

# STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT

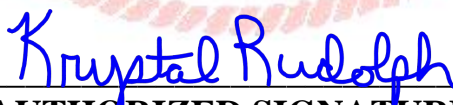
TO CONSTRUCT AIR EMISSIONS EQUIPMENT

**THIS CERTIFIES THAT**

Brookhaven Pellets, LLC  
W1 Behan Road  
Brookhaven, Lincoln 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: October 27, 2020**

**Permit No.: 1620-00057**

## SECTION 1

### 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 MDEQ within a reasonable time any information the MDEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the MDEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the 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. 1.10., "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants."

(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:

- (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)

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

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

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

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 Condition 24 of Section, 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).)

22. *Application for a Permit to Operate:* Except as otherwise specified in Condition 24 of Section 1, 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 Section 1, 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 Prevention of Significant Deterioration / New Source Review (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. *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).)

26. *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. Said report shall be made within five (5) working days of the time the deviation began.

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

27. *Compliance Testing:* Regarding compliance testing:

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

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

**SECTION 2**  
**EMISSION POINT DESCRIPTION**

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

Emission Point	Description
AA-100	Facility-Wide (Brookhaven Pellets, LLC)
AA-001	Pre-Dried Raw Material Handling [emissions controlled by maintaining negative pressure in the dump area and routing emissions to a cartridge filter]
AA-002a	Dry Hammermill No. 1 [emissions routed to a baghouse]
AA-002b	Dry Hammermill No. 2 [emissions routed to a baghouse]
AA-003a	Pelletizer / Pellet Cooler No. 1 [emissions routed to a high-efficiency cyclone]
AA-003b	Pelletizer / Pellet Cooler No. 2 [emissions routed to a high-efficiency cyclone]
AA-004	Pellet Storage Silo
AA-005	250 HP Diesel-Fired Emergency Fire Water Pump Engine [manufactured after April 1, 2006]
AA-006	Finished Pellet Truck Loading Operations

**SECTION 3  
EMISSION LIMITATIONS AND STANDARDS**

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limitation / Standard
AA-100 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity	40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.C.	3.2	PM	General Nuisance Clause
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.3		E = 4.1 (p <sup>0.67</sup> )
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.4	VOCs	245.0 tpy (12-Month Rolling Total)
AA-005	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.5	PM (filterable only)	0.6 Pounds / MMBTU
	40 CFR Part 60, Subpart III – Standards of Performance for Stationary Compression Ignition Combustion Engines 40 CFR 60.4200(a)(2)(iii), Subpart III  40 CFR 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines 40 CFR 63.6590(c)(1), Subpart ZZZZ	3.6	NMHC + NO <sub>x</sub>  PM	General Applicability
	40 CFR 60.4205(c), 60.4206, and 60.4211(c), Subpart III	3.7		Purchase Engine Certified to Emission Standards
	40 CFR 60.4207(b), Subpart III and 40 CFR 80.510(b), Subpart I	3.8	Diesel Fuel Requirement	15 ppm Maximum Sulfur Content; and 40 Minimum Cetane Index or 35% Maximum Aromatic Content
	40 CFR 60.4211(f)(1) – (3), Subpart III	3.9	Hours of Operation	100 Hours Per Calendar Year For Maintenance and Testing 50 Hours Per Calendar Year For Non-Emergency Situations

3.1 For Emission Point AA-100 (Facility-Wide), the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emission source any air



contaminant of such opacity to obscure an observer's view to a degree of forty percent (40%).

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

- 3.2 For Emission Point AA-100 (Facility-Wide), the permittee shall not cause or allow the emission of particles or any contaminants in sufficient amounts or of such duration from any process as to be injurious to humans, animals, plants, or property, or to be a public nuisance, or create a condition of air pollution.

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

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

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

- 3.3 For Emission Point AA-100 (Facility-Wide), except as otherwise specified, the permittee shall not cause, permit, or allow the emission of particulate matter (PM) in total quantities in any one (1) hour from any manufacturing process (which includes any associated stacks, vents, outlets, or combination thereof) to exceed the amount determined by the 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-100 (Facility-Wide), the permittee shall limit the total emission of volatile organic compounds (VOCs) to no more than 245.0 tons per year (tpy) based on a 12-month rolling total.

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

- 3.5 For Emission Point AA-005, except as otherwise specified or limited herein, the permittee shall limit the emission of ash and/or particulate matter (PM) to no more than 0.60 pounds per MMBTU per hour heat input.

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

- 3.6 For Emission Point AA-005, the permittee is subject to and shall comply with applicable requirements found in 40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines and 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

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 60.4200(a)(2)(iii), Subpart IIII)

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

- 3.7 For Emission Point AA-005, the permittee shall purchase a fire pump engine that complies with following emission standards:

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

- 3.8 For Emission Point AA-005, the permittee shall only use diesel fuel 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 IIII and 40 CFR 80.510(b), Subpart I)

- 3.9 For Emission Point AA-005, 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 Parts (a) through (c) of this condition, the engine will not be considered an emergency engine under Subpart IIII and shall then meet all applicable requirements under Subpart IIII 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 III)

## SECTION 4 WORK PRACTICE STANDARDS

Emission Point	Applicable Requirement	Condition Number	Pollutant / Parameter	Work Practice Standard
AA-005	40 CFR 60.4211(a) and (g)(2), Subpart III	4.1	NMHC + NO <sub>x</sub> PM	Best Management Practices

- 4.1 For Emission Point AA-005, the permittee shall adhere to the following 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 Parts 89, 94, and/or 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)(2), Subpart III.

(Ref.: 40 CFR 60.4211(a) and (g)(2), Subpart III)

## SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number	Pollutant / Parameter	Monitoring / Recordkeeping Requirement
AA-100 (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>	Develop, Maintain, and Implement a Dust Management Plan
		5.3	VOCs	Calculate the Total Emissions (Monthly and 12-Month Rolling Totals)
		5.4	Moisture Content	Maintain Records of Moisture Content of Raw Material
AA-001 AA-002a AA-002b AA-003a AA-003b	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.5	Opacity	Perform Weekly Visible Emission Observations
		5.6	PM / PM <sub>10</sub> / PM <sub>2.5</sub>	Perform Weekly Inspections on Process Units
AA-002a AA-002b AA-003a AA-003b	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.7	VOCs PM (filterable only) PM <sub>10</sub> / PM <sub>2.5</sub> (filterable + condensable)	Initial Performance Test Requirements
		5.8	VOCs	Subsequent Performance Test Requirements
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.9	PM / PM <sub>10</sub> / PM <sub>2.5</sub> VOCs	Establish Site-Specific Emission Factors (As Applicable)
AA-002a AA-002b	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.10	PM / PM <sub>10</sub> / PM <sub>2.5</sub>	Evaluate Pressure Drop on Each Baghouse Daily
AA-005	40 CFR 60.4211(c), Subpart III	5.11	NMHC + NO <sub>x</sub> PM	Maintain Documentation that Demonstrates Engine Certification
	40 CFR 60.4214(b), Subpart III	5.12	Hours of Operation	Monitor Hours of Operation for Emergency and Non-Emergency Service

5.1 Except as otherwise specified or limited herein, the permittee shall retain all required records, monitoring data, supporting information, and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application.

Supporting information includes all calibration and maintenance records, all original strip-chart recordings or other data from continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to the MDEQ as required by “Applicable Rules and Regulations” of this permit upon request.

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

- 5.2 For Emission Point AA-100 (Facility-Wide), prior to commencing actual operation, the permittee shall develop, maintain, and implement a “*Dust Management Plan*” that details the procedures for operating and maintaining applicable process units to minimize the emission of fugitive and uncontrolled particulate matter (PM).

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

- 5.3 For Emission Point AA-100 (Facility-Wide), the permittee shall calculate and record the total emission of volatile organic compounds (VOCs) in tons on a monthly basis, in tons per year (tpy) based on a 12-month rolling total basis, and in accordance with the following specifications:

- (a) Beginning on the date of initial start-up and ending on the date in which the emission factors established in accordance with Condition 5.9 are approved, the permittee shall calculate emissions from Emission Points AA-002a, AA-002b, AA-003a, and AA-003b (as applicable) using the emission factors presented in the Permit to Construct application for the proposed project.
- (b) Upon approval of the site-specific emission factors, the permittee shall calculate and record emissions from Emission Points AA-002a, AA-002b, AA-003a, and AA-003b (as applicable) using collected production data, collected parametric monitoring data, and the established site-specific emission factors. Additionally, the permittee shall revise and update the monthly and 12-month rolling total emissions calculated in accordance with paragraph (a) above to reflect the approved site-specific emission factors.
- (c) For all other emission sources, when determining compliance with the ton per year emission limits, the permittee shall either assume actual emissions are equivalent to potential emissions or shall maintain actual data (e.g. throughput) and use the emission factors presented in the Permit to Construct application to determine actual emissions on a monthly and 12-month rolling total basis.
- (d) Unless otherwise specified herein, the permittee shall maintain records of all reference data utilized to validate calculated emissions (operational data, applicable emission factors, engineering judgement determinations, etc.) in accordance with the requirements specified in Condition 5.1 of this permit.

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

- 5.4 For Emission Point AA-100 (Facility-Wide), the permittee shall maintain documentation that indicates the moisture content of the pre-dried wood material used for pellet production.

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

- 5.5 For Emission Points AA-001, AA-002a, AA-002b, AA-003a, and AA-003b, the permittee shall perform and record a weekly visible emission observation in accordance with EPA Test Method 22 on the exhaust of each process unit during daylight hours and during representative operating conditions.

If visible emissions are detected during an observation, a visible emission evaluation (VEE) in accordance with EPA Test Method 9 shall then be performed and recorded by certified personnel. The overall observation period for a VEE shall last (at a minimum) six (6) consecutive minutes.

The permittee shall maintain documentation pertaining to all visual observations, the nature and cause of any visible emissions, any corrective action(s) taken to prevent or minimize emissions, and the date / time when visual emission observations were performed in accordance with Condition 5.1 of this permit. Additionally, in the event that a VEE is required but not performed, the permittee shall record a written explanation as to why it was not possible to perform the VEE.

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

- 5.6 For Emission Points AA-001, AA-002a, AA-002b, AA-003a, and AA-003b, the permittee shall perform and record an inspection of each process unit weekly to note any required maintenance.

If a problem is noted during an inspection, the permittee shall perform the maintenance necessary on the process unit to ensure operation as originally designed. Additionally, the permittee shall maintain on-site sufficient components as is necessary to repair a process unit (to the extent practicable).

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

- 5.7 For Emission Points AA-002a, AA-002b, AA-003a, and AA-003b, except as otherwise allowed herein, the permittee shall conduct initial performance testing no later than one hundred eighty (180) days after the initial start-up of each process unit in accordance with the following specifications:

- (a) For Emission Points AA-002a, AA-002b, AA-003a, and AA-003b, the permittee shall evaluate the emission of volatile organic compounds (VOCs);
- (b) For Emission Points AA-003a and AA-003b, the permittee shall evaluate the emission of particulate matter (PM; filterable only), particulate matter less than 10

µm in diameter (PM<sub>10</sub>; filterable + condensable); and particulate matter less than 2.5 µm in diameter (PM<sub>2.5</sub>; filterable + condensable);

- (c) All performance testing shall be conducted in accordance with either applicable U.S. EPA-approved test methods 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 alternative test method approved by the MDEQ and the U.S. EPA prior to the testing event.
- (d) 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.
- (e) Testing shall be conducted using 100% softwood.
- (f) The initial testing shall be conducted while a process unit is at no less than ninety-five percent (95%) of its maximum hourly design capacity (in oven-dried tons per hour). The actual production rate will be determined individually for each unit during the performance test.

If a process unit has not achieved 95% of the maximum hourly design capacity within 180 days of its initial start-up, the permittee shall conduct the initial performance testing while operating at the capacity achieved up to that point. Thereafter, the permittee shall conduct subsequent performance testing in accordance with the specifications of this condition no later than ninety (90) days after the monthly average production rate (in oven-dried tons per hour) increases by more than ten (10) percentage points above the capacity established during the prior performance testing (until achieving no less than 95% of the maximum hourly design capacity).

- (g) For Emission Points AA-002a and AA-002b, the permittee shall monitor and record the hourly throughput (in oven-dried tons) of wood chips processed in a hammermill during a performance test.
- (h) For Emission Points AA-003a and AA-003b, the permittee shall monitor and record the hourly throughput (in oven-dried tons) of wood pellets produced in a pelletizer / pellet cooler during a performance test.
- (i) Contingent upon the results from performance testing conducted on Emission Points AA-002a and/or AA-003a to evaluate the emission of PM, PM<sub>10</sub>, PM<sub>2.5</sub>, and VOCs, the permittee may request (in accordance with Condition 6.14) that performance testing required for Emission Points AA-002b and/or AA-003b be waived.

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

- 5.8 For Emission Points AA-002a, AA-002b, AA-003a, and AA-003b, unless otherwise required herein or otherwise allowed herein, the permittee shall conduct subsequent performance testing to evaluate the emission of volatile organic compounds (VOCs) from each process unit biennially (every two years) and no later than twenty-five (25) months



after the previously completed performance test. All testing shall be conducted in accordance with the specifications outlined in Condition 5.6(c), (d), (g), and (h).

If the permittee has been granted approval to forgo initial performance testing requirements for Emission Points AA-002b and/or AA-003b (as outlined in Condition 6.14), the permittee may choose to conduct subsequent performance testing on either the combination of Emission Points AA-002a / AA-003a or Emission Points AA-002b / AA-003b.

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

5.9 For Emission Points AA-002a, AA-002b, AA-003a, and AA-003b (as applicable), upon completing a performance test in accordance with Condition 5.7 or 5.8, the permittee shall utilize both the test results and applicable throughput data collected during the testing event to determine site-specific factors for PM, PM<sub>10</sub>, PM<sub>2.5</sub>, and VOCs emissions from a process unit (as applicable) in pounds of respective pollutant per oven-dried tons (ODT). The permittee shall establish these emission factors in accordance with the following specifications:

- (a) For Emission Points AA-002a and/or AA-002b, all site-specific emission factors shall be based on the pounds of pollutant per ODT of wood chips processed in a hammermill.
- (b) For Emission Points AA-003a and/or AA-003b, all site-specific emission factors shall be based on the pounds of pollutant per ODT of wood pellets produced in a pelletizer.

If the results from any determination exceed a site-specific emission factor(s) already established, the permittee **shall** submit the new emission factor(s) in accordance with Condition 6.11. However, if the results are lower than the approved site-specific emission factor(s), the permittee **may** submit the new emission factor(s) in accordance with Condition 6.11.

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

5.10 For Emission Point AA-002a and AA-002b, the permittee shall monitor and record the differential pressure drop across each baghouse daily (in inches of water) and compare to the corresponding manufacturer's recommended pressure drop range. If a monitored pressure drop is outside the recommended range for a baghouse, the permittee shall conduct and record any maintenance and/or repairs conducted to return the baghouse to optimal operating condition.

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

5.11 For Emission Point AA-005, the permittee shall maintain documentation that certifies the engine complies with the emission standards specified in Condition 3.8.

(Ref.: 40 CFR 60.4211(c), Subpart IIII)

- 5.12 For Emission Point AA-005, the permittee shall keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The permittee must record the time of operation of the engine and the reason the engine was in operation during that time.

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

## SECTION 6 REPORTING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Reporting Requirement
AA-100 (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 from Requirements Within Five (5) Days
	11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).	6.3	Submit a Notification on the Commencement of Construction
	11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).	6.4	Submit a Notification When Construction Does Not Begin Within 18 Months (As Applicable)
	11 Miss. Admin. Code Pt. 2, R. 2.5.D(1). and (3).	6.5	Submit a Notification on the Completion of Construction
	11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).	6.6	Submit a Notification on a Change in Approved Construction Plans / Specifications
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.7	Submit Notification on Initial Start-Up
		6.8	Submit a Certified Semi-Annual Monitoring Report (SMR)
		6.9	Operational Data Reported in the SMR
		6.10	Submit Dust Management Plan for Review and Approval
AA-002a AA-002b AA-003a AA-003b	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.11	Submit Site-Specific Emission Factors for Review / Approval
	11 Miss. Admin. Code Pt. 2, R. 2.6.B(5).	6.12	Submit Performance Testing Protocol Submit 10-Day Notification of Performance Testing Event
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.13	Submit Performance Test Results
AA-002b AA-003b	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.14	Submit Request to Waive Initial Performance Testing
AA-005	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.15	Submit Annual Hours of Operations

- 6.1 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-100 (Facility-Wide), 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 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-100 (Facility-Wide), the permittee shall notify the MDEQ in writing that construction has begun no later than fifteen (15) days after actual construction commences.

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

- 6.4 For Emission Point AA-100 (Facility-Wide), the permittee shall notify the MDEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for 18 months or more.

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

- 6.5 For Emission Point AA-100 (Facility-Wide), upon the completion of construction / installation of all permitted emission sources and prior to commencing operation, the permittee shall notify the MDEQ in writing that construction / installation has been completed in accordance with the approved plans and specifications on file no later than fifteen (15) days after completing the actual construction / installation.

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

- 6.6 For Emission Point AA-100 (Facility-Wide), the MDEQ shall be promptly notified in writing of any change in construction from the previously approved plans and specifications or permit. If the MDEQ determines the changes are substantial, it may require the submission of a new application to construct with “*as built*” plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an “*as built*” application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law.

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

6.7 For Emission Point AA-100 (Facility-Wide), the permittee shall notify the MDEQ in writing of the initial start-up date for on-site operations no later than fifteen (15) days after actual start-up.

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

6.8 For Emission Point AA-100 (Facility-Wide), the permittee shall submit a certified semi-annual monitoring report (SMR) postmarked no later than January 31<sup>st</sup> and July 31<sup>st</sup> of each calendar year for the preceding six-month period. This report shall contain any required monitoring specified in Section 6 of this permit. Additionally, all instances of deviations from permit requirements shall be clearly identified within the report. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration.

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

6.9 For Emission Point AA-100 (Facility-Wide), the permittee shall submit a semi-annual monitoring report (SMR) in accordance with Condition 6.8 that contains the following information:

- (a) The total emission of VOCs from in tons both on a monthly basis and a 12-month rolling total;
- (b) The total wood pellet production in oven-dried tons (ODT) on both a monthly basis and a 12-month rolling total;
- (c) A summary detailing any maintenance action(s) performed on a process unit;
- (d) A summary detailing the date(s) and corresponding duration (in hours) in which an air pollution control device was non-operational; and
- (d) A summary detailing the date(s) and corresponding duration (in hours) in which a baghouse operates outside the recommended differential pressure drop range and any maintenance or repairs conducted to return the baghouse to optimal operating condition.

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

6.10 For Emission Point AA-100 (Facility-Wide), the permittee shall submit the initial Dust Management Plan (the “*Plan*”) as required by Condition 5.2 for review and approval by the MDEQ no later than sixty (60) days after certifying completion of construction. Thereafter, the permittee shall submit a notification within the SMR in accordance with Condition 6.8 that summarizes any revision(s) made to the *Plan*.

The MDEQ reserves the right to comment on and request revisions to any submitted version of the *Plan*, as deemed necessary to prevent nuisance conditions.

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

- 6.11 For Emission Points AA-002a, AA-002b, AA-003a, and AA-003b, the permittee shall submit the initial site-specific emission factors required by Condition 5.9 for review and approval by the MDEQ no later than ninety (90) days after completing the initial performance test required by Condition 5.7.

Thereafter, if an approved site-specific emission factor(s) must be modified as a result of subsequent testing required by Condition 5.8, the permittee shall submit a written request with supporting data to the MDEQ for review and approval no later than 90 days after completing the most recent performance test.

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

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

- 6.12 For Emission Points AA-002a, AA-002b, AA-003a, and AA-003b, the permittee shall submit a written performance test protocol for testing required by Condition 5.7 or 5.8 that details the procedures and test methods to be implemented during the actual testing event no later than thirty (30) days prior to the intended testing date.

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

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

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

- 6.13 For Emission Points AA-002a, AA-002b, AA-003a, and AA-003b, the permittee shall submit a report for any conducted performance test no later than sixty (60) days after completing the testing event. The report, at a minimum, shall include the information specified in Condition 27(c) of Section 1 and the following information:

- (a) The hourly processed wood chip throughput or hourly wood pellet production throughput for each test run (as applicable);
- (b) The feedstock ratio of softwood and hardwood used during a performance test (as applicable);

- (c) A comparison of current results [noting the average pollutant emission rate and the average applicable throughput] with any prior results from the previous five (5) years; and
- (d) The moisture content of wood chips processed during stack testing.

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

6.14 For Emission Points AA-002b and AA-003b, the permittee may request (in writing) that the initial performance testing required for Emission Points AA-002b and/or AA-003b. The request shall include (at a minimum) the following information:

- (a) The manufacturer design specifications of the corresponding process units (i.e. Emission Points AA-002a and AA-002b; Emission Points AA-003a and AA-003b);
- (b) The results from the applicable performance testing conducted on Emission Points AA-002a and/or AA-003a;
- (c) The operational information required by Condition 6.13(a), (b), and (d) for the corresponding performance test; and
- (d) An analysis of potential pollutant emissions from the combined process units (i.e. Emission Points AA-002a and AA-002b; Emission Points AA-003a and AA-003b) utilizing approved pollutant emission factors and the maximum potential production capacity.

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

6.15 For Emission Point AA-005, the permittee shall submit a summary within the semi-annual monitoring report (SMR) postmarked by January 31<sup>st</sup> that details the hours of operation for the engine during the preceding calendar year. The report shall include how many hours are spent for emergency operation, what classified the operation as an emergency, how many hours are spent for non-emergency operation, and the reason for the non-emergency operation.

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