

# STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

## THIS CERTIFIES THAT

Enviva, LLC – Enviva Bond  
2901 Highway 49  
Wiggins, Stone County, Mississippi

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

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

*Becky Simonson*

AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: March 14, 2023

Permit No.: 2540-00027

Modified: September 12, 2024

Modified: February 19, 2025 (Admin. Mod. – Transfer)

## SECTION 1. GENERAL CONDITIONS

- 1.1 This permit is for air pollution control purposes only.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
- 1.2 Any activities not identified in the application are not authorized by this permit.  
(Ref.: Miss. Code Ann. 49-17-29(1)(b))
- 1.3 The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for operating without a valid permit pursuant to State Law.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
- 1.4 It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(6).)
- 1.5 The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
- 1.6 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit, unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)
- 1.7 The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).)
- 1.8 The permit does not convey any property rights of any sort, or any exclusive privilege.

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

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

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

- 1.10 *Design and Construction Requirements:* The stationary source shall be designed and constructed so as to operate without causing a violation of any Applicable Rules and Regulations (without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards) and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries.

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

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

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

- 1.12 *Fugitive Dust Emissions from Construction Activities:* The construction of the stationary source shall be performed in such a manner so as to reduce fugitive dust emissions from construction activities to a minimum.

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

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

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

- (b) When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than that from which it originated or to violate any other provision of this permit, the MDEQ may order such corrected in a way that all air and gases or air and gas-borne material leaving the building or equipment are controlled or removed prior to discharge to the open air.

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

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

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

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

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

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

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

- 1.16 *Public Record and Confidential Information:* Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the MDEQ Office of Pollution Control.

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

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

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

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

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

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

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

- 1.20 *Certification of Construction:* A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee.

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

- 1.21 *Beginning Operation:* After certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Operating Permit or the application for issuance or modification of the State Permit to Operate (whichever is applicable) is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by Mississippi Administrative Code, Part 2, Title 11, Chapter 2, Rule 2.13.G.

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

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

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

- 1.23 *Operating Under a Permit to Construct:* Upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Operating Permit (whichever is applicable), the applicant may continue to operate under the terms

and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).)

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

(a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)

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

- (b) Start-ups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) Start-ups and shutdowns are part of normal source operation. Emission limitations apply during start-ups and shutdowns unless source specific emission limitations or work practice standards for start-ups and shutdowns are defined by an applicable rule, regulation, or permit.
  - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this Mississippi Administrative Code, Title 11, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for start-ups and shutdowns. Source specific emission limitations or work practice standards established for start-ups and shutdowns are subject to the requirements prescribed in Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 1.10.B.(2)(a) through (e).
  - (3) Where an upset as defined in Rule 1.2 occurs during start-up or shutdown, see the upset requirements above.

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

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

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

- 1.26 *Compliance Testing:* Regarding compliance testing:

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

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

## SECTION 2. EMISSION POINT DESCRIPTION

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

EMISSION POINT	DESCRIPTION
AA-000	Facility-Wide [Enviva Pellets Bond, LLC]
<b>AA-100</b>	<b>Raw Material Handling and Processing Operations</b>
AA-101	Debarker
AA-102	Log Chipping Operations
AA-103	Bark Hog
AA-104	Green Wood Handling Operations [consists of processing green chips delivered on-site]
AA-105	Three (3) Enclosed Green Screens
AA-106	Green Wood Chip Storage Piles
AA-107	Dry Shavings Handling Operations [consists of processing dry shavings delivered on-site; equipped with a baghouse]
AA-108	Dry Shavings Storage Silo [equipped with a baghouse]
AA-109	No. 1 Green Chip Storage Silo
AA-110	No. 2 Green Chip Storage Silo
AA-111	Bark Handling Operations [consists of processing bark delivered on-site]
AA-112	Bark Storage Pile
<b>AA-200</b>	<b>Wood Drying Operations</b>
AA-201	Five (5) Green Hammer Mills [emissions are controlled by Emission Point AA-202e or Emission Point AA-203e (as a back-up)]
AA-202a	No. 1 Rotary Drum Dryer [emissions are routed to the No.1 Wood Drying Control System]
AA-202b	No. 1 Rotary Drum Dryer Bypass Stack
AA-202c	No. 1 Wood Waste-Fired Furnace [max. heat input: 310.6 MMBTU / hour]
AA-202d	No. 1 Furnace Bypass Stack



EMISSION POINT	DESCRIPTION
AA-202e	No. 1 Wood Drying Control System [consists of – in series – one (1) wet electrostatic precipitator (WESP) and one (1) regenerative thermal oxidizer (RTO) equipped with six (6) natural gas-fired burners (max. heat input: 8.0 MMBTU / hour each) and a direct natural gas injection system (max. rate: 12.0 MMBTU / hour)]
AA-203a	No. 2 Rotary Drum Dryer [emissions are routed to No. 2 Wood Drying Control System]
AA-203b	No. 2 Rotary Drum Dryer Bypass Stack
AA-203c	No. 2 Wood Waste-Fired Furnace [Max. Heat Input: 310.6 MMBTU / Hour]
AA-203d	No. 2 Furnace Bypass Stack
AA-203e	No. 2 Wood Drying Control System [consists of – in series – one (1) wet electrostatic precipitator (WESP) and one (1) regenerative thermal oxidizer (RTO) equipped with six (6) natural gas-fired burners (max. heat input: 8.0 MMBTU / hour each) and a direct natural gas injection system (max. rate: 12.0 MMBTU / hour)]
AA-204	Off-Spec. and Fire Dump Management Operations [Dried material that does not achieve moisture specification is diverted to small storage piles and then transferred via front-end loaders to feed storage piles for reintroduction to the process; material will also be diverted to the fire dump in the event a spark is detected in the post-dryer conveyer systems]
<b>AA-300</b>	<b>Wood Pellet Production Operations</b>
AA-301	Dry Fiber Silo [emissions are controlled by the Pellet Mill Control System]
AA-302	Sixty (60) Dry Hammermills and Enclosed Hammermill Outfeed Conveyers [emissions are routed to the Pellet Mill Control System]
AA-303	Thirty-Two (32) Pellet Mills [emissions are routed to the Pellet Mill Control System]
AA-304	Eleven (11) Pellet Coolers and Cyclones [emissions are routed to the Pellet Mill Control System]
AA-305	Pellet Mill Control System [consists of a regenerative thermal oxidizer (RTO) that can also function as a regenerative catalytic oxidizer (RCO) – equipped with six (6) burners (max. heat input: 6.2 MMBTU / hour each)]
AA-306	Pellet Mill Building Vacuum System [equipped with a baghouse]
<b>AA-400</b>	<b>Finished Pellet Product Handling and Storage</b>
AA-401	Pellet Transfer Surge Bin [equipped with a baghouse]
AA-402	No. 1 Pellet Storage Silo [equipped with a baghouse]
AA-403	No. 2 Pellet Storage Silo [equipped with a baghouse]
AA-404	No. 3 Pellet Storage Silo [equipped with a baghouse]

EMISSION POINT	DESCRIPTION
AA-405	No. 4 Pellet Storage Silo [equipped with a baghouse]
AA-406	Finished Product Handling [equipped with a baghouse]
AA-407	Four (4) Truck Load-Out Spouts [equipped with a baghouse]
<b>AA-500</b>	<b>Auxiliary Equipment</b>
AA-501	305 HP (227 kw) Diesel-Fired Emergency Fire Water Pump Engine [total heat input: 2.14 MMBTU / hour; manufactured after June 2006]
AA-502	865 HP (645 kW) Diesel-Fired Emergency Generator Engine No. 1 [total heat input: 6.06 MMBTU / hour; manufactured after June 2006]
AA-503	865 HP (645 kW) Diesel-Fired Emergency Generator Engine No. 2 [total heat input: 6.06 MMBTU / hour; manufactured after June 2006]
AA-504	Paved and Unpaved Haul Roads [ <i>fugitive</i> ]
AA-505	Four (4) 2.5 MMBTU / Hour Natural Gas-Fired Dryer Line Duct Burners
AA-506a	500 Gallon Diesel Storage Tank No. 1
AA-506b	500 Gallon Diesel Storage Tank No. 2
AA-506c	185 Gallon Diesel Storage Tank
AA-506d	5,000 Gallon Diesel Storage Tank

### SECTION 3. EMISSION LIMITATIONS AND STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limitation / Standard
AA-000	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity	≤ 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)	$E = 4.1 \cdot (p^{0.67})$
	11 Miss. Admin. Code Pt. 2, R. 1.3.C.	3.4	All Pollutants	General Nuisance Clause
	11 Miss. Admin. Code Pt. 2, R. 1.8.A. 11 Miss. Admin. Code Pt. 2, R. 8.1. 40 CFR Part 63, Subpart B – Requirements for Control Technology Determinations for Major Sources in Accordance with Clean Air Act Sections, Sections 112(g) and 112(j) 40 CFR 63.40(b) and 63.43(g)(2)(iv); Subpart B	3.5	HAPs	General Applicability
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). <b>(PSD Avoidance Limits)</b>	3.6	PM (filterable)	249.0 tpy (Rolling 12-Month Total)
			PM <sub>10</sub> / PM <sub>2.5</sub> (filterable + condensable)	249.0 tpy (Rolling 12-Month Totals)
			NO <sub>x</sub>	249.0 tpy (Rolling 12-Month Total)
			CO	249.0 tpy (Rolling 12-Month Total)
			VOCs	249.0 tpy (Rolling 12-Month Total)
AA-201	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.7	PM / PM <sub>10</sub> / PM <sub>2.5</sub> VOCs	Emissions Control Requirement
AA-202a AA-203a AA-202c AA-203c	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). 11 Miss. Admin. Code Pt. 2, R. 1.10.B.	3.8	NO <sub>x</sub> PM / PM <sub>10</sub> / PM <sub>2.5</sub> CO VOCs	Operational Requirements <u>Start-Up and Shutdown Requirements:</u> Bypass Emissions for ≤ 50 Hours Total (Each Furnace and Dryer; Rolling 12-Month Total) <u>Idle Mode Requirements:</u> Bypass Emissions for ≤ 500 Hours (Each Furnace; Rolling 12-Month Total)]

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limitation / Standard
AA-202a AA-203a	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.9	Dried Wood Chip Throughput	1,201,995.0 ODT / Year (Total for Both Dryers; Rolling 12-Month Total)
AA-202c AA-203c	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.10	Fuel Source Restriction	Only Combust Uncontaminated Wood Waste (diesel fuel may be used during start-up activities)
AA-202e AA-203e AA-305	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). 11 Miss. Admin. Code Pt. 2, R. 1.8.C.	3.11	HAPs	95.0% Destruction Efficiency, Measured as VOCs (for RTO and RTO / RCO)
AA-300	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.12	Wood Pellet Production	1,201,995.0 ODT / Year (Rolling 12-Month Total)
		3.13	Final Moisture Content	3.0% or Greater (Monthly Average)
AA-501 AA-502 AA-503	11 Miss. Admin. Code Pt. 2, R. 1.3.D.(1)(a).	3.14	PM	0.6 lb. / MMBTU per Hour
	40 CFR Part 63, Subpart ZZZZ – NESHAP for Stationary Reciprocating Internal Combustion Engines 40 CFR 63.6585(a), (b), and 63.6590(c)(7); Subpart ZZZZ	3.15	HAPs	General Applicability
	40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Combustion Engines 40 CFR 60.4200(a)(2); Subpart IIII	3.16	NMHC + NO <sub>x</sub> CO PM	General Applicability
	40 CFR 60.4207(b); Subpart IIII	3.17	Fuel Requirement	15 ppm Sulfur Content (Max.) 40 Cetane Index (Min.) or 35% Aromatic Content (Max. – by volume)
	40 CFR 60.4209(a); Subpart IIII 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.18	Hours of Operation	Install Non-Resettable Hour Meter
	40 CFR 60.4211(f)(1) – (3); Subpart IIII	3.19	Operational Requirements	100 Hours / Calendar Year for Maintenance and Readiness Testing; 50 Hours / Calendar Year for Non-Emergency Situations
	40 CFR 60.4205(c) – Table 4 and 60.4206; Subpart IIII	3.20	NMHC + NO <sub>x</sub>	4.0 g / kW-hr (or 3.0 g / HP-hr)
AA-501			PM	0.20 g / kW-hr (or 0.15 g / HP-hr)

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limitation / Standard
AA-502 AA-503	40 CFR 60.4202(a)(2), 60.4205(b), and 60.4206; Subpart IIII Table 2 to Appendix I; Part 1039	3.21	NMHC + NO <sub>x</sub>	6.4 g / kW-hr
			CO	3.5 g / kW-hr
			PM	0.20 g / kW-hr
	40 CFR 60.4202(a)(2) and 60.4205(b); Subpart IIII 40 CFR 1039.105; Subpart B	3.22	Opacity (Smoke)	20% During Acceleration Mode 15% During Lugging Mode 50% During Peaks in Either Acceleration or Lugging Modes

3.1 For Emission Point AA-000 (Facility-Wide), except as otherwise specified herein, the permittee shall not cause or allow the emission of smoke into the open air from a point source or from any manufacturing / industrial process on-site that exceeds forty (40) percent opacity subject to the following exceptions:

- (a) Start-up operations may produce emissions that exceed 40% opacity for up to fifteen (15) minutes per start-up in any one (1) hour and not to exceed three (3) start-ups per stack in any twenty-four (24) hour period.
- (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed sixty (60) percent opacity and provided further that the aggregation duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any (1) one hour.

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

3.2 For Emission Point AA-000 (Facility-Wide), the permittee shall not discharge into the ambient air from a point source any contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity. This shall not apply to vision obscuration caused by uncombined water droplets.

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

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

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

Where “E” is the emission rate in pounds per hour and “p” is the process weight input rate in tons per hour. Conveyer 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 not cause or allow the emission of particles or any contaminants in sufficient amounts or of such duration from any process as to be injurious to humans, animals, plants, or property, or to be a public nuisance, or create a condition of air pollution.

Additionally, the permittee shall not cause the handling, transporting, or storage of any material in a manner, which allows or may allow unnecessary amounts of particulate matter to become airborne.

When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than that from which it originated or to violate any other provision of this regulation, the MDEQ may offer such corrected in a way that all air and gases or air and gas-borne material leaving the building or equipment are controlled or removed prior to discharge to the open air.

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

- 3.5 For Emission Point AA-000 (Facility-Wide), the permittee is a major source of hazardous air pollutants (HAPs) and subject to the case-by-case maximum achievable control technology (MACT) requirements of Section 112(g) of the Federal Clean Air Act. The permittee shall comply with the requirements of Section 112(g) in accordance with Mississippi Administrative Code, Title 11, Part 2, Chapter 8, Rule 8.1 and 40 CFR Part 63, Subpart B – Requirements for Control Technology Determinations for Major Sources in Accordance with Clean Air Act Sections, Section 112(g) and 112(j).

The permittee is also subject to and shall comply with applicable requirements found in 40 CFR Part 63, Subpart A – General Provisions.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.8.A. and R. 8.1.)

(Ref.: 40 CFR 63.40(b) and 63.43(g)(2)(iv); Subpart B)

- 3.6 For Emission Point AA-000 (Facility-Wide), the permittee shall limit the total emission of particulate matter (PM; filterable), particulate matter less than 10 microns ( $\mu\text{m}$ ) in diameter ( $\text{PM}_{10}$ ; filterable + condensable), particulate matter less than 2.5 microns ( $\mu\text{m}$ ) in diameter ( $\text{PM}_{2.5}$ ; filterable + condensable), carbon monoxide (CO), and volatile organic compounds (VOCs) from all applicable emission sources to be no more than 249.0 tons per year (tpy) based on a rolling 12-month total.

(Ref.: 11 Miss. Admin. Code Pt. 2, 2.2.B.(10). – PSD Avoidance Limits)

3.7 For Emission Point AA-201, the permittee shall operate the No. 1 Wood Drying Control System (Emission Point AA-202e) at all times that the Green Hammermills are in operation, except as outlined below:

- (a) In the event that Emission Point AA-202e malfunctions or becomes non-operational, emissions from the Green Hammermills shall be routed to the No. 2 Wood Drying Control System (Emission Point AA-203e).
- (b) If both Emission Points AA-202e and AA-203e simultaneously malfunction or become non-operational, the permittee shall cease operation of the Green Hammermills until either control system is fully operational.

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

3.8 For Emission Points AA-202a, AA-202c, AA-203a, and AA-203c, the permittee shall at all times direct emissions to the corresponding Wood Drying Control System (Emission Point AA-202e or AA-203e) except during periods of furnace start-up, furnace shutdown, and furnace idle.

- (a) During periods of furnace start-up and/or shutdown, the permittee may vent the emissions from each furnace to the corresponding Rotary Drum Dryer or Furnace Bypass Stack (Emission Points AA-202b and AA-202d; AA-203b and AA-203d) in accordance with the work practice standards outlined in Condition 4.1.
- (b) The total duration for all periods in which furnace emissions are vented to a corresponding Furnace Bypass Stack and Dryer Bypass Stack (Emission Points AA-202b and AA-203b; AA-202d and AA-203d) shall not exceed fifty (50) hours during any rolling 12-month period.

Once 50 hours are attained, the permittee shall either direct furnace emissions to the corresponding Wood Drying Control System (if fully operational) or cease all operations (including periods of start-up and shutdown) from the applicable furnace and dryer.

- (c) During periods of furnace idle mode, the permittee may vent the emissions from each furnace to the corresponding Furnace Bypass Stack in accordance with the work practice standards outlined in Condition 4.1 and for no more than five hundred (500) hours during any rolling 12-month period.

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

Once 500 hours are attained, the permittee shall either direct furnace emissions to the corresponding Rotary Drum Dryer (if fully operational) or cease all operations (including periods of idle mode) from the furnace.

The use of the Furnace or Dryer Bypass Stack for any purpose other than the furnace start-up, furnace shutdown, or furnace idle constitutes a deviation of this permit and is subject to the deviation reporting requirements specified in Condition 6.1(a).

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

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

- 3.9 For Emission Points AA-202a and AA-203a, the permittee shall limit the total throughput of green wood chips dried in the dryers to no more than 1,201,995.0 oven-dried tons (ODT) per year based on a rolling 12-month total.

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).)

- 3.10 For Emission Points AA-202c and AA-203c, the permittee shall only utilize uncontaminated wood waste as the primary fuel source for each furnace.

Additionally, the permittee shall utilize diesel fuel as the only accelerant for any cold start-up of a furnace and shall minimize the volume of diesel fuel used during any cold start-up to the best extent practicable.

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

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

- 3.11 For Emission Points AA-202e, AA-203e, and AA-305, the permittee shall operate each regenerative thermal oxidizer (RTO) or RTO / regenerative catalytic oxidizer (RCO) [which can operate as either a RTO or a RCO] in such a manner as to achieve (at a minimum) ninety-five (95.0) percent destruction efficiency of hazardous air pollutant (HAP) emissions, measured as VOCs, across each control device.

The use of a RTO or RTO / RCO to achieve 95.0% destruction efficiency (at a minimum) of HAPs has been determined to satisfy the case-by-case MACT requirements of Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 1.8.

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

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

- 3.12 For Emission Point AA-300, the permittee shall limit the total production of wood pellets to no more than 1,201,995.0 oven-dried tons (ODT) per year based on a rolling 12-month total.

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



- 3.13 For Emission Point AA-300, the permittee shall limit the final moisture content of wood pellets to 3.0% or greater based on a monthly average.

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

- 3.14 For Emission Points AA-501, AA-502, and AA-503, the maximum permissible emission of ash and/or particulate matter (PM) from any fossil fuel burning installation less than ten (10) MMBTU per hour heat input shall not exceed 0.6 pounds per MMBTU per hour heat input.

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

- 3.15 For Emission Points AA-501, AA-502, and AA-503, the permittee is subject to and shall comply with the applicable requirements found in 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE) and 40 CFR Part 63, Subpart A – General Provisions (as required by Table 8 of Subpart ZZZZ).

For the purpose of this permit, stationary RICE is classified as “new” if construction or reconstruction commenced on / after June 12, 2006.

For new compression-ignition RICE (Emission Points AA-501, AA-502, and AA-503), the permittee shall comply with the applicable requirements in Subpart ZZZZ by complying with 40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition (CI) Combustion Engines. With the exception of the initial notification requirement for Emission Points AA-502 and AA-503 pursuant to 40 CFR 6590(b)(1), no further requirements apply for such engines under Subpart ZZZZ.

(Ref.: 40 CFR 63.6585(a), (b), and 63.6590(c)(7); Subpart ZZZZ)

- 3.16 For Emission Points AA-501, AA-502, and AA-503, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines and 40 CFR Part 60, Subpart A – General Provisions (as required by Table 8 of Subpart IIII).

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

- 3.17 For Emission Points AA-501, AA-502, and AA-503, the permittee shall only combust diesel fuel within each engine that meet the following requirements (on a per-gallon basis):

- (a) A maximum sulfur content of fifteen (15) parts per million (ppm); and
- (b) A minimum cetane index of forty (40) or a maximum aromatic content of thirty-five (35) volume percent.

(Ref.: 40 CFR 60.4207(b); Subpart IIII)

- 3.18 For Emission Points AA-501, AA-502, and AA-503, the permittee shall install a non-resettable hour meter on each engine regardless of whether the permittee is required to do so by a Federal Regulation.

(Ref.: 40 CFR 60.4209(a); Subpart IIII and 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).)

- 3.19 For Emission Points AA-501, AA-502, and AA-503, any operation of the engine for any reason other than emergency operation, maintenance and testing, and operation in non-emergency situations for fifty (50) hours per year is prohibited. If an engine is not operated in accordance with paragraphs (a) through (c) of this condition, the engine will not be considered an emergency engine under the applicable regulation and shall meet all requirements for a corresponding non-emergency engine.

- (a) There is no time limit on the use of an engine in emergency situations.
- (b) The permittee may operate an engine for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, or the insurance company accompanied with the engine. Maintenance checks and readiness testing of an engine is limited to a maximum of one hundred (100) hours per calendar year. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing. However, a petition is not required if the permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of the engine beyond 100 hours per calendar year.
- (c) The permittee may operate an engine 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. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to 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)

- 3.20 For Emission Point AA-501, the permittee shall not discharge into the atmosphere any gases that contain the following pollutants in excess of the corresponding emission standards:

- (a) Non-Methane Hydrocarbons + Nitrogen Oxides (NMHC + NO<sub>x</sub>): 4.0 grams per kilowatt-hour (or 3.0 grams per horsepower-hour); and
- (b) Particulate Matter (PM): 0.20 grams per kilowatt-hour (or 0.15 grams per horsepower-hour).

The engine shall be installed and configured in accordance with the manufacturer's emission-related specifications. Additionally, the permittee shall operate and maintain the

engine in such a manner to achieve the referenced emission standards over the entire life of the engine.

(Ref.: 40 CFR 60.4205(c), 60.4206, and Table 4; Subpart IIII)

3.21 For Emission Points AA-502 and AA-503, the permittee shall comply with the following emission standards:

- (a) Non-Methane Hydrocarbons and Nitrogen Oxides (NMHC + NO<sub>x</sub>): 6.4 grams per kilowatt-hour (g / kW-hr);
- (b) Carbon Monoxide (CO): 3.5 grams per kilowatt-hour; and
- (c) Particulate Matter (PM): 0.20 grams per kilowatt-hour.

The permittee shall operate and maintain each engine in such a manner to achieve the referenced emission standards over the entire life of the engine.

(Ref.: 40 CFR 60.4202(a)(2), 60.4205(b), and 60.4206; Subpart IIII)

(Ref.: Table 2 in Appendix I; Part 1039)

3.22 For Emission Points AA-502 and AA-503, the permittee shall not discharge into the atmosphere smoke exhaust that exceeds the following opacity standards:

- (a) Twenty (20) percent during acceleration mode;
- (b) fifteen (15) percent during lugging mode; and
- (c) Fifty (50) percent during the peaks in either the acceleration or lugging modes.

The permittee shall operate and maintain the engine in such a manner to achieve the reference emission standards over the entire life of the engine.

(Ref.: 40 CFR 60.4202(a)(2) and 60.4205(b); Subpart IIII)

(Ref.: 40 CFR 1039.105; Subpart B)

## SECTION 4. WORK PRACTICE STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Work Practice Standard
AA-000	40 CFR 63.6(e)(1)(i) – (ii); Subpart A 11 Miss. Admin. Code Pt. 2, R. 1.10.B.	4.1	General Duty Clause
AA-501 AA-502 AA-503	40 CFR 60.4211(a); Subpart IIII	4.2	Perform Compliance Practices

- 4.1 For Emission Point AA-000 (Facility-Wide), the permittee shall operate and maintain any affected source (including associated air pollution control equipment and monitoring equipment) in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times (including periods of start-up, shutdown, and malfunction).

During a period of start-up, shutdown, or malfunction, this general duty to minimize emissions requires that the permittee reduce emissions from any affected source to the greatest extent that is consistent with safety and good air pollution control practices. However, the general duty to minimize emissions during a period of start-up, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times if this is not consistent with safety and good air pollution control practices, nor does it require the permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved.

The determination of whether such operation and maintenance procedures are being used will be based on information available to the MDEQ that may include (but not limited to) monitoring results, review of operation and maintenance procedures (including the “Start-up, Shutdown, and Malfunction Plan” required in Condition 5.2), review of operation and maintenance records, and inspection of the source.

Malfunctions must be corrected as soon as practicable after their occurrence. To the extent that an unexpected event arises during a start-up, shutdown, or malfunction, the permittee shall comply by minimizing emissions during such a start-up, shutdown, malfunction, and shutdown event consistent with safety and good air pollution control practices.

(Ref.: 40 CFR 63.6(e)(1)(i) – (ii); Subpart A and 11 Miss. Admin. Code Pt. 2, R. 1.10.B.)

- 4.2 For Emission Points AA-501, AA-502, and AA-503, the permittee shall demonstrate compliance with the emission standards specified in Conditions 3.20 through 3.22 by performing the following work practices:

- (a) Operate and maintain each engine and control device (if any) 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 Part 1068 (as applicable).
- (Ref.: 40 CFR 60.4211(a); Subpart IIII)

## SECTION 5. MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	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 Five (5) Years
	40 CFR 63.6(e)(3)(i); Subpart A	5.2	HAPs	Develop and Implement Start-Up, Shutdown, and Malfunction Plan
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.3	PM / PM <sub>10</sub> / PM <sub>2.5</sub>	Develop and Implement a Dust Management Plan
		5.4	NO <sub>x</sub> PM / PM <sub>10</sub> / PM <sub>2.5</sub> VOCs CO	Calculate the Total Emission of Applicable Pollutants (Monthly and Rolling 12-Month Totals)
AA-202a AA-203a	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.5	Dried Wood Chip Throughput	Monitor the Total Throughput (Monthly and Rolling 12-Month Total)
AA-202b AA-202d AA-203b AA-203d	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.6	Hours of Duration	Monitor the Date, Time, and Duration of Each Start-Up / Shutdown Period Calculate the Total Duration of All Start-Up / Shutdown Periods (Rolling 12-Month Total)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.7	Hours of Duration (Idle Mode)	Monitor and Record Date, Time, and Duration of Idle Mode Periods Calculate Total Duration of All Idle Mode Periods (Rolling 12-Month Total)
AA-202e AA-203e AA-305 AA-401 through AA-407	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.8	Opacity	Conduct a Visible Emission Observation Weekly
AA-202e AA-203e AA-305	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.9	Total Power Combustion Chamber Temperature	Install, Calibrate, Monitor, Operate, and Inspect Continuous Monitoring / Recording System for Operating Parameters
		5.10		Air Pollution Control Device Operational Specifications

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Monitoring / Recordkeeping Requirement
AA-202e AA-203e AA-305	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11). 40 CFR 63.43(l)(1); Subpart B	5.11	PM (filterable) PM <sub>10</sub> / PM <sub>2.5</sub> (filterable + condensable)	Initial Performance Test Requirements
		5.12	CO HAPs (measured as VOCs) NO <sub>x</sub>	Conduct Subsequent Performance Testing
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.13	PM / PM <sub>10</sub> / PM <sub>2.5</sub> VOC CO NO <sub>x</sub>	Establish Site-Specific Emission Factors
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11). 40 CFR 63.43(l)(1); Subpart B	5.14	VOCs HAPs	Establish a Minimum Combustion Chamber Temperature (Each RTO and RTO / RCO)
		5.15	Combustion Chamber Temperature	Continuously Monitor the Combustion Chamber Temperature (3-Hour Block Average)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.16	PM / PM <sub>10</sub> / PM <sub>2.5</sub>	Establish the Minimum Total Power for Each WESP
AA-202e AA-203e		5.17	Secondary Voltage	Continuously Monitor the Total Power (Each WESP) (3-Hour Block Average)
AA-300	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.18	Wood Pellet Production	Monitor Total Production (Monthly and Rolling 12-Month Total)
		5.19	Final Moisture Content	Monitor the Moisture Content of All Wood Pellets Produced Daily Calculate the Moisture Content on Monthly Average
		5.20	VOCs HAPs	Conduct Routine Testing to Determine Apparent Media Density and Percent Saturation of Catalytic Media (RCO Mode)
AA-401 through AA-407	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.21	PM / PM <sub>10</sub> / PM <sub>2.5</sub>	Conduct an Inspection on Each Baghouse and Bin Vent Monthly
AA-501 AA-502 AA-503	40 CFR 60.4214(b); Subpart III 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.22	Emergency Engine Status	Monitor Hours of Operation Monthly (Emergency and Non-Emergency)

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Monitoring / Recordkeeping Requirement
AA-501 AA-502 AA-503	40 CFR 60.4114(a)(2)(i) – (iii); Subpart IIII  11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.23	NMHC + NO <sub>x</sub>  CO  PM	Recordkeeping Requirements
	40 CFR 60.4211(g)(2) and (3); Subpart IIII	5.24		Perform Compliance Actions (As Applicable)

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

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

- 5.2 For Emission Point AA-000 (Facility-Wide), the permittee shall develop, maintain, and implement a “Start-Up, Shutdown, and Malfunction Plan” (SSMP) that details the procedures for operating and maintaining the applicable emissions equipment during periods of start-up, shutdown, and malfunction as well as a program of corrective action(s) for any malfunctioning equipment (i.e. air pollution control equipment, monitoring equipment, and/or process equipment) used to comply with the case-by-case MACT determination under Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 1.8.A.

The purpose of the SSMP is to ensure the following actions:

- (a) At all times, the permittee shall operate and maintain all applicable emission sources (including all associated air pollution control and monitoring equipment) in a manner that satisfies the general duty to minimize emissions established in Condition 4.1;
- (b) The permittee is prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize the excess emission of HAPs; and
- (c) Reduce the reporting burden associated with periods of start-up, shutdown, and malfunction (including corrective action taken to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation).

(Ref.: 40 CFR 63.6(e)(3)(i); Subpart A)

- 5.3 For Emission Point AA-000 (Facility-Wide), the permittee shall develop, maintain, and implement a “Dust Management Plan” (DMP) that details the procedures for routinely



operating, evaluating and maintaining applicable emission sources to minimize the emission of fugitive particulate matter.

Additionally, the permittee shall maintain documentation that details the results of any inspection, evaluation, survey, or corrective / maintenance actions completed in accordance with the DMP. As deemed necessary, the permittee shall revise the DMP 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).)

- 5.4 For Emission Point AA-000 (Facility-Wide), the permittee shall calculate and record the total respective emission of NO<sub>x</sub>, PM (filterable), PM<sub>10</sub> (filterable + condensable), PM<sub>2.5</sub> (filterable + condensable), VOCs, and CO from all applicable emission sources in tons both on a monthly and rolling 12-month total basis in accordance with the following specifications:

- (a) Beginning on the date of initial start-up and ending on the date in which the emission factors required by Condition 5.13 are established, the permittee shall calculate emissions from the Wood Drying Control Systems (Emission Points AA-202e and AA-203e) and the Pellet Mill Control System (Emission Points AA-305) using the applicable emission factors presented in the application for this proposed project.
- (b) Upon approval of the site-specific emission factors, the permittee shall calculate and record emissions from the Wood Drying Control Systems and the Pellet Mill Control System using collected production data, collected parametric monitoring data, and the established site-specific emission factors.

Additionally, the permittee shall revise and update the monthly emissions and rolling 12-month total emissions calculated in accordance with paragraph (a) of this condition to reflect the established site-specific emission factors.

- (c) For all sources not otherwise specified, the permittee shall either assume actual emissions are equivalent to potential emissions or utilize actual data (e.g. throughput or fuel usage) in conjunction with the emission factors specified in the application for the specified project to determine compliance with the emission limitations specified in Conditions 3.6.
- (d) Unless otherwise specified herein, the permittee shall maintain documentation that detail any reference data utilized to validate calculated emissions (operational data, applicable emission factors, engineering judgement determinations, performance test results, etc.).

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

- 5.5 For Emission Points AA-202a and AA-203a, the permittee shall monitor and record the total throughput of all wood chips dried within the dryers in oven-dried tons (ODT) on both a monthly and rolling 12-month total basis.

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

- 5.6 For Emission Points AA-202b, AA-202d, AA-203b, and AA-203d, the permittee shall monitor and record the date, time, and duration of every start-up and shutdown period experienced by each dryer / furnace in which emissions are diverted to the corresponding bypass stack. Additionally, the permittee shall calculate and record the total duration of all start-up and shutdown periods for each dryer / furnace in hours per year based on a rolling 12-month total.

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

- 5.7 For Emission Points AA-202b, AA-202d, AA-203b, and AA-203d, the permittee shall monitor and record the date, time, and duration of every period that each furnace operates in idle mode. Additionally, the permittee shall calculate and record the total duration of all idle mode periods for each furnace in hours per year based on a rolling 12-month total.

During any period that a furnace operates in idle mode, the permittee shall monitor the number of fuel pushes and calculate the hourly heat input rate based on a 3-hour block average.

For the purpose of this permit, a “*fuel push*” is defined as the conveyance of a definitive volume of wood waste onto the furnace grate.

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

- 5.8 For Emission Points AA-202e, AA-203e, AA-305, and AA-401 through AA-407, the permittee shall perform a visible emission observation in accordance with EPA Test Method 22 on the exhaust of each source on a weekly basis during daylight hours and during representative operating conditions. Each observation shall be performed for a minimum of six (6) consecutive minutes.

If visible emissions are detected during an observation, the permittee shall immediately perform a visible emissions evaluations (VEE) in accordance with EPA Test Method 9. However, in lieu of performing a VEE, the permittee may assume that the visual opacity of emissions from a source exceed the applicable limitation (i.e. Condition 3.1 or 3.2) and immediately implement corrective actions.

In the event that a VEE is required but cannot be conducted, the permittee shall record a written explanations as to why it was not possible to perform the VEE.

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

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

- 5.9 For Emission Points AA-202e, AA-203e, and AA-305, the permittee shall install, calibrate, operate, maintain, and inspect a continuous monitoring system for the operating parameter

specified for each of the following control devices in accordance with the manufacturer's recommendations:

- (a) Wet Electrostatic Precipitator (WESP) – total power (in kilowatts);
- (b) Regenerative Thermal Oxidizer (RTO) – combustion chamber temperature (in degrees Fahrenheit); and
- (c) Regenerative Thermal Oxidizer / Regenerative Catalytic Oxidizer (RTO / RCO) – combustion chamber temperature (in degrees Fahrenheit)

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

- 5.10 For Emission Points AA-202e, AA-203e, and AA-305, the permittee shall operate and maintain each air pollution control device within the noted control systems in accordance with the specified manufacturer's instructions / recommendations until such a time as the applicable operating parameters required by Conditions 5.14 and 5.16 are established.

Additionally, the permittee shall maintain documentation that details the manufacturer's instructions / recommendations for each control device.

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

- 5.11 For Emission Points AA-202e, AA-203e, and AA-305, the permittee shall demonstrate compliance with the HAP destruction efficiency standard [measured as VOCs] specified in Conditions 3.11 by conducting an initial performance test on each control system no later than one hundred eighty (180) days after the initial start-up of the system.

In addition to the aforementioned initial compliance demonstration, the permittee shall conduct performance testing to evaluate the emission of NO<sub>x</sub>, CO, PM (filterable), PM<sub>10</sub> (filterable), PM<sub>2.5</sub> (filterable), and condensable PM at the respective exhaust points by the deadline specified above. The testing for NO<sub>x</sub> and CO shall be performed during the same test runs.

All testing shall be conducted in accordance with the following requirements:

- (a) All performance testing shall be conducted in accordance with an applicable EPA-approved test method found in Appendix A of 40 CFR Part 60, Appendix M of 40 CFR Part 51, Appendix A of 40 CFR Part 63, or an applicable alternative test method approved by EPA prior to the testing event.
- (b) The permittee shall conduct a minimum of three (3) separate test runs for a performance stack test as specified in 40 CFR 63.7(e)(3), Subpart A.
- (c) The permittee shall conduct the initial performance test while the dried wood throughput and/or the wood pellet throughput is at no less than ninety (90.0) percent of the maximum permitted equipment production capacity and no less than one hundred (100.0) percent by weight of softwood usage as a feedstock. The actual

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

If the permittee has not achieved 90.0% of the maximum permitted equipment production capacity or 100% by weight of softwood usage as a feedstock within 180 days after the initial start-up of a corresponding control system, the permittee shall conduct the initial performance test on the source while operating at the maximum achievable capacities up to that point. Thereafter, the permittee shall conduct subsequent performance testing in accordance with the specifications of this condition no later than ninety (90) days after satisfying at least one of the following stipulations:

- (1) The monthly average dried wood throughput or wood pellet production increases by more than ten (10.0) percent above the capacity established during the prior performance testing (until achieving no less than 90.0% of the maximum permitted equipment production capacity);
- (2) The monthly average weight percent of softwood used as a feedstock increases by more than ten (10.0) percent above that measured during the prior performance testing (until achieving no less than 100% by weight of softwood usage as a feedstock); or
- (3) The monthly average moisture content of the wood pellets decreases by more than one (1.0) percent below the moisture content measured during the prior performance testing [not to decrease below 3.0% moisture content].

If the permittee meets the minimum HAP destruction efficiency specified in Condition 3.11 during the initial performance test, the permittee may request that the evaluation of VOC emissions be conducted at the respective exhaust point (in lieu of performing VOC destruction efficiency testing) for any subsequent testing prompted by paragraph (c)(2) or (c)(3) of this condition.

- (d) For the Wood Drying Control Systems and the Pellet Mill Control System: the permittee shall demonstrate compliance with the HAP efficiency standard by simultaneously measuring the VOC concentration at both the inlet and outlet of each RTO or RTO / RCO.
- (e) For the Wood Drying Control Systems: the permittee shall not inject natural gas directly into the pollutant stream during the initial performance testing for NO<sub>x</sub> emissions.
- (f) For the No. 1 Wood Drying Control System: the permittee shall monitor and record hourly throughput data on the green wood chips processed in the Green Hammermills (Emission Point AA-201) and wood chips dried by the No. 1 Rotary Drum Dryer (Emission Point AA-201a) during a performance test.

For the No. 2 Wood Drying Control System: the permittee shall monitor and record hourly throughput data on the wood chips dried by the corresponding Rotary Drum Dryer (Emission Points AA-203a) during a performance test.

- (g) For the Pellet Mill Control System: the permittee shall monitor and record hourly throughput data in ODT of wood pellets produced during a performance test.
- (h) For the Pellet Mill Control System: in addition to the above-mentioned requirements, the permittee shall conduct the initial performance testing on the RTO / RCO in accordance with the following requirements:
  - (1) The permittee shall demonstrate compliance with the respective HAP destruction efficiency for each oxidizer control mode. Upon completing the initial compliance demonstration for the oxidizer operating in thermal mode (RTO) or catalytic mode (RCO), the subsequent compliance demonstration is required no later than ninety (90) days after commencing operation of the auxiliary control mode.
  - (2) The permittee shall evaluate the emission of PM, PM<sub>10</sub>, and PM<sub>2.5</sub> while operating the oxidizer in thermal mode or catalytic mode.
  - (3) The permittee must evaluate the emission of NO<sub>x</sub> and CO while operating the oxidizer in thermal mode.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11). and 40 CFR 63.43(l)(1); Subpart B)

- 5.12 For Emission Points AA-202e, AA-203e, and AA-305, unless otherwise required herein, the permittee shall conduct subsequent performance testing to demonstrate compliance with the HAP destruction efficiency standard [measured as VOCs] specified in Condition 3.11 no later than twenty-five (25) months after the previously completed performance test.

Additionally, the permittee shall conduct subsequent performance testing to evaluate the respective emission of PM (filterable), PM<sub>10</sub> (filterable), PM<sub>2.5</sub> (filterable), condensable PM, NO<sub>x</sub>, and CO on the same frequency specified above.

The testing for NO<sub>x</sub> and CO shall be performed during the same test runs. Moreover, all testing shall be conducted in accordance with the specifications outlined in Condition 5.11(a), (b), (d), (f), and (g) (as applicable).

The permittee shall utilize both the test results and applicable throughput data collected during the testing event to create site-specific emission factors for noted pollutants in pounds per oven-dried tons (ODT) in accordance with Condition 5.13. If the converted results exceed any of the already approved site-specific emission factors, the permittee shall submit the new emission factors in accordance with Condition 6.6.

If the converted results are lower than the approved site-specific emission factors, the permittee may submit the new emission factors in accordance with Condition 6.6.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11). and 40 CFR 63.43(l)(1); Subpart B)

- 5.13 For Emission Points AA-202e, AA-203e, and AA-305, the permittee shall utilize both the test results and applicable throughput data collected during the testing event to determine site-specific emission factors for PM, PM<sub>10</sub>, PM<sub>2.5</sub>, VOCs, NO<sub>x</sub>, and CO in pounds per oven-dried tons (ODT) upon completing a performance test as required by Condition 5.11 or 5.12 (as applicable). The permittee shall establish these emission factors in accordance with the following requirements:

- (a) For the Wood Drying Control Systems and the Pellet Mill Control System: the permittee shall establish a VOC site-specific emission factor for each control system based on a modified EPA OTM-26:

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

Where:

$EF_{VOC}$  = the site-specific emission factor for VOCs, pound per ODT;

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

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

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

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

$\overline{M}_{Throughput}$  = the average throughput rate of applicable material (i.e. green wood chips processed, dried wood chips, wood pellets) during performance testing, in ODT per hour.

- (b) For the No. 1 Wood Drying Control System: all site-specific emission factors shall be based on the pounds of pollutant per combined ODT of dried wood chips from the No. 1 Rotary Drum Dryer (Emission Point AA-202a) and green wood chips processed in the Green Hammermills (Emission Point AA-201).

For the No. 2 Wood Drying Control System: all site-specific emission factors shall be based on the pounds of pollutant per ODT of dried wood chips from the corresponding Rotary Drum Dryer.

- (c) For the Pellet Mill Control System: all site-specific emission factors shall be based on the pounds of pollutant per ODT of wood pellets produced.
- (d) For the Pellet Mill Control System: the unit-specific emission factors for NO<sub>x</sub> and CO shall be based on testing conducted while operating the oxidizer in thermal mode.

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

- 5.14 For Emission Points AA-202e, AA-203e, and AA-305, the permittee shall establish a minimum combustion chamber temperature for each RTO or RTO / RCO (in degrees Fahrenheit) to demonstrate continuous compliance with the HAP destruction efficiency specified in Condition 3.11 by continuously monitoring and recording the combustion temperature 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 minimum combustion chamber temperature may be modified based on subsequent performance testing that demonstrates compliance with the minimum HAP destruction efficiency in accordance with the specifications outlined in Condition 5.12.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11). and 40 CFR 63.43(l)(1); Subpart B)

- 5.15 For Emission Points AA-202e, AA-203e, and AA-305, the permittee shall continuously monitor and record the combustion chamber temperature for each RTO or RTO / RCO (in degrees Fahrenheit) based on a 3-hour block average.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11). and 40 CFR 63.43(l)(1); Subpart B)

- 5.16 For Emission Points AA-202e and AA-203e, the permittee shall establish an operational minimum total power (in kilowatts) for each wet electrostatic precipitator (WESP) during each initial PM-based performance test required by Condition 5.11 to maximize the removal of particular matter.

The “minimum total power” shall be based on the average minimum values measured over the span of the total test runs. The minimum total power may be modified based on subsequent performance testing as required by Condition 5.12 for PM, PM<sub>10</sub>, and PM<sub>2.5</sub>.

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

- 5.17 For Emission Points AA-202e and AA-203e, the permittee shall continuously monitor and record the total power (in kilowatts) of each WESP based on a 3-hour block average.

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

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

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

- 5.19 For Emission Point AA-300, the permittee shall demonstrate compliance with the final moisture content limit specified in Condition 3.13 by monitoring the final moisture content of wood pellets produced on a daily basis. This monitoring data shall also be utilized to determine the final moisture content of the wood pellets produced based on a monthly average.

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

- 5.20 For Emission Point AA-305, the permittee shall monitor the effective life of the catalytic media in the RTO / RCO when operating in catalytic mode by determining the apparent density (in grams per cubic centimeter) and percent saturation no later than sixteen (16) months after the initial start-up of the RTO / RCO in catalytic mode in accordance with the manufacturer's recommendations. Thereafter, the permittee shall perform subsequent apparent density testing on the catalytic media no later than 16 months after the previously completed test.

Additionally, the permittee shall maintain documentation that details the manufacturer's recommendations on each catalytic media used.

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

- 5.21 For Emission Points AA-401 through AA-407, the permittee shall perform an inspection that evaluates the performance capability of each baghouse and bin vent on a monthly basis. If a problem is noted during an inspection, the permittee shall perform the necessary maintenance to ensure operation as originally designed. Additionally, the permittee shall maintain on-site (to the extent practicable) sufficient components as is necessary to repair a baghouse or bin vent.

The permittee shall maintain documentation that details the date / time of each inspection the results of each inspection, any problem that is experienced, any maintenance (either corrective or preventative) performed to return a baghouse or bin vent to operation as originally designed, and the duration in which a baghouse is non-operational due to malfunction.

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

- 5.22 For Emission Points AA-501, AA-502, and AA-503, the permittee shall monitor and record (via a non-resettable hour meter) the hours of operation for each engine on a monthly basis for both emergency and non-emergency service. Additionally, the permittee shall detail (in writing) and maintain what classified each occurrence as either an emergency or a non-emergency.

(Ref.: 40 CFR 60.4214(b); Subpart IIII and 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).)

- 5.23 For Emission Points AA-501, AA-502, and AA-503, the permittee shall maintain documentation that details the following information:

(a) All notifications submitted must comply with Subpart IIII;



- (b) Any maintenance conducted on an engine; and
- (c) Documentation from the manufacturer that indicate an engine is certified to meet the emission standards specified in Conditions 3.20, 3.21, and 3.22.

(Ref.: 40 CFR 60.4114(a)(2); Subpart IIII)

5.24 For Emission Point AA-501, AA-502, and AA-503, the permittee shall demonstrate compliance through the emission standards specified in Condition 3.20, 3.21, and 3.22 through the following actions **if** the permittee does not operate and maintain the engine according to the manufacturer's emission-related written instructions or the permittee changes emission-related settings in a way that is not permitted by the manufacturer:

- (a) Keep a maintenance plan, records of conducted maintenance, and (to the extent practicable) maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.
- (b) For Emission Point AA-501 – the permittee shall conduct an initial performance test to demonstrate compliance with the applicable emission standards in accordance with one of the following deadlines:
  - (1) Within one (1) year of start-up, or
  - (2) Within one (1) year after the engine is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or
  - (3) Within one (1) year after the permittee changes emission-related settings in a way that is not permitted by the manufacturer;
- (c) For Emission Point AA-502 and AA-503 – in addition to paragraphs (a) and (b) of this condition, the permittee shall conduct subsequent performance testing either every 8,760 hours of engine operation or three (3) years (whichever comes first).

Any required performance test shall be conducted in accordance with the procedures outlined in 40 CFR 60.4212(a) – (c); Subpart IIII (as applicable).

(Ref.: 40 CFR 60.4211(g)(2) and (3); Subpart IIII)

## SECTION 6. REPORTING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Reporting Requirement
AA-000	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.1(a)	Report Deviations Within Five (5) Working Days
		6.1(b)	Semi-Annual Reporting Requirements
		6.1(c)	Submit Certifications Signed By a Responsible Official
	11 Miss. Admin. Code Pt. 2, R. 2.5.C.(2).	6.1(d)	Submit a Notification on Beginning Actual Construction
	11 Miss. Admin. Code Pt. 2, R. 2.5.C.(3).	6.1(e)	Submit a Notification When Construction Does Not Begin or Is Suspended
	11 Miss. Admin. Code Pt. 2, R. 2.5.D.(1) and (3).	6.1(f)	Submit a Certification on the Completion of Construction Prior to Operation
	11 Miss. Admin. Code Pt. 2, R. 2.5.D.(2).	6.1(g)	Submit a Notification on Changes in Construction
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.2	Submit a Semi-Annual Monitoring Report
		6.3	Submit the Initial Start-Up, Shutdown, and Malfunction Plan
		6.4	Submit the Initial Dust Management Plan
		6.5	Submit a Notification on the Initial Start-Up of On-Site Operations
AA-202e AA-203e AA-305	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.6	Submit the Site-Specific Emission Factors
	11 Miss Admin. Code Pt. 2, R. 2.2.B.(11). and 2.6.B.(5).	6.7	Submit a Performance Testing Protocol Submit a 10-Day Notification of Performance Testing Event
	11 Miss Admin. Code Pt. 2, R. 2.2.B.(11). and 2.6.B.(6).	6.8	Submit the Performance Test Results and Additional Information
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.9	Submit a Notification Upon Satisfying Stipulation(s) for Subsequent Performance Testing
AA-305	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.10	Submit the Results from Apparent Density Testing

### 6.1 General Reporting Requirements:

- (a) The permittee shall report all deviations from permit requirements (including those attributable to upsets), the probable cause of such deviations, and any corrective

actions or preventive measures taken. The report shall be made within five (5) working days of the time the deviation began.

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

- (b) Beginning upon issuance of this permit and lasting until issuance or modification of the applicable operating permit, the permittee shall submit a report for any required monitoring by July 31 and January 31 of each calendar year for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with Mississippi Administrative Code, Title 11, Part 2, Chapter 2, Rule 2.1.C.

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

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

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

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

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

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

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C.(3).)

- (f) Upon the completion of construction or installation of an approved stationary source or modification, and prior to commencing operation, the applicant shall notify the Permit Board that construction or installation was performed in accordance with the approved plans and specifications on file with the Permit Board no later than fifteen (15) days after the actual event.

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

- (g) The Permit Board shall be promptly notified in writing of any change in construction from the previously approved plans and specifications or permit. If the Permit Board determines the changes are substantial, it may require the submission of a new application to construct with “*as built*” plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an “*as built*” application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law.

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

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

- (a) The total emission of PM (filterable), PM<sub>10</sub> (filterable + condensable), PM<sub>2.5</sub> (filterable + condensable), VOCs, NO<sub>x</sub>, and CO from all applicable sources in tons on both a monthly and rolling 12-month total basis;
- (b) The total throughput of wood chips dried within the Rotary Drum Dryers (Emission Points AA-202a and AA-203a) in ODT on both a monthly and rolling 12-month total basis;
- (c) The total duration of all combined start-up and shutdown periods experienced by each Wood Waste-Fired Furnace (Emission Points AA-202c and AA-203c) in which emissions are diverted to the corresponding furnace or dryer bypass stack on both a monthly and rolling 12-month total basis;
- (d) The total duration of all idle mode periods experienced by each Wood Waste-Fired Furnace on both a monthly and rolling 12-month total basis;
- (e) The final moisture content of the wood pellets produced based on a monthly average;
- (f) A summary for each parametric continuous monitoring and recording system (CMRS) that provides the following information:
  - (1) Operation Outside Established Range – the specific emission point / control equipment, the date, the beginning and ending times, the cause(s) for each excursion; and any corrective action taken as a result of the excursion; and
  - (2) CMRS Downtime – the specific emission point / control equipment, the date, the beginning and ending times, the cause(s) for each downtime event; and any corrective action taken as result of a downtime event.
- (g) The hours of operation for each emergency engine (including a summary on how many hours are spent for emergency operation, what classified the operation as an

emergency situation, how many hours are spent for non-emergency operation, and the circumstance(s) for non-emergency operation).

- (h) A summary of any revision(s) made to the “Dust Management Plan” and/or the “Start-Up, Shutdown, and Malfunction Plan” during the reporting period.

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

- 6.3 For Emission Point AA-000 (Facility-Wide), the permittee shall submit the initial “Start-Up, Shutdown, and Malfunction Plan” (SSMP) required by Condition 5.2 to the MDEQ for review no later than sixty (60) days after certifying completion of construction.

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

- 6.4 For Emission Point AA-000 (Facility-Wide), the permittee shall submit the initial “Dust Management Plan” (DAP) required by Condition 5.3 to the MDEQ for review no later than sixty (60) days after certifying completion of construction.

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

- 6.5 For Emission Point AA-000 (Facility-Wide), the permittee shall notify the MDEQ in writing of the initial start-up of on-site operations no later than fifteen (15) days after the actual start-up date.

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

- 6.6 For Emission Points AA-202b, AA-203b, AA-202e, AA-203e, and AA-305, the permittee shall submit the site-specific emission factors required by Condition 5.13 to the MDEQ for review no later than ninety (90) days after completing the corresponding performance testing event.

If an already established site-specific emission factor(s) must be modified as a result of subsequent performance test required by Condition 5.12, the permittee shall submit the corresponding supporting data to the MDEQ with the site-specific emission factor(s).

With exception of the site-specific emission factors established as a result of initial performance testing required by Condition 5.11 (which shall be applied from the initial start-up until otherwise specified), any modification of a site-specific emission factor shall become effective on the month corresponding with the MDEQ’s receipt of the information. The MDEQ retains the right to modify a site-specific emission factor based on additional performance testing.

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

- 6.7 For Emission Points AA-202e, AA-203e, and AA-305, the permittee shall submit a written performance test protocol for testing required by Conditions 5.11 and 5.12 that details the procedures and test methods to be implemented during the actual testing event no later than thirty (30) days prior to the intended testing date.

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

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11). and 2.6.B.(5).)

6.8 For Emission Points AA-202e, AA-203e, and AA-305, the permittee shall submit a report for any conducted performance test no later than sixty (60) days after completing the testing event. The report shall include the information specified in Condition 1.26(c) and the following information (as applicable):

- (a) Applicable parametric monitoring data that corresponds to the specified pollutant(s) (i.e. combustion chamber temperature; total power) and the supporting documentation;
- (b) The hourly throughput data for the applicable process units (i.e. green wood chips processed; wood chips dried; wood pellets produced);
- (c) The feedstock ratio (in weight percent) of softwood and hardwood used during a performance test;
- (d) The moisture content of the wood pellets produced during a performance test;
- (e) Oxygen (O<sub>2</sub>) concentration data;
- (f) A table summarizing the current and past performance test results for each pollutant tested, [noting the average pollutant emission rate and the average applicable throughput]; and
- (g) For the RTO / RCO – the control method being utilized during a performance test (i.e. thermal or catalytic mode).

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

6.9 For Emission Points AA-202e, AA-203e, and AA-305, the permittee shall submit a written notification to the MDEQ upon triggering additional performance testing as specified in Condition 5.11(c) no later than thirty (30) days after the applicable percentage increase and/or decrease occurs.

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

6.10 For Emission Point AA-305, the permittee shall submit the results of an apparent density test required by Condition 5.20 no later than thirty (30) days after receipt of the test report.

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