

STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Northeast Mississippi Renewables LLC, Fulton Facility
150 American Cellulose Road
Fulton, Mississippi
Itawamba County

has been granted permission to construct air emissions equipment to comply with the emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: _____

Permit No.: 1240-00037

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

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

- 1.10 *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 Nuisances:* 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.

- (a) The permittee shall not cause or permit the handling, transporting, or storage of any material in a manner which allows or may allow unnecessary amounts of particulate matter to become airborne.
- (b) When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than that from which it originated or to violate any other provision of 11 Miss. Admin. Code Pt. 2, Ch. 1, the Commission may order such corrected in a way that all air and gases or air and gasborne 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 Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives upon presentation of credentials:
- (a) To enter at reasonable times 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) 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 contaminants or waste waters, fuel, process material, or other material which affects or may affect emission of air contaminants from any source.

(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 Mississippi Department of Environmental Quality, 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 eighteen (18) months or more, or if construction is not completed within a reasonable time. The DEQ 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 Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by 11 Miss. Admin. Code Pt. 2, R. 2.13.G.

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

- 1.22 *Application for a Permit to Operate:* The application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).)

- 1.23 *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 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, startups, 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 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 in 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 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 11 Miss. Admin. Code Pt. 2, R. 1.2., occurs during startup 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 or this permit and in units of mass per time.
- (b) Compliance testing will be performed at the expense of the permittee.
- (c) Each emission sampling and analysis report shall include but not be limited to the following:
 - (1) detailed description of testing procedures;
 - (2) sample calculation(s);
 - (3) results; and
 - (4) comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

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

SECTION 2. EMISSION POINT DESCRIPTION

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

Emission Point	Description
AA-000	Facility-Wide [Northeast Mississippi Renewables, LLC]
AA-100	Raw Material Handling and Processing [Fugitive Emissions Sources]
AA-101	Truck Unloading [Whole logs and green chips]
AA-102	Whole Log Pile
AA-103	Log Chipping Operations
AA-104	Green Wood Chip Storage Pile
AA-105	Paved Haul Roads for Log/Chip Receiving
AA-200	Wood Drying/Torrefaction Operations
AA-201	Rotary Dryer for reducing the moisture content of green chips. [Heat for the Dryer is provided by the Torrefier burners, Emission Points AA-202a and AA-202b. Emissions from the Dryer are routed to Drying and Torrefaction Control System, Emission Point AA-203.]
AA-202a	Torrefier #1A for torrefaction of dried chips from the Rotary Dryer. [Heat is provided by an 85 MMBtu/hr dual-fired burner capable of burning natural gas or syngas generated by the torrefaction process. Emissions from Torrefier #1A are routed to Drying and Torrefaction Control System, Emission Point AA-203.]
AA-202b	Torrefier #1B for torrefaction of dried chips from the Rotary Dryer. [Heat is provided by an 85 MMBtu/hr dual-fired burner capable of burning natural gas or syngas generated by the torrefaction process. Emissions from Torrefier #1A are routed to Drying and Torrefaction Control System, Emission Point AA-203.]
AA-203	Dryer and Torrefaction Control System [Consists of a wet electrostatic precipitator (WESP) followed by a regenerative thermal oxidizer (RTO) equipped with a total of 8.7 MMBtu/hr natural gas-fired burners.]
AA-204	Drying/Torrefaction Bypass Stack
AA-300	Wood Pellet Production Operations
AA-301	Torrefied Material Storage Silo [equipped with a dust collector]
AA-302	Dry Hammermill [equipped with a dust collector]
AA-303	Six (6) Pellet Mills and one (1) Pellet Cooler [equipped with a shared dust collector]
AA-304	Fugitive emissions from material handling

Emission Point	Description
AA-400	Finished Pellet Storage and Loadout
AA-401	Pellet Storage Silo No. 1 [equipped with a dust collector]
AA-402	Pellet Storage Silo No. 2 [equipped with a dust collector]
AA-403	Barge Loadout [equipped with a dust collector]
AA-500	Auxiliary Equipment
AA-501	8.6 MMBtu/hr Natural Gas-fired Boiler providing steam to the Pellet Mills [equipped with a low-NO _x burner]
AA-502	220 hp (164 kW) Diesel Emergency Fire Pump Engine [Compression ignition internal combustion engine; Manufactured date: TBD]

SECTION 3. EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
AA-000 [Facility-Wide]	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity	≤ 40% (from smoke)
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2		≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.3	PM (filterable)	$E = 4.1(p^{0.67})$
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). (PSD Avoidance Limits)	3.4	PM (filterable)	245.0 tpy (12-month rolling total)
			PM ₁₀ /PM _{2.5} (filterable + condensable)	245.0 tpy (12-month rolling total)
			NO _x	245.0 tpy (12-month rolling total)
			CO	245.0 tpy (12-month rolling total)
			VOC	245.0 tpy (12-month rolling total)
AA-201 AA-202a AA-202b AA-203 AA-204	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.5	PM, PM ₁₀ , PM _{2.5} , VOC, HAP	Control emissions from the Rotary Dryer and Torrefiers and limit bypass of the Control System to ≤ 500 hours per year (12-month rolling total)
AA-202a AA-202b	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.6	Torrefied Wood Chip Throughput	165,347 ODT/year (total for both Torrefiers; 12-month rolling total)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.7	Fuel Source Restriction	Only combust natural gas and syngas produced from the Torrefiers
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.8	PM (filterable only)	$E = 0.8808 * I^{-0.1667}$
AA-202a AA-202b AA-203 AA-501	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.9	SO ₂	4.8 lb/MMBtu
AA-203	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.10	PM, PM ₁₀ , PM _{2.5} , VOC, HAP	WESP and RTO control requirements
		3.11	VOC	≥ 95.0% destruction removal efficiency
AA-300	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.12	Wood Pellet Production	165,347 ODT/year (12-month rolling total)

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
AA-301 AA-302 AA-303 AA-401 AA-402 AA-403	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.13	PM, PM ₁₀ , PM _{2.5}	Dust collector control requirements
AA-203 (RTO burner) AA-501 AA-502	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.14	PM	0.6 lb/MMBtu
AA-502	40 CFR 63, Subpart ZZZZ NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE) 40 CFR 63.6580, 63.6585, and 63.6590(a)(2)(iii) and (c)(1), Subpart ZZZZ	3.15	HAP	Applicability
	40 CFR 60, Subpart IIII Standards of Performance for Stationary Compression Ignition Internal Combustion Engines 40 CFR 60.4200(a)(2)(i), 60.4218, and Table 8 to Subpart IIII	3.16	NMHC+NO _x PM (filterable only), CO, SO ₂	Applicability
	40 CFR 60.4205(b), 60.4206, and Table 4, Subpart IIII	3.17	NMHC+NO _x CO PM (filterable only)	4.0 g/kW-hr 3.5 g/kW-hr 0.20 g/kW-hr
	40 CFR 60.4207(b), Subpart IIII and 40 CFR 1090.305	3.18	SO ₂ (Diesel Fuel Requirements)	Max sulfur content of diesel fuel ≤15 ppm Min. cetane index of 40 or max aromatic content of 35 volume percent.
	40 CFR 60.4211(a)(1)-(3) and (c), Subpart IIII	3.19	NMHC+NO _x , PM (filterable only), CO, SO ₂	Certified engine requirements
	40 CFR 60.4211(f)(1)-(3), Subpart IIII	3.20		Operating requirements

- 3.1 For Emission Point AA-000 (Facility-Wide), 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 Emission Point AA-000 (Facility-Wide), 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 Emission Point AA-000 (Facility-Wide), except as otherwise specified herein, the permittee shall limit the emissions of Particulate Matter (PM) to no more than the rate determined by the following relationship:

$$E = 4.1 * p^{0.67}$$

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

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

- 3.4 For Emission Point AA-000 (Facility-Wide), the permittee shall limit the total emissions of each of the following pollutants to 245.0 tons per year (tpy), as determined on a consecutive 12-month rolling total basis:

- (a) Particulate matter (PM) – filterable only;
- (b) Particulate matter with a diameter of 10 microns (μm) or less (PM_{10}) – filterable and condensable;
- (c) Particulate matter with a diameter of 2.5 microns (μm) or less ($\text{PM}_{2.5}$) – filterable and condensable;
- (d) Nitrogen oxides (NO_x);
- (e) Carbon monoxide (CO); and
- (f) Volatile organic compounds (VOCs).

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

- 3.5 The permittee shall vent emissions from the Rotary Dryer (Emission Point AA-201) and Torrefiers (Emission Points AA-202a and AA-202b) to the Dryer and Torrefaction Control System (Emission Point AA-203) at all times except during periods of start-up, shutdown, idling, malfunction, or upset, when emissions may be vented to the Bypass Stack (Emission Point AA-204). The permittee shall not bypass the Dryer and Torrefaction Control System more than 500 hours in any consecutive 12-month rolling period. The use of the Bypass

Stack for any purpose other than start-up, shutdown, idling, malfunction, or upset constitutes a deviation of this permit and is subject to the deviation reporting requirements specified in Condition 6.1(a).

For the purpose of this permit, “idle mode” is defined as the operation of either Torrefier at a heat input rate not to exceed ten (10) MMBTU per hour.

The permittee must cease bypass of the Dryer and Torrefaction Control System if such bypass results in nuisance conditions according to Condition 1.12, including but not limited to adverse impacts on visibility at the adjacent highway, Interstate 22.

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

- 3.6 For Emission Points AA-202a and AA-202b, the permittee shall limit the total throughput of torrefied wood chips to no more than 165,347 oven-dried tons (ODT) per year, as determined on a consecutive 12-month rolling total basis. For the purpose of this permit, an “oven-dried ton” is defined as a short ton with zero percent moisture.

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

- 3.7 For Emission Points AA-202a and AA-202b, the permittee shall only combust natural gas and/or syngas produced from the Torrefiers as fuel in the burners.

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

- 3.8 For the burners associated with Emission Points AA-202a and AA-202b, the maximum permissible emission of ash and/or particulate matter shall not exceed an emission rate as determined by the relationship $E = 0.8808 * I^{-0.1667}$, where E is the emission rate in pounds per million BTU per hour heat input and I is the heat input in millions of BTU per hour.

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

- 3.9 For the burners associated with Emission Points AA-202a, AA-202b, AA-203, and AA-501, the maximum discharge of sulfur oxides shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.

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

- 3.10 For Emission Point AA-203, the permittee shall install, operate, and maintain a Wet Electrostatic Precipitator (WESP) followed by a Regenerative Thermal Oxidizer (RTO) for control of emissions from the Rotary Dryer (Emission Point AA-201) and the Torrefiers (Emission Points AA-202a and AA-202b).

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

- 3.11 For Emission Point AA-203, the permittee shall operate the RTO in such a manner as to achieve 95.0 percent destruction efficiency, at a minimum, of volatile organic compounds (VOCs) across the control device.

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

- 3.12 For Emission Point AA-300, the permittee shall limit the total production of wood pellets to no more than 165,347 oven-dried tons (ODT) per year, as determined on a consecutive 12-month rolling total basis.

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

- 3.13 For Emission Points AA-301, AA-302, AA-303, AA-401, AA-402, and AA-403, the permittee shall install, operate, and maintain dust collectors on each emission point. Emissions from pellet production, storage, and loadout shall be routed through the dust collectors at all times when operating.

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

- 3.14 For Emission Points AA-203 (RTO burner), AA-501, and 502, the emission of ash and/or particulate matter shall not exceed 0.6 pounds per million BTU per hour heat input.

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

- 3.15 Emission Point AA-502 is subject to and shall comply with all applicable requirements of the NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR 63, Subpart ZZZZ and the applicable General Provisions in 40 CFR 63, Subpart A, as noted in Table 8 to Subpart ZZZZ. Emission Point AA-502 is considered a new, emergency CI stationary RICE at an area source of HAP emissions. As such, the permittee shall comply with Subpart ZZZZ by complying with the applicable requirements of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart IIII. No other requirements of Subpart ZZZZ apply.

(Ref.: 40 CFR 63.6580, 63.6585, and 63.6590(a)(2)(iii) and (c)(1), Subpart ZZZZ)

- 3.16 Emission Point AA-502 is subject to and shall comply with all applicable requirements of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart IIII and the applicable General Provisions in 40 CFR 60, Subpart A, as required in Table 8 to Subpart IIII.

(Ref.: 40 CFR 60.4200(a)(2)(i), 60.4218, and Table 8 to Subpart IIII)

- 3.17 For Emission Point AA-502, the permittee shall operate and maintain the engine such that it achieves the following emission standards for the life of the engine:

- (a) Non-methane hydrocarbon and nitrogen oxides (NMHC + NO_x) ≤ 4.0 g/kW-hr (3.0 g/hp-hr)
- (b) Carbon monoxide (CO) ≤ 3.5 g/kW-hr (2.6 g/hp-hr)
- (c) PM ≤ 0.20 g/kW-hr (0.15 g/hp-hr)

(Ref.: 60.4205(c), 60.4206, and Table 4, Subpart IIII and 40 CFR Part 1039, Appendix I and 40 CFR 1039.105)

- 3.18 For Emission Point AA-502, the permittee shall use diesel fuel that meets the following per gallon standards:

- (a) Maximum sulfur content of ≤ 15 ppm, and
- (b) Minimum cetane index of 40 or a maximum aromatic content of 35 volume percent.

(Ref.: 40 CFR 60.4207(b), Subpart IIII and 40 CFR 1039.305)

- 3.19 For Emission Point AA-502, the permittee shall comply with the emission standards contained in Condition 3.17 by purchasing, installing, operating, and maintaining an engine certified to meet the emission standards. The permittee shall operate and maintain the engine in accordance with the manufacturer's emission-related written instructions and can only change the emission-related settings that are permitted by the manufacturer. The permittee shall meet the applicable requirements of 40 CFR Part 1068.

(Ref.: 40 CFR 60.4211(a)(1)-(3) and (c), Subpart IIII)

- 3.20 For Emission Point AA-502, the engine shall be considered an emergency stationary engine under Subpart IIII provided the engine only operates according to the requirements in paragraphs (a) through (c) below. If the permittee does not operate the engine according to the requirements in paragraphs (a) through (c) below, the engine will not be considered an emergency engine under Subpart IIII and must meet all requirements for non-emergency engines.

- (a) There is no limit on the use of the engine during an emergency situation.
- (b) The permittee may operate the engine for maintenance checks and readiness testing for a maximum of 100 hours per calendar year provided 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 insurance company associated with an engine. The permittee may petition the DEQ 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 the federal, state, or local standards require maintenance testing of an engine beyond 100 hours per calendar year.
- (c) The emergency engine 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 provided in paragraph (b). Except as provided in 40 CFR 60.4211(f)(3)(i), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(Ref.: 40 CFR 60.4211(f)(1)-(3), Subpart IIII)

SECTION 4. WORK PRACTICES

This section was intentionally left blank since no work practice standards apply to this permit action.

SECTION 5. MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
AA-000 [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)	Develop, implement, and maintain a Dust Management Plan
		5.3	PM, PM ₁₀ , PM _{2.5} , NO _x , CO, and VOC	Calculate monthly emissions and consecutive 12-month rolling totals
AA-201 AA-202a AA-202b	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.4	Bypasses	Record date, time, duration, and nature of each event resulting in a bypass of the control system
AA-202a AA-202b	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.5	Wood chip throughput	Monitor monthly and 12-month rolling total torrefied wood chip throughput
AA-203	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.6	Operation and maintenance	Operate and maintain control devices in accordance with manufacturer's instructions and recommendations
		5.7	PM, PM ₁₀ , PM _{2.5} , NO _x , CO, and VOC	Initial and subsequent performance testing
		5.8	HAPs	Initial test for HAPs: acetaldehyde, acrolein, formaldehyde, hydrogen chloride, methanol, phenol, and propionaldehyde
		5.9	PM, PM ₁₀ , PM _{2.5} , NO _x , CO, and VOC	Develop site-specific emission factor
		5.10	Temperature	Establish minimum combustion chamber temperature (degrees Fahrenheit) for RTO
		5.11		Install and maintain temperature monitor and continuously monitor combustion chamber temperature of RTO
		5.12	Total Power	Establish minimum total power (Watts) for WESP
		5.13		Install and maintain devices for continuously monitoring secondary voltage (kV) and secondary current (ma) to calculate total power to the WESP

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
AA-300	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.14	Wood pellet production	Monitor monthly and 12-month rolling total wood pellet production
AA-301 AA-302 AA-303 AA-401 AA-402 AA-403	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.15	PM, PM ₁₀ , PM _{2.5} (filterable)	Conduct weekly inspections on each dust collector
		5.16		Monitor and record pressure drop on a daily basis
AA-302 AA-303	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.17	VOC	Initial performance test
AA-502	40 CFR 60.4209(a) and 60.4214(b), Subpart IIII	5.18	Hours	Install non-resettable hour meter and record hours of operation
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.19	Fuel specifications	Maintain records of diesel purchased

- 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, but is not limited to, 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 DEQ 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 Emission Point AA-000 (Facility-Wide), to comply with the General Nuisance provisions in Condition 1.12, the permittee shall develop, implement, and maintain a Dust Management Plan that details the procedures for routinely evaluating and maintaining emission sources of particulate matter to minimize the emissions of fugitive dust. The Dust Management Plan shall be developed prior to startup of the facility and shall be implemented upon startup.

Additionally, the permittee shall maintain documentation that details the results of any inspection, evaluation, survey, and corrective or maintenance action completed in accordance with the Dust Management Plan. As deemed necessary by the permittee or upon request by the DEQ, the permittee shall revise the Dust Management Plan to address changes to applicable operations and/or to incorporate additional best management practices.

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

- 5.3 For Emission Point AA-000 (Facility-Wide), to demonstrate compliance with the facility-wide limits, the permittee shall calculate and record the total respective emissions of PM (filterable), PM₁₀ (filterable + condensable), PM_{2.5} (filterable + condensable), NO_x, CO,

and VOC, from all emission sources in tons, both on a monthly and consecutive 12-month rolling total basis according to the following specifications:

- (a) For Emission Points AA-203, AA-302, and AA-303, the site-specific emission factors required by Condition 5.9 or Condition 5.17 shall be used to demonstrate compliance with the facility-wide limits according to the following procedures:
 - (1) Beginning on the date of initial start-up and ending on the date the site-specific emission factors required are established for a given pollutant, the permittee shall calculate emissions using the applicable emission factors presented in the application dated June 2025, including any subsequent revisions, and the actual throughput of torrefied wood or pellets, as applicable.
 - (2) The permittee shall calculate emissions using the site-specific emission factors and the actual throughput of torrefied wood or pellets, as applicable. The permittee shall revise and update the monthly emissions and consecutive 12-month rolling total emissions calculated in accordance with paragraph (a)(1) of this condition to reflect the site-specific emission factors.
 - (3) Any subsequent site-specific emission factors developed as a result of additional approved testing shall be used to calculate emissions from the month the test was conducted until such time additional testing is conducted resulting in an updated emission factor.
- (b) For all sources, including specific pollutants not otherwise required to be tested, the permittee shall either assume the actual emissions are equivalent to the potential emissions provided in the application dated June 2025, including any subsequent revisions, or utilize actual data (e.g., actual throughput, fuel usage, etc.) in conjunction with the emission factors specified in the application to determine compliance with the facility-wide emission limits.
- (c) The permittee shall maintain documentation that details any reference data used to validate calculated emissions (e.g., 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 Points AA-201, AA-202a, and AA-202b, the permittee shall monitor and record the date, time, and duration of every start-up, shutdown, idling, malfunction, or upset experienced by the Dryer or Torrefiers in which emissions are diverted to the Bypass Stack (Emission Point AA-204). Additionally, the permittee shall monitor and record the total duration of all periods during which the emissions from the Dryer and/or Torrefiers were vented to the Bypass Stack (Emission Point AA-204) in hours on both a monthly and consecutive 12-month rolling total basis.

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

- 5.5 For Emission Points AA-202a and AA-202b, the permittee shall monitor and record the total throughput of torrefied wood chips in oven-dried tons (ODT) on both a monthly and consecutive 12-month rolling total basis.

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

- 5.6 For Emission Point AA-203, the permittee shall operate and maintain the WESP and RTO according to the manufacturer's written instructions and recommendations. Following the initial performance testing required by Condition 5.7, the permittee shall use the operating parameters established pursuant to Conditions 5.10 and 5.12 in lieu of those recommended by the manufacturer. The permittee shall maintain documentation of the manufacturer's instructions and recommendations for each control device.

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

- 5.7 For Emission Point AA-203, the permittee shall conduct the following performance testing within 180 days after initial startup of the Rotary Dryer and Torrefiers. Subsequent performance testing shall be conducted within 25 months of the previous test or within six (6) months of exceeding 110% of the maximum torrefied wood production rate (in ODT/hr) of any prior testing (on a pollutant-by-pollutant basis), whichever date comes first.

- (a) VOC Destruction Efficiency – EPA Method 25A, or other EPA-approved alternative, measured at both the inlet and outlet to the RTO to demonstrate compliance with the VOC destruction efficiency standard specified in Condition 3.11;
- (b) VOC – EPA Other Test Method 26 (i.e., the Wood Products Protocol 1, “WPP1”);
- (c) PM (filterable) – EPA Method 5 (40 CFR Part 60, Appendix A), or other EPA-approved alternative;
- (d) PM₁₀ and PM_{2.5} (filterable + condensable) – EPA Method 201 or 201A and EPA Method 202 (40 CFR Part 51, Appendix M), or other EPA-approved alternative;
- (e) NO_x¹ – EPA Method 7 (40 CFR Part 60, Appendix A), or other EPA-approved alternative; and
- (f) CO¹ – EPA Method 10 (40 CFR Part 60, Appendix A), or other EPA-approved alternative.
- (g) Opacity – EPA Method 9 (40 CFR Part 60, Appendix A).

¹ NO_x and CO testing shall be conducted simultaneously.

Unless otherwise specified herein, the permittee shall comply with the requirements for Performance Tests found in 40 CFR 60.8, which requires conducting a minimum of three (3) separate test runs. The performance tests shall be conducted while both Torrefiers are in operation and the dried wood throughput is as close to maximum capacity as operating

conditions allow. Additionally, the performance tests shall be conducted while the permittee is burning syngas, to the maximum extent possible as dictated by operating conditions. The actual production rate (in ODT of torrefied wood) and amount of syngas and natural gas (in actual cubic feet) combusted shall be measured and recorded for each Torrefier during the performance test.

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

- 5.8 For Emission Point AA-203, the permittee shall conduct an initial performance test for the following hazardous air pollutants (HAPs) within 180 days after startup of the facility: acetaldehyde, acrolein, formaldehyde, hydrogen chloride, methanol, phenol, and propionaldehyde. The permittee shall use EPA-approved test methods, as outlined in the test protocol required by Condition 6.6.(a). Unless otherwise specified herein, the permittee shall comply with the requirements for Performance Tests found in 40 CFR 60.8, which requires conducting a minimum of three (3) separate test runs. The performance tests shall be performed as close to maximum capacity as operating conditions allow. The actual production rate (in ODT of pellets produced) shall be measured and recorded during the performance test.

Additionally, the performance tests shall be conducted while the permittee is burning syngas, to the maximum extent possible as dictated by operating conditions. The actual production rate (in ODT of torrefied wood) and amount of syngas and natural gas (in actual cubic feet) combusted shall be measured and recorded for each Torrefier during the performance test.

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

- 5.9 For Emission Point AA-203, for each pollutant tested, the permittee shall determine the pounds of pollutant per oven-dried ton (ODT) of torrefied wood processed during each test run and average the results to develop a site-specific emission factor in lb/ODT for each pollutant from the Dryer and Torrefaction Control System. The site-specific factor shall be submitted with the respective performance test report used to derive the factor.

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

- 5.10 For Emission Point AA-203, the permittee shall establish a minimum combustion chamber temperature for the RTO to demonstrate continuous compliance with the VOC destruction efficiency specified in Condition 3.11 by continuously monitoring and recording the combustion temperature (in degrees Fahrenheit) during each test run of the initial performance test. The minimum combustion chamber temperature shall be the average of all temperature measurements over the span of the total test runs. The temperature shall be measured and recorded at least once every 15 minutes during the test runs such that a minimum of four temperature values are available for each test run. The minimum combustion chamber temperature may be modified based on subsequent performance testing that demonstrates compliance with the minimum VOC destruction efficiency.

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

- 5.11 For Emission Point AA-203, the permittee shall install a gas temperature monitor in the combustion chamber of the thermal oxidizer or in the duct immediately downstream of the chamber before any substantial heat exchange occurs. The permittee shall continuously monitor the combustion chamber temperature for the RTO and calculate the 3-hour rolling average on an hourly basis (in degrees Fahrenheit). “Continuous” shall mean a temperature is recorded at least once every 15 minutes. The permittee shall meet the following requirements for the temperature monitoring device:
- (a) Locate the temperature sensor in a position that provides a representative temperature.
 - (b) Use a temperature sensor with a measurement sensitivity of 5 degrees Fahrenheit or 1.0 percent of the temperature value, whichever is larger.
 - (c) Before using the sensor for the first time or when relocating or replacing the sensor, perform a validation check by comparing the sensor output to a calibrated temperature measurement device or by comparing the sensor output to a simulated temperature.
 - (d) Conduct an accuracy audit every quarter and after every deviation. Accuracy audit methods include comparisons of sensor output to redundant temperature sensors, to calibrated temperature measurement devices, or to temperature simulation devices.
 - (e) Conduct a visual inspection of each sensor every quarter if redundant temperature sensors are not used.

To demonstrate compliance with requirements in (a) through (e) above, the permittee shall keep the manufacturer’s specifications for the temperature monitor and shall keep a log of validation checks, accuracy audits, and visual inspection (if required). The specifications and log shall be made readily available for review by the DEQ upon request.

The permittee shall record the 3-hour average temperature, as determined for each hour. Should the temperature fall below the minimum combustion chamber temperature established in Condition 5.10, the permittee shall take immediate corrective measures to restore the temperature above the minimum.

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

- 5.12 For Emission Point AA-203, the permittee shall establish minimum total power in Watts (W) for the WESP during the initial performance test for PM (filterable) to ensure efficient removal of particulate matter. The minimum total power shall be the average of all power measurements over the span of the total test runs. Power shall be determined by multiplying the WESP secondary voltage in kilovolts (kV) by the corresponding secondary current in milliamps (ma). The secondary voltage and secondary current shall be measured and recorded at least once every 15 minutes during the test runs such that a minimum of four power values are calculated for each test run. The minimum total power may be modified based on subsequent performance testing for PM (filterable).

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

- 5.13 For Emission Point AA-203, the permittee shall install devices for measuring the secondary voltage (in kilovolts) and secondary current (in milliamperes) to the WESP. The permittee shall continuously monitor the secondary voltage and secondary current and calculate the total power (in Watts), which shall be averaged hourly to determine the 3-hour rolling average. "Continuous" shall mean a secondary voltage and secondary current is recorded at least once every 15 minutes. The permittee shall maintain the measurement devices according to the manufacturer's written specifications and shall keep a log of all inspections, calibrations, and maintenance recommended by the manufacturer. The manufacturer's specifications and log shall be made readily available for review by the DEQ upon request.

The permittee shall record the 3-hour average total power to the WESP, as determined for each hour. Should the total power fall below the minimum total power established in Condition 5.12, the permittee shall take immediate corrective measures to restore the total power above the minimum.

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

- 5.14 For Emission Point AA-300, the permittee shall monitor and record the total production of wood pellets in ODT on both a monthly and consecutive 12-month rolling total basis.

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

- 5.15 For Emission Points AA-301, AA-302, AA-303, AA-401, AA-402, and AA-403, the permittee shall conduct a weekly inspection of each dust collector. Maintenance shall be performed as necessary to maintain proper operation of each dust collector at all times. The records from each inspection and any maintenance performed shall be kept in log form and made readily available for review by the DEQ upon request. The permittee shall also maintain sufficient equipment on-site to conduct any necessary maintenance, including replacement of bags or cartridges.

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

- 5.16 For Emission Points AA-301, AA-302, AA-303, AA-401, AA-402, and AA-403, the permittee shall monitor and record the pressure drop across each dust collector while operating the pellet production process. If a monitored pressure drop is outside the manufacturer's recommended range for the dust collector, the permittee shall immediately take corrective measures to return the dust collector to within the recommended pressure drop range. For each dust collector, the permittee shall initially monitor the pressure drop daily for six (6) months following startup of the facility. With exception of Emission Point AA-302, if there is no pressure drop reading outside the manufacturer's recommended pressure drop range for a given dust collector, the permittee may decrease the monitoring from daily to weekly. If a weekly reading falls outside the manufacturer's recommended pressure drop range, the permittee shall return to daily monitoring for at least 28 days before resuming weekly monitoring if there are no readings outside the manufacturer's recommended pressure drop range during the 28 days.

The permittee shall maintain a log identifying the dust collector, date, pressure drop reading, manufacturer's recommended range, and any corrective measures taken. The log shall be made readily available for review by the DEQ upon request

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

- 5.17 For Emission Points AA-302 and AA-303, the permittee shall conduct a performance test for VOC within 180 days after initial startup of the facility using EPA Other Test Method 26 (WPP1). Unless otherwise specified herein, the permittee shall comply with the requirements for Performance Tests found in 40 CFR 60.8, which requires conducting a minimum of three (3) separate test runs. The performance tests shall be performed as close to maximum capacity as operating conditions allow. The actual production rate (in ODT of pellets produced) shall be measured and recorded during the performance test.

Should VOC be measured at either emission point, the permittee shall use the pounds of VOC per oven-dried ton (ODT) of wood pellet produced during each test run and average the results to develop a site-specific emission factor in lb/ODT for the given emission point. The site-specific factor shall be submitted with the respective performance test report used to derive the factor. Additionally, the permittee shall revise the potential emissions provided in the application dated June 2025, or the most recent revision, to reflect emissions of VOC and any hazardous air pollutants (HAPs) measured during the performance test.

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

- 5.18 For Emission Point AA-502, the permittee shall install a non-resettable hour meter on the engine, if one is not already installed. The permittee shall keep records of the operation of the engine in emergency and non-emergency service that are recorded through the hour meter. The permittee shall record the time of operation and the reason the engine was in operation during that time.

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

- 5.19 For Emission Point AA-502, the permittee shall maintain records documenting the diesel fuel meets the requirements of 40 CFR 1090.305 for nonroad diesel fuel.

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

SECTION 6. REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1(a)	Report deviations within five (5) working days
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1(b)	Semiannual reporting
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1(c)	Certification by responsible official
	11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).	6.1(d)	Notification of beginning actual construction within 15 days
	11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).	6.1(e)	Notification when construction does not being or is suspended
	11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).	6.1(f)	Certification of completion of construction prior to operation
	11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).	6.1(g)	Notification of changes in construction
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.2	Submit initial Dust Management Plan prior to startup
		6.3	Report monthly and 12-month rolling total emissions of PM, PM ₁₀ , PM _{2.5} , NO _x , CO, and VOC
AA-201 AA-202a AA-202b	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.4	Report of date, time, and duration of startups, shutdowns, idling, malfunctions, and upsets resulting in a bypass to AA-204, including monthly hours of bypass and 12-month rolling total hours of bypass
AA-202a AA-202b AA-300	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.5	Monthly and 12-month rolling total amount of torrefied wood chip production and wood pellet production (in ODT)
AA-203 AA-302 AA-303	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.6	Performance test notification and reporting requirements
AA-203	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.7	Report of date, time, and duration temperature or total power fell below the established minimum and corrective measures taken
AA-301 AA-302 AA-303 AA-401 AA-402 AA-403	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.8	Submit a copy of the weekly inspection logs and daily pressure drop readings
AA-502	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.9	Annual report summarizing hours of operation in emergency and non-emergency use

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. 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).)

- (b) Beginning upon issuance of this permit and lasting until issuance or modification of the applicable operating permit, the permittee shall submit reports of any required monitoring by July 31st and January 31st for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 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 startup, 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 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).)

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

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

- (e) The permittee must notify DEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(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 copy of the Dust Management Plan developed according to Condition 5.2 to DEQ prior to startup of the facility. Any revisions to the Dust Management Plan shall be summarized in the semiannual report submitted in accordance with Condition 6.1(b). If no revisions are made, the permittee shall state such in the semiannual report.

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

- 6.3 For Emission Point AA-000 (Facility-Wide), in accordance with Condition 6.1(b), the permittee shall submit a semiannual report of the monthly and 12-month rolling total emissions of PM, PM₁₀, PM_{2.5}, NO_x, CO, and VOC calculated for each month in the semiannual reporting period. The basis for the emission factors and data used to calculate the monthly emissions shall be clearly identified in the report.

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

- 6.4 For Emission Points AA-201, AA-202a, and AA-202b, in accordance with Condition 6.1(b), the permittee shall submit a semiannual report containing the date, time, duration, and cause for each event during which emissions from the Rotary Dryer or Torrefiers are diverted to the Bypass Stack (Emission Point AA-204). The report shall also provide total monthly hours of bypass and 12-month rolling total for each month in the semiannual period.

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

- 6.5 For Emission Points AA-202a, AA-202b, and AA-300, in accordance with Condition 6.1(b), the permittee shall submit a semiannual report containing monthly total and 12-month rolling total torrefied wood chips produced in ODT and wood pellets produced in ODT for each month in the semiannual period.

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

- 6.6 For Emission Points AA-203, AA-302, and AA-303, the permittee shall comply with the following notification and reporting provisions.

- (a) The permittee shall submit a test protocol at least thirty (30) days prior to the scheduled test date to ensure that all test methods and procedures are acceptable to

DEQ. If the initial protocol is acceptable, subsequent protocols may be waived upon request by the permittee if they do not contain significant changes.

- (b) The DEQ shall be notified at least ten (10) days prior to the scheduled test date so that an observer may be present to witness the test(s).
- (c) The permittee shall submit results from any required stack tests to the DEQ within 60 days of the completion of any stack test required by this permit.
- (d) For Emission Point AA-203, the report shall include any parametric monitoring required to establish monitoring parameter values required by Conditions 5.10 and 5.12.
- (e) For Emission Points AA-203, AA-302, and AA-303, the report shall include the throughput or production measured during each test run and the calculated site-specific emission factor in lb/ODT.
- (f) The permittee shall submit written notification to the DEQ upon triggering additional performance testing as specified in Condition 5.7 no later than thirty (30) days after the applicable percentage increase occurs.

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

- 6.7 For Emission Point AA-203, in accordance with Condition 6.1(b), the permittee shall submit a semiannual report containing the date, time, and duration that any 3-hour average combustion temperature in the RTO or total power to the WESP fell below the minimum established during the most recent performance testing. The report shall also summarize the corrective measures taken to restore the temperature or total power, as applicable, above the established minimum.

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

- 6.8 For Emission Points AA-301, AA-302, AA-303, AA-401, AA-402, and AA-403, in accordance with Condition 6.1(b), the permittee shall submit a copy of the weekly inspection logs and all pressure drop readings, including any corrective measures taken, as required by Conditions 5.15 and 5.16.

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

- 6.9 For Emission Point AA-502, the permittee shall submit an annual report on January 31st for the preceding calendar year summarizing the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must 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.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)