

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

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Enviva Pellets Amory, LLC
205 Martin Luther Jr King Drive
Amory, Monroe County, Mississippi

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

Permit Issued: January 5, 2022

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: December 31, 2026

Permit No.: 1840-00082

Modified:

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SECTION 1. GENERAL CONDITIONS

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

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

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

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

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

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

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

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

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

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

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

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

revised or revoked to assure compliance with the applicable requirements.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- 1.19 Should the Executive Director of the MDEQ declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in Mississippi Administrative Code, Title 11, Part 2, Chapter 3 – “Regulations for the Prevention of Air Pollution Emergency Episodes” – for the level of emergency declared.

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

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

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

- (a) Routine maintenance, repair, and replacement;
- (b) Use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
- (c) Use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
- (d) Use of an alternative fuel or raw material by a stationary source which:
 - (1) The source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51, Subpart I (or 40 CFR 51.166); or
 - (2) The source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I (or 40 CFR 51.166).
- (e) An increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51 – Subpart I (or 40 CFR 51.166); or
- (f) Any change in ownership of the stationary source.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
 - (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:
 - (i) An upset occurred and that the source can identify the cause(s) of the upset;
 - (ii) The source was at the time being properly operated;
 - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
 - (iv) That within five (5) working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other non-compliance, and the corrective actions taken and;
 - (v) That as soon as practicable but no later than twenty-four (24) hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or

caused a general nuisance to the public, the source provided notification to the Department.

- (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
 - (3) This provision is in addition to any upset provision contained in any applicable requirement.
 - (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- (b) Start-ups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) Start-ups and shutdowns are part of normal source operation. Emission limitations apply during start-ups and shutdowns unless source specific emission limitations or work practice standards for start-ups and shutdowns are defined by an applicable rule, regulation, or permit.
 - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this Mississippi Administrative Code, Title 11, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for start-ups and shutdowns. Source specific emission limitations or work practice standards established for start-ups and shutdowns are subject to the requirements prescribed in Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 1.10.B.(2)(a) through (e).
 - (3) Where an upset as defined in Rule 1.2 occurs during start-up or shutdown, see the upset requirements above.

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

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

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

- 1.27 Regarding compliance testing (if applicable):

- (a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.

- (b) Compliance testing will be performed at the expense of the permittee.
- (c) Each emission sampling and analysis report shall include (but not be limited to) the following:
 - (1) Detailed description of testing procedures;
 - (2) Sample calculation(s);
 - (3) Results; and
 - (4) Comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

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

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-000	Facility-Wide (Enviva Pellets Amory, LLC)
AA-002	Rotary Dryer [process material is routed to a multiclone for separation]
AA-003	Dry Hammermills [process material is routed to a cyclone for material separation, followed by a baghouse for control of particulate matter]
AA-004	Pellet Mills and Pellet Coolers [emissions are controlled by twin cyclones]
AA-007	Green Metering Bin
AA-008	Green Hammermill [process material is routed to a cyclone for material separation]
AA-009	Finished Goods Bins [emissions are controlled by a baghouse]
AA-020	Green Wood Handling Operations
AA-021	Truck Loadout Operations
AA-022	Dry Shaving Handling Operations
AA-024	Green Screen
AA-025a	55 MMBTU / Hour Wood-Fired Furnace
AA-025b	Wood-Fired Furnace Bypass Stack
AA-026	Pellet Storage and Handling Operations [conducted inside a building]

SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. Facility-Wide Emission Limitations & Standards

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

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

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

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

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

B. EMISSION POINT SPECIFIC EMISSION LIMITATIONS & STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R.1.3.F.	3.B.1	PM	$E = 4.1 (p^{0.67})$
	11 Miss. Admin Code Pt. 2, R.1.3.C.	3.B.2	All Pollutants	General Nuisance Clause
	11 Miss. Admin. Code, Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued January 5, 2022 (Major Source Avoidance Limits)	3.B.3	HAPs	9.0 tpy (Individual) 24.0 tpy (Total) (Rolling 12-Month Totals)
	11 Miss. Admin. Code, Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued January 5, 2022 (PSD Avoidance Limits)	3.B.4	PM (filterable)	245.0 tpy (Rolling 12-Month Total)
			PM ₁₀ / PM _{2.5} (filterable + condensable)	245.0 tpy (Rolling 12-Month Totals)
			VOCs	245.0 tpy (Rolling 12-Month Total)
11 Miss. Admin. Code, Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued January 5, 2022	3.B.5	Wood Pellet Production	137,600.0 ODT / Year (Rolling 12-Month Total)	
AA-002 AA-003 AA-004 AA-008 AA-009	11 Miss. Admin. Code, Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued January 5, 2022	3.B.6	PM (filterable) PM ₁₀ / PM _{2.5} (filterable only)	Operational Requirements
AA-003 AA-004	40 CFR Part 64 – Compliance Assurance Monitoring 40 CFR 64.2(a), CAM	3.B.7	PM / PM ₁₀ / PM _{2.5}	General Applicability

3.B.1 For Emission Point AA-000 (Facility-Wide), except as otherwise specified herein or limited 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 combination thereof) to exceed the amount determined by the following relationship:

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

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

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

- 3.B.2 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 and cause a nuisance to a property other than the one from which it originated or any other provision of this regulation is violated, the MDEQ may order 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.B.3 For Emission Point AA-000 (Facility-Wide), the permittee shall limit the emission of each individual hazardous air pollutant (HAP) to no more than 9.0 tons per year (tpy) based on a rolling 12-month total and all HAPs in total to no more than 24.0 tpy based on a rolling 12-month total.

(Ref.: 11 Miss. Admin. Code, Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued January 5, 2022 – Major Source Avoidance Limits)

- 3.B.4 For Emission Point AA-000 (Facility-Wide), the permittee shall respectively limit the total emission of particulate matter (PM; filterable), particulate matter less than 10 microns (μm) in diameter (PM_{10} ; filterable + condensable), particulate matter less than 2.5 μm in diameter ($\text{PM}_{2.5}$; filterable + condensable), and volatile organic compounds (VOCs) from all applicable emission sources to no more than 245.0 tons per year (tpy) based on a rolling 12-month total.

(Ref.: 11 Miss. Admin. Code, Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued January 5, 2022 – PSD Avoidance Limits)

- 3.B.5 For Emission Point AA-000 (Facility-Wide), the permittee shall limit the total production of wood pellets to no more than 137,600.0 oven-dried tons (ODT) per year based on a rolling 12-month total basis. For the purpose of this permit, an “oven-dried ton” equates to a ton of wood at zero percent (0%) moisture.

(Ref.: 11 Miss. Admin. Code, Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued January 5, 2022)

3.B.6 For Emission Points AA-002, AA-003, AA-004, AA-008, and AA-009, the permittee shall at all times operate each device that minimizes the emission of filterable particulate matter during the active operation of the associated process unit(s). If the event that a device malfunctions or becomes non-operational, the permittee shall cease activity of the applicable unit(s) until the device returns to normal service.

(Ref.: 11 Miss. Admin. Code, Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued January 5, 2022)

3.B.7 For Emission Points AA-003 and AA-004, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 64, Compliance Assurance Monitoring (CAM).

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

C. INSIGNIFICANT AND TRIVIAL ACTIVITY EMISSION LIMITATIONS & STANDARDS

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

3.C.1 The maximum permissible emission of ash and/or particulate matter (PM) from fossil fuel burning installations of less than ten (10) million BTU (MMBTU) per hour heat input 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.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide or SO₂) per MMBTU heat input.

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

D. WORK PRACTICE STANDARDS

THIS SECTION WAS INTENTIONALLY LEFT BLANK SINCE THERE ARE NO
WORK PRACTICE STANDARDS THAT APPLY TO THIS PERMIT ACTION

SECTION 4. COMPLIANCE SCHEDULE

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

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

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. GENERAL MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS

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

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

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

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

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

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

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

5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 of each 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 6, Rule 6.2.E.

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

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

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

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

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

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

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

B. SPECIFIC MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Monitoring / Recordkeeping Requirement
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.1	HAPs	Calculate Emissions (Monthly and Rolling 12-Month Total)
		5.B.2	PM / PM ₁₀ / PM _{2.5} VOCs	Calculate the Total Emission of Applicable Pollutants (Monthly and Rolling 12-Month Totals)
		5.B.3	Wood Pellet Production	Monitor Total Production (Monthly and Rolling 12-Month Total)
		5.B.4	PM	Operate and Monitor in Accordance with the Dust Management Plan
		5.B.5	All Pollutants	Conduct Performance Testing Mandated by the MDEQ (As Applicable)
AA-002 AA-003 AA-004 AA-008	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.6	PM (filterable)	Conduct Initial Performance Testing
		5.B.7	PM ₁₀ / PM _{2.5} (filterable + condensable)	Conduct Subsequent Performance Testing
		5.B.8	VOCs HAPs	Establish Site-Specific Emission Factors
AA-002 AA-003 AA-008 AA-009	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.9	Opacity	Conduct Weekly Visible Emission Observations
AA-002 AA-003 AA-004 AA-008 AA-009	11 Miss. Admin. Code Pt. 2, R. 6.3.(A)(3)(a)(2).	5.B.10	PM / PM ₁₀ / PM _{2.5}	Perform Monthly Inspections on Each Device Minimizing Emissions
AA-003 AA-004	40 CFR 64.7(d); CAM	5.B.11	Corrective Action	Perform Corrective Action Response to an Excursion / Exceedance of CAM Indicator

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Monitoring / Recordkeeping Requirement
	40 CFR 64.8; CAM	5.B.12	QIP	Develop a Quality Improvement Plan (QIP) (Upon Request)
	40 CFR 64.9(b); CAM	5.B.13	CAM Records	Record and Maintain CAM Records (As Specified)
AA-003	40 CFR 64.3(a), (b), and 64.6(c); CAM	5.B.14	Pressure Drop Opacity	<i>CAM Requirements:</i> Daily Monitoring of Pressure Drop and Weekly Monitoring of Visible Emissions
AA-004	40 CFR 64.3(a), (b), and 64.6(c); CAM	5.B.15	Opacity	<i>CAM Requirements:</i> Daily Monitoring of Visible Emissions
AA-025b	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.16	Hours of Duration	Monitor the Date, Time, and Duration of Each Cold Start-Up and Idle Period Calculate Total Duration of Each Period Type (Rolling 12-Month Total)

5.B.1 For Emission Point AA-000 (Facility-Wide), the permittee shall calculate and record the individual emission of acetaldehyde, acrolein, formaldehyde, methanol, propionaldehyde, hydrogen chloride, and phenol as well as all HAPs in total (i.e. the sum of noted individual HAPS) from all applicable sources in tons both on a monthly basis and on a rolling 12-month total basis.

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

5.B.2 For Emission Point AA-000 (Facility-Wide), the permittee shall calculate and record the total respective emission of particulate matter (PM), particulate matter less than 10 microns (μm) in diameter (PM_{10}), particulate matter less than 2.5 μm in diameter ($\text{PM}_{2.5}$), and volatile organic compounds (VOCs) in tons both on a monthly basis and rolling 12-month total basis in accordance with the following specifications:

- (a) Beginning on the date of this permit issuance and ending on the date in which the emission factors required by Condition 5.B.8 are approved, the permittee shall calculate emissions from Emission Points AA-002, AA-003, AA-004, and AA-008 by using the applicable emission factors presented in the Title V Operating Permit (TVOP) renewal application for this permitting action.
- (b) Upon approval of the site-specific emission factors, the permittee shall calculate and record emissions from Emission Points AA-002, AA-003, AA-004, and AA-008 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 12-month rolling total emissions calculated

in accordance with paragraph (a) above to reflect the approved site-specific emission factors.

- (c) For all other emission sources, when determining compliance with the emission limitations specified in Condition 3.B.4, the permittee shall either assume actual emissions are equivalent to potential emissions or shall maintain actual data (e.g. throughput) and use the emission factors in the TVOP renewal application to determine actual emissions on a monthly basis and rolling 12-month basis.
- (d) Unless otherwise specified herein, the permittee shall maintain records of all reference data utilized to validate calculated emissions (operational data, applicable emission factors, engineering judgement determinations, etc.).

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

- 5.B.3 For Emission Point AA-000 (Facility-Wide), the permittee shall monitor and record the total production of wood pellets in ODT both on a monthly basis and a rolling 12-month total basis.

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

- 5.B.4 For Emission Point AA-000 (Facility-Wide), the permittee shall operate, maintain, and monitor all applicable sources in accordance with the Dust Management Plan (DMP) found in Appendix C of this permit. Additionally, the permittee shall maintain all documentation required by the DMP.

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

- 5.B.5 For Emission Point AA-000 (Facility-Wide), the MDEQ reserves the right to mandate the evaluation of stack emissions via performance testing from any point source capable of being tested independent of the requirements specified herein. In the event that the MDEQ requires as such, the permittee may conduct the testing in accordance with any requirements specified by the MDEQ and the requirements in Condition 5.B.6(a), (b), (f), and a test protocol approved by MDEQ.

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

- 5.B.6 For Emission Points AA-002, AA-003, AA-004, and AA-008, the permittee shall evaluate the emission of specified pollutants by conducting initial performance testing no later than one hundred eighty (180) days after issuance of this permit and in accordance with the following requirements:

- (a) All performance testing shall be conducted accordance with applicable EPA-approved test methods found in Appendix A of 40 CFR Part 60, Appendix M of 40 CFR Part 51, or Appendix A of 40 CFR Part 63, or an alternative test method approved by the EPA prior to the testing event.

- (b) The permittee shall conduct a minimum of three (3) separate test runs for a performance stack test as specified in 40 CFR 63.7(e)(3), Subpart A.
- (c) Initial performance testing shall be conducted while the average wood chip throughput and/or the average wood pellet production is at no less than ninety percent (90%) of the maximum permitted equipment production capacity (in oven-dried tons per hour). The actual production rate will be determined individually for each unit during the performance test.

If the permittee has not achieved 90% of the maximum permitted equipment production capacity within 180 days, the permittee shall conduct the initial performance testing while operating at the capacity achieved up to that point. Thereafter, the permittee shall conduct subsequent performance testing in accordance with the specifications of this condition no later than one hundred and twenty (120) days after a respective monthly average production rate (in oven-dried tons per hour) increases by more than ten (10) percentage points above the capacity established during the prior performance testing (until achieving no less than 90% of the maximum hourly design capacity).

- (d) *For Emission Points AA-002, AA-003, AA-004, and AA-008:* The permittee shall evaluate the emission of PM (filterable), PM₁₀ (filterable + condensable), PM_{2.5} (filterable + condensable), VOCs, methanol, acetaldehyde, formaldehyde, acrolein, propionaldehyde, and phenol.
- (e) *For Emission Point AA-002:* The permittee shall evaluate the emission of hydrogen chloride.
- (f) The permittee shall monitor and record hourly throughput data on the applicable material (i.e. green wood chips processed, green woods dried, dried wood chips processed, wood pellets produced) in ODT during a performance test.

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

5.B.7 For Emission Points AA-002, AA-003, AA-004, and AA-008, unless otherwise required herein, the permittee shall conduct subsequent performance testing on the exhaust of each unit to evaluate the emission of the following pollutants at the specified frequency:

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

All testing shall be conducted in accordance with the specifications outlined in Condition 5.B.6(a), (b), and (f).

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.B.8. If the converted results exceed any of the already approved site-specific emission factors, the permittee shall **submit** the new emission factors in accordance with Condition 5.C.4.

If the converted results are lower than the approved site-specific emission factors, the permittee **may** submit the new emission factors in accordance with Condition 5.C.4.

Contingent upon the results from performance testing required by Condition 5.B.6, the permittee may request (in accordance with Condition 5.C.6) that the frequency for subsequent testing specified in paragraphs (a) and (c) be completely waived.

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

5.B.8 For Emission Points AA-002, AA-003, AA-004, and AA-008, upon completing a performance test as required by Condition 5.B.6 or 5.B.7, 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, PM₁₀, PM_{2.5}, VOCs, methanol, acetaldehyde, formaldehyde, acrolein, propionaldehyde, hydrogen chloride, and phenol in pounds per oven-dried tons. The permittee shall establish these emission factors in accordance with the following specifications:

(a) The permittee shall establish a site-specific VOC emission factor for each exhaust point based on a modified EPA OTM-26:

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

Where:

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

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

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

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

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

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

- (b) All site-specific emission factors shall be based on the pounds of pollutant per ODT of applicable material (i.e. green wood chips processed, green woods dried, dried wood chips processed, wood pellets produced).

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

- 5.B.9 For Emission Points AA-002, AA-003, AA-008, and AA-009, the permittee shall perform and record a weekly visible emission observation on the exhaust of each denoted point source or the ambient air surrounding a corresponding building in accordance with EPA Test Method 22 during daylight hours and during representative operating conditions. Each observation shall be conducted for a minimum period of six (6) consecutive minutes.

If visible emissions are detected during an observation, the permittee shall immediately perform a visible emissions evaluation (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 point source exceed the applicable limitation (i.e. Condition 3.A.1. or 3.A.2) and immediately implement corrective actions. In the event that a VEE is required but cannot be conducted, the permittee shall record a written explanation as to why it was not possible to perform the VEE.

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

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

- 5.B.10 For Emission Points AA-002, AA-003, AA-004, AA-008, and AA-009, the permittee shall perform a monthly inspection on each device utilized to minimize PM emissions. If any problem is noted during an inspection, the permittee shall perform and record the necessary maintenance activities to ensure operation of a device as originally designed. Additionally, preventative maintenance shall be performed (as necessary) to maintain proper operation of each device.

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

For Emission Points AA-003 and AA-009, the permittee shall maintain on-site sufficient bags and/or parts to repair a baghouse.

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

5.B.11 For Emission Points AA-003 and AA-004, the permittee shall comply with the following requirements for monitoring required by the approved CAM Plan:

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

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

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

5.B.12 For Emission Points AA-003 and AA-004, upon detecting an excursion or exceedance, the permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

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

Determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include (but

is not limited to) monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

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

- 5.B.13 For Emission Points AA-003 and AA-004, the MDEQ may require the permittee to develop and implement a Quality Improvement Plan (QIP) that contains the elements specified in 40 CFR 64.8(b).

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

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

- 5.B.14 For Emission Point AA-003, the permittee shall monitor and record the differential pressure drop across the baghouse on a daily basis in accordance with the CAM Plan found in Appendix B of the permit. Additionally, the permittee shall perform and record a weekly visible emissions observation on the exhaust of the baghouse in accordance with the CAM Plan.

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

- 5.B.15 For Emission Point AA-004, the permittee shall monitor and record the visible emissions from the exhaust of the twin cyclones during active operations and daylight hours on a daily basis in accordance with the CAM Plan found in Appendix B of this permit.

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

- 5.B.16 For Emission Point AA-025b, the permittee shall monitor and record the date, time, and duration of each cold start-up and idle period in which the furnace exhaust is diverted to the bypass stack. Additionally, the permittee shall calculate and record the total duration of all idling periods and cold start-up periods in hours per year based on a rolling 12-month period.

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

C. SPECIFIC REPORTING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Reporting Requirement
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.1	PM / PM ₁₀ / PM _{2.5} VOCs HAPs	Submit a Semi-Annual Monitoring Report
AA-002 AA-003 AA-004 AA-008	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). 11 Miss. Admin. Code Pt. 2, R. 2.6.B(5).	5.C.2	PM / PM ₁₀ / PM _{2.5} VOCs HAPs	Submit Performance Testing Protocol Submit 10-Day Notification of Performance Testing Event
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). 11 Miss. Admin. Code Pt. 2, R. 2.6.B(6).	5.C.3		Submit Performance Test Results
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.C.4		Submit Site-Specific Emission Factors for Review and Approval
		5.C.5		Submit a Notification Upon Satisfying the Stipulation for Subsequent Performance Testing
		5.C.6		Submit Request to Waive Subsequent Performance Testing
	AA-003 AA-004	40 CFR 64.9(a); CAM		5.C.7
40 CFR 64.7(e); CAM		5.C.8	CAM Modification	Promptly Notify the MDEQ of Failure to Achieve Limit / Standard (Though no Excursion or Exceedance was Indicated By Approved Monitoring)

- 5.C.1 For Emission Point AA-000 (Facility-Wide), the permittee shall submit a semi-annual monitoring report (SMR) in accordance with Condition 5.A.4 that details the following information (at a minimum):
- (a) The total emission of each individual HAP (acetaldehyde, acrolein, formaldehyde, methanol, propionaldehyde, hydrogen chloride, and phenol) and all combined HAPs (i.e. the sum of the noted individual HAPs) in tons based on both a monthly basis and a rolling 12-month total basis;
 - (b) The total respective emission of PM, PM₁₀, PM_{2.5}, and VOCs from all applicable source in tons based on both a monthly basis and a rolling 12-month total basis;
 - (c) The total wood pellet throughput in oven-dried tons (ODT) both on a monthly basis and a rolling 12-month total basis;

- (d) The total duration of all idling periods and cold start-up periods in which the furnace exhaust was diverted to the Furnace Bypass Stack (Emission Point AA-025b) both on a monthly basis and a rolling 12-month total basis;
- (e) A summary of any revision(s) made to the “Dust Management Plan”;
- (f) Any occurrence in which a required visible emission evaluation (VEE) was not conducted and an explanation as to why it was not performed; and
- (g) Any maintenance action(s) performed on a device minimizing PM emissions and any periods of time (including date and duration) in which an applicable device was non-operational.

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

- 5.C.2 For Emission Points AA-002, AA-003, AA-004, and AA-008, the permittee shall submit a written performance test protocol for any testing required by this permit that details the procedures and test methods to be implemented during the actual testing event no later than thirty (30) days prior to the intended testing date.

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

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

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

- 5.C.3 For Emission Points AA-002, AA-003, AA-004, and AA-008, unless otherwise approved by the MDEQ, the permittee shall submit a report for any conducted performance test no later than sixty (60) days after completing the testing event. The report (at a minimum) shall include the information specified below:

- (a) A detailed description of testing procedures;
- (b) Sample calculation(s);
- (c) The results;
- (d) A comparison of results to all Applicable Rules and Regulations and to emission limitations in this permit;
- (e) The hourly throughput data for all applicable process units;

- (f) The feedstock ratio of softwood and hardwood used during a performance test (as applicable);
- (g) A table summarizing the current and past performance test results for each pollutant tested, [noting the average pollutant emission rate and the average applicable throughput]; and
- (h) Oxygen (O₂) concentration data.

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

- 5.C.4 For Emission Points AA-002, AA-003, AA-004, and AA-008, the permittee shall submit the initial site-specific emission factors required by Condition 5.B.8 for review and approval by the MDEQ no later than ninety (90) days after completing the initial performance test required by Condition 5.B.6.

Thereafter, if an approved site-specific emission factor(s) must be modified as a result of subsequent testing required by Condition 5.B.7, the permittee shall submit a written request with supporting data to the MDEQ for review and approval no later than 90 days after completing the most recent performance test.

With exception of the site-specific emission factors approved initially, which shall be applied from the issuance of this permit until otherwise specified, any modification of a site-specific emission factor shall become effective on the month corresponding with the MDEQ's approval. The MDEQ retains the right to modify a site-specific emission factor(s) based on additional performance testing.

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

- 5.C.5 For Emission Points AA-002, AA-003, AA-004, and AA-008, the permittee shall submit a written notification to the MDEQ upon triggering additional testing required by Condition 5.B.6(c) no later than thirty (30) days after the applicable percentage point increase occurs.

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

- 5.C.6 For Emission Points AA-002, AA-003, AA-004, and AA-008, the permittee may request (in writing) for a reduction in the frequency for subsequent performance testing as specified in Condition 5.B.7. The permittee shall submit a request for review and approval by the MDEQ no later than one hundred twenty (120) days prior to any required subsequent testing and shall include (at a minimum) the following information:

- (a) The manufacturer design specifications of the corresponding process unit(s);
- (b) The results from the applicable performance testing previously conducted;

- (c) The operational information required by Condition 5.C.3 for the corresponding performance test; and
- (d) An analysis of the potential pollutant emissions from the combined process units (i.e. Emission Points AA-002, AA-003, AA-004, and AA-008) utilizing the approved pollutant emission factors (as required by Condition 5.C.4) and the corresponding maximum potential production capacity.

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

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

5.C.7 For Emission Points AA-003 and AA-004, the permittee shall submit a semi-annual monitoring report (SMR) in accordance with Condition 5.A.4 that details the following information (as applicable):

- (a) Summary information on the number, duration, and cause (including any unknown cause, if applicable) of excursions or exceedances (as applicable) and the corrective actions taken;
- (b) Summary information on the number, duration, and cause (including any unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- (c) A description of the actions taken to implement a QIP (if requested) during the reporting period as specified in Condition 5.B.13. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances.

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

5.C.8 For Emission Points AA-003 and AA-004, if the permittee identifies a failure to achieve compliance with the emission limitation or standard for which the approved CAM monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes.

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

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

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

SECTION 7. TITLE VI REQUIREMENTS

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

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

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

APPENDIX A

List of Abbreviations Used In this Permit

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

APPENDIX B
COMPLIANCE ASSURANCE MONITORING (CAM) PLANS

CAM Plan for Emission Point AA-003 (Baghouse)

	Indicator No. 1	Indicator No. 2
Indicator	Visible Emissions	Pressure Drop
Measurement Approach	Visible emissions will be monitored weekly using EPA Reference Method 22 procedures.	Pressure drop across the baghouse is measured with a differential pressure gauge.
Monitoring Method and Location	Visible observations are being made at the emission point (baghouse exhaust)	Pressure taps are located at the baghouse inlet and outlet. The gauge has a minimum accuracy of 0.5 in H ₂ O.
Indicator Range (including the corrective action taken for an excursion)	An excursion is defined as the presence of visible emissions. Excursions trigger an inspection, corrective action, and a reporting requirement.	As excursion is defined as a pressure drop greater than 4 and less than 1 in. H ₂ O. Excursions trigger an inspection, corrective action, and a reporting requirement.
QIP Threshold	219 hours of visible emissions per semi-annual reporting period (i.e. the total duration of excursion events during the semi-annual reporting period)	219 hours of pressure drop greater than 4 or less than 1 in. H ₂ O per semi-annual reporting period (i.e. the total duration of excursion events during the semi-annual reporting period)
Monitoring Frequency	A 6-minute Method 22 observation is performed weekly.	Pressure drop is monitored daily.
Data Collection / Recordkeeping Procedures	VE observation is documented by the observer and records of the observation will be retained for five years.	Pressure drop is manually recorded daily.
Averaging Period	N/A	None
QA / QC Practices	The observer will be familiar with Reference Method 22 and follow Method 22 procedures.	The pressure gauge is calibrated annually. Pressure taps are checked for plugging daily.

CAM Plan for Emission Point AA-004 (Twin Cyclones)

	Indicator No. 1
Indicator	Visible Emissions
Measurement Approach	Daily visible emissions observations using EPA Reference Method 22 procedures.
Monitoring Method and Location	Visible observations are being made at the emission point (cyclone exhaust).
Indicator Range (including the corrective action taken for an excursion)	An excursion is defined as the presence of visible emissions. Excursions trigger an inspection, corrective action, and a reporting requirement.
QIP Threshold	219 hours of visible emissions per semi-annual reporting period (i.e. the total duration of excursion events during the semi-annual reporting period)
Monitoring Frequency	Daily 6-minute Method 22 observations.
Data Collection / Recordkeeping Procedures	Daily Method 22 visible emission monitoring will be recorded and retained on site for five years.
Averaging Period	N/A
QA / QC Practices	The observer will be familiar with Reference Method 22 and follow Method 22 procedures.

APPENDIX C
SITE-SPECIFIC DUST MANAGEMENT PLAN