

STATE OF MISSISSIPPI AND FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL

PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT AT A
SYNTHETIC MINOR SOURCE

THIS CERTIFIES THAT

Enviva Port of Pascagoula LLC
East Bank Facility
549 Industrial Road
Pascagoula, Mississippi
Jackson County

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with the Federal Clean Air Act and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), the regulations and standards adopted and promulgated thereunder, and the State Implementation Plan for operating permits for synthetic minor sources.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: _____

Permit No.: 1280-00148

Effective Date: As specified herein.

Expires: [No more than 5 years from the issue date.]

Draft/Proposed 11/12/2025

Section 1.

A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
2. This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.4.D.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.4.D.)
3. Any activities not identified in the application are not authorized by this permit.

(Ref.: Miss. Code Ann. 49-17-29 1.b)
4. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)
7. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)
8. The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:

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

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

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

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

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

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

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

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

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

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

B. GENERAL OPERATIONAL CONDITIONS

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

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

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

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

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

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

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

- a. Upsets

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

b. Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.)

- (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
- (2) Where the source is unable to comply with existing emission limitations

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

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

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

5. Compliance Testing: Regarding compliance testing:

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

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

C. PERMIT RENEWAL / MODIFICATION / TRANSFER / TERMINATION

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

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

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

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

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

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

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

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

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

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

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

SECTION 2 EMISSION POINT DESCRIPTION

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

Emission Point	Facility ID	Description
AA-001	Baghouse 201	Baghouse controlling emissions from Truck and Rail Receiving System, and material transfer from Dome Feed Belt Conveyor (BC-301) to Dome Feed Belt Conveyor (BC-302)
AA-002	Baghouse 302	Baghouse controlling emissions from material transfer from Dome Feed Belt Conveyor (BC-302) to Dome Feed Belt Conveyor (BC-303)
AA-003	Baghouse 303	Baghouse controlling emissions from material transfer from Dome Feed Belt Conveyor (BC-303) to Dome Feed Belt Conveyor (BC-304), and material transfer from Dome Feed Belt Conveyor (BC-303) to Pellet Storage Dome No. 5
AA-005	Baghouse 304	Baghouse controlling emissions from material transfer from Dome Feed Belt Conveyor (BC-304) to Pellet Storage Dome No. 6
AA-006	Baghouse 305	Baghouse controlling emissions from material transfer from Pellet Storage Dome No. 5 to Dome Reclaim Belt Conveyor (BC-305), and material transfer from Dome Reclaim Belt Conveyor (BC-305) to Belt Conveyor (BC-307)
AA-007	Baghouse 306	Baghouse controlling emissions from material transfer from Pellet Storage Dome No. 6 to Dome Reclaim Belt Conveyor (BC-306), and material transfer from Dome Reclaim Belt Conveyor (BC-306) to Belt Conveyor (BC-307)
AA-008	Baghouse 308	Baghouse controlling emissions from material transfer from Belt Conveyor (BC-307) to Belt Conveyor (BC-308)
AA-010	Baghouse 309	Baghouse controlling emissions from material transfer from Belt Conveyor (BC-308) to Ship Loader Shuttle/Gantry Conveyor (BC-309A)
AA-012	Baghouse 401	Baghouse controlling emissions from 45,000 MT Pellet Storage Dome No. 5
AA-013	Baghouse 402	Baghouse controlling emissions from 45,000 MT Pellet Storage Dome No. 6
AA-014	N/A	Emissions associated with material transfer points (Pellets from Barge to Ship via Floating Crane, and Pellets from Shuttle/Gantry Conveyor Spout to Ship)
AA-016	N/A	211 bhp diesel-fired Emergency Fire Pump Engine
AA-020	N/A	Emissions associated with Truck Traveling on Paved Roads
AA-031	N/A	34.9 bhp propane-fired Emergency Generator

SECTION 3 EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity	Opacity shall not exceed 40%
	11 Miss. Admin. Code pt. 2, R. 1.3.B.	3.2		Equivalent Opacity
	11 Miss. Admin. Code Pt. 2, R. 1.3.C(1).	3.3	Particulate Matter	General Nuisance
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.4	PM/PM ₁₀ /PM _{2.5}	≤ 99.0 tons/yr (Title V and PSD Avoidance)
AA-001 AA-002 AA-003 AA-005 AA-006 AA-007 AA-008 AA-010 AA-012 AA-013	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.5	Operation	Operate baghouses when material is transferred (Title V and PSD Avoidance)
AA-016 AA-031	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.6	PM	≤ 0.6 lbs/MMBTU
AA-016 AA-031	40 CFR 63, Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines)	3.7	HAP	Applicability
AA-016	40 CFR 63.6585, Subpart ZZZZ 40 CFR 63.6590(c)(1), Subpart ZZZZ			Comply with the requirements of 40 CFR 60, Subpart IIII
AA-031				Comply with the requirements of 40 CFR 60, Subpart JJJJ
AA-016	40 CFR 60, Subpart IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines)	3.8	HAP	Applicability
	40 CFR 60.4200(a)(2), Subpart IIII			
	40 CFR 60.4207(b), Subpart IIII	3.9	Fuel	Utilize fuel that meets requirements of 40 CFR 1090.305 for nonroad diesel fuel
	40 CFR 60.4211(a), Subpart IIII	3.10	Operation	Operate according to manufacturer’s

				instructions
	40 CFR 60.4211(c), Subpart IIII	3.11	Engine	Purchase certified engine
	40 CFR 60.4206, Subpart IIII	3.12	NMHC NO _x , CO, and PM	Meet emission standards over the life of the engine
	40 CFR 60.4205(c) and Table 4, Subpart IIII	3.13	NMHC + NO _x	≤ 4.0 g/kW-hr (3.0 g/hp-hr)
			PM	≤ 0.30 g/kW-hr (0.22 g/hp-hr)
	40 CFR 60.4211(f), Subpart IIII	3.14	Operation	Emergency use requirements
	40 CFR 60.4209(a), Subpart IIII	3.15	Hours of Operation	Install non-resettable hour meter
AA-031	40 CFR 60, Subpart JJJJ (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines) 40 CFR 60.4230(a)(4)(iv), Subpart JJJJ	3.16	NO _x CO VOC	General Applicability
	40 CFR 60.4233(c), 40 CFR 60.4231(c), Subpart JJJJ	3.17		Emissions Standards
	40 CFR 60.4234, Subpart JJJJ	3.18		Meet emission standards over the life of the engine.
	40 CFR 60.4243(d), Subpart JJJJ	3.19		Emergency engine operation requirements
	40 CFR 60.4237, Subpart JJJJ	3.20		Install non-resettable hour meter

- 3.1. For the entire facility, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity. Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.

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

- 3.2. For the entire facility, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in **Condition 3.1**. This shall not apply to vision obscuration caused by uncombined water droplets.

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

- 3.3. For the entire facility, the permittee shall not cause, permit, 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. The permittee shall not cause or permit the handling or transporting or storage of any material in a manner which allows or may allow unnecessary amounts of particulate matter to become airborne.

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

- 3.4. For the entire facility, the permittee shall limit the facility's Particulate Matter (PM/PM₁₀/PM_{2.5}) emissions to no more than 99.0 tons per year (tpy) as determined for each consecutive 12-month period on a rolling basis.

- 3.5. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). PSD and Title V Avoidance) For Emission Points AA-001, AA-002, AA-003, AA-005, AA-006, AA-007, AA-008, AA-010, AA-012, and AA-013, the permittee shall ensure the baghouses are operational at all times material is transferred. If the baghouse is not operating according to the manufacturer's specifications, then the process being controlled by the baghouse must be shut down immediately and not restarted until the baghouse is repaired or brought back to normal operating conditions.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). PSD and Title V Avoidance)

- 3.6. For Emission Points AA-016 and AA-031, the permittee shall not cause, permit, or allow the emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input to exceed 0.6 pounds per million BTU per hour heat input.

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

- 3.7. For Emission Points AA-016 and AA-031, the facility is subject to and shall comply with all the applicable conditions of National Emissions Standards for Hazardous Air Pollutants (HAP) for Stationary Reciprocating Internal Combustion Engines, Subpart ZZZZ.

Emission Point AA-016 is a new, compression ignition (CI), diesel fired emergency fire pump engine with a displacement per cylinder between 10 and 30 liters. The permittee shall meet the requirements of Subpart ZZZZ by complying with 40 CFR 60, Subpart IIII.

Emission Point AA-031 is a new, spark ignition (SI), propane fired emergency generator with a displacement per cylinder of less than 10 liters. The permittee shall meet the requirements of Subpart ZZZZ by complying with 40 CFR 60, Subpart JJJJ.

(Ref.: 40 CFR 63.63590(c)(1), Subpart ZZZZ)

- 3.8. For Emission Point AA-016, the permittee is subject to and shall comply with the applicable requirements of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (40 CFR 60, Subpart IIII) and the General Provisions (40 CFR 60, Subpart A).

(Ref.: 40 CFR 60.4200(a)(2), Subpart IIII)

- 3.9. For Emission Point AA-016, the permittee must use diesel fuel that meets the requirements below for nonroad diesel fuel.

(a) Sulfur content not to exceed 15 ppm

(b) A minimum cetane index of 40; or a maximum aromatic content of 35 volume percent.

(Ref.: 40 CFR 60.4207(b) and 40 CFR 1090.305, Subpart IIII)

- 3.10. For Emission Point AA-016, the permittee shall do all of the following, except as permitted under 40 CFR 60.4211(g), Subpart IIII:

(a) Operate and maintain the unit according to the manufacturer's emission-related written instructions;

(b) Change only those emission-related settings that are permitted by the manufacturer; and

(c) Meet the requirements of 40 CFR 89, 94, and/or 1068, as they apply.

(Ref.: 40 CFR 60.4211(a), Subpart IIII)

- 3.11. For Emission Point AA-016, the permittee shall comply with the emission standards specified in Condition 3.13 by purchasing an engine certified to the emission standards. The engine must be installed and configured according to the manufacturer's emission related specifications, except as permitted under 40 CFR 60.4211(g), Subpart IIII.

(Ref.: 40 CFR 60.4211(c), Subpart IIII)

- 3.12. For Emission Point AA-016, the permittee must operate and maintain the units that achieve the emission standard required in Conditions 3.14 over the entire life of the engine.

(Ref.: 40 CFR 60.4206, Subpart IIII)

- 3.13. For Emission Point AA-016, the permittee shall comply with the emission standards in Table 4 to 40 CFR 60, Subpart IIII, listed below:

(a) 4.0 g/kW-hr (3.0 g/hp-hr) of NMHC + NO_x and

(b) 0.30 g/kW-hr (0.22 g/hp-hr) of PM.

(Ref.: 40 CFR 60.4205(c), Subpart IIII)

- 3.14. For Emission Point AA-016, the permittee shall operate the units according to the paragraphs below. In order for the engines to be considered emergency stationary ICE under 40 CFR 60, Subpart IIII, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in the paragraphs below, is prohibited. If the permittee does not operate the engine according to the requirements of this condition, the engine will not be considered an emergency engine under 40 CFR 60, Subpart IIII, and must meet all requirements for non-emergency engines.

(a) There is no time limit on the use of emergency stationary ICE in emergency situations.

(b) The permittee may operate the emergency stationary ICE for maintenance checks and readiness testing for a maximum of 100 hours per calendar year, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (c) of this condition count as part of the 100 hours per calendar year.

(c) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing according to paragraph (b) of this condition.

(Ref.: 40 CFR 60.4211(f), Subpart IIII)

- 3.15. For Emission Point AA-016, the permittee shall install a non-resettable hour meter if one is not already installed.

(Ref.: 40 CFR 60.4209(a), Subpart IIII)

- 3.16. For Emission Point AA-031, the permittee is subject to and shall comply with the applicable requirements of the Standards of Performance for Stationary Spark Ignition (SI) Internal Combustion Engines (ICE) (40 CFR 60, Subpart JJJJ) and the General Provisions (40 CFR 60, Subpart A).

(Ref.: 40 CFR 60.4230(a)(4)(iv), Subpart JJJJ)

- 3.17. For Emission Point AA-031, the permittee shall comply with the emission standards for new SI engines by purchasing an engine certified to meet the Phase I emission standards in 40 CFR part 1054, appendix I, applicable to class II engines, for new nonroad SI engines in 40 CFR part 1054.

(Ref.: 40 CFR 60.4233(c), 40 CFR 60.4231(c), Subpart JJJJ)

- 3.18. For Emission Point AA-031, the permittee must operate and maintain the stationary SI ICE that achieves the emission standards as required in Condition 3.17 over the entire life of the engine.

(Ref.: 40 CFR 60.4234, Subpart JJJJ)

- 3.19. For Emission Point AA-031, the permittee shall operate the units according to the paragraphs below: In order for the engine to be considered emergency stationary ICE under 40 CFR 60, Subpart JJJJ, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in the paragraphs below, is prohibited. If the permittee does not operate the engine according to the requirements of this condition, the engine will not be considered an emergency engine under 40 CFR 60, Subpart JJJJ, and must meet all requirements for non-emergency engines.

(a) There is no time limit on the use of the engine in emergency situations.

(b) The permittee may operate the emergency stationary ICE for maintenance checks and readiness testing for a maximum of 100 hours per calendar year, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (c) of this condition count as part of the 100 hours per calendar year.

(c) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing according to paragraph (b) of this condition.

(Ref.: 40 CFR 60.4243(d), Subpart JJJJ)

- 3.20. For Emission Point AA-031, the permittee shall install a non-resettable, hour meter if one is not already installed.

(Ref.: 40 CFR 60.4237, Subpart JJJJ)

SECTION 4
WORK PRACTICES

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Work Practice
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	4.1	Operation	Operate efficiently and perform routine maintenance

- 4.1. For the entire facility, in order to minimize the emissions of air pollutants, the permittee shall operate and maintain all air emission equipment, including associated air pollution control and monitoring equipment, as efficiently as possible and in a manner consistent with safe and good air pollution control practices for minimizing emissions. Furthermore, the permittee shall perform routine maintenance on all air emissions equipment such that the equipment may be operated in an efficient manner. Determination of whether such operation and maintenance procedures are being used will be based on information available to MDEQ, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

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

SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain records for a minimum of 5 years.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2	PM	Dust Management Plan
		5.3	PM/PM ₁₀ /PM _{2.5}	Keep records of material and calculate emission rate (Title V and PSD Avoidance)
AA-001 AA-002 AA-003 AA-005 AA-006 AA-007 AA-008 AA-010 AA-012 AA-013	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.4	Opacity	Conduct weekly visible emission evaluations
		5.5	PM	Perform visual inspections and routine maintenance on baghouses
		5.6		Maintain records of inspections and maintenance performed
		5.7	Operation	Maintain pressure drop gauges (Title V Avoidance)
		5.8		Vendor maintenance plan
		5.9	Monitoring	Perform biennial stack tests
AA-016	40 CFR 60.4214(b), Subpart IIII	5.10	Hours of Operation	Record hours of operation
AA-031	40 CFR 60.4243(a), Subpart JJJJ	5.11	VOC NO _x CO HAP	Continuous Compliance
	40 CFR 60.4245(a), Subpart JJJJ	5.12		Recordkeeping requirements
	40 CFR 60.4245(b), Subpart JJJJ	5.13		Record hours of operation

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

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

- 5.2. For the entire facility, the permittee shall develop, maintain, and implement a “Dust Management Plan” that describes, in detail, procedures for operating and maintaining applicable emission sources to minimize the emission of fugitive particulate matter (PM).

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

- 5.3. For the entire facility, the permittee shall keep records of pellet throughput (ODT/yr) and fuel usage at the facility each month and shall calculate PM/PM₁₀/PM_{2.5} emissions in tons per year (tons/yr) for each consecutive 12-month period on a rolling basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). PSD and Title V Avoidance)

- 5.4. For Emission Points AA-001, AA-002, AA-003, AA-005, AA-006, AA-007, AA-008, AA-010, AA-012, and AA-013, the permittee shall perform EPA Test Method 22 visual observation on a weekly basis. Results shall be recorded in log form. If visible emissions are observed, the source producing visual emissions shall be shut down in accordance with the manufacturer’s protocols and corrective actions shall be taken. The emission source shall begin operations once corrective actions have been taken. Records of observations, any maintenance work conducted, and any corrective actions shall be kept in log form and made available for review upon request.

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

- 5.5. For Emission Points AA-001, AA-002, AA-003, AA-005, AA-006, AA-007, AA-008, AA-010, AA-012, and AA-013, the permittee shall perform inspections and maintenance as recommended by the baghouse manufacturer, which shall include the following as a minimum:

- (a) Monthly visual inspections of the system ductwork and material collection units for leaks; and
- (b) Annual internal inspection of the structural integrity of the bag filters.

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

- 5.6. For Emission Points AA-001, AA-002, AA-003, AA-005, AA-006, AA-007, AA-008, AA-010, AA-012, and AA-013, the permittee shall maintain in written or electronic format records of the inspections and maintenance, as required by Condition 5.5, on each of the baghouses and made available upon request. The records shall include the following:

- (a) Date and time of each inspection;
- (b) The results of each inspection;
- (c) The results of any maintenance performed;

- (d) Variance for manufacturer's recommendations, if any, and corrections made; and
- (e) A record of repairs and maintenance shall be maintained on site including the date and duration the baghouses were non-operational and the reason they were non-operational.

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

- 5.7. For Emission Points AA-001, AA-002, AA-003, AA-005, AA-006, AA-007, AA-008, AA-010, AA-012, and AA-013, the permittee shall install, operate, and maintain pressure drop gauges on each module of the baghouses. Pressure drop readings shall be recorded daily during source operation. The pressure drop gauges shall be in place and operational whenever processes controlled by the baghouses are running, except during periods of baghouse malfunction or mechanical failure. Operational ranges for the monitored parameters shall be established to provide a reasonable assurance of compliance. These operational ranges for the monitored parameters shall be derived from vendor certification and/or operational history and visual inspections, which demonstrate the proper operation of the equipment in compliance. The permittee shall keep a log of the daily pressure drop readings. Should a pressure drop reading be measured outside the established range, the permittee should shut down the process being controlled and immediately take corrective measures to restore the baghouse operating efficiency and note any corrective measures taken.

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

- 5.8. For Emission Points AA-001, AA-002, AA-003, AA-005, AA-006, AA-007, AA-008, AA-010, AA-012, and AA-013, the permittee shall maintain on site the vendor maintenance specifications and any spare parts needed to repair and maintain the baghouses in case of malfunction or failure.

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

- 5.9. For Emission Points AA-001, AA-002, AA-003, AA-005, AA-006, AA-007, AA-008, AA-010, AA-012, and AA-013, the permittee shall determine using engineering judgment if it is feasible to perform stack testing. If it is determined that testing is feasible, the permittee shall demonstrate compliance with PM₁₀, PM_{2.5} and Opacity emission limitations by stack testing in accordance with EPA Reference Methods 1-5, and 9, 40 CFR 60, Appendix A, and the procedures outlined below:

- (a) The compliance demonstration test shall be performed within 180 days after permit issuance.
- (b) Testing must be performed at no less than 80% of the maximum rated capacity of the system. If the permittee desires to test at a rate less than 80% of maximum rated capacity, it must be agreed upon by MDEQ during a pretest conference.

(c) The test must consist of three test runs of at least one (1) hour each.

(d) Subsequent compliance demonstration testing shall be performed biennially (not to exceed 25 months from the previous stack test).

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

- 5.10. For Emission Point AA-016, the permittee shall keep records of the operation of each engine in emergency and non-emergency service that are recorded through the non-resettable hour meter required by Condition 3.16. The owner must record the time of operation of the engine and the reason the engine was in operation during that time.

(Ref.: 40 CFR 60.4209(a) and 60.4214(b), Subpart IIII)

- 5.11. For Emission Point AA-031, if the permittee operates and maintains the certified stationary spark-ignited (SI) internal combustion engine according to the manufacturer's emission-related instructions, the permittee must keep records of conducted maintenance to demonstrate compliance. If the permittee does not operate and maintain the engine according to the manufacturer's emission-related instructions, the engine will be considered a non-certified engine, and the permittee must demonstrate compliance by keeping a maintenance plan, keeping records of conducted maintenance, and maintaining and operating the engine in a manner consistent with good air pollution control practice for minimizing emissions.

(Ref.: 40 CFR 60.4243(a)(1) and 40 CFR 60.4243(a)(2)(i), Subpart JJJJ)

- 5.12. For Emission Point AA-031, the permittee shall keep records of the following information in paragraphs (a) through (d):

(a) All notifications submitted to comply with 40 CFR Subpart JJJJ and all documentation supporting any notification.

(b) Maintenance conducted on the engine.

(c) For certified stationary SI internal combustion engines, documentation from the manufacturer that the engine is certified to meet the emissions standards in 40 CFR parts 90, 1048, 1054, and 1060, as applicable.

(d) For non-certified stationary SI internal combustion engines, documentation that the engine meets the emissions standards required by Condition 3.17.

(Ref.: 40 CFR 60.4245(a), Subpart JJJJ)

- 5.13. For Emission Point AA-031, the permittee shall keep records of the hours of operation of the engine through the non-resettable hour meter required by Condition 3.20. The permittee shall document how many hours are spent for emergency operation; including

what classified the operation as emergency and how many hours are spent for non-emergency operation.

(Ref.: 40 CFR 60.4245(b), Subpart JJJJ)

SECTION 6 REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	Report any permit deviations within five (5) working days.
		6.2	Submit certified annual monitoring report.
		6.3	All documents submitted to MDEQ shall be certified by a Responsible Official.
		6.4	Dust Management Plan submittal
		6.5	Submit records of material and emission rate
AA-001 AA-002 AA-003 AA-005 AA-006 AA-007 AA-008 AA-010 AA-012 AA-013	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.6	Submit records of pressure drop malfunction
		6.7	Submit stack test protocol 30 days prior to conducting the stack test
		6.8	Submit a stack test report within 60 days of conducting the stack test
AA-016 AA-031	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.9	Submit hours of operation

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

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

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

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

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

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

- 6.4. For the entire facility, the permittee shall submit an annual notification that summarizes any revision(s) made to the “Dust Management Plan” required by Condition 5.2 no later than January 31st of each calendar year for the preceding 12-month period. If an amendment is made to the plan during the 12-month period, the permittee shall include the revision(s) within the corresponding annual report.

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

- 6.5. For the entire facility, the permittee shall submit records as required by Condition 5.3 of pellet throughput, fuel usage at the facility, and records of PM/PM₁₀/PM_{2.5} emissions.

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

- 6.6. For Emission Points AA-001, AA-002, AA-003, AA-005, AA-006, AA-007, AA-008, AA-010, AA-012, and AA-013, the permittee shall submit all pressure reading logs as required by Condition 5.7.

- 6.7. For Emission Points AA-001, AA-002, AA-003, AA-005, AA-006, AA-007, AA-008, AA-010, AA-012, and AA-013, the permittee shall submit a stack test protocol at least thirty (30) days prior to the scheduled test date to ensure that all test methods and procedures are acceptable to the MDEQ. If the initial stack test protocol is acceptable, subsequent test protocols may be waived if these protocols contain no significant changes. Also, the MDEQ must be notified at least ten (10) days prior to the scheduled test date so that an observer may be scheduled to witness the test(s).

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

- 6.8. For Emission Points AA-001, AA-002, AA-003, AA-005, AA-006, AA-007, AA-008, AA-010, AA-012, and AA-013, the permittee shall submit a report of any stack test results within sixty (60) days of conducting the respective stack test.

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

- 6.9. For Emission Points AA-016 and AA-031, the permittee shall submit records of the hours of operation of the emergency engines.

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