – Production and Consumption Controls.
- 7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.
- 7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E – The Labeling of Products Using Ozone-Depleting Substances, for the following containers and products:
 - (a) All containers in which a class I or class II substance is stored or transported;
 - (b) All products containing a class I substance; and
 - (c) All products directly manufactured with a process that uses a class I substance, unless otherwise exempted by this subpart or, unless EPA determines for a particular product that there are no substitute products or manufacturing processes for such product that do not rely on the use of a class I substance, that reduce overall risk to human health and the environment, and that are currently or potentially available. If the EPA makes such a determination for a particular product, then the requirements of this subpart are effective for such product no later than January 1, 2015.
- 7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F – Recycling and Emissions Reduction:
 - (a) Servicing, maintaining, or repairing appliances;
 - (b) Disposing of appliances, including small appliances and motor vehicle air conditioners; or
 - (c) Refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, as well as persons selling, offering for sale, and/or purchasing class I, class II, or non-exempt substitute refrigerants.

- 7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any acceptable alternative that is listed in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR Part 82, Subpart G – Significant New Alternatives Policy Program. The permittee shall also comply with any use conditions for the acceptable alternative substance.
- 7.6 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart H – Halon Emissions Reduction:
- (a) Any person testing, servicing, maintaining, repairing, or disposing of equipment that contains halons or using such equipment during technician training;
 - (b) Any person disposing of halons;
 - (c) Manufacturers of halon blends; or
 - (d) Organizations that employ technicians who service halon-containing equipment.

APPENDIX A

List of Abbreviations Used In this Permit

11 Miss. Admin. Code Pt. 2, Ch. 1.	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
11 Miss. Admin. Code Pt. 2, Ch. 2.	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
11 Miss. Admin. Code Pt. 2, Ch. 3.	Regulations for the Prevention of Air Pollution Emergency Episodes
11 Miss. Admin. Code Pt. 2, Ch. 4.	Ambient Air Quality Standards
11 Miss. Admin. Code Pt. 2, Ch. 5.	Regulations for the Prevention of Significant Deterioration of Air Quality
11 Miss. Admin. Code Pt. 2, Ch. 6.	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
11 Miss. Admin. Code Pt. 2, Ch. 7.	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lb/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards for Hazardous Air Pollutants, 40 CFR 61 or National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR 63
NM VOC	Non-Methane Volatile Organic Compounds
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM ₁₀	Particulate Matter less than 10 µm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound

APPENDIX B

Site-Specific CAM Plans

Compliance Assurance Monitoring Plan Drying System High Efficiency Multicyclone

I. BACKGROUND

A. Emissions Unit

Description: Drying System High Efficiency Multicyclone
Facility: Quitman Pellets, LLC – Quitman, MS

B. Applicable Regulations, Emission Limit, and Monitoring Requirements

Regulation:

- 11 Miss. Admin. Code Pt 2. Ch. 1. R. 1.3.A (Visible Emission Regulations)
- 11 Miss. Admin. Code Pt 2. Ch. 1. R. 1.3.F (Process Emission Standards)
- 11 Miss. Admin. Code Pt 2. Ch. 1. R. 1.3 C (Fugitive Dust)

Emission Limits:

- Visible emissions limit: 40% opacity
- Process weight rule limit: 22.5 lb/hr

Monitoring Requirements: N/A

C. Control Technology

High efficiency Multicyclone

II. MONITORING APPROACH

The key elements of the monitoring approach are presented below:

A. Indicator

Indicator: Daily differential pressure (dp) gauge readings.

B. Measurement Approach

Once per day a person familiar with the process shall read the dp gauge across the high efficiency multiclone and record the reading.

C. Indicator Range

An excursion is defined as a dp gauge measurement reading that is above the range set for the multiclone by the manufacturer, which equates to 5.0 inches water column (WC). Excursions trigger an inspection of the multiclone and corrective action within 24 hours.

D. Performance Criteria

Data Representativeness: Readings are taken of the dp gauge on the multicyclone while the dryer system is operating.

Verification of Operational Status: N/A

QA/QC Practices and Criteria: The technician is familiar with the process operations.

Monitoring Frequency and Data: Dp gauge readings will be recorded once per day.

Collection Procedure: Record the gauge readings at the Plant Office.

III. **JUSTIFICATION**

A. **Background**

High efficiency multicyclone for particulate matter control.

B. **Rationale for Selection of Performance Indicator**

Daily dp gauge readings were selected as the indicator of control device performance. Dp readings were selected as the performance indicator because it is indicative of good operation and maintenance of the high efficiency multiclone. When the multiclone is operating optimally, the dp reading will be no more than 5.0 WC. A reading greater than the set range indicates reduced performance of the multiclone.

C. **Rationale for Selection of Indicator Level**

The facility operates the high efficiency multicyclone in accordance with manufacturer recommendations. In addition, historic performance testing affirms that daily dp readings will provide reasonable assurance that the high efficiency multicyclone is operating properly.

The selected Quality Improvement Plan (QIP) threshold is 18 excursions in a semi-annual reporting period. If the QIP threshold is exceeded in a semi-annual reporting period, a QIP will be developed and implemented.

Compliance Assurance Monitoring Plan Small Pellet Mills and Large Pellets Mills

I. BACKGROUND

A. Emissions Unit

Description: Small Pellet Mills Baghouse and Large Pellets Mills Baghouse
Facility: Quitman Pellets, LLC – Quitman, MS

B. Applicable Regulations, Emission Limit, and Monitoring Requirements

Regulation:

- 11 Miss. Admin. Code Pt 2. Ch. 1. R. 1.3.A (Visible Emission Regulations)
- 11 Miss. Admin. Code Pt 2. Ch. 1. R. 1.3.F (Process Emission Standards)
- 11 Miss. Admin. Code Pt 2. Ch. 1. R. 1.3 C (Fugitive Dust)

Emission Limits:

- Visible emissions limit: 40% opacity
- Process weight rule limit: 30.51 lb/hr

Monitoring Requirements: N/A

C. Control Technology

Baghouse

II. MONITORING APPROACH

The key elements of the monitoring approach are presented below:

A. Indicator

Indicator: Daily differential pressure (dp) gauge readings.

B. Measurement Approach

Once per day a person familiar with the process shall read the dp gauge across the filters in the baghouse and record the reading.

C. Indicator Range

An excursion is defined as a dp drop measurement reading that is above the range set for the baghouse by the manufacturer, which equates to 4.0 inches water column (WC). Excursions trigger an inspection of the baghouse and corrective action within 24 hours.

D. Performance Criteria

Data Representativeness: Readings are taken of the dp gauge while the small pellet mills are operating.

Verification of Operational Status: N/A

QA/QC Practices and Criteria: The technician is familiar with the process operations.

Monitoring Frequency and Data: Dp gauge readings will be recorded once per day.

Collection Procedure: Record the dp gauge readings at the Plant Office.

III. JUSTIFICATION

A. Background

Baghouse for particulate matter control.

B. Rationale for Selection of Performance Indicator

Daily dp gauge readings were selected as the indicator of control device performance. Dp readings were selected as the performance indicator because it is indicative of good operation and maintenance of the baghouse. When the baghouse is operating optimally, the dp reading will be no greater than 4.0 WC. A reading greater than the set range indicates reduced performance of the baghouse.

C. Rationale for Selection of Indicator Level

The facility operates the baghouse in accordance with manufacturer recommendations. In addition, historic performance testing affirms that the daily dp readings provide reasonable assurance that the baghouse is operating properly.

The selected Quality Improvement Plan (QIP) threshold is 18 excursions in a semi-annual reporting period. If the QIP threshold is exceeded in a semi-annual reporting period, a QIP will be developed and implemented.