STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
PERMIT

AND PREVENTION OF SIGNIFICANT DETERIORATION AUTHORITY TO CONSTRUCT AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Leaf River Cellulose, LLC
157 Buck Creek Road
New Augusta, Mississippi
Perry County

has been granted permission to construct air emissions equipment to comply with 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 and under authority granted by the Environmental Protection Agency under 40 CFR 52.01 and 52.21.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

Krystle Rudolph

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: FEB 0 1 2018

Permit No.: 2200-00005

9342 PER20160003

Part I

A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)

2. Any activities not identified in the application are not authorized by this permit. (Ref.: Miss. Code Ann. 49-17-29 1.b)

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).)

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).)

5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)

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

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).)

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).)

9. The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).)

10. Design and Construction Requirements: The stationary source shall be designed and constructed so as to operate without causing a violation of an Applicable Rules and Regulations, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards, and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A.)

11. Solids Removal: The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits. (Ref.: Miss. Code Ann. 49-17-29)

12. Diversion and Bypass of Air Pollution Controls: The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed except as provided for in 11 Miss. Admin. Code Pt. 2, R. 1.1.10, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

13. 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).)

14. Right of Entry: The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives upon presentation of credentials:

    i) 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

    ii) 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)

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:

    i) Persistent violation of any of the terms or conditions of this permit;

    ii) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

    iii) A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

16. Public Record and Confidential Information: Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality, Office of Pollution Control. (Ref.: Miss. Code Ann. 49-17-39)

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.)

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).)

19. Permit Expiration: The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance or if construction is suspended for eighteen (18) months or more. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(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).)

21. Beginning Operation: Except as prohibited in Part I, Condition 24 of this permit, after certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by 11 Miss. Admin. Code Pt. 2, R. 2.13.G. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).)

22. Application for a Permit to Operate: Except as otherwise specified in Part I, Condition 24 of this permit, the application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).)

23. Operating Under a Permit to Construct: Except as otherwise specified in Part I, Condition 24 of this permit, upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).)

24. Application Requirements for a Permit to Operate for Moderate Modifications: For moderate modifications that require contemporaneous enforceable emissions reductions from more than one emission point in order to "net" out of PSD/NSR, the applicable Title V Permit to Operate or State Permit to Operate must be modified prior to beginning operation of the modified facilities. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7).)

25. Compliance Testing: Regarding compliance testing:

    i) 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.

    ii) Compliance testing will be performed at the expense of the permittee.

    iii) 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), & (6).)

B. GENERAL NOTIFICATION REQUIREMENTS

1. Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).)

2. The permittee must notify DEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).)

3. Upon the completion of construction or installation of an approved stationary source or modification, the applicant shall notify the Permit Board that construction or installation was performed in accordance with the approved plans and specifications on file with the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1).)

4. 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).)

Part II.
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Upon issuance, the permittee is authorized to modify air emissions equipment and emit air contaminants from AA-011, the 1755.3 MMBTU/hr Recovery Furnace constructed in 1983. The recovery furnace combusts black liquor and natural gas fuel and is equipped with an electrostatic precipitator (UT-9)

The air emissions equipment shall be constructed to comply with the emission limitations and monitoring requirements specified below.

EMISSIONS LIMITATIONS

Carbon Monoxide	**300 ppm corrected to 8% oxygen (8-hr average) (Ref.: Federally Enforceable PSD Permit to Construct issued on April 9, 1991.)**
PM/PM_{10}	**$E = 0.8808 * I^{-0.1667}$ where E is the emission rate in pounds per million BTU per hour heat input, and I is the heat input in millions of BTU per hour. (Ref.: 11 Miss. Admin. Code Pt. 2, R.1.3.D (1)(b).)**
	4 lbs/ton of equivalent air-dried Kraft pulp. (Ref.:11 Miss. Admin. Code Pt. 2, R.1.3.E.)
PM/HAP Metals (as PM)	**0.044 gr/dscf (0.10 g/dscm) corrected to 8% Oxygen. (Ref.: 40 CFR 60.282(a)(1)(i))**
SO_2	**4.8 lbs/MMBTU (Ref.:11 Miss. Admin. Code Pt. 2, R.1.4.A(1).)**
	300 ppm corrected to 8% Oxygen (Ref.: Federally Enforceable PSD Permit to Construct issued on January 12, 1982)
Opacity	**$\leq$ 35% for more than 6% of the operating time within any quarterly period. (Ref.: 40 CFR 60.282(a)(1)(ii) and 40 CFR 60.284(e)(1)(ii))**

TRS	**5 ppm by volume on a dry basis corrected to 8 % oxygen; and periods of excess emissions (excluding SSM periods) shall not exceed 1% of the operating time within any quarterly period. (Ref.:40 CFR 60.283(a)(2) and 60.284(e)(ii))**

All test methods specified above shall be those versions, or their approved equivalents, which are in effect upon issuance of this permit.

BACT LIMITATIONS

Nitrogen Oxides	**80 ppm corrected to 8% oxygen (8-hr average)**
	227.5 lb/hr and 996.3 ton/yr
GHG	**208.1 lb/MMBTU**
	365, 318 lb/hr and 1,600,092 ton/yr
CO_{2e}	**208.5 lb/MMBTU**
	365,977 lb/hr and 1,602,979 ton/yr

OPERATIONAL LIMITATIONS

1. **The permittee is required to operate the Recovery Furnace (AA-011) and associated equipment using a fourth level of combustion air to meet the NOx emission limitation.**

2. **For Emission Point AA-011, the permittee is authorized to burn natural gas as auxiliary fuel as established in the Federally Enforceable PSD Permit to Construct issued on July 14, 1992. For Emission Point AA-011, the permittee is also authorized to combust ultra-low sulfur diesel fuel.**

3. **For Emission Point AA-011, the natural gas and fuel oil annual capacity factor shall be 10% or less per calendar year, as established in the Federally Enforceable PSD Permit to Construct issued on July 14, 1992. Note, the criteria for calculation of the annual capacity factor are set forth in 40 CFR 60.44b(d). The annual capacity factor shall be defined as the ratio between the actual heat input to the boiler from coal, oil, or natural gas during a calendar year, and the potential heat input to the boiler had it been operated 8760 hours at the maximum steady state design heat input.**

4. **For Emission Point AA-011, as an alternative to meeting the requirements of 40 CFR 63.862(a)(1)(i), the permittee may establish PM emissions limits for each existing Kraft recovery furnace, smelt dissolving tank, and lime kiln that operates more than 6,300 hours per year by:**

    a) **Establishing an overall PM emission limit for each existing process unit in the recovery system at the mill using the methods set forth in 40 CFR 63.865(a)(1) & (2);**

    b) **The emission limits for each recovery furnace, smelt dissolving tank, and lime kiln that are used to establish the overall PM limit must not be less stringent than the emissions limitations required by 40 CFR 60.282.**

    c) **The permittee must ensure that the particulate matter emissions discharged to the atmosphere from each existing recovery furnace, smelt dissolving tank, and lime kiln are less than or equal to the applicable particulate matter emissions limits, established using the methods outlined in 40 CFR 63.865(a)(1). (Ref.: 40 CFR 63.862(a)(1)(ii))**

MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS

5. **For Emission Point AA-011, the permittee is required to have and implement a written Startup, Shutdown and Malfunction Plan as described in 40 CFR 63.6(e)(3). The plan must contain specific procedures to be followed for operation and maintenance of the affected sources during periods of startup, shutdown and malfunction, and a program of corrective action for malfunctioning process and control systems used to comply with the standards. In addition to the requirements of in 40 CFR 63.6(e), the plan must include the following requirements as set forth in 40 CFR 63.866(a)(1) and (2):**

    a) **Procedures for responding to any process parameter level that is inconsistent with the level(s) established under 40 CFR 63.864(j), including:**

        i) **Procedures to determine and record the cause of an operating parameter exceedance and the time the exceedance began and ended; and**
        ii) **Corrective actions to be taken in the event of an operating parameter exceedance, including procedures for recording the actions taken to correct the exceedance.**

    b) **The Startup, Shutdown, and Malfunction Plan also must include the following schedules:**
        i) **A maintenance schedule for each control technique that is consistent with, but not limited to, the manufacturer's instructions and recommendations for routine and long-term maintenance; and**

ii) **An inspection schedule for each continuous monitoring system required under 40 CFR 63.864, to ensure at least once in each 24-hour period, that each continuous monitoring system is properly functioning.**

(Ref.: 40 CFR 63.6(e)(3) & 40 CFR 63.866(a)).

6. **For Emission Point AA-011, the permittee shall be required to implement corrective action, as specified in the Startup, Shutdown, and Malfunction Plan detailed above, when opacity monitoring indicates that the average of ten (10) consecutive 6-minute averages result in a measurement greater than 20%. (Ref.: 40 CFR 63.864(j) and 40 CFR 63.864(k)(1)(i) and (ii))**

7. **For Emission Points AA-011, the permittee shall maintain records of the hours of operation on a daily basis. (Ref.: PTC issued November 23, 1993)**

8. **For Emission Point AA-011, the permittee shall maintain daily records of the type and amount of fossil fuel (e.g., natural gas or fuel oil) fired. (Ref.: PSD PTC issued July 14, 1992)**

9. **For Emission Point AA-011, the permittee shall maintain records of the actual heat input of fossil fuel (e.g., natural gas or fuel oil) to the Recovery Boiler on a daily basis. (Ref.: PSD Permit to Construct issued July 14, 1992)**

10. **For Emission Point AA-011, the permittee shall maintain and record the annual capacity factor of each fossil fuel (e.g., natural gas or fuel oil) used for each calendar quarter. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month. (Ref.: PSD PTC issued July 14, 1992)**

11. **For Emission Point AA-011, the permittee shall record and maintain daily records of the black liquor solids (BLS) firing rate (in tons/day) and calculate a 12-month rolling total. (Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.A(3). and 40 CFR 63.866(c)(1))**

12. **For Emission Point AA-011, the permittee shall maintain records of any occurrence of excess TRS emissions from the recovery furnace. Excess emissions shall be defined as all 12-hour averages of TRS concentrations above 5 ppm by volume. (Ref.: 40 CFR 60.284(d)(1)(i))**

13. **For Emission Point AA-011, the permittee must install, maintain, operate, and calibrate a continuous opacity monitoring system (COMS) for the recovery furnace to record the opacity of the gases discharged into the atmosphere at least once every successive 10-second period. The permittee must also calculate and record each successive 6-minute average opacity, using the procedures set forth in 40 CFR 63.6(h) and 40 CFR 63.8. (Ref.: 40 CFR 63.864(d))**

    The permittee shall use the COMS to monitor and record the opacity of the gases discharged into the atmosphere. When burning BLS, the monitoring system shall be

operated as required in 40 CFR 60.284 and the span of this system shall be set at 70 percent. The procedures under 40 CFR 60.13 shall be followed for evaluation and operation of the monitoring system. (Ref.: 40 CFR 60.284(a)(1))
The permittee shall maintain records of excess opacity emissions from the recovery furnace. Excess emissions shall be defined as all 6-minute average opacities that exceed 35%. (Ref.: 40 CFR 60.284(d)(1)(ii))

14. For Emission Point AA-011, the permittee shall maintain an Operation and Maintenance (O&M) Plan for the electrostatic precipitator (ESP) control device. The O&M Plan should be maintained on-site and include, but is not limited to, the following information:
    a) Operational Checklist (i.e., fields energized, minimum voltage level);
    b) Operational Procedures; and
    c) Maintenance Schedules and Maintenance Activity Performed.

    The permittee shall maintain records of any operational and/or maintenance activities associated with the ESP's O&M plan in accordance with Condition 5.A.3, and all records shall be made available upon request by MDEQ personnel. (Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.A(3).)

15. For Emission Point AA-011, the permittee shall be required to stack test biennially (every 2 years) with the initial testing to occur within eighteen (18) months of start-up of the recovery furnace. The permittee shall demonstrate compliance with the PM/PM_{10} (filterable only), SO_2, NOx, and CO limitations in accordance with the appropriate EPA Reference Methods (e.g., EPA Ref. Methods 1-5/ 201 and 201a, 8, 7, and 10), or an otherwise approved equivalent method. The permittee must record the black liquor solids firing rate during each performance test.
    A test protocol shall be submitted at least thirty (30) days prior to the proposed test date to ensure that all test methods and procedures are acceptable to the MDEQ. A pre-test conference (if necessary) may be scheduled prior to the submittal of the test protocol. Also, the MDEQ must be notified at least ten (10) days prior to the scheduled test date so that an observer may be scheduled to witness the test(s). (Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.A(3).)

16. For Emission Point AA-011, the permittee must maintain records of any occurrence when corrective action is required and a violation is noted under 40 CFR 63.864. Corrective action is required when the average of ten consecutive 6-minute averages result in a measurement greater than 20 percent opacity (Ref.: 40 CFR 63.864(k)(1)(i)).

17. For Emission Point AA-011, the permittee shall use a CMS to monitor and record the concentration of TRS (on a dry basis). The TRS concentration span of the monitoring system shall be set at 30 ppm. (Ref.: 40 CFR 60.284(a)(2))

18. For Emission Point AA-011, the permittee shall calculate and record on a daily basis, 12-hour average TRS concentrations for the two (2) consecutive periods of each operating day. Each 12-hour average shall be determined as the arithmetic mean of the appropriate 12 contiguous 1-hour average TRS concentrations provided by the

continuous monitoring system(s). For the Recovery Boiler, the 12-hour TRS concentration shall be corrected to 8% oxygen. (Ref.: 40 CFR 60.284(c))

19. **For Emission Point AA-011, the permittee shall use a continuous monitoring system to monitor and record the percent of oxygen on a dry basis from the gases discharged into the atmosphere from the recovery boiler. The span of the monitoring system shall be set at 20% oxygen. (Ref.: 40 CFR 60.284(a)(2))**

20. **For Emission Point AA-011, the permittee shall calculate and record on a daily basis, 12-hour average oxygen concentrations from the recovery furnace, for the two consecutive periods of each operating day. Each 12-hour average shall be determined as the arithmetic mean of the appropriate twelve contiguous 1-hour average oxygen concentrations provided by the CMS. The 12-hour oxygen average must correspond to the TRS concentration average. (Ref.: 40 CFR 60.284(c))**

21. **The permittee shall submit the following notifications, information, and reports for each required performance test:**

    a) **A notification of the scheduled test date(s) should be submitted ten (10) days prior to the scheduled date(s) so an observer may be afforded the opportunity to witness the test(s).**

    b) **For all required testing, the permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the MDEQ.**

    c) **After the first successful submittal of a written test protocol, the permittee may request that the submittal of a testing protocol be waived for subsequent testing by certifying in writing at least thirty (30) days prior to the subsequent testing that all conditions for testing remain unchanged such that the original protocol can and will be followed.**

    d) **The permittee shall submit the results of all required emissions testing in the units specified by the limitations set forth in this permit.**

    e) **The permittee shall submit a summary of the results of any periodic and/or parametric monitoring required to be monitored and recorded by this permit during performance testing.**

    f) **The performance test results must be submitted to MDEQ within sixty (60) days following completion of the performance test.**

    g) **For Emission Point AA-011, report the black liquor solids firing rate during each performance test.**

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

22. For Emission Point AA-011, the permittee shall submit a semiannual report of any corrective action(s), violation, and/or maintenance required in accordance with Condition 5.A.4 for the previous semiannual period. (Ref.: 40 CFR 63.866(b))

23. For Emission Point AA-011, the permittee shall submit a semiannual report summarizing the information required by 40 CFR 63.10(b)(2), and the parametric monitoring data as set forth in 40 CFR 63.866(c), for the previous semiannual period. (Ref.: 40 CFR 63.866(c))

24. For Emission Point AA-011, the permittee shall submit semiannual report summarizing the fossil fuel usage and heat input for the previous semiannual period. (Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.A(3).)

25. For Emission Point AA-011, the permittee shall submit reports of the monthly annual capacity factor calculations based on a 12-month rolling total for the previous semiannual period. (Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.A(3).)

26. For Emission Point AA-011, the permittee shall submit a report summarizing the black liquor solids firing rate as determined based on a 365-day rolling for the previous semiannual period. (Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.A(3). and 40 CFR 63.866(c)(1))

27. For Emission Point AA-011, the permittee shall submit a report indicating periods of excess emissions for all 12-hour averages of TRS above 5 ppm by volume total for the previous semiannual period. It will not be indicative of a violation of 40 CFR 60.11(d) if the percent of the total number of possible contiguous periods of excess emissions in a quarter (excluding periods of startup, shutdown, or malfunction) during which excess emissions occur does not exceed 1%. In addition, the facility must demonstrate that the affected facility, including air pollution control equipment, is maintained and operated in a manner which is consistent with good air pollution control practice for minimizing emissions during periods of excess emissions. (Ref.: 40 CFR 60.284(d) & (e))

28. For Emission Point AA-011, when operating the continuous monitoring system under 40 CFR 60, Subpart BB (i.e., burning BLS), the permittee shall report periods of excess emissions for all 6-minute average opacities that exceed 35% total, for the previous semiannual period. Periods of excess emissions will not be considered indicative of a violation of 40 CFR 60.11(d) provided that the total number of possible contiguous periods of excess emissions in quarter (excluding periods of startup, shutdown, or malfunction) during which excess emissions occur does not exceed 6% for average opacities. In addition, the facility must demonstrate that the affected facility, including air pollution control equipment, is maintained and operated in a manner which is consistent with good air pollution control practice for minimizing emissions during periods of excess emissions. (Ref.: 40 CFR 60.284(d) & (e))

Part III
OTHER REQUIREMENTS

1. **This facility is subject to and shall comply with all applicable requirements of the NESHAP, Subpart MM - Standards for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semi-chemical Pulp Mills. (Ref.: 40 CFR 63.860 – 63.868)**

2. **The facility is subject to and shall comply with all applicable requirements and limitations of New Source Performance Standard (NSPS), Subpart BB - Standards of Performance for Kraft Pulp Mills. (Ref.: 40 CFR 60.280-285)**

3. **The permittee shall monitor the emissions of $PM_{2.5}$ and calculate and maintain a record of the annual emissions, in tons/yr on a calendar year basis, for a period of ten (10) years following resumption of regular operations after the change. The permittee shall submit a report to the DEQ if the annual emissions (tons/year), from the project covered by this permit exceed the baseline actual emissions (as documented in the project application for PSD permit to construct), by a significant amount for $PM_{2.5}$ and if such emissions differ from the preconstruction projection as documented in the associated permit application. The permittee shall conduct this monitoring for a period of 10 years following resumption of regular operations after the change. Such report shall be submitted to the DEQ within 60 days after the end of such year.**

   The report shall contain the following:

   a) **The name, address, and telephone number of the major stationary source;**
   b) **The annual emissions as calculated pursuant to §52.21®(6)(iii); and,**
   c) **Any other information that the permittee wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).**

   (Ref.: 40 CFR 52.21(r)(6)(v))

4. **The emission points in the following table have existing NOx emission limits included in the facility's current TV permit. Upon startup of the Recovery Furnace, these limits are being adjusted to demonstrate the facility's compliance with NAAQS modeling.**

   In addition, the stack height of Emission Point AA-005 (190 MMBTU/hr Natural Gas-Fired Package Boiler) will increase to 135 ft.; and Emission Point AA-024 (10 MMBTU/hr Natural Gas-Fired Boiler (UT-18)) shall be decommissioned and taken out of service prior to the Recovery Furnace (AA-011) restarting following completion of the modification. (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 2. R.2.2.B(10))

Emission Point	Description	NOx limit	
		lb/hr	ton/yr
AA-005	190 MMBTU/hr Natural Gas-Fired Package Boiler	15	65.7
AA-013	138.6 MMBTU/hr Lime Kiln	100	438
AA-016	31.5 MMBTU/hr Incinerator	6	26.3