

# STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

**THIS CERTIFIES THAT**

Amite BioEnergy, LLC – Wood Pellet Manufacturing Facility  
1763 Georgia Pacific Road No. 2  
Gloster, Amite County, Mississippi

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

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**



**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Issued: November 26, 2012**

**Permit No.: 0080-00031**

**Modified: March 21, 2014; March 9, 2021; March 10, 2026**

## SECTION 1 GENERAL CONDITIONS

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

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

- 1.9 The permittee shall furnish to the Department of Environmental Quality (DEQ) within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.

Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator of EPA along with a claim of confidentiality.

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

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

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

- 1.11 *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)

- 1.12 *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 Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 1.10 – “Provisions for Upsets, Start-Ups, and Shutdowns”.

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

- 1.13 *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 emission from construction activities to a minimum.

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

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

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

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

1.15 *Permit Modification or Revocation* After notice and opportunity for hearing, the Permit Board may modify or revoke (in whole or in part) any permit issued pursuant to these regulations for good cause shown including (but not limited to) the following:

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

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

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

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

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

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

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

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

1.19 *The Notice of Maximum Achievable Control Technology (MACT) Approval shall expire if construction or reconstruction has not commenced within eighteen (18) months of*

issuance, unless the permitting authority has granted an extension that shall not exceed an additional twelve (12) months.

(Ref.: 40 CFR 63.43(g)(4); Subpart B)

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

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

- 1.21 *Beginning Operation:* After certification of construction by the permittee, the permit to construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V permit or the application for issuance or modification of the State Permit to Operate (whichever is applicable) is due.

This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by Mississippi Administrative Code, Title 11, Part 2, Chapter 2, Rule 2.13.G.

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

- 1.22 *Operating Under a Permit to Construct:* The application for issuance or modification of the State Permit to Operate or the application for issuance or modification of 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.

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.(5) and (6).)

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

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

- 1.24 *Deviation Reporting:* 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. 2.2.B.(10).)

1.25 *Compliance Testing*: Regarding compliance testing:

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

1.26 All applicable provisions contained within this permit shall be considered the final “Notice of MACT Approval” for the purpose of 40 CFR Part 63; Subpart B [Requirements for Control Technology Determinations for Major Sources in Accordance With Clean Air Act Sections, Sections 112(g) and 112(j)]. As such, these provisions shall be federally enforceable upon the effective date of this permit issuance.

(Ref.: 40 CFR 63.43(g)(3) and (j); Subpart B)

1.27 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 non-compliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:
    - (i) An upset occurred and that the source can identify the cause(s) of the upset;
    - (ii) The source was at the time being properly operated;

- (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
  - (iv) That within five (5) working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
  - (v) That as soon as practicable but no later than 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) Startups 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 startups 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 regulation (“11 Mississippi Administrative Code, 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 11 Miss. Admin. Code Pt. 2, R. 1.10.B.(2)(a) through (e).

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

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

## SECTION 2 EMISSION POINT DESCRIPTION

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

EMISSION POINT	DESCRIPTION
AA-000	Facility-Wide (Amite BioEnergy, LLC – Wood Pellet Manufacturing Facility)
<b>AA-100</b>	<b>Fugitive Emission Sources – Wood Yard Operations</b>
AA-101	Log Debarker
AA-102	Log Chipper
AA-103	Wood Material Transfer and Handling Operations
AA-104	Green Wood Storage Pile
AA-105	Dry Fiber and Chip Storage Tent
<b>AA-200</b>	<b>Wood Drying Operations</b>
AA-201	Wet Electrostatic Precipitator (WESP) – Regenerative Thermal Oxidizer (RTO) Control System [equipped with one (1) 24 MMBTU / hour natural gas-fired burner; controls emissions from the Wood Chip Rotary Dryer and the 165 MMBTU / Hour Wood-Fired Furnace]
AA-203a	165 MMBTU / Hour Wood-Fired Furnace
AA-203d	Wood-Fired Furnace Bypass Stack
AA-204a	Wood Chip Rotary Dryer
AA-204b	Wood Chip Rotary Dryer Bypass Stack
<b>AA-300</b>	<b>Wood Pellet Operations</b>
AA-301	Regenerative Catalytic Oxidizer (RCO) [equipped with one (1) 14 MMBTU / Hour natural gas-fired burner; controls emissions from the Primary Dry Hammermills, the Secondary Dry Hammermills, and the Pellet Mills / Pellet Coolers]
AA-302	Feed Silo for Primary Dry Hammermills

EMISSION POINT	DESCRIPTION
AA-303a	Six (6) Primary Dry Hammermill Pneumatic Systems A – F [each system equipped with a baghouse filter to control particulate matter emissions; emissions from the baghouse filters are routed to the RCO (AA-301)]
AA-303b	Primary Hammermill Baghouse Bypass Stack
AA-304	Dry Shavings Truck Dump [equipped with a baghouse]
AA-305	Secondary Dry Hammermill Silo No. 1
AA-306	Secondary Dry Hammermill Silo No. 2
AA-307a	Three (3) Secondary Dry Hammermill Pneumatic Systems A – C [each system equipped with a baghouse filter to control particulate matter emissions; emissions from the baghouse filters are routed to the RCO (AA-301)]
AA-307b	Secondary Hammermill Baghouse Bypass Stack
AA-308a	Six (6) Pellet Mill / Cooler Pneumatic Systems A – F [each system comprised of two (2) pellet mills and one (1) pellet cooler; each system equipped with a baghouse filter to control particulate matter emissions; emissions from the baghouse filters are routed to the RCO (AA-301)]
AA-308b	Pellet Mill / Cooler Baghouse Bypass Stack
AA-309	Starch Storage Silo [equipped with a bin vent filter]
	<b>Finished Pellet Operations</b>
AA-401	Two (2) Pellet Storage Silos and Pellet Truck Load-Out System [emissions from all sources are controlled by a common baghouse; collected wood solids from the common baghouse are pneumatically conveyed to the “Screened Materials Return System”]
<b>AA-500</b>	<b>Emergency Engines</b>
AA-501	250 HP (187 kW) Diesel-Fired Emergency Pump Engine [total heat input: 0.64 MMBTU / hour; manufactured in 2013]
AA-502	402 HP (300 kW) Diesel-Fired Emergency Generator Engine [total heat input: 0.81 MMBTU / hour; manufactured in 2015]

### SECTION 3 EMISSION LIMITATIONS AND STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limitation / Standard
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity (smoke)	40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2	Opacity	
	11 Miss. Admin. Code Pt. 2, R. 1.3.F.(1).	3.3	PM (filterable)	E = 4.1 (p <sup>0.67</sup> )
	11 Miss. Admin. Code Pt. 2, R. 1.3.C.	3.4		General Nuisance Clause
	11 Miss. Admin. Code Pt. 2, R. 8.1 40 CFR Part 63, Subpart B – Requirements for Control Technology Determinations for Major Sources in Accordance with Clean Air Act Sections, Sections 112(g) and 112(j) 40 CFR 63.40(b), 63.43(g)(2)(iv), (k), and (l); Subpart B	3.5	HAPs	General Applicability
AA-200 AA-300 AA-401 AA-500	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued November 26, 2012 and modified March 9, 2021  <b>(PSD Avoidance Limits)</b>	3.6	PM (filterable)	245.0 tpy (Rolling 12-Month Total)
			PM <sub>10</sub> / PM <sub>2.5</sub> (filterable + condensable)	245.0 tpy (Rolling 12-Month Totals)
			NO <sub>x</sub>	245.0 tpy (Rolling 12-Month Total)
			VOCs	245.0 tpy (Rolling 12-Month Total)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued November 26, 2012; modified March 9, 2021 and March 10, 2026  <b>(PSD Avoidance Limit)</b>	3.7	CO	249.0 tpy (Rolling 12-Month Total)
AA-201	40 CR 63.43(c)(2); Subpart B 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.8	Total HAPs	96.0% Destruction Efficiency (RTO)

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limitation / Standard
AA-203a	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued March 9, 2021, and modified March 10, 2026 40 CR 63.43(c)(2); Subpart B	3.9	Fuel Source Restrictions Non-VOC HAPs	Combust Only Uncontaminated Wood Waste or WESP By-Products (diesel fuel may be used during cold start-up activities)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued March 9, 2021, and modified March 10, 2026	3.10	CO NO <sub>x</sub> PM / PM <sub>10</sub> / PM <sub>2.5</sub> VOCs HAPs	<i>Start-Up and Shutdown Requirements:</i> Bypass Furnace Emissions for ≤ 100.0 Hours <i>Idle Mode Requirements:</i> Bypass Furnace Emissions for ≤ 500.0 Hours (Rolling 12-Month Totals)
AA-204a	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued March 9, 2021 and modified March 10, 2026	3.11	PM / PM <sub>10</sub> / PM <sub>2.5</sub> VOCs HAPs	Operational Requirements (WESP-RTO)
		3.12	Dried Wood Chip Throughput	467,316.0 ODT / Year (Rolling 12-Month Total)
AA-300 AA-401	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued March 9, 2021, and modified March 10, 2026	3.13	PM / PM <sub>10</sub> / PM <sub>2.5</sub> (filterable only)	Operational Requirements (Baghouses)
AA-300	11 Miss. Admin. Code Pt. 2, R.2.2.B.(10)., as established in the Permit to Construct issued March 9, 2021, and modified March 10, 2026	3.14	Wood Pellet Production	624,700.0 ODT / Year (Rolling 12-Month Total)
AA-301	40 CR 63.43(c)(2); Subpart B 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.15	Total HAPs	96.0% Destruction Efficiency (RCO)
AA-303a AA-307a AA-308a	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued March 9, 2021, and modified March 10, 2026	3.16	VOCs HAPs	Operational Requirements (RCO and Baghouse Filters)
AA-500	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.17	PM	0.6 lb. / MMBTU per Hour Heat Input

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limitation / Standard
AA-500	40 CFR Part 60, Subpart III – Standards of Performance for Stationary Compression Ignition Combustion Engines 40 CFR 60.4200(a)(2); 60.4218, and Table 8; Subpart III	3.18	NMHC + NO <sub>x</sub> CO PM (filterable)	General Applicability
	40 CFR 60.4207(b); Subpart III	3.19	Diesel Fuel Requirement	15 ppm Maximum Sulfur Content; and 40 Min. Cetane Index <u>or</u> 35% Max. Aromatic Content
	40 CFR 60.4211(f)(1) – (3); Subpart III	3.20	Hours of Operation	100 Hours / Calendar Year for Maintenance and Testing 50 Hours / Calendar Year for Non-Emergency Situations
	40 CFR Part 63, Subpart ZZZZ – NESHAP for Stationary Reciprocating Internal Combustion Engines 40 CFR 63.6590(c)(1), Subpart ZZZZ	3.21	HAPs	General Applicability
AA-501	40 CFR 60.4205(c), 60.4206, and 60.4211(c); Subpart III	3.22	NMHC + NO <sub>x</sub> PM (filterable) CO	Purchase Engine Certified to Emission Standards
AA-502	40 CFR 60.4205(b), 60.4202(a)(2), 60.4206, and 60.4211(c); Subpart III	3.23	NMHC + NO <sub>x</sub> CO PM (filterable) Opacity	

3.1 For Emission Point AA-000 (Facility-Wide), 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, which exceeds forty (40) percent opacity subject to the following exceptions:

- (a) Start-up operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) 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 (60) percent 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 hour.

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

- 3.2 For Emission Point AA-000 (Facility-Wide), 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 or emissions of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Condition 3.1. This shall not apply to vision obscuration caused by uncombined water droplets.

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

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

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

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

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

- 3.4 For Emission Point AA-000 (Facility-Wide), the permittee shall 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.)

- 3.5 For Emission Point AA-000 (Facility-Wide), the permittee is subject to and shall comply with the applicable requirements specified in Mississippi Administrative Code, Title 11, Part 2, Chapter 8, Rule 8.1, 40 CFR Part 63; Subpart B [Requirements for Control Technology Determinations for Major Sources in Accordance With Clean Air Act Sections, Sections 112(g) and 112(j)], and 40 CFR Part 63; Subpart A [General Provisions].

On and after the date of start-up, the permittee shall comply with all applicable requirements specified in the MACT determination. Moreover, the permittee shall comply

with all requirements in the final Notice of MACT Approval (i.e., the Permit to Construct issued March 10, 2026), including (but not limited to) any MACT emission limit, MACT work practice standard, notification, applicable operation and maintenance, performance testing, monitoring, recordkeeping, and reporting.

Upon obtaining a MACT determination, the permittee shall be deemed in compliance with Section 112(g)(2)(B) of the Clean Air Act only to the extent that the permittee is in compliance with all requirements set forth in the final Notice of MACT Approval. Any violation of such requirements by the permittee shall be deemed by the MDEQ and EPA to be a violation of the prohibition on construction or reconstruction in section 112(g)(2)(B) for whatever period the permittee is determined to be in violation of such requirements and shall subject the permittee to appropriate enforcement action under the Clean Air Act.

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

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

- 3.6 For Emission Points AA-200 (Wood Drying Operations), AA-300 (Wood Pellet Operations), AA-401 (Pellet Storage Silos / Pellet Truck Load-Out System), and AA-500 (Emergency Engines), the permittee shall respectively limit the total emission of filterable particulate matter (PM), particulate matter less than 10 microns ( $\mu\text{m}$ ) in diameter ( $\text{PM}_{10}$ ; filterable + condensable), particulate matter less than 2.5  $\mu\text{m}$  in diameter ( $\text{PM}_{2.5}$ ; filterable + condensable), nitrogen oxides ( $\text{NO}_x$ ), and volatile organic compounds (VOCs) from all applicable 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. 2.2.B.(10)., as established in Permit to Construct issued November 26, 2012 and modified March 9, 2021 – PSD Avoidance Limits)

- 3.7 For Emission Points AA-200 (Wood Drying Operations), AA-300 (Wood Pellet Operations), AA-401 (Pellet Storage Silos / Pellet Truck Load-Out System), and AA-500 (Emergency Engines), the permittee shall limit the total emission of carbon monoxide (CO) from all applicable sources to no more than 249.0 tons per year (tpy) based on a rolling 12-month total.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued November 26, 2012; modified on March 9, 2021, and March 10, 2026 – PSD Avoidance Limit)

- 3.8 For Emission Point AA-201 (WESP-RTO Control System), the permittee shall at all times operate the regenerative thermal oxidizer (RTO) in such a manner as to achieve at minimum ninety-six (96.0) percent destruction efficiency of total hazardous air pollutants (HAPs) (measured in “organic carbon as propane”) from the Wood Chip Rotary Dryer (Emission Point AA-204a).

The use of the RTO to achieve 96.0% destruction efficiency of total HAPs has been determined to satisfy the case-by-case MACT requirements of Mississippi Administrative Code, Title 11, Part 2, Chapter 8, Rule 8.1.

(Ref.: 40 CR 63.43(c)(2); Subpart B and 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).)

- 3.9 For Emission Point AA-203a (Wood-Fired Furnace), the permittee shall only utilize uncontaminated wood material or WESP by-products (i.e., sludge or washdown waste) as the primary fuel sources for the furnace.

In addition, the permittee may utilize diesel fuel as an accelerant for a cold start-up of the furnace. However, to the best extent practicable, the permittee shall minimize the volume of diesel fuel used during any cold start-up period.

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

(Ref.: 40 CFR 63.43(c)(2); Subpart B and 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in Permit to Construct issued March 9, 2021, and modified March 10, 2026)

- 3.10 For Emission Point AA-203a (Wood-Fired Furnace), the permittee shall direct emissions from the furnace to the operational WESP-RTO Control System (Emission Point AA-201), except as otherwise specified herein (as applicable):

- (a) During any period of furnace start-up in which the Wood Chip Rotary Dryer (Emission Point AA-204a) does not contain wood chip material, the permittee may vent emissions from the furnace to either the Furnace Bypass Stack (Emission Point AA-203d) or the Wood Chip Rotary Dryer Bypass Stack (Emission AA-204b) in accordance with the “Start-up, Shutdown, and Malfunction Plan” required by Condition 5.3.
- (b) During any period of furnace shutdown, the permittee may vent emissions from the furnace to the Furnace Bypass Stack (Emission Point AA-203d) in accordance with the “Start-up, Shutdown, and Malfunction Plan” required by Condition 5.3.
- (c) The total duration for all periods of furnace start-up and furnace shutdown in which emissions from the furnace are vented to the Furnace Bypass Stack (Emission Point AA-203d) and/or the Wood Chip Rotary Dryer Bypass Stack (Emission AA-204b) shall not exceed one hundred (100) hours during any rolling 12-month period.

Once a total of 100 hours is attained for any rolling 12-month period, the permittee shall either direct emissions from the furnace to the operational WESP- RTO Control System or cease operation of the furnace.

- (d) During periods of furnace idle mode, the permittee may vent the emissions from the furnace to the Furnace Bypass Stack (Emission Point AA-203d) for no more than five hundred (500) hours based on a rolling 12-month total.

Once a total of 500 hours is attained for any rolling 12-month period, the permittee shall either direct emissions from the furnace to the operational WESP-RTO Control System or cease operation of the furnace.

For the purpose of this permit, “*idle mode*” is defined as the operation of the furnace at a heat input rate established in accordance with the “Start-up, Shutdown, and Malfunction Plan” required by Condition 5.3.

The use of the Furnace Bypass Stack or the Wood Chip Rotary Dryer Bypass Stack for any purpose other than the scenarios outlined in paragraphs (a) and (b) of this condition shall constitute a deviation and is subject to the deviation reporting requirements specified in Condition 6.1(a).

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued March 9, 2021, and modified March 10, 2026)

- 3.11 For Emission Point AA-204a (Wood Chip Rotary Dryer), the permittee shall at all times direct emissions to the operational WESP – RTO Control System (Emission Point AA-201) during any period in which the Wood Chip Rotary Dryer contains wood chip material, including periods of dryer shutdown.

Except for periods of malfunction, the permittee shall cease wood chip drying operations as soon as practicable during any period in which the Wood Chip Rotary Dryer contains wood chip material and either air pollution control device associated with WESP-RTO Control System is non-operational.

For any period in which the Wood Chip Rotary Dryer and/or either air pollution control device associated the WESP-RTO Control System malfunctions and the Wood Chip Rotary Dryer contains wood chip material, the permittee shall cease wood chip drying operations and minimize any uncontrolled emissions from the Wood Chip Rotary Dryer as soon as practicable in accordance with Condition 4.2 and the “Start-up, Shutdown, and Malfunction Plan” required by Condition 5.3.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in Permit to Construct issued March 9, 2021, and modified March 10, 2026)

- 3.12 For Emission Point AA-204a (Wood Chip Rotary Dryer), the permittee shall limit the throughput of wood chips dried to no more than 467,316.0 oven-dried tons (ODT) per year based on a rolling 12-month total.

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. 2.2.B.(10)., as established in the Permit to Construct issued March 9, 2021, and modified March 10, 2026)

- 3.13 For Emission Points AA-300 (Wood Pellet Operations) and AA-401 (Pellet Storage Silos / Pellet Truck Load-Out System), the permittee shall at all times operate each baghouse when the corresponding process source is operational and storing / transferring material. For any period in which a baghouse is non-operational, the permittee shall cease operation from associated process source(s) until such time that the applicable control device returns to operational status.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in Permit to Construct issued March 9, 2021, and modified March 10, 2026)

- 3.14 For Emission Point AA-300 (Wood Pellet Operations), the permittee shall limit the total production of wood pellets to no more than 624,700.0 oven-dried tons (ODT) per year based on a rolling 12-month total.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued March 9, 2021, and modified March 10, 2026)

- 3.15 For Emission Point AA-301 (RCO Control System), the permittee shall at all times operate the regenerative catalytic oxidizer (RCO) in such a manner as to achieve at minimum ninety-six (96.0) percent destruction efficiency of total HAPs (measured in “organic carbon as propane”) from the Primary Dry Hammermill Systems (Emission Points AA-303a), the Secondary Dry Hammermill Systems (Emission Points AA-307a), and the Pellet Mill / Cooler Systems (Emission Point AA-308a).

The use of the RCO to achieve 96.0% destruction efficiency of total HAPs has been determined to satisfy the case-by-case MACT requirements of Mississippi Administrative Code, Title 11, Part 2, Chapter 8, Rule 8.1.

(Ref.: 40 CR 63.43(c)(2); Subpart B and 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).)

- 3.16 For Emission Points AA-303a (Primary Dry Hammermill Systems), AA-307a (Secondary Dry Hammermill Systems), and AA-308a (Pellet Mill / Cooler Systems), the permittee shall at all times direct the respective emissions to the applicable operational baghouse filter(s) and the operational RCO (Emission Point AA-301) during any period in which the corresponding source(s) processes dried wood chip material, including periods of source shutdown.

Except for periods of malfunction, the permittee shall cease pelletizing operations from any process source(s) as soon as practicable during any period in which a process source contains dried wood material and either the applicable baghouse filters(s) and/or the RCO is non-operational.

For any period in which any process source(s), corresponding baghouse filter(s), and/or the RCO malfunctions and the applicable process source(s) contain dried wood material, the permittee shall cease pelletizing operations and minimize uncontrolled emissions from the process source(s) as soon as practicable in accordance with Condition 4.2 and the “Start-up, Shutdown, and Malfunction Plan” required by Condition 5.3.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in Permit to Construct issued March 9, 2021, and modified March 10, 2026)

- 3.17 For Emission Point AA-500 (Emergency Engines), the maximum emission of ash and/or particulate matter (PM) from each engine shall not exceed 0.6 pounds per MMBTU per hour heat input.

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

- 3.18 For Emission Point AA-500 (Emergency Engines), the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 60, Subpart III – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines and 40 CFR Part 60, Subpart A – General Provisions (as required in Table 8 of Subpart III).

(Ref.: 40 CFR 60.4200(a)(2), 60.4218, and Table 8; Subpart III)

- 3.19 For Emission Point AA-500 (Emergency Engines), the permittee shall only use diesel fuel in each engine that meets the following requirements (on a per-gallon basis):

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

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

- 3.20 For Emission Point AA-500 (Emergency Engines), any operation of the engine for any purpose other than emergency operation, maintenance and testing, and operation in non-emergency situations, as allowed in paragraph (c), is prohibited. If an engine is not operated in accordance with paragraphs (a) through (c) of this condition, the engine will not be considered an emergency engine under Subpart III and shall then meet all applicable requirements under Subpart III for non-emergency engines:

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

counted as part of the 100 hours per calendar year for maintenance and testing. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

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

- 3.20 For Emission Point AA-500 (Emergency Engines), the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines.

As the engines are considered “*new*” and subject to 40 CFR Part 60 – Subpart IIII, the permittee shall demonstrate compliance with Subpart ZZZZ by complying with the applicable requirements of Subpart IIII. No further requirements apply under Subpart ZZZZ.

(Ref.: 40 CFR 63.6590(c)(1), Subpart ZZZZ)

- 3.22 For Emission Point AA-501 (Emergency Pump Engine), the permittee shall purchase the engine that complies with the following emission standards:

- (a) Non-methane Hydrocarbon + Nitrogen Oxides (NMHC + NO<sub>x</sub>): 4.0 grams per kilowatt-hour (or 3.0 grams per horsepower-hour);
- (b) Particulate Matter (PM): 0.20 grams per kilowatt-hour (or 0.15 grams per horsepower-hour); and
- (c) Carbon Monoxide (CO): 3.5 grams per kilowatt-hour (or 2.6 grams per horsepower-hour).

The engine shall be installed and configured according to the manufacturer's emission-related specifications. Additionally, the permittee shall operate the engine in such a manner as to achieve the noted emission standards over the entire life of the engine.

(Ref.: 40 CFR 60.4205(c), 60.4206, and 60.4211(c); Subpart IIII)

- 3.23 For Emission Point AA-502 (Emergency Generator Engine), the permittee shall purchase the engine that complies with the following emission standards:

- (a) NMHC + NO<sub>x</sub>: 4.0 grams per kilowatt-hour;
- (b) CO: 3.5 grams per kilowatt-hour; and
- (c) PM: 0.20 grams per kilowatt-hour.

Additionally, the permittee shall not discharge into the atmosphere any smoke exhaust that exceeds the following opacity standards:

- (d) 20 percent (20%) during the acceleration mode;
- (e) 15 percent (15%) during the lugging mode; and
- (f) 50 percent (50%) during the peaks in either the acceleration or lugging modes.

The engine shall be installed and configured according to the manufacturer's emission-related specifications. Additionally, the permittee shall operate the engine in such a manner as to achieve the noted emission standards over the entire life of the engine.

(Ref.: 40 CFR 60.4205(b), 60.4202(a)(2), 60.4206, and 60.4211(c); Subpart III)

**SECTION 4 WORK PRACTICE STANDARDS**

Emission Point	Applicable Requirement	Condition Number	Work Practice
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in Permit to Construct issued March 10, 2026	4.1	Minimize the Off-Site Migration of Fugitive Dust
AA-200 AA-300	40 CFR 63.2 and 63.6(e)(1)(i) – (ii); Subpart A	4.2	General Duty Clause
AA-500	40 CFR 60. 4211(a); Subpart III	4.3	Conduct Best Management Practices

4.1 For Emission Point AA-000 (Facility-Wide), the permittee shall develop, implement, and maintain reasonable work practices to minimize (to the best extent practicable) the off-site migration of fugitive dust from each applicable operation, process, handling, storage, or transportation activity to comply with the requirements specified in Condition 3.4.

Such work practices shall include (but not limited to) the following measures:

- (a) The application of water and/or a dust suppressant onto any unpaved or uncovered ground surface while the facility is in operation and dry conditions exist (or when fugitive dust is observed).
- (b) The implementation of an on-site vehicle speed limit for areas with any unpaved or uncovered ground surface.
- (c) Conduct a visual inspection of each potential dust source and the existing control measures in accordance with Condition 5.10;
- (d) The covering of open bodied trucks while transporting materials likely to create airborne dusts;
- (e) As determined to be beneficial, increase the frequency of watering or dust suppressant application to paved and unpaved roads; and
- (f) At a frequency no less than annually, conduct training for personnel to ensure adherence to best management practices for dust control and preventive maintenance.

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

4.2 For Emission Points AA-200 (Wood Drying Operations) and AA-300 (Wood Pellet Operations), the permittee shall at all times operate and maintain each applicable source (including associated air pollution control equipment and monitoring equipment) in a manner consistent with safety and good air pollution control practices for minimizing emissions (including periods of start-up, shutdown, and malfunction).

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

The determination of whether such operation and maintenance procedures are being used will be based on information available to the MDEQ that may include (but not limited to) monitoring results, review of operation and maintenance procedures [including the SSMP required in Condition 5.3], review of operation and maintenance records, and inspection of the source.

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

For the purpose of this permit, a “malfunction” means any sudden, infrequent, and not reasonably preventable failure of air pollution control and monitoring equipment, process equipment, or a process to operate in a normal or usual manner which causes (or has the potential to cause) the emission limitations in an applicable standard to be exceeded. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(Ref.: 40 CFR 63.2 and 63.6(e)(1)(i) – (ii); Subpart A)

- 4.3 For Emission Point AA-500 (Emergency Engines), the permittee shall adhere to the following work practices:
- (a) Operate and maintain each engine and control device (if any) according to the manufacturer’s emission-related written instructions;
  - (b) Change only those emission-related settings that are permitted by the manufacturer;
  - (c) Meet the requirements of 40 CFR Part 1068 (as applicable); and
  - (d) If the permittee does not operate and maintain each engine according to the manufacturer’s emission-related written instruction, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee shall demonstrate compliance in accordance with 40 CFR 60.4211(g), Subpart III.

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

## SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Monitoring / Recordkeeping Requirement
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain Records for a Minimum of Five (5) Years
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.2	PM / PM <sub>10</sub> / PM <sub>2.5</sub> (filterable only)	Maintain and Implement a Dust Management Plan
AA-200 AA-300	40 CFR 63.43(c)(2); Subpart B 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.3	HAPs	Maintain and Implement a Start-Up, Shutdown, and Malfunction Plan
AA-200 AA-300 AA-401 AA-500	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.4	PM (filterable)  PM <sub>10</sub> / PM <sub>2.5</sub> (filterable + condensable)  NO <sub>x</sub>  CO  VOCs	Calculate Emissions (Monthly and Rolling 12-Month Totals)
AA-201 AA-303 AA-307 AA-308	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.5	Secondary Voltage  Secondary Current  Differential Pressure Drop	Continuous Monitoring System Requirements
AA-201 AA-301	40 CFR 63.43(c)(2); Subpart B 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.6	Firebox Temperature	Continuous Temperature Monitoring System Requirements
		5.7	HAP Destruction Efficiency  PM / PM <sub>10</sub> / PM <sub>2.5</sub> (filterable)  Condensable PM  CO  NO <sub>x</sub>  VOCs  HAPs	Conduct Routine Performance Testing Develop Operating Limits
	11 Miss. Admin. Code, Pt. 2, R. 2.2.B.(11).	5.8	PM (filterable)  PM <sub>10</sub> / PM <sub>2.5</sub> (filterable + condensable)  NO <sub>x</sub>  CO  VOCs  HAPs	Establish Site-Specific Emission Factors

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Monitoring / Recordkeeping Requirement
AA-201 AA-301	40 CFR 63.43(c)(2); Subpart B 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.9	Firebox Temperature	Continuously Monitor the RTO and RCO (3-Hour Block Average)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.10	PM / PM <sub>10</sub> / PM <sub>2.5</sub>	Conduct Weekly Visible Emission Observations / Evaluations
AA-201	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.11	Secondary Voltage Secondary Current	Continuously Monitor for the WESP (3-Hour Block Average)
AA-203a	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.12	Fuel Sources	Recordkeeping Requirements
AA-203d AA-204b	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.13	Hours of Duration	Monitor Date, Time, and Duration of Start-Up and Shutdown Periods (Monthly) Calculate Total Duration of All Start-Up and Shutdown Periods (Rolling 12-Month Total)
AA-203d	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.14	Hours of Duration	Monitor Date, Time, and Duration of Idle Mode Periods (Monthly) Calculate Total Duration of All Idle Mode Periods (Rolling 12-Month Total)
AA-204a	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.15	Dried Wood Chips	Monitor Total Throughput (Monthly and Rolling 12-Month Total)
AA-300 AA-401	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.16	PM / PM <sub>10</sub> / PM <sub>2.5</sub> (filterable only)	Conduct an Inspection on Each Baghouse Weekly
AA-300	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.17	Wood Pellets	Monitor Total Production (Monthly and Rolling 12-Month Total)
AA-301	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.18	Catalytic Reactivity Structural Integrity	Conduct Routine Testing on Catalytic Media in the RCO
AA-303a AA-304 AA-307a AA-308a AA-401	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.19	Differential Pressure Drop	Monitor Each Baghouse Filter Daily
AA-500	40 CFR 60.4209(a); Subpart III 11 Miss Admin. Code Pt. 2, R. 2.2.B(11).	5.20	Emergency Engine Status	Monitor the Hours of Operation Monthly (Emergency and Non-Emergency)

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Monitoring / Recordkeeping Requirement
AA-500	40 CFR 60.4114(a)(2)(i) – (iii); Subpart III 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.21	NMHC + NO <sub>x</sub> CO PM	Recordkeeping Requirements
	40 CFR 60.4211(g)(2); Subpart III	5.22		Perform Additional Compliance Actions (As Applicable)

5.1 For Emission Point AA-000 (Facility-Wide), except as otherwise specified or limited herein, the permittee shall retain all required records, monitoring data, supporting information, and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes all calibration and maintenance records, all original strip-chart recordings or other data from continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to the MDEQ as required by “Applicable Rules and Regulations” of this permit upon request.

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

5.2 For Emission Point AA-000 (Facility-Wide), the permittee shall maintain and implement “Dust Management Plan” (DMP) (dated March 2025) that details the work practices implemented in accordance with Condition 4.1 to minimize the off-site migration of fugitive dust.

Additionally, the permittee shall maintain documentation that details any associated monitoring, compliance action(s), and/or applied frequency for each implemented work practice.

As deemed necessary, the permittee may revise the DMP to address changes to applicable operations and/or to incorporate additional best management practices.

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

5.3 For Emission Point AA-000 (Facility-Wide), the permittee shall implement and maintain the “Start-Up, Shutdown, and Malfunction Plan” (SSMP) (dated September 27, 2024) for the operation and maintenance of applicable emissions equipment during periods of start-up, shutdown, and malfunction.

As deemed necessary, the permittee may revise the SSMP to address changes to applicable operations and/or to incorporate additional best management / maintenance practices for the purpose of ensuring the following requirements:

- (a) At all times, the permittee shall operate and maintain all applicable sources (including all associated air pollution control and monitoring equipment) in a manner that satisfies the general duty to minimize emissions established in Condition 4.2;
- (b) The permittee is prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize the excess emission of HAPs; and
- (c) Reduce the reporting burden associated with periods of start-up, shutdown, and malfunction (including corrective action taken to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation).

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

5.4 For Emission Points AA-200 (Wood Drying Operations), AA-300 (Wood Pellet Operations), AA-401 (Pellet Storage Silos / Pellet Truck Load-Out System), and AA-500 (Emergency Engines), the permittee shall calculate and maintain the total respective emission of filterable PM, PM<sub>10</sub> (filterable and condensable), PM<sub>2.5</sub> (filterable and condensable), NO<sub>x</sub>, CO, and VOCs in tons from all denoted sources on both a monthly and rolling 12-month total basis in accordance with the following requirements:

- (a) The permittee shall calculate emissions from WESP – RTO Control System (Emission Point AA-201) and the RCO Control System (Emission Point AA-301) using applicable production data, applicable parametric monitoring data, and the most recently established site-specific emission factors.
- (b) For any source in which emissions are not controlled by the WESP – RTO Control System (Emission Point AA-201) or RCO Control System (Emission Point AA-301), the permittee shall either assume actual emissions are equivalent to potential emissions or utilize actual applicable throughput / production data in addition to applicable emission factors and device removal efficiency factors (as applicable).
- (c) The permittee shall include any period in which emissions bypass an applicable air pollution control device within the calculation of total pollutant emissions.
- (d) Unless otherwise specified herein, the permittee shall maintain records of all reference data utilized to calculate emissions (operational data, applicable emission factors, engineering judgement determinations, stack testing results, etc.).

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

5.5 For Emission Points AA-201 (WESP – RTO Control System), AA-303a (Primary Dry Hammermill Systems), Emission Point AA-307a (Secondary Dry Hammermill Systems), and AA-308a (Pellet Mill / Cooler Systems), the permittee shall calibrate, operate, maintain, and inspect a continuous monitoring system in accordance with the manufacturer's recommendations for the specified operating parameter on the following air pollution control devices:

- (a) Wet Electrostatic Precipitator (WESP) – Secondary voltage (in volts) and secondary current (in amps); and
- (b) Baghouse Filter – differential pressure drop (in inches of water).

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

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

5.6 For Emission Points AA-201 (WESP – RTO Control System) and AA-301 (RCO Control System), the permittee shall operate and maintain the continuous temperature monitoring system in accordance with the following specifications:

- (a) The continuous monitoring system shall be capable of completing a minimum one cycle of operation (i.e. sampling, analyzing, and recording) for each successive 15-minute period;
- (b) The permittee shall maintain the equipment for the continuous monitoring system at all times including (but not limited to) the parts necessary for routine repairs of equipment;
- (c) The permittee shall record and maintain the results of each inspection and validation check;
- (d) The permittee shall locate the temperature sensor in a position that provides a representative temperature;
- (e) The permittee shall use a temperature sensor with a minimum accuracy of 4°F or 0.75 percent of the minimum required firebox temperature (whichever is larger);
- (f) The permittee shall validate the temperature sensor's reading on an annual basis in accordance with the manufacturer's specifications;
- (g) The permittee shall conduct validation checks using the procedures specified in paragraph (f) of the condition any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor; and
- (h) The permittee shall inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrossions at least quarterly.

(Ref.: 40 CFR 63.42(c)(2); Subpart B and 11 Miss. Admin. Code Pt. 2, R. 2. 2.B.(11).)

5.7 For Emission Points AA-201 (WESP – RTO Control System) and AA-301 (RCO Control System), the permittee shall demonstrate initial compliance with the total HAP destruction efficiency limits specified in Conditions 3.9 and 3.15 by conducting a performance test no

later than thirteen (13) months after issuance of this modified permit. The permittee shall demonstrate subsequent compliance by conducting a performance test once every three (3) years [and not to exceed thirty-seven (37) months after the previously completed test].

With each total HAP destruction efficiency compliance demonstration, the permittee shall also evaluate the respective emission of methanol, formaldehyde, acetaldehyde, CO, and NO<sub>x</sub>.

In addition, the permittee shall evaluate the emission of PM (filterable), PM<sub>10</sub> (filterable), PM<sub>2.5</sub> (filterable), and condensable PM from each source by conducting performance testing no later than December 3, 2028. Thereafter, the permittee shall conduct subsequent performance testing no later than sixty-one (61) months after the previously completed test.

The permittee shall perform each test in accordance with the following requirements (as applicable):

- (a) Unless otherwise specified herein, the permittee shall conduct a performance test in accordance with an applicable EPA-approved test method found in Appendix A of 40 CFR Part 60, Appendix M of 40 CFR Part 51, Appendix A of 40 CFR Part 63, or an applicable alternative test method approved by EPA prior to the testing event.
- (b) The permittee shall conduct a minimum of three (3) separate test runs for a performance stack test as specified in 40 CFR 63.7(e)(3), Subpart A.
- (c) The permittee shall evaluate emission of NO<sub>x</sub> and CO concurrently.
- (d) The permittee shall evaluate the emission of condensable PM concurrently with the evaluation of PM<sub>10</sub> (filterable) or PM (filterable).
- (e) *For the RTO and RCO:* For each HAP destruction efficiency compliance demonstration, the permittee shall utilize EPA Test Method 25A to simultaneously measure total emissions at the inlet and outlet of each air pollution control device.
- (f) *For the RTO and RCO:* For each HAP destruction efficiency compliance demonstration, the permittee shall continuously monitor the firebox temperature during each of the required 1-hour test runs. However, the permittee may measure the temperature in multiple locations (e.g. one location per burner) in the combustion chamber and calculate the average of the temperature measurements prior to reducing the temperature data to 15-minute averages for purposes of establishing the minimum firebox temperature.

The minimum firebox temperature shall be established as the average of the three (3) minimum 15-minute firebox temperatures monitored during the three (3) test runs. Multiple three-run performance tests may be conducted to establish a range of parameter values under different operating conditions.

The permittee may establish a different minimum firebox temperature for the RTO or RCO by conducting a repeat performance test (in accordance with the applicable requirements specified in this condition) that demonstrates compliance with the HAP destruction efficiency standard.

- (g) *For the WESP:* For each PM<sub>10</sub> performance test, the permittee shall continuously monitor the secondary voltage and secondary current during each of the required 1-hour test runs.

The minimum secondary voltage and minimum secondary current shall be established as the average of the respective three (3) minimum 15-minute values monitored during the three (3) test runs. Multiple three-run performance tests may be conducted to establish a range of parameter values under different operating conditions. The secondary voltage and secondary current shall be used to calculate the power of each WESP field.

- (h) *For the RTO:* The permittee shall monitor and record hourly throughput data on the wood chips dried by the Wood Chip Rotary Dryer (Emission Point AA-204a) during a performance test.
- (i) *For the RCO:* The permittee shall monitor and record hourly throughput data in ODT of wood pellets produced during a performance test.

(40 CFR 63.43(c)(2); Subpart B and 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).)

- 5.8 For Emission Points AA-201 (WESP – RTO Control System) and AA-301 (RCO Control System), 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 (filterable), PM<sub>10</sub> (filterable and condensable), PM<sub>2.5</sub> (filterable and condensable), VOCs, NO<sub>x</sub>, CO, methanol, formaldehyde, and acetaldehyde in pounds per oven-dried tons (ODT) upon completing a performance test required by Condition 5.7 (as applicable). The permittee shall establish the emission factors in accordance with the following requirements:

- (a) The permittee shall calculate the site-specific VOC emission factor for each control system based on the following EPA OTM-26:

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

Where:

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

$\bar{M}_{OC \text{ (as propane)}}$  = the average mass emission rate of organic carbon (as propane) from the applicable performance testing; in pounds per hour;

- $\bar{M}_{Methanol}$  = the average mass emission rate of methanol from the applicable performance testing; in pounds per hour;
- $\bar{M}_{Formaldehyde}$  = the average mass emission rate of formaldehyde from the applicable performance testing; in pounds per hour;
- $\bar{M}_{Acetaldehyde}$  = the average mass emission rate of acetaldehyde from applicable performance testing; in pounds per hour; and
- $\bar{M}_{Throughput}$  = the average throughput rate of applicable material (i.e. green wood chips processed, dried wood chips, wood pellets) during the applicable performance testing; in ODT per hour.

- (b) Except as otherwise specified in paragraph (a) of this condition, the permittee shall calculate the site-specific emission factor for each required pollutant based on the following equation:

$$EF_{P,i} = \frac{\bar{M}_{P,i}}{\bar{M}_{Throughput}}$$

Where:

- $EF_{P,i}$  = the site-specific emission factor for pollutant “i”; in pounds per ODT;
- $\bar{M}_{P,i}$  = the average mass emission rate of pollutant “i” from the applicable performance testing; in pounds per hour; and
- $\bar{M}_{Throughput}$  = the average throughput rate of applicable material (i.e. green wood chips processed, dried wood chips, wood pellets) during the applicable performance testing; in ODT per hour
- (c) For the WESP – RTO Control System: All site-specific emission factors shall be based on the pounds of pollutant per combined ODT of dried wood chips from the Wood Chip Rotary Dryer (Emission Point AA-204a).
- (d) For the RCO Control System: All site-specific emission factors shall be based on the pounds of pollutant per ODT of wood pellets produced.

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

- 5.9 For Emission Points AA-201 (WESP- RTO Control System) and AA-301 (RCO Control System), the permittee shall demonstrate continuous compliance with the operating limits

established in accordance with Condition 5.7(f) by monitoring and collecting temperature data from the RTO or RCO in accordance with the following specifications:

- (a) As appropriate, the permittee shall conduct all monitoring in continuous operation at all times the process unit is operating except during periods of monitor malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments – as applicable).
- (b) For the purpose of calculating data averages, the permittee **shall** not use data recorded during periods of monitoring malfunction, associated repair, out-of-control periods, and required quality assurance / control activities. However, the permittee **may** not use data recorded during periods of safety-related shutdown.

Data collected during all other periods shall be used in assessing compliance and operation of the RTO or RCO.

For the purpose of this permit, 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. Any period for which the monitoring system is out-of-control and data are not available for required calibrations constitutes a deviation from the monitoring requirements.

- (c) The permittee shall determine the 3-hour block average of all recorded readings calculated after every three (3) hours of operation as the average of the evenly spaced recorded readings in the previous three (3) operating hours [excluding the periods described in paragraphs (a) and (b) of this condition].
- (d) To calculate the data averages for each 3-hour averaging period, the permittee shall have at least seventy-five percent (75%) of the required recorded readings for that period using only recorded readings that are based on valid data.

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

- 5.10 For Emission Points AA-201 (WESP-RTO Control System) and AA-301 (RCO Control System), the permittee shall perform a visible emission observation in accordance with EPA Test Method 22 (“Method 22”) on the exhaust of each source on a weekly basis during daylight hours and during representative operating conditions. Each observation shall be performed for a minimum of six (6) consecutive minutes.

If visible emissions are detected during an observation period, the permittee shall then immediately perform a visible emission evaluation (VEE) in accordance with EPA Test Method 9 (“Method 9”). 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 immediately and shall conduct the VEE as soon as practicable.

The permittee shall maintain all documentation and information required by Method 22 and/or 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. 2.2.B.(11).)

- 5.11 For Emission Point AA-201 (WESP-RTO Control System), the permittee shall demonstrate continuous compliance with the operating limit established in accordance with Condition 5.7(g) by continuously monitoring and collecting the secondary voltage (in volts) and secondary current (in amps) for each field in the WESP to calculate the 3-hour block average power of each field.

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

- 5.12 For Emission AA-203a (Wood-Fired Furnace), the permittee shall maintain documentation that certifies the material combusted within the furnace complies with the fuel source restrictions specified in Condition 3.10 on a calendar year basis. In addition, the permittee shall monitor and maintain the volume of diesel fuel used for each cold start-up of the furnace.

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

- 5.13 For Emission Points AA-203d (Furnace Bypass Stack) and AA-204b (Rotary Dryer Bypass Stack), the permittee shall monitor and record the date, time, and duration of each start-up and/or shutdown period in which emissions from the furnace are diverted to denoted bypass stack. Additionally, the permittee shall calculate and record the total duration of all start-up and shutdown periods for the furnace in hours per year based on a rolling 12-month total.

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

- 5.14 For Emission Points AA-203d (Furnace Bypass Stack), the permittee shall monitor and record the date, time, and duration of each period in which the furnace operates in idle mode. Additionally, the permittee shall calculate and record the total duration of all idle mode periods for the furnace in hours per year based on a rolling 12-month total.

During any period that the furnace operates in idle mode, the permittee shall monitor the volume of wood waste fed into the furnace and calculate the heat input rate during the bypass period and convert the heat input into an hourly heat input by dividing the heat input during the bypass period by the duration of the bypass period that occurred.

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

- 5.15 For Emission Point AA-204a (Wood Chip Rotary Dryer), the permittee shall monitor and record the throughput of dried wood chips from the dryer in oven-dried tons (ODT) on both a monthly and rolling 12-month total basis.

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

- 5.16 For Emission Points AA-300 (Pellet Operations) and AA-401 (Pellet Storage Silos / Pellet Truck Load-Out System), the permittee shall perform and record an inspection that evaluates the performance capability of each baghouse filter, baghouse, and bin vent filter on a monthly basis. If a problem is noted during an inspection, the permittee shall perform the necessary maintenance to ensure operation of the control device as originally designed. Additionally, the permittee shall maintain on-site (to the extent practicable) sufficient components as is necessary to repair a baghouse filter, baghouse, or bin vent filter.

The permittee shall maintain documentation that details the date / time each inspection is performed, any noted problem that is experienced, and any maintenance (either corrective or preventative) performed to return a control device to operation as originally designed. Additionally, the permittee shall monitor and record each period of time (including the date and duration) in which a control device is non-operational on a monthly basis.

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

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

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

- 5.18 For Emission Point AA-301 (RCO Control System), the permittee shall determine the effective life of the catalytic media in the RCO by evaluating the catalyst reactivity and structural integrity in accordance with the applicable vendor's specifications and/or recommendations no later than March 22, 2025. Thereafter, the permittee shall conduct subsequent testing no later than sixteen (16) months after the previously completed test.

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

- 5.19 For Emission Points AA-303a (Primary Dry Hammermill Systems), AA-307a (Secondary Dry Hammermill Systems), AA-308a (Pellet Mill / Cooler Systems), AA-304 (Dry Shavings Truck Dump), and AA-401 (Pellet Storage Silos / Pellet Truck Load-Out System), the permittee shall monitor and record the differential pressure drop (in inches of water) across each baghouse filter on a daily basis during active operation of the applicable source.

If a monitored pressure drop is outside the manufacturer's specifications and/or recommendations range for a baghouse filter, the permittee shall perform and record any corrective measures taken to return the baghouse to the recommended pressure drop range.

Additionally, the permittee shall maintain documentation for each baghouse filter that details the recommended differential pressure drop range specified by the respective manufacturer.

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

- 5.20 For Emission Point AA-500 (Emergency Engines), the permittee shall monitor and record (via a non-resettable hour meter) the hours of operation for each engine on a monthly basis for both emergency and non-emergency service. Additionally, the permittee shall maintain documentation that details what classified each occurrence as either an emergency or a non-emergency.

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

- 5.21 For Emission Point AA-500 (Emergency Engines), the permittee shall maintain documentation that details the following information:

- (a) All notifications submitted must comply with Subpart IIII;
- (b) Any maintenance conducted on an engine; and
- (c) Documentation from the manufacturer that indicates an engine is certified to meet the emission standards specified in Condition 3.21 or 3.22.

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

- 5.22 For Emission Point AA-500 (Emergency Engines), the permittee shall demonstrate compliance through the emission standards specified in Condition 3.20 and 3.22 through the following actions **if** the permittee does not operate and maintain the engine according to the manufacturer's emission-related written instructions or the permittee changes emission-related settings in a way that is not permitted by the manufacturer:

- (a) Keep a maintenance plan, records of conducted maintenance, and (to the extent practicable) maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.
- (b) The permittee shall conduct an initial performance test to demonstrate compliance with the applicable emission standards in accordance with one of the following deadlines:
  - (1) Within one (1) year of start-up, or
  - (2) Within one (1) year after the engine is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or
  - (3) Within one (1) year after the permittee changes emission-related settings in a way that is not permitted by the manufacturer.

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

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

## SECTION 6 REPORTING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Reporting Requirement
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.1	Submit Documents Certified by a Responsible Official
		6.2	Report a Deviation Within Five (5) Days
		6.3	Submit a Semi-Annual Monitoring Report
AA-201 AA-301	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.4	Submit Site-Specific Emission Factors
		6.5	Submit Performance Testing Protocol Submit 10-Day Notification of Performance Testing Event
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11) and 2.6.B.(6).	6.6	Submit Performance Test Results to MDEQ
	40 CFR 63.42(c)(2); Subpart B	6.7	Submit Performance Test Results to EPA
AA-301	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.8	Submit Testing Results Indicating Effective Life of Catalytic Media

6.1 For Emission Point AA-000 (Facility-Wide), any document required by this permit to be submitted to the MDEQ shall contain a certification signed by a Responsible Official (RO) that affirms (based on information and belief formed after reasonable inquiry) the statements and information in the document are true, accurate, and complete.

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

6.2 For Emission Point AA-000 (Facility-Wide), except as otherwise specified herein, the permittee shall report all deviations from permit requirements (including those attributable to upsets or malfunctions), the probable cause of such deviations, and any corrective action(s) and/or preventive measures taken. The report shall be submitted to the MDEQ within five (5) working days of the time the deviation began.

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

6.3 For Emission Point AA-000 (Facility-Wide), the permittee shall submit a certified semi-annual monitoring report (SMR) postmarked no later than January 31 and July 31 of each calendar year for the preceding six-month period.

Each SMR shall contain the following information:

- (a) A summary of any revision(s) made to the “Dust Management Plan” required by Condition 5.2 and/or the “Start-Up, Shutdown, and Malfunction Plan” required by Condition 5.3 during the reporting period as well as the updated plan(s);
- (b) For Emission Points AA-200 (Wood Drying Operations), AA-300 (Wood Pellet Operations), AA-401 (Pellet Storage Silos / Pellet Truck Load-Out System), and AA-500 (Emergency Engines) – the total emission of PM (filterable), PM<sub>10</sub> (filterable and condensable), PM<sub>2.5</sub> (filterable and condensable), NO<sub>x</sub>, CO, and VOCs in tons based on both a monthly and rolling 12-month total basis;
- (c) For Emission Points AA-201 (WESP – RTO Control System) and AA-301 (RCO Control System) – the permittee shall include within each SMR the following information for the RTO and/or RCO (as applicable):
  - (1) A description of any maintenance performed while the RTO or RCO was off-line;
  - (2) The date and time when the RTO or RCO was shut down and restarted;
  - (3) If there were no deviations from any operating limit established in accordance with Condition 5.7(e), a statement that there were no deviations during the reporting period;
  - (4) For each deviation from an operating limit established in accordance with Condition 5.7(e) (including during periods of start-up, shutdown, and malfunction), the permittee shall include the following information in the SMR:
    - (i) The date and time that each malfunction started and stopped;
    - (ii) The date and time that each continuous temperature monitoring system (CTMS) was inoperative, except for zero (low-level) and high-level checks;
    - (iii) The date, time, and duration that each CTMS was out-of-control, including the information specified in 40 CFR 63.8(c)(8), Subpart A.
    - (iv) The date and time that each deviation started and stopped as well as whether each deviation occurred during a period of start-up, shutdown, malfunction, or another unspecified period;
    - (v) A summary on the total duration of the deviations during the reporting period and the total duration as a percent of the total operating time of the RTO or RCO during that reporting period;
    - (vi) A breakdown on the total duration of the deviations during the reporting period into those that are due to start-up, shutdown, control system

problems, control device maintenance, process problems, other known causes, and other unknown causes; and

(vii) The date of the latest CTMS certification or audit.

- (d) For Emission Points AA-201 (WESP – RTO Control System), AA-303a (Primary Dry Hammermill Systems), AA-307a (Secondary Dry Hammermill Systems), and AA-308a (Pellet Mill / Cooler Systems) – the permittee shall include the following information on the WESP and each baghouse filter (as applicable):
- (1) *Operation Outside Established Operating Limit* – the specific control device, the date, the beginning and ending times, the cause(s) for each deviation; and any corrective action taken as a result of the deviation.
- (e) For Emission Points AA-203d (Furnace Bypass Stack) and/or AA-204b (Rotary Dryer Bypass Stack) – the permittee shall include in the report the following information:
- (1) The total duration of all combined start-up and shutdown periods in which emissions from the Wood-Fire Furnace are diverted to either the furnace bypass stack or dryer bypass stack in hours on both a monthly and rolling 12-month total basis; and
  - (2) The total duration of all idle mode periods for the Wood-Fired Furnace in hours on both a monthly and rolling 12-month total basis.
- (f) For Emission Point AA-204a (Wood Chip Rotary Dryer) – The total throughput of wood chips dried in oven-dried tons (ODT) on both a monthly and rolling 12-month total basis;
- (g) For Emission Point AA-300 (Wood Pellet Operations) – The total throughput of wood pellets produced in oven-dried tons (ODT) on both a monthly and a rolling 12-month total basis;
- (h) For Emission Point AA-500 (Emergency Engines) – The hours of operation for each emergency engine (including a summary on how many hours are spent for emergency operation, what classified the operation as an emergency situation, how many hours are spent for non-emergency operation, and the circumstance(s) for non-emergency operation).

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

- 6.4 For Emission Points AA-201 (WESP – RTO) and AA-301 (RCO Control System), the permittee shall submit the site-specific emission factors calculated in accordance with Condition 5.8 and all supporting documentation for review by the MDEQ no later than ninety (90) days after completing the applicable performance testing required by Condition 5.7.

For the purpose of this condition, any modification of a site-specific emission factor shall become effective on the month corresponding with the applicable stack testing event. The MDEQ retains the right to modify a site-specific emission factor based on additional performance testing.

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

- 6.5 For Emission Points AA-201 (WESP – RTO Control System) and AA-301 (RCO Control System), the permittee shall submit a written performance test protocol for testing required by Conditions 5.7 that details the procedures and test methods to be implemented during the actual testing event no later than thirty (30) days prior to the intended testing date.

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

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

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

- 6.6 For Emission Points AA-201 (WESP – RTO Control System) and AA-301 (RCO Control System), the permittee shall submit the results of a performance test required by Condition 5.7 to the MDEQ no later than sixty (60) days after completing the actual testing event.

Additionally, the permittee shall include with submission of the results the information specified by Condition 1.25 and the following data (as applicable):

- (a) The applicable parametric monitoring data collected during each test run (i.e., firebox temperature; total power based on secondary current and secondary voltage) and supporting documentation;
- (b) The hourly throughput data for the applicable process units (i.e., wood chips dried; wood pellets produced);
- (c) The feedstock ratio of softwood and hardwood used during the performance test (as applicable);
- (d) The moisture content of the wood pellets produced during the performance test;
- (e) Oxygen (O<sub>2</sub>) concentration data; and
- (f) A table summarizing the current and previous performance test results for each pollutant tested [noting the average pollutant emission rate and the average applicable throughput].

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

6.7 For Emission Points AA-201 (WESP – RTO Control System) and AA-301 (RCO Control System), the permittee shall submit the results of a performance test required to demonstrate compliance with the total HAP destruction efficiency limits specified in Conditions 3.9 and 3.15 to the EPA no later than sixty (60) days after completion of the performance test in accordance with the following requirements:

- (a) Submit the results of a performance test via the Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA’s CDX (<https://cdx.epa.gov/>). The data must be submitted in a file format generated using the EPA’s Electronic Reporting Tool (ERT) as listed on the following website: (<https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert>).

Alternatively, the permittee may submit an electronic file consistent with the extensible markup language (XML) schema listed on the EPA’s ERT website. When submitting to CEDRI, choose the “*State or Other Regulation – State or Other Regulation*” subpart report named “Performance Test Report (Submittal via CEDRI optional for Federal reporting)”.

- (b) If the permittee claims some of the information submitted to EPA under paragraph (a) is “Confidential Business Information” (CBI), the permittee must submit a complete file (including information claimed to be CBI) to the EPA in accordance with 40 CFR 63.9(k), Subpart A.

Clearly mark the part or all of the information that you claim to be CBI. Information not marked as CBI may be authorized for public release without prior notice. Information marked as CBI will not be disclosed except in accordance with procedures set forth in 40 CFR Part 2 (Public Information). The permittee must submit the same file submitted to the CBI office with the CBI omitted to the EPA via the EPA’s CDX as described in 40 CFR 63.9(k), Subpart A.

(Ref.: 40 CFR 63.42(c)(2); Subpart B)

6.8 For Emission Points AA-301 (RCO Control System), the permittee shall submit the results of each test evaluating the effective life of catalytic media (as required by Condition 5.20) no later than sixty (60) days after completing the actual testing event.

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