

STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

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

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

Krystal Rudolph

AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: December 9, 2010

Permit No.: 0440-00063

**Modified: June 6, 2014; February 25, 2021; February 25, 2022 (Name Change);
September 23, 2022**

SECTION 1. GENERAL CONDITIONS

- 1.1 This permit is for air pollution control purposes only.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
- 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 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).)
- 1.4 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).)
- 1.5 The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
- 1.6 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of 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).)
- 1.7 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).)
- 1.8 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).)

- 1.9 The permittee shall furnish to the Mississippi Department of Environmental Quality (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 permit or, for information claimed 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. 2.2.B(15)(d).)

- 1.10 *Design and Construction Requirements:* The stationary source shall be designed and constructed so as to operate without causing a violation of an Applicable Rules and Regulations (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) – (3).)

- 1.11 The necessary facilities shall be constructed to prevent any wastes or other products or substances to be placed in a location where they are likely to cause pollution of the air or waters of the State without the proper environmental permits.

(Ref.: Miss. Code Ann. 49-17-29(1) and (2).)

- 1.12 *Fugitive Dust Emissions from Construction Activities:* 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).)

- 1.13 *General Nuisance Clause:* 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 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 this permit, the MDEQ 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.)

1.14 *Right of Entry:* The permittee shall allow the MDEQ Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives upon 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 emissions.

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

1.15 *Permit Modification or Revocation:* After notice and opportunity for a hearing, the Permit Board may modify the permit or revoke it in whole or in part for good cause shown including, but not limited to:

- (a) Persistent violation of any of the terms or conditions of this permit;
- (b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
- (c) A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

1.16 *Public Record and Confidential Information:* 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 MDEQ Office of Pollution Control.

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

1.17 *Permit Transfer:* This permit shall not be transferred except upon approval of the Permit Board.

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

- 1.18 *Severability*: 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. 2.1.D(7).)

- 1.19 *Permit Expiration*: The Permit to Construct will expire if construction does not begin within eighteen (18) months from the date of issuance, if construction is suspended for at least eighteen (18) months, or if construction is not completed within a reasonable time. The MDEQ may extend the 18-month period upon a satisfactory showing that an extension is justified.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1)., R. 2.5.C(4)., and R. 5.2.)

- 1.20 *Certification of Construction*: 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).)

- 1.21 *Beginning Operation*: 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 Operating 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 Mississippi Administrative Code, Part 2, Title 11, Chapter 2, Rule 2.13.G.

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

- 1.22 *Application for a Permit to Operate*: The application for issuance or modification of the State Permit to Operate or the Title V Operating 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).)

- 1.23 *Operating Under a Permit to Construct*: Upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Operating 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).)

1.24 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.)

1.25 *General Duty:* All air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants.

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

1.26 *Compliance Testing:* Regarding compliance testing:

- (a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations of 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 POINT DESCRIPTION

The permittee is authorized to construct, modify, and operate (upon certification of construction), air emissions equipment as described in the following table:

EMISSION POINT	DESCRIPTION
AA-000	Facility-Wide [Quitman Pellets, LLC]
AA-201	Green Wood Hammermill [emissions are released to the atmosphere]
AA-202	Green Wood Hammermill [emissions are released to the atmosphere]
AA-203	90 MMBTU / Hour Wood-Fired Burner [emissions are routed to the Primary Control System]
AA-204	Wood Chip Rotary Dryer (Facility Ref. No. WC1) [emissions are routed to the Primary Control System]
AA-205	Dry Wood Storage Silo [emissions are released to the atmosphere]
AA-206	Dry Fuel Storage Silo [emissions are released to the atmosphere]
AA-207	Dry Fuel Hammermill [dried wood from the Wood Chip Rotary Dryer is milled / stored to fuel the Wood Dust Burner; emissions are routed to a baghouse (BGH-1)]
AA-208	Two (2) Dry Wood Hammermills [emissions are routed to a baghouse (BGH-2) and then the Primary Control System]
AA-209	Two (2) Dry Wood Hammermills [emissions are routed to a baghouse (BGH-3) and then the Primary Control System]
AA-210	No. 1 Pellet Mill System [consists of five (5) pellet mills and a pellet cooler; combined emissions are routed to a baghouse (BGH-4) and then the Primary Control System]
AA-211	No. 2 Pellet Mill System [consists of five (5) pellet mills and a pellet cooler; combined emissions are routed to a baghouse (BGH-5)]
AA-212	Two (2) Pellet Handling and Storage Operations [emissions are routed to the atmosphere]
AA-213	Primary Control System [consists of one (1) wet electrostatic precipitator (WESP) and one (1) regenerative thermal oxidizer (RTO) equipped with a 10 MMBTU / hour natural gas-fired burner]

SECTION 3 EMISSION LIMITATIONS AND STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limitation / Standard
AA-000	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity (smoke)	≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2	Opacity	
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.3	PM	$E = 4.1 \cdot (p^{0.67})$
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Permit to Construct issued December 9, 2010 and modified February 25, 2021 (Major Source Avoidance Limits)	3.4	HAPs	9.0 tpy (Individual) 24.90 tpy (Total) (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 (PSD Avoidance Limits)	3.5	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 (PSD Avoidance Limit)	3.5	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 (PSD Avoidance Limits)		PM (filterable)	249.0 tpy (Rolling 12-Month Total)
			PM ₁₀ / PM _{2.5} (filterable + condensable)	249.0 tpy (Rolling 12-Month Totals)
11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Permit to Construct issued February 25, 2021 and modified September 23, 2022	3.6	PM / PM ₁₀ / PM _{2.5} VOCs HAPs	Emission Control Requirement	
AA-201 AA-202	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.7	Green Wood Throughput	600,000.0 Short-Tons / Year (Rolling 12-Month Total)
AA-203	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Permit to Construct issued February 25, 2021	3.8	Fuel Source Restriction	Only Combust Uncontaminated Wood Waste and Natural Gas

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limitation / Standard
AA-204	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.9	Dried Wood Throughput	300,000.0 ODT / Year (Rolling 12-Month Total)
AA-210 AA-211	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10), as established in Permit to Construct issued February 25, 2021 and modified September 23, 2022	3.10	Wood Pellet Production	300,000.0 Short-Tons / Year (Rolling 12-Month Total)

3.1 For Emission Point AA-000 (Facility-Wide), 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 or industrial process on-site that exceeds forty (40) percent opacity subject to the following exceptions:

- (a) Start-up operations may produce emissions, which exceed 40% 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 (i.e. ash removal) operations shall be permitted provided such emissions do not exceed sixty (60) percent opacity and provided further that 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.)

3.2 For Emission Point AA-000 (Facility-Wide), 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. 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 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:

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

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).)

- 3.4 For Emission Point AA-000 (Facility-Wide), the permittee shall limit the emission of each individual hazardous air pollutant (HAP) to no more than 9.0 tons per year (tpy) based on a rolling 12-month total and all HAPs combined to no more than 24.90 tpy 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 and modified February 25, 2021 – Major Source Avoidance Limits)

- 3.5 For Emission Point AA-000 (Facility-Wide), the permittee shall limit the total respective emission of nitrogen oxides (NO_x), particulate matter (PM; filterable), particulate matter less than 10 microns (µm) in diameter (PM₁₀; filterable and condensable), particulate matter less than 2.5 µm in diameter (PM_{2.5}; filterable and condensable), volatile organic compounds (VOCs), and carbon monoxide (CO) from all applicable sources to no more than 249.0 tpy 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; modified on June 6, 2014 and February 25, 2021 – PSD Avoidance Limits)

- 3.6 For Emission Point AA-000 (Facility-Wide), the permittee shall at all times direct the emissions generated by each applicable process unit to the corresponding control device(s) (as applicable).

Additionally, the permittee shall at all times operate the control device(s) associated with each process unit during active operation to minimize the emission of PM, VOCs, and/or HAPs. In the event that a control device malfunctions or becomes non-operational, the permittee shall cease activity from the corresponding applicable process unit(s) until the device 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 and modified September 23, 2022)

- 3.7 For Emission Points AA-201 and AA-202, the permittee shall limit the total throughput of green wood processed to no more than 600,000.0 short-tons per year based on a rolling 12-month total.

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

- 3.8 For Emission Point AA-203, the permittee shall only combust uncontaminated wood waste or natural gas as a fuel source for 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)

- 3.9 For Emission Point AA-204, the permittee shall limit the total throughput of green wood dried to no more than 300,000.0 oven-dried tons (ODT) per year based on a rolling 12-month total.

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

- 3.10 For Emission Points AA-210 and AA-211, the permittee shall limit the total production of wood pellets from both systems to no more than 300,000.0 short-tons per year 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 February 25, 2021 and modified September 23, 2022)

SECTION 4 WORK PRACTICE STANDARDS

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SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Monitoring / Recordkeeping Requirement
AA-000	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain Records for a Minimum of Five (5) Years
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2	PM / PM ₁₀ / PM _{2.5}	Maintain and Implement a Dust Management Plan
		5.3	NO _x PM / PM ₁₀ / PM _{2.5} VOCs CO HAPs	Calculate the Total Emission of Applicable Pollutants (Monthly and Rolling 12-Month Period)
		5.4	PM / PM ₁₀ / PM _{2.5} VOCs HAPs	Perform an Inspection on Each Control Device Monthly Maintain Documentation on Periods of Non-Operation for Control Devices
AA-201 AA-202 AA-205 AA-206 AA-212	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.5	Opacity	Conduct a Weekly Visible Emission Observation / Evaluation
AA-201 AA-202 AA-207 AA-211 AA-213	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.6	NO _x PM (filterable)	Conduct Initial Performance Testing
		5.7	PM ₁₀ / PM _{2.5} (filterable + condensable)	Conduct Subsequent Performance Testing
		5.8	CO HAPs VOCs	Establish Site-Specific Emission Factors
AA-201 AA-202	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.9	Green Wood Processed	Monitor Total Throughput (Monthly and Rolling 12-Month Total)
AA-204	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.10	Wood Chips Dried	Monitor Total Throughput (Monthly and Rolling 12-Month Total)
AA-207 through AA-211	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.11	PM / PM ₁₀ / PM _{2.5} (filterable only)	Establish a Differential Pressure Drop for Each Baghouse
		5.12	Differential Pressure Drop	Continuously Monitor the Pressure Drop Across Each Baghouse (3-Hour Block Average)

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Monitoring / Recordkeeping Requirement
AA-209 AA-210	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.13	Wood Pellet Production	Monitor Total Production (Monthly and Rolling 12-Month Total)
AA-212	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.14	Secondary Voltage Combustion Chamber Temperature	Install, Calibrate, Monitor, Operate, and Inspect the Continuous Monitoring / Recording System for Operating Parameters
		5.15	PM / PM ₁₀ / PM _{2.5}	Establish a Secondary Voltage Range for the WESP
		5.16	Secondary Voltage	Continuously Monitor the Secondary Voltage on the WESP (3-Hour Block Average)
		5.17	VOCs	Establish a Minimum Combustion Chamber Temperature for the RTO
		5.18	Combustion Chamber Temperature	Continuously Monitor the Combustion Chamber Temperature for the RTO (3-Hour Block Average)

5.1 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.)

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

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

5.3 For Point AA-000 (Facility-Wide), the permittee shall calculate and record the total emission of NO_x, PM (filterable), PM₁₀ (filterable and condensable), PM_{2.5} (filterable and condensable), VOCs, CO, each individual HAP, and all HAPs combined in tons from all sources that can reasonably emit the pollutant(s) both on a monthly basis and rolling 12-month total basis in accordance with the following specifications:

- (a) Prior to the initial start-up of the Primary Control System (Emission Point AA-213), the permittee shall utilize the current and up-to-date emission factors and collected production data to calculate emissions from the applicable sources.
- (b) Beginning on the date of the initial start-up of the Primary Control System (Emission Point AA-213) and ending on the date in which up-to-date emission factors are determined (as required by Condition 5.8), the permittee shall calculate pollutant emissions from the Green Wood Hammermills (Emission Points AA-201 and AA-202), the Dry Fuel Hammermill (Emission Point AA-207), the No. 2 Pellet Mill System (Emission Point AA-211), and the Primary Control System by using the applicable throughput data and the applicable emission factors presented in the most up-to-date application for the specified project.
- (c) Upon the submittal of up-to-date emission factors (and unless otherwise required by the MDEQ), the permittee shall calculate and record the emissions from Green Wood Hammermills (Emission Points AA-201 and AA-202), the Dry Fuel Hammermill (Emission Point AA-207), the No. 2 Pellet Mill System (Emission Point AA-211), and the Primary Control System (Emission Point AA-213) by utilizing archived parametric monitoring data, applicable throughput data, and the established site-specific emission factors.

Additionally, the permittee shall revise and update pollutant emissions calculated in accordance with paragraph (a) of this condition to reflect the up-to-date site specific emission factors.

- (d) For all sources not otherwise specified, the permittee shall either assume actual emissions are equivalent to potential emissions or utilize actual data (e.g. throughput or fuel usage) in conjunction with the emission factors specified in the most up-to-date application for the specified project to determine compliance with the emission limitations specified in Conditions 3.4 and 3.5.
- (e) Unless otherwise specified herein, the permittee shall maintain documentation that detail any 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. 2.2.B(11).)

- 5.4 For Emission Point AA-000 (Facility-Wide), the permittee shall demonstrate compliance with Condition 3.6 by performing an inspection that evaluates the performance capability of each control device on a monthly basis.

If a problem is noted during an inspection of a control device, the permittee shall perform the necessary maintenance to ensure operation as originally designed. Additionally, the

permittee shall maintain on-site (to the best extent practicable) sufficient components as is necessary to repair a control device.

The permittee shall maintain documentation that details the date / time each inspection is performed, any noted problem that is experienced, and any maintenance (either corrective or preventative) performed to return a control device to operation as originally designed. Additionally, the permittee shall monitor and record each period of time (including the date and duration) in which a control device is non-operational on a monthly basis.

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

- 5.5 For Emission Points AA-201, AA-202, AA-205, AA-206, and AA-212, the permittee shall perform a visible emission observation in accordance with EPA Test Method 22 on the exhaust of each source on a weekly basis during daylight hours and during representative operating conditions. Each observation shall be performed for a minimum of six (6) consecutive minutes.

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

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

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

- 5.6 For Emission Points AA-201, AA-202, AA-207, AA-211, and AA-213, the permittee shall evaluate the emission of specified pollutants by conducting performance testing on the exhaust of each source no later than one hundred eighty (180) days after the initial start-up of the Primary Control System and in accordance with the following requirements:

- (a) All performance testing shall be conducted in accordance with an applicable EPA-approved test method found in Appendix A of 40 CFR Part 60, Appendix M of 40 CFR Part 51, Appendix A of 40 CFR Part 63, or an applicable alternative test method approved by EPA prior to the testing event.
- (b) The permittee shall conduct a minimum of three (3) separate test runs for a performance stack test, and the duration of each run shall span at one (1) hour.
- (c) The initial performance testing shall be conducted while the respective green wood throughput, dried wood throughput and/or the wood pellet throughput is at no less than ninety (90.0) percent of the maximum permitted equipment production capacity and no less than one hundred (100.0) percent by weight of softwood usage as a

feedstock. The actual production rate and the weight percent of softwood as a feedstock shall be determined individually for each applicable source during a performance test.

If the permittee has not achieved 90.0% of the maximum permitted equipment production capacity or 100.0% by weight of softwood usage as a feedstock within 180 days after the initial start-up of the Primary Control System, the permittee shall conduct the initial performance testing on a source while operating at the maximum achievable capacity up to that point.

Thereafter, the permittee shall conduct subsequent performance testing in accordance with the specifications of this condition no later than ninety (90) days after satisfying at least one (1) of the following stipulations:

- (1) The monthly average green wood throughput, dried wood throughput or wood pellet production increases by more than ten (10.0) percentage points above the capacity established during the prior performance testing (until achieving no less than 90.0% of the maximum permitted equipment production capacity); or
 - (2) The monthly average weight percent of softwood as a feedstock increases by more than 10.0 percentage points above that measured during the prior performance testing (until achieving no less than 100% by weight of softwood usage as a feedstock).
- (d) For Emission Point AA-201 and AA-202 (Green Hammermills): The permittee shall evaluate the emission of VOCs and the following individual HAPs: methanol, acetaldehyde, formaldehyde, acrolein, propionaldehyde, and phenol.
 - (e) For Emission Point AA-201 and AA-202 (Green Hammermills): The permittee shall monitor and record the hourly throughput rate (in short-tons per hour) for green wood processed.
 - (f) For Emission Points AA-207 (Dry Fuel Hammermill) and AA-211 (No. 2 Pellet Mill System): The permittee shall evaluate the emission of PM (filterable), PM₁₀ (filterable), PM_{2.5} (filterable), condensable PM, VOCs, and the following individual HAPs: methanol, acetaldehyde, formaldehyde, acrolein, propionaldehyde, and phenol.
 - (g) For Emission Point AA-207 (Dry Fuel Hammermill): The permittee shall monitor and record the hourly throughput rate (in ODT per hour) for dried wood chips processed.
 - (h) For Emission Point AA-211 (No. 2 Pellet Mill System): The permittee shall monitor and record the hourly wood pellet production rate (in short-tons per hour) during a performance test.

- (i) For Emission Point AA-213 (Primary Control System): The permittee shall evaluate the emission of PM (filterable), PM₁₀ (filterable), PM_{2.5} (filterable), condensable PM, NO_x, CO, VOCs, and the following individual HAPs: methanol, acetaldehyde, formaldehyde, acrolein, propionaldehyde, phenol, and hydrogen chloride.

Moreover, the testing for NO_x and CO shall be performed during the same test runs.

- (j) For Emission Point AA-213 (Primary Control System): The permittee shall monitor and record the respective hourly throughput rate for wood chips dried (in ODT per hour) and wood pellets produced from the No. 2 Pellet Mill System (in short-tons per hour) during a performance test.

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

- 5.7 For Emission Points AA-201, AA-202, AA-207, AA-211, and AA-213, unless otherwise required herein, the permittee shall conduct subsequent performance testing on the exhaust of each source to evaluate the emission of the following pollutants at the specified frequency:

- (a) For PM (filterable), PM₁₀ (filterable), PM_{2.5} (filterable), and condensable PM – no later than sixty (60) months after the previously completed performance test;
- (b) For VOCs, methanol, acetaldehyde, formaldehyde, acrolein, propionaldehyde, and phenol – no later than twenty-four (24) months after the previously completed performance test; and
- (c) For hydrogen chloride – no later than sixty (60) months after the previously completed performance test.

All testing shall be conducted in accordance with the specifications outlined in Condition 5.6(a), (b), (e), (g), (h), and (i) (as applicable).

Contingent upon the results from performance testing required by this condition, the permittee may request (in accordance with Condition 6.7) that the frequency for subsequent testing specified in paragraph (b) of this condition be reduced to once every five (5) years [not to exceed sixty (60) months after the previously completed performance test].

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

- 5.8 For Emission Points AA-201, AA-202, AA-207, AA-211, and AA-213, upon completing a performance test in accordance with Condition 5.6 and/or 5.7, the permittee shall utilize both the test results and the applicable throughput data collected during the test event to determine site-specific emission factors for PM (filterable), PM₁₀ (filterable + condensable), PM_{2.5} (filterable + condensable), VOCs, NO_x, CO, methanol, acetaldehyde, formaldehyde, acrolein, propionaldehyde, hydrogen chloride, and phenol.

Additionally, the permittee shall establish the emission factors in accordance with the following requirements:

- (a) For each source, the permittee shall establish a site-specific VOC emission factor 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} = the site-specific emission factor for VOCs, in either pounds per short-ton or pounds per ODT (as applicable);

$\bar{M}_{VOC(as\ propane)}$ = the average mass flow rate of volatile organic compound (as propane) emissions from applicable performance testing, in pounds per hour;

$\bar{M}_{Methanol}$ = the average mass flow rate of methanol emissions from applicable performance testing, in pounds per hour;

$\bar{M}_{Formaldehyde}$ = the average mass flow rate of formaldehyde emissions from applicable performance testing, in pounds per hour;

$\bar{M}_{Acetaldehyde}$ = the average mass flow rate of acetaldehyde emissions from applicable performance testing, in pounds per hour; and

$\bar{M}_{Throughput}$ = the average throughput rate of each applicable material (i.e. green wood processed; wood chips dried; wood pellets produced) during performance testing, in short-tons per hour or ODT per hour (as applicable).

- (b) For Emission Point AA-201 and AA-202 (Green Hammermills): The site-specific emission factors shall be based on the pounds of pollutant per short-ton of green wood processed at a nominal moisture content of fifty (50.0) percent.
- (c) For Emission Point AA-207 (Dry Fuel Hammermill): The site-specific emission factors shall be based on the pounds of pollutant per ODT of dried wood chips processed at a nominal moisture content of eleven (11.0) percent.
- (d) For Emission Point AA-211 (No. 2 Pellet Mill System): The site-specific emission factors shall be based on the pounds of pollutant per short-ton of wood pellets produced at a nominal moisture content of five (5.0) percent.

- (e) *For Emission Point AA-213 (Primary Control System)*: The site-specific emission factors shall be based on the pounds of pollutant per ODT at a nominal moisture content of eleven (11.0) percent.

If the converted results exceed any of the site-specific emission factors that have been submitted to the MDEQ, the permittee **shall** submit the new emission factors in accordance with Condition 6.5. However, if the converted results are lower than the already established site-specific emission factors, the permittee **may** submit the new emission factors in accordance with Condition 6.5.

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

- 5.9 For Emission Points AA-201 and AA-202, the permittee shall demonstrate compliance with throughput limitation specified in Condition 3.7 by monitoring and recording the total throughput of green wood processed in short tons on both a monthly and rolling 12-month total basis.

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

- 5.10 For Emission Point AA-204, the permittee shall demonstrate compliance with the throughput limitation specified in Condition 3.9 by monitoring and recording the total throughput of wood chips dried in ODT on both a monthly and rolling 12-month total basis.

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

- 5.11 For Emission Points AA-207 through AA-211, the permittee shall establish a differential pressure drop range (in inches of water) for each baghouse during a PM-related performance testing required by Condition 5.6 by continuously monitoring and recording the pressure drop during each test run.

Each differential pressure drop range shall encompass an average minimum and average maximum reading measured over the span of the total test runs. The pressure drop range may be modified for a baghouse based on subsequent performance testing required by Condition 5.7 for PM, PM₁₀, and/or PM_{2.5}.

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

- 5.12 For Emission Points AA-206 through AA-210, the permittee shall continuously monitor and record the differential pressure drop (in inches of water) for each baghouse based on a 3-hour block average.

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

- 5.13 For Emission Points AA-210 and AA-211, the permittee shall demonstrate compliance with the throughput limitation specified in Condition 3.10 by monitoring and recording the

production of wood pellets from each system in short tons on both a monthly and rolling 12-month total basis.

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

5.14 For Emission Point AA-213, the permittee shall calibrate, operate, maintain, and inspect a continuous monitoring and recording system on each operating parameter specified for the following control devices in accordance with the manufacturer's instructions / recommendations and the operating parameters required by Conditions 5.15 and 5.17 (as applicable):

- (a) Wet Electrostatic Precipitator (WESP) – Secondary voltage (in volts); and
- (b) Regenerative Thermal Oxidizer (RTO) – Combustion chamber temperature (in degrees Fahrenheit).

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

5.15 For Emission Point AA-213, the permittee shall establish a secondary voltage range for the WESP during each PM-related performance required by Condition 5.6 by continuously monitoring and recording the secondary voltage during each test run.

The secondary voltage range shall encompass the average minimum and maximum values measured over the span of the total test runs. The secondary voltage range may be modified based on subsequent performance testing required by Condition 5.7 for PM, PM₁₀, and PM_{2.5}.

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

5.16 For Emission Point AA-213, the permittee shall continuously monitor and record the secondary voltage (in volts) for the WESP based on a 3-hour block average.

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

5.17 For Emission Point AA-213, the permittee shall establish a minimum combustion chamber temperature for the RTO (in degrees Fahrenheit) during each VOC-related performance test required by Condition 5.6 by continuously monitoring and recording the combustion temperature during each test run.

The “minimum combustion chamber temperature” shall be the average of all temperature measurements over the span of the total test runs. The minimum combustion chamber temperature may be modified based on subsequent performance testing required by Condition 5.7 for VOCs.

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

- 5.18 For Emission Point AA-213, the permittee shall continuously monitor and record the combustion chamber temperature for the RTO (in degrees Fahrenheit) based on a 3-hour block average.

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

SECTION 6 REPORTING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Reporting Requirement
AA-000	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1(a)	Report Deviations Within Five (5) Working Days
		6.1(b)	Semi-Annual Reporting Requirements
		6.1(c)	Submit Certifications Signed By the Responsible Official
	11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).	6.1(d)	Submit a Notification on Beginning Actual Construction
	11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).	6.1(e)	Submit a Notification When construction Does Not Begin or Is Suspended
	11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).	6.1(f)	Submit a Certification on the Completion of Construction Prior to Operation
	11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).	6.1(g)	Submit a Notification on Changes in Construction
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.2	Submit a Semi-Annual Monitoring Report
AA-201 AA-202 AA-207 AA-211 AA-213	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). and 2.6.B(5).	6.3	Submit Performance Testing Protocol Submit 10-Day Notification of Performance Testing Event
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). and R. 2.6.B(6).	6.4	Submit Performance Test Results
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.5	Submit Site-Specific Emission Factors
		6.6	Submit a Notification Upon Triggering a Stipulation for Subsequent Performance Testing
		6.7	Submit a Request to Reduce the Frequency for Subsequent Performance Testing (As Applicable)

6.1 General Reporting Requirements:

- (a) 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. 2.2.B.(11).)

- (b) Beginning upon issuance of this permit and lasting until issuance or modification of the applicable operating permit, the permittee shall submit a report for any required monitoring by July 31 and January 31 of each calendar 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 2, Rule 2.1.C.

Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration. For any air emissions equipment not yet constructed and/or operating the report shall so note and include an estimated date of commencement of construction and/or start-up (whichever is applicable).

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

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

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

- (d) Within fifteen (15) days of beginning actual construction, the permittee must notify the MDEQ in writing that construction has begun.

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

- (e) The permittee must notify the MDEQ 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(3).)

- (f) Upon the completion of construction or installation of an approved stationary source or modification, and prior to commencing operation, the applicant shall notify the Permit Board that construction or installation was performed in accordance with the approved plans and specifications on file with the Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).)

- (g) The Permit Board shall be promptly notified in writing of any change in construction from the previously approved plans and specifications or permit. If the Permit Board determines the changes are substantial, it 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(2).)

6.2 For Emission Point AA-000 (Facility-Wide), the permittee shall submit a semi-annual monitoring report (SMR) in accordance with Condition 6.1(b) that contains the following information:

- (a) The total respective emission of PM (filterable), PM₁₀ (filterable and condensable), PM_{2.5} (filterable and condensable), VOCs, NO_x, CO, each individual HAP, and all combined HAPs from all applicable sources in tons on both a monthly basis and rolling 12-month total basis;
- (b) The total throughput of green wood processed within the Green Hammermills (Emission Points AA-201 and AA-202) in short-tons on both a monthly and rolling 12-month total basis;
- (c) The total throughput of wood chips dried within the Rotary Dryer (Emission Point AA-204) in oven-dried tons (ODT) on both a monthly and rolling 12-month total basis;
- (d) The total throughput of dried wood chips processed in the Dry Fuel Hammermill (Emission Point AA-207) in ODT on both a monthly and rolling 12-month total basis;
- (e) A summary of any maintenance action(s) performed on each control device and any periods of time (including date and duration) in which a control device was non-operational;
- (f) The throughput of wood pellets produced within each Pellet Mill System (Emission Points AA-210 and AA-211) in short-tons on both a monthly basis and rolling 12-month total basis;
- (g) A summary of any revision(s) made to the “Dust Management Plan”; and
- (h) A summary for each parametric continuous monitoring and recording system (CMRS) that provides the following information:
 - (1) *Operation Outside Established Range* – the specific emission point / control equipment, the minimum temperature or secondary voltage established during

the performance test, the date, the beginning and ending times, the cause(s) for each excursion; and any corrective action taken as result of the excursion.

- (2) *CMS Downtime* – the specific emission point / control equipment, the date, the beginning and ending times, the cause(s) for each downtime event, and any corrective action taken as result of a downtime event.

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

- 6.3 For Emission Points AA-201, AA-202, AA-207, AA-211, and AA-213, the permittee shall submit a written performance test protocol for any test required by Condition 5.6 or 5.7 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.

Additionally, 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. 2.2.B(11).)

- 6.4 For Emission Points AA-201, AA-202, AA-207, AA-211, and AA-213, the permittee shall submit a report for any conducted performance test no later than sixty (60) days after completing the testing event. The report (at a minimum) shall include the information specified in Condition 1.26(c) and the following information:

- (a) The average combustion chamber temperature (in degrees Fahrenheit) of the RTO during each test run;
- (b) The average minimum and average maximum secondary voltage (in volts) for the wet electrostatic precipitator (WESP);
- (c) The average minimum and average maximum differential pressure drop (in inches of water) for each baghouse;
- (d) The hourly throughput data for the applicable process unit(s) (i.e. green wood chips processed; wood chips dried; dried wood chips processed; wood pellets produced);
- (e) The feedstock ratio (in weight percent) of softwood and hardwood used during a performance test (as applicable);
- (f) The moisture content of the wood chips dried or the wood pellets produced during a performance test (as applicable);

- (g) A table summarizing the current and past performance test results for each pollutant tested, [noting the average pollutant emission rate and the average applicable throughput]; and
- (h) Oxygen (O₂) concentration data.

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

- 6.5 For Emission Points AA-201, AA-202, AA-207, AA-211, and AA-213, the permittee shall submit site-specific emission factors required by Condition 5.8 for review by the MDEQ no later than ninety (90) days after completing the corresponding performance testing event.

If an already site-specific emission factor(s) must be modified as a result of subsequent performance test required by Condition 5.7, the permittee shall submit the corresponding supporting data to the MDEQ with the site-specific emission factor(s).

With exception of the site-specific emission factors established as a result of performance testing required by Condition 5.6 (which shall be applied from the initial start-up until otherwise specified), any modification of a site-specific emission factor shall become effective on the month corresponding with the MDEQ's receipt of the information. The MDEQ retains the right to modify a site-specific emission factor based on additional performance testing.

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

- 6.6 For Emission Points AA-201, AA-202, AA-207, AA-211, and AA-213, the permittee shall submit a written notification to MDEQ upon triggering additional performance testing as required by Condition 5.7(c) no later than thirty (30) days after the applicable percentage point increase occurs.

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

- 6.7 For Emission Points AA-201, AA-202, AA-207, AA-211, and AA-213, the permittee may request (in writing) for a reduction in the frequency for subsequent performance testing as specified in Condition 5.8. The permittee shall submit a request for review and approval by the MDEQ no later than one hundred twenty (120) days prior to any required subsequent testing and shall include (at a minimum) the following information:

- (a) The manufacturer design specifications of the corresponding process unit(s);
- (b) The results from the applicable performance testing previously conducted;
- (c) The operational information required by Condition 6.4 for the corresponding performance test; and

- (d) An analysis of the potential pollutant emissions from the combined process units (i.e. Emission Points AA-201, AA-202, AA-207, AA-211, and AA-213) utilizing the established site-specific pollutant emission factors (as required by Condition 6.5) and the corresponding maximum potential production capacity.

Notwithstanding the approval of any request, the MDEQ retains the right to require additional performance testing.

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