

STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Enviva LLC
East Bank Facility
Pascagoula, Mississippi
Jackson County

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

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

Becky Simonson

AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: April 9, 2019

Modified: May 9, 2024 , May 30, 2025

Permit No.: 1280-00148

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 DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such

records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

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

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

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 Section 1, Condition 24 of this permit, after certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by 11 Miss. Admin. Code Pt. 2, R. 2.13.G.

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

22. Application for a Permit to Operate: Except as otherwise specified in Section 1, Condition 24 of this permit, the application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing.

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

23. Operating Under a Permit to Construct: Except as otherwise specified in 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 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).)

B. GENERAL NOTIFICATION REQUIREMENTS

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

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

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

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

3. Upon the completion of construction or installation of an approved stationary source or modification, and prior to commencing operation, the applicant shall notify the Permit Board that construction or installation was performed in accordance with the approved plans and specifications on file with the Permit Board.

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

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

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

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-001	Baghouse 1 controlling emissions from truck and rail receiving system, material transfer from Dome Feed Belt Conveyor (BC1) to Dome Feed Belt Conveyor (BC2), and material transfer from Dome Feed Belt Conveyor (BC1) to Dome Feed Belt Conveyor to (BC7)
AA-002	Baghouse 2 controlling emissions material transfer from Dome Feed Belt Conveyor (BC2) to Dome Feed Belt Conveyor (BC3) and material transfer from Dome Feed Belt Conveyor (BC10) to Dome Feed Belt Conveyor (BC3)
AA-003	Baghouse 3 controlling emissions from material transfer from Dome Feed Belt Conveyor (BC3) to Dome Feed Belt Conveyor (BC4)
AA-004	Baghouse 4 controlling emissions from material transfer from Dome Feed Belt Conveyor (BC3) to Pellet Storage Dome No. 1
AA-005	Baghouse 5 controlling emissions from material transfer from Dome Feed Belt Conveyor (BC4) to Pellet Storage Dome No. 2
AA-006	Baghouse 6 controlling emissions from material transfer from Pellet Storage Dome No. 1 to Dome Reclaim Belt Conveyor (BC5) and material transfer from Dome Reclaim Belt Conveyor (BC5) to Belt Conveyor (BC8)
AA-007	Baghouse 7 controlling emissions from material transfer from Pellet Storage Dome No. 2 to Dome Reclaim Belt Conveyor (BC6) and material transfer from Dome Reclaim Belt Conveyor (BC6) to Belt Conveyor (BC8)
AA-008	Baghouse 8 controlling emissions from material transfer from Direct Loading Belt Conveyor (BC7) to Belt Conveyor (BC8)
AA-009	Baghouse 9 controlling emissions from material transfer from Belt Conveyor (BC8) to Belt Conveyor (BC9) and material transfer from Belt Conveyor (BC9) to Ship Loading Conveyor
AA-010	Baghouse 10 controlling emissions from Ship Loading Conveyor and associated transition points
AA-011	Baghouse 11 controlling emissions from material transfer to ships via telescoping ship loadout spout
AA-012	Baghouse 12 controlling emissions from Pellet Storage Dome No. 1
AA-013	Baghouse 13 controlling emissions from Pellet Storage Dome No. 2
AA-014	Pellet Handling and Emissions Associated with Material Transfer Points
AA-015	671 bhp diesel-fired Emergency Generator
AA-016	131 bhp diesel-fired Emergency Fire Pump Engine
AA-017	525 hp diesel-fired non-emergency Compression Ignition Engine No. 1
AA-018	525 hp diesel-fired non-emergency Compression Ignition Engine No. 2
AA-019	322 hp diesel-fired non-emergency Compression Ignition Hopper Engine
AA-020	Truck Traveling on Paved Roads
AA-031	34.9 bhp propane-fired Emergency Generator

SECTION 3 EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
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.B.	3.2	Equivalent Opacity	≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.C(1).	3.3	Particulate Matter	General Nuisance
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.4	PM	≤ 99.0 tons/yr
		3.5	CO	≤ 99.0 ton/yr
		3.6	Operation	Operate baghouses when material is transferred
AA-001 AA-002 AA-003 AA-004 AA-005 AA-006 AA-007 AA-008 AA-009 AA-010 AA-011 AA-012 AA-013				
AA-017 AA-018 AA-019				
AA-015 AA-016 AA-017 AA-018 AA-019 AA-031	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.8	PM	≤ 0.6 lbs/MMBTU
AA-015 AA-016 AA-017 AA-018 AA-019 AA-031	40 CFR 63, Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines) 40 CFR 63.6585, Subpart ZZZZ	3.9	HAP	Applicability
AA-015 AA-016 AA-017 AA-018 AA-019	40 CFR 63.6590(c)(1), Subpart ZZZZ	3.10		Comply with the requirements of 40 CFR 60, Subpart IIII
	40 CFR 60, Subpart IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines) 40 CFR 60.4200(a)(2), Subpart IIII	3.11		Applicability
	40 CFR 60.4207(b), Subpart IIII	3.12		Utilize fuel that meets requirements of 40 CFR 80.510(b) for nonroad diesel fuel
	40 CFR 60.4211(a), Subpart IIII	3.13		Operate according to manufacturer's

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				instructions
	40 CFR 60.4211(c), Subpart IIII	3.14	Engine	Purchase certified engine
	40 CFR 60.4206, Subpart IIII	3.15	NMHC NO _x , CO, and PM	Meet emission standards over the life of the engine
AA-015	40 CFR 60.4205(b), Subpart IIII	3.16	NMHC + NO _x	≤ 4.0 g/kW-hr
			CO	≤ 3.5 g/kW-hr
			PM	≤ 0.20 g/kW-hr
AA-016	40 CFR 60.4205(c) and Table 4, Subpart IIII	3.17	NMHC + NO _x	≤ 4.0 g/kW-hr (3.0 g/hp-hr)
			PM	≤ 0.30 g/kW-hr (0.22 g/hp-hr)
AA-017 AA-018	40 CFR 60.4204(b) and 60.4201(a), Subpart IIII, and Table 1 to 40 CFR 1039.101	3.18	PM	≤ 0.02 g/kW-hr
			NO _x	≤ 0.40 g/kW-hr
			NMHC	≤ 0.19 g/kW-hr
			CO	≤ 3.5 g/kW-hr
AA-019	40 CFR 60.4204(b) and 60.4201(a), Subpart IIII, and Table 1 to 40 CFR 1039.101	3.19	PM	≤ 0.02 g/kW-hr
			NO _x	≤ 0.40 g/kW-hr
			NMHC	≤ 0.19 g/kW-hr
			CO	≤ 3.5 g/kW-hr
AA-031	40 CFR 63.6590(c)(1), Subpart ZZZZ	3.20	HAP	Comply with the requirements of 40 CFR 60, Subpart JJJJ
	40 CFR 60.4230(a)(4)(iv), Subpart JJJJ	3.21	NO _x CO VOC	General Applicability
	40 CFR 60.4233(c), 40 CFR 60.4231(c), Subpart JJJJ	3.22		Emissions Standards
	40 CFR 60.4234, Subpart JJJJ	3.23		Meet emission standards over the life of the engine.
	40 CFR 60.4243(d), Subpart JJJJ	3.24		Emergency engine operation requirements
	40 CFR 60.4237, Subpart JJJJ	3.25		Install non-resettable hour meter

3.1 For the entire facility, except as otherwise specified or limited herein, the permittee shall not cause, permit, 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 exceptions provided in (a) & (b).

- (a) Startup 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) startups per stack in any twenty-four (24) hour period.
- (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60% opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel any one hours.

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

- 3.2 For the entire facility, except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Condition 3.1. 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 the entire facility, the permittee shall not cause, permit, 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. The permittee shall not cause or permit the handling or transporting or storage of any material in a manner which allows or may allow unnecessary amounts of particulate matter to become airborne.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.C(1).)
- 3.4 For the entire facility, the permittee shall not emit more than 99.0 tons per year (tons/yr) of particulate matter (PM) for each consecutive 12-month period on a rolling monthly basis.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 3.5 For the entire facility, the permittee shall not emit more than 99.0 tons per year (tons/yr) of carbon monoxide (CO) for each consecutive 12-month period on a rolling monthly basis.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 3.6 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-007, AA-008, AA-009, AA-010, AA-011, AA-012, and AA-013, the permittee shall ensure the baghouses are operational at all times material is transferred. If the baghouse is not operating according to the manufacturer's specifications, then the process being controlled by the baghouse must be shut down immediately and not restarted until the baghouse is repaired or brought back to normal operating conditions.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 3.7 For Emission Points AA-017, AA-018, and AA-019, the permittee shall not operate each engine for more than 4,928 hours per year (hr/yr) determined for each consecutive 12-month period on a rolling monthly basis.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 3.8 For Emission Points AA-015, AA-016, AA-017, AA-018, AA-019, and AA-031, the permittee shall not cause, permit, or allow the emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input to exceed 0.6 pounds per million BTU per hour heat input.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).)
- 3.9 For Emission Points AA-015, AA-016, AA-017, AA-018, AA-019, and AA-031, the permittee is subject to and shall comply with the applicable requirements of the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal

Combustion Engines (40 CFR 63, Subpart ZZZZ) and the General Provisions (40 CFR 63, Subpart A).

(Ref.: 40 CFR 63.6585, Subpart ZZZZ)

- 3.10 For Emission Points AA-015, AA-016, AA-017, AA-018, and AA-019, the permittee shall meet the requirements of 40 CFR 63, Subpart ZZZZ, by meeting the requirements of 40 CFR 60, Subpart IIII.

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

- 3.11 For Emission Points AA-015, AA-016, AA-017, AA-018, and AA-019, the permittee is subject to and shall comply with the applicable requirements of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (40 CFR 60, Subpart IIII) and the General Provisions (40 CFR 60, Subpart A).

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

- 3.12 For Emission Points AA-015, AA-016, AA-017, AA-018, and AA-019, the permittee must use diesel fuel that meets the requirements below for nonroad diesel fuel.

- (a) Sulfur content not to exceed 15 ppm
- (b) A minimum cetane index of 40; or a maximum aromatic content of 35 volume percent.

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

- 3.13 For Emission Points AA-015, AA-016, AA-017, AA-018, and AA-019, the permittee shall do all of the following, except as permitted under 40 CFR 60.4211(g), Subpart IIII:

- (a) Operate and maintain the unit according to the manufacturer's emission-related written instructions;
- (b) Change only those emission-related settings that are permitted by the manufacturer; and
- (c) Meet the requirements of 40 CFR 89, 94, and/or 1068, as they apply.

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

- 3.14 For Emission Points AA-015, AA-016, AA-017, AA-018, and AA-019 the permittee shall comply with the emission standards specified in Conditions 3.16 through 3.20 by purchasing an engine certified to the emission standards. The engine must be installed and configured according to the manufacturer's emission related specifications, except as permitted under 40 CFR 60.4211(g), Subpart IIII.

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

- 3.15 For Emission Points AA-015, AA-016, AA-017, AA-018, and AA-019, the permittee must operate and maintain the units that achieve the emission standards as required in Conditions 3.16 through 3.20 over the entire life of the engine.

(Ref.: 40 CFR 60.4206, Subpart IIII)

- 3.16 For Emission Point AA-015, the permittee shall comply with the emission standards for new nonroad CI engines in Table 1 to 40 CFR 89.112(a) listed below:

- (a) 4.0 g/kW-hr of NMHC + NO_x;
 - (b) 3.5 g/kW-hr of CO; and
 - (c) 0.20 g/kW-hr of PM.
- (Ref.: 40 CFR 60.4205(b), Subpart IIII)
- 3.17 For Emission Point AA-016, the permittee shall comply with the emission standards in Table 4 to 40 CFR 60, Subpart IIII, listed below:
- (a) 4.0 g/kW-hr (3.0 g/hp-hr) of NMHC + NO_x and
 - (b) 0.30 g/kW-hr (0.22 g/hp-hr) of PM.
- (Ref.: 40 CFR 60.4205(c), Subpart IIII)
- 3.18 For Emission Points AA-017 and AA-018, the permittee shall comply with the emission standards for new CI engines in 40 CFR 60.4201, Subpart IIII, listed below:
- (a) 0.02 g/kW-hr of PM
 - (b) 0.40 g/kW-hr of NO_x
 - (c) 0.19 g/kW-hr of NMHC; and
 - (d) 3.5 g/kW-hr of CO.
- (Ref.: 40 CFR 60.4204(b) and 60.4201(a), Subpart IIII, and Table 1 to 40 CFR 1039.101)
- 3.19 For Emission Point AA-019, the permittee shall comply with the emission standards for new CI engines in 40 CFR 60.4201, Subpart IIII, listed below:
- (a) 0.02 g/kW-hr of PM;
 - (b) 0.40 g/kW-hr of NO_x;
 - (c) 0.19 g/kW-hr of NMHC; and
 - (d) 3.5 g/kW-hr of CO.
- (Ref.: 40 CFR 60.4204(b) and 60.4201(a), Subpart IIII, and Table 1 to 40 CFR 1039.101)
- 3.20 For Emission Point AA-031, the permittee shall meet the requirements of 40 CFR 63, Subpart ZZZZ, by meeting the requirements of 40 CFR 60, Subpart JJJJ.
- (Ref.: 40 CFR 63.6590(c)(1), Subpart ZZZZ)
- 3.21 For Emission Point AA-031, the permittee is subject to and shall comply with the applicable requirements of the Standards of Performance for Stationary Spark Ignition (SI) Internal Combustion Engines (ICE) (40 CFR 60, Subpart JJJJ) and the General Provisions (40 CFR 60, Subpart A).
- (Ref.: 40 CFR 60.4230(a)(4)(iv), Subpart JJJJ)
- 3.22 For Emission Point AA-031, the permittee shall comply with the emission standards for new SI engines by purchasing an engine certified to meet the Phase 1 emission standards

in 40 CFR part 1054, appendix I, applicable to class II engines, for new nonroad SI engines in 40 CFR part 1054.

(Ref.: 40 CFR 60.4233(c), 40 CFR 60.4231(c), Subpart JJJJ)

- 3.23 For Emission Point AA-031, the permittee must operate and maintain the stationary SI ICE that achieves the emission standards as required in Condition 3.22 over the entire life of the engine.

(Ref.: 40 CFR 60.4234, Subpart JJJJ)

- 3.24 For Emission Point AA-031, the permittee shall operate the emergency, stationary ICE according to the requirements in (a) through (c) below:

- (a) There is no time limit on the use of the engine in emergency situations.
- (b) The engine may be operated for maintenance checks and readiness testing for a maximum of 100 hours per calendar year, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of each engine beyond 100 hours per calendar year.
- (c) The engine may be operated 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 and emergency demand response provided in (b). Except as provided in 40 CFR 60.4243(d)(3)(i), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial agreement with another entity.

(Ref.: 40 CFR 60.4243(d), Subpart JJJJ)

- 3.25 For Emission Point AA-031, the permittee shall install a non-resettable, hour meter if one is not already installed.

(Ref.: 40 CFR 60.4237, Subpart JJJJ)

SECTION 4 WORK PRACTICES

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Work Practice
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	4.1	Operation	Operate efficiently and perform routine maintenance
AA-015 AA-016	40 CFR 60, Subpart IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines) 40 CFR 60.4211(f), Subpart IIII	4.2		Emergency use requirements

4.1 For the entire facility, in order to minimize the emissions of air pollutants, the permittee shall operate and maintain all air emission equipment, including associated air pollution control and monitoring equipment, as efficiently as possible and in a manner consistent with safe and good air pollution control practices for minimizing emissions. Furthermore, the permittee shall perform routine maintenance on all air emissions equipment such that the equipment may be operated in an efficient manner. Determination of whether such operation and maintenance procedures are being used will be based on information available to MDEQ, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

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

4.2 For Emission Points AA-015 and AA-016, the permittee shall operate the units according to the paragraphs below. In order for the engines to be considered emergency stationary ICE under 40 CFR 60, Subpart IIII, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in the paragraphs below, is prohibited. If the permittee does not operate the engine according to the requirements of this condition, the engine will not be considered an emergency engine under 40 CFR 60, Subpart IIII, and must meet all requirements for non-emergency engines.

- (a) There is no time limit on the use of emergency stationary ICE in emergency situations.
- (b) The permittee may operate the emergency stationary ICE for maintenance checks and readiness testing for a maximum of 100 hours per calendar year, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (c) of this condition count as part of the 100 hours per calendar year.

- (c) Emergency stationary ICE may be operated for up for 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 according to paragraph (b) of this condition.

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

SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 2.9	5.1	Records Retention	Maintain all records for five (5) years from the date generated
		5.2	PM	Dust Management Plan
		5.3	PM	Keep records of material and calculate emission rate
AA-001 AA-002 AA-003 AA-004 AA-005 AA-006 AA-007 AA-008 AA-009 AA-010 AA-011 AA-012 AA-013	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.4	Opacity	Conduct weekly visible emission evaluations
		5.5	PM	Visual inspections
		5.6		Recordkeeping
		5.7	Operation	Maintain pressure drop gauges
		5.8		Vendor maintenance plan
		5.9	Monitoring	Assess ability to perform compliance demonstration
AA-015 AA-016	40 CFR 60, Subpart IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines) 40 CFR 60.4209(a) and 60.4214(b), Subpart IIII	5.10	Hours of Operation	Install non-resettable hour meter
AA-017 AA-018 AA-019	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.11		
AA-031	40 CFR 60.4243(a), Subpart JJJJ	5.12		Continuous Compliance
	40 CFR 60.4245(a), Subpart JJJJ	5.13	VOC NO _x CO HAP	Recordkeeping requirements
	40 CFR 60.4245(b), Subpart JJJJ	5.14		Record hours of operation

5.1 For the entire facility, the permittee shall retain all require 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. Support information includes all calibration and maintenance records, all original strip-chart recordings, or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to MDEQ as required by Applicable Rules and Regulations or this permit upon request.

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

5.2 For the entire facility, the permittee shall develop, maintain, and implement a “Dust Management Plan” that describes, in detail, procedures for operating and maintaining applicable emission sources to minimize the emission of fugitive particulate matter (PM).

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

- 5.3 For the entire facility, the permittee shall keep records of pellet throughput (ODT/yr) and fuel usage at the facility each month and shall calculate PM emissions in tons per year (tons/yr) for each consecutive 12-month period.

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

- 5.4 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-007, AA-008, AA-009, AA-010, AA-011, AA-012, and AA-013, the permittee shall perform weekly observations for a period of six (6) consecutive minutes on the exhaust discharged from the baghouses while material is being loaded or transferred. If visible emissions are observed, the permittee shall perform Visible Emission Evaluations (VEE) using EPA Test Method 9, (i.e., "Method 9") on the exhaust discharged from the baghouses while material is being loaded or transferred. In addition to the provisions outlined in Method 9, the permittee shall also adhere to the following guidelines:

- (a) All evaluations shall be conducted during daylight hours and during conditions representative of normal operation for the respective sources;
- (b) In the event that a VEE is not conducted during any calendar month, the permittee shall denote and maintain an explanation on why the VEE was not performed;
- (c) If the result of a VEE indicates non-compliance with an opacity limit referenced in this permit, the permittee shall immediately determine the cause(s) for the exceedance and perform the necessary corrective action(s) to minimize emissions; and
- (d) The permittee shall maintain applicable documents pertaining to all VEEs and any corrective action(s) taken to minimize emissions as a result of any VEE.

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

- 5.5 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-007, AA-008, AA-009, AA-010, AA-011, AA-012, and AA-013, the permittee shall perform inspections and maintenance as recommended by the baghouse manufacturer, which shall include the following as a minimum:

- (a) Monthly visual inspections of the system ductwork and material collection units for leaks; and
- (b) Annual internal inspection of the structural integrity of the bag filters.

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

- 5.6 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-007, AA-008, AA-009, AA-010, AA-011, AA-012, and AA-013, the permittee shall maintain in written or electronic format records of the inspections and maintenance on each of the baghouses and made available upon request. The records shall include the following:

- (a) Date and time of each inspection;
- (b) The results of each inspection;
- (c) The results of any maintenance performed;
- (d) Variance for manufacturer's recommendations, if any, and corrections made; and

- (e) A record of repairs and maintenance shall be maintained on site including the date and duration the baghouses were non-operational and the reason they were non-operational.

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

- 5.7 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-007, AA-008, AA-009, AA-010, AA-011, AA-012, and AA-013, the permittee shall install, operate, and maintain pressure drop gauges on each module of the baghouses. Pressure drop readings shall be recorded daily during source operation. The pressure drop gauges shall be in place and operational whenever processes controlled by the baghouses are running, except during periods of baghouse malfunction or mechanical failure. Operational ranges for the monitored parameters shall be established to provide a reasonable assurance of compliance. These operational ranges for the monitored parameters shall be derived from vendor certification and/or operational history and visual inspections, which demonstrate the proper operation of the equipment in compliance. The permittee shall keep a log of the daily pressure drop readings. Should a pressure drop reading be measured outside the established range, the permittee should shut down the process being controlled and immediately take corrective measures to restore the baghouse operating efficiency and note any corrective measures taken.

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

- 5.8 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-007, AA-008, AA-009, AA-010, AA-011, AA-012, and AA-013, the permittee shall maintain on site the vendor maintenance specifications and any spare parts needed to repair and maintain the baghouses in case of malfunction or failure.

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

- 5.9 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-007, AA-008, AA-009, AA-010, AA-011, AA-012, and AA-013, the permittee shall determine using engineering judgment if it is feasible to perform stack testing. If it is determined that testing is feasible, the permittee shall demonstrate compliance with PM and Opacity emission limitations by stack testing in accordance with EPA Reference Methods 1-5, and 9, 40 CFR 60, Appendix A, and the procedures outlined below:

- (a) The initial compliance demonstration test shall be performed within 180 days after initial start-up of the permitted equipment.
- (b) A written test protocol shall be submitted at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the Office of Pollution Control. If needed, the permittee may request a pretest conference to discuss the test methods and procedures. The pretest conference should be scheduled at least thirty (30) days prior to the test date.
- (c) A notification of the scheduled test date(s) should be submitted ten (10) days prior to the scheduled date(s) so that an observer may be afforded the opportunity to witness the test(s).

- (d) Testing must be performed at no less than 80% of the maximum rated capacity of the system. If the permittee desires to test at a rate less than 80% of maximum rated capacity, it must be agreed upon by MDEQ during a pretest conference.
- (e) The test must consist of three test runs of at least one (1) hour each.
- (f) The test results must be submitted to the Office of Pollution Control within 60 days following completion of the compliance demonstration test.
- (g) The compliance demonstration testing shall be performed once. The need for additional testing will be addressed in the facility's operating permit, once issued.

If it is determined that testing is not feasible, the permittee shall submit a report in accordance with Condition 6.5.

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

- 5.10 For Emission Points AA-015 and AA-016, the permittee shall install a non-resettable hour meter prior to startup of each engine. The permittee shall keep records of the operation of each engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The owner must record the time of operation of the engine and the reason the engine was in operation during that time.

(Ref.: 40 CFR 60.4209(a) and 60.4214(b), Subpart IIII)

- 5.11 For Emission Points AA-017, AA-018, and AA-019, the permittee shall install a non-resettable hour meter prior to startup of each engine. The permittee shall keep daily records of the operation of each engine in non-emergency service that is recorded through the non-resettable hour meter to demonstrate compliance with Condition 3.7. These records shall be kept in a logbook and each month an hourly total calculated for each engine.

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

- 5.12 For Emission Point AA-031, if the permittee operates and maintains the certified stationary spark-ignited (SI) internal combustion engine according to the manufacturer's emission-related instructions, the permittee must keep records of conducted maintenance to demonstrate compliance. If the permittee does not operate and maintain the engine according to the manufacturer's emission-related instructions, the engine will be considered a non-certified engine, and the permittee must demonstrate compliance by keeping a maintenance plan, keeping records of conducted maintenance, and maintaining and operating the engine in a manner consistent with good air pollution control practice for minimizing emissions.

(Ref.: 40 CFR 60.4243(a)(1) and 40 CFR 60.4243(a)(2)(i), Subpart JJJJ)

- 5.13 For Emission Point AA-031, the permittee shall keep records of the following information in paragraphs (a) through (d):
- (a) All notifications submitted to comply with 40 CFR Subpart JJJJ and all documentation supporting any notification.
 - (b) Maintenance conducted on the engine.

- (c) For certified stationary SI internal combustion engines, documentation from the manufacturer that the engine is certified to meet the emissions standards in 40 CFR parts 90, 1048, 1054, and 1060, as applicable.
- (d) For non-certified stationary SI internal combustion engines, documentation that the engine meets the emissions standards required by Condition 3.22.

(Ref.: 40 CFR 60.4245(a), Subpart JJJJ)

- 5.14 For Emission Point AA-031, the permittee shall keep records of the hours of operation of the engine through the non-resettable hour meter required by Condition 3.25. The permittee shall document how many hours are spent for emergency operation; including what classified the operation as emergency and how many hours are spent for non-emergency operation.

(Ref.: 40 CFR 60.4245(b), Subpart JJJJ)

SECTION 6 REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	Report any permit deviations within five (5) days
		6.2	Submit certified annual monitoring report
		6.3	All documents submitted to MDEQ shall be certified by a Responsible Official or Duly Authorized Representative
		6.4	Dust Management Plan submittal
AA-001 AA-002 AA-003 AA-004 AA-005 AA-006 AA-007 AA-008 AA-009 AA-010 AA-011 AA-012 AA-013		6.5	Report for compliance demonstration assessment

- 6.1 For the entire facility, 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 preventative 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(11).)

- 6.2 For the entire facility, except as otherwise specified herein, the permittee shall submit a certified annual synthetic minor monitoring report postmarked no later than the 31st of January for the preceding calendar year. This report shall address any required monitoring specified in the permit including the monitoring required in Conditions 5.3 through 5.7, 5.11 and if applicable the required information from Condition 5.9. 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).)

- 6.3 For the entire facility, any document required by this permit to be submitted to MDEQ, the permittee shall include a certification signed by a responsible official or duly authorized representative stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

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

- 6.4 For the entire facility, the permittee shall submit the initial “Dust Management Plan” required by Condition 5.2 for review by the MDEQ with the notification certifying completion of construction. Thereafter, the permittee shall submit an annual notification that summarizes any revision(s) made to the plan no later than January 31st of each

calendar year for the preceding 12-month period. If an amendment is made to the plan during the 12-month period, the permittee shall include the revision(s) within the corresponding annual report.

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

- 6.5 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-007, AA-008, AA-009, AA-010, AA-011, AA-012, and AA-013, the permittee shall submit a report prior to start-up of the equipment the results of the assessment required by Condition 5.9. If it is determined that testing is not feasible, then the report shall declare the limiting factors for compliance testing and include the vendor maintenance plan. MDEQ will evaluate the report and provide concurrence or non-concurrence with the information provided. MDEQ may request additional data to make this determination. If it is determined that testing is feasible, then the permittee shall comply with the compliance testing procedures detailed in Condition 5.9.

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