

AIR PERMIT

PERMITTEE: ENVIVA PELLETS EPES, LLC
FACILITY NAME: ENVIVA PELLETS EPES, LLC
LOCATION: EPES, SUMTER COUNTY, ALABAMA

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
412-0017-X001	Green Raw Material Receipt, Production, and Storage (Includes Green Wood Handling Operations (EP-001); Bark Handling Operations (EP-002); Debarker (EP-004), Log Chipping (EP-005); Bark Hog (EP-006); Bark Storage Pile (EP-007); and Green Wood Storage Pile (EP-008))

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

ISSUANCE DATE: DRAFT

**ENVIVA PELLETS EPES, LLC
EPES, SUMTER COUNTY, ALABAMA
(PERMIT NO. 412-0017-X001)
PROVISOS**

1. This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.
2. This permit is not transferable. Upon sale or legal transfer, the new owner or operator must apply for a permit within 30 days.
3. A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.
4. The permittee shall keep this permit under file or on display at all times at the site where the facility for which the permit is issued is located and shall make the permit readily available for inspection by any or all persons who may request to see it.
5. This process, including all air pollution control devices and capture systems for which this permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.
6. This permit expires and the application is cancelled if construction has not begun within 24 months of the date of issuance of the permit.
7. On completion of construction of the device(s) for which this permit is issued, written notification of the fact is to be submitted to the Chief of the Air Division. The notification shall indicate whether the device(s) was constructed as proposed in the application. The device(s) shall not be operated until authorization to operate is granted by the Chief of the Air Division. Failure to notify the Chief of the Air Division of completion of construction and/or operation without authorization could result in revocation of this permit.
8. Submittal of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require stack emission testing at any time.
9. Additions and revisions to the conditions of this Permit will be made, if necessary, to ensure that the Department's air pollution control rules and regulations are not violated.
10. Nothing in this permit or conditions thereto shall negate any authority granted to the Air Division pursuant to the Alabama Environmental Management Act or regulations issued thereunder.

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11. This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.
12. Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.

Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds:

- a. by the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;
- b. by reducing the speed of vehicular traffic to a point below that at which dust emissions are created;
- c. by paving;
- d. by the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;

Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Department prior to utilization.

13. Precautions shall be taken by the permittee and its personnel to ensure that no person shall ignite, cause to be ignited, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.
14. Should Air Division personnel make a determination that excessive emissions are occurring from this process such that offsite impacts are noted, the permittee shall investigate and implement additional emission controls or operational measures to correct the problem. If the permittee would need to install additional emission control equipment and/or institute additional permanent operational measures to address the problem, the permittee shall notify the Air Division in writing within 10 working days of determining that additional controls are needed.
15. This process shall be operated at all times using the best available operating and management practices so that provisions of the Department's rules and regulations shall not be violated.

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16. The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.
17. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.

Emission Monitoring

18. While the process is operating, someone familiar with the process shall observe the three chip truck dumps (EP-001), the bark truck dump (EP-002), the debarker (EP-004), the log chipper (EP-005), the bark hog (EP-006), the bark storage pile (EP-007), and the green wood storage pile (EP-008) using EPA Method 22 a minimum of once weekly during daylight hours for greater than normal emissions as determined by previous observations. Whenever observed emissions are greater than normal, the permittee shall initiate corrective action as soon as practicable but no longer than 24 hours from the time of observation, followed by an additional EPA Method 22 observation to confirm that emissions have been reduced to normal.

Recordkeeping and Reporting Requirements

19. The permittee shall maintain records, including the dates and times, of all weekly observation results, corrective actions taken, and emissions-related maintenance performed. The records shall be made available for inspection for at least five (5) years from the date of generation of each record.
20. The permittee shall submit a written report to the Air Division on a semiannual basis, postmarked or delivered no later than August 29th and March 1st of each year, for the reporting periods of January 1st through June 30th and July 1st through December 31st, respectively, certifying that the weekly observations were accomplished as required and noting the nature and date of any episodes of greater-than-normal emissions observed and corrective or emissions-related maintenance actions taken.
21. The permittee shall submit an annual compliance certification to the Air Division no later than March 1st of each year for the previous calendar year. The compliance certification shall include the following:
 - a) The identification of each term or condition of this permit that is the basis of the certification.
 - b) The compliance status, whether continuous or intermittent.
 - c) The method(s) used for determining the compliance status of the source, currently and over the reporting period.
 - d) Other facts the Department may require to determine the compliance status of the source.

The compliance certification shall contain certification by a responsible official of truth, accuracy and completeness. This certification shall state that, based on information and

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belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

DRAFT
Date

AIR PERMIT

PERMITTEE: ETS EPES, LLC

PERMIT LOCATION: EPES, LLC

PERMIT LOCATION: MONTER COUNTY, ALABAMA

DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE

Green Wood Milling, Drying, and Storage (Includes Five Green Wood Hammermills; Drying Line Nos. 1, 2, and 3; Three 168 MMBtu/hr Wood-Fired Furnaces; Three Rotary Drum Dryers; Three Twin HE Material Handling Cyclone Pairs; Six 2.5 MMBtu/hr NG-Fired Duct Burners (2 per dryer line); Three Wet Electrostatic Precipitators (WESP); Three Regenerative Thermal Oxidizers (RTO) (EP-010, EP-013, EP-016); Three Furnace Bypass Stacks (EP-011, EP-014, EP-017); Three Dryer Bypass Stacks (EP-012, EP-015, EP-018); Dry Hammermill Feed Silo) (SMS)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

ISSUANCE DATE: DRAFT

**ENVIVA PELLETS EPES, LLC
EPES, SUMTER COUNTY, ALABAMA
(PERMIT NO. 412-0017-X002)
PROVISOS**

1. This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.
2. This permit is not transferable. Upon sale or legal transfer, the new owner or operator must apply for a permit within 30 days.
3. A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.
4. The permittee shall keep this permit under file or on display at all times at the site where the facility for which the permit is issued is located and shall make the permit readily available for inspection by any or all persons who may request to see it.
5. Each point of emission, which requires testing, will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.
6. All air pollution control equipment shall be operated at all times while this process is operational. In the event of scheduled maintenance, unscheduled maintenance, or a breakdown of the pollution control equipment, the process shall be shutdown as expeditiously as possible (unless this act and subsequent re-start would clearly cause greater emissions than continuing operations of the process for a short period). The Department shall be notified of all such events **that exceed 1 hour** within 24 hours. The notification shall include all pertinent facts, including the duration of the process operating without the control device and the level of excess emissions which have occurred. Records of all such events, regardless of reporting requirements, shall be made and maintained for a period of five (5) years from the date of generation. These records shall be available for inspection.
7. This process, including all air pollution control devices and capture systems for which this permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.
8. This permit expires and the application is cancelled if construction has not begun within 24 months of the date of issuance of the permit.
9. On completion of construction of the device(s) for which this permit is issued, written notification of the fact is to be submitted to the Chief of the Air Division. The notification shall indicate whether the device(s) was constructed as proposed in the

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application. The device(s) shall not be operated until authorization to operate is granted by the Chief of the Air Division. Failure to notify the Chief of the Air Division of completion of construction and/or operation without authorization could result in revocation of this permit.

- 10. Prior to a date to be specified by the Chief of the Air Division in the authorization to operate, emission tests are to be conducted on the RTO stacks (Emission Points EP-010, EP-013, and EP-016) by persons familiar with and using the EPA Sampling Train and Test Procedure as described in the Code of Federal Regulations, Title 40, Part 60, for the following pollutants. Written tests results are to be reported to the Air Division within 60 days of completion of testing.

Particulates(X) Carbon Monoxide(X)
Sulfur Dioxide.....() Nitrogen Oxides(X)
Volatile Organic Compounds.....(X) Visible Emissions.....(X)

- 11. Emissions tests are to be conducted on the RTO stacks (Emission Points EP-010, EP-013, and EP-016) for the following pollutants at intervals not to exceed 12 months following the date of initial compliance testing, unless a longer interval duration is approved by the Air Division. If the emission tests for at least two consecutive years show that the emissions are at or below 75% of all applicable emission limits, the frequency of testing may be reduced to once every 5 years (60 months). If a subsequent test shows that the emissions are above 75% of an applicable emission limit, the permittee must revert to annual testing until emission tests for at least two consecutive years show that the emissions are at or below 75% of all applicable emission limits. All test reports must be submitted to the Air Division within 60 days of completion of testing.

Particulates(X) Carbon Monoxide(X)
Sulfur Dioxide.....() Nitrogen Oxides(X)
Volatile Organic Compounds(X)

- 12. Submittal of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require stack emission testing at any time.
- 13. Additions and revisions to the conditions of this Permit will be made, if necessary, to ensure that the Department's air pollution control rules and regulations are not violated.
- 14. Nothing in this permit or conditions thereto shall negate any authority granted to the Air Division pursuant to the Alabama Environmental Management Act or regulations issued thereunder.
- 15. This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of

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Environmental Management that these measures are technically and economically feasible.

16. Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.

Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds:

- a. by the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;
- b. by reducing the speed of vehicular traffic to a point below that at which dust emissions are created;
- c. by paving;
- d. by the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;

Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Department prior to utilization.

17. The Air Division must be notified in writing at least 10 working days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.

To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:

- a. The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.
- b. A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedure requires probe cleaning).
- c. A description of the process(es) to be tested, including the feed rate, any operating parameter used to control or influence the operations, and the rated capacity.

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- d. A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.

A pretest meeting may be held at the request of the source owner or the Department. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.

All test reports must be submitted to the Air Division within 60 days of the actual completion of the test, unless an extension of time is specifically approved by the Air Division.

18. Precautions shall be taken by the permittee and its personnel to ensure that no person shall ignite, cause to be ignited, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.
19. Should Air Division personnel make a determination that excessive emissions are occurring from this process such that offsite impacts are noted, the permittee shall investigate and implement additional emission controls or operational measures to correct the problem. If the permittee would need to install additional emission control equipment and/or institute additional permanent operational measures to address the problem, the permittee shall notify the Air Division in writing within 10 working days of determining that additional controls are needed.
20. This process shall be operated at all times using the best available operating and management practices so that provisions of the Department's rules and regulations shall not be violated.
21. The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.
22. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.
23. The permittee shall not cause or permit the emissions of particulate matter in any 1-hour period from this process to exceed the amount determined by use of the following equation:

$$E=3.59P^{0.62} (P < 30 \text{ tons per hour})$$

OR

$$E=17.31P^{0.16} (P \geq 30 \text{ tons per hour})$$

Where: E=Emissions in pounds per hour
P=Process weight in tons per hour

24. Any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge

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- a 6-minute average opacity of particulate emissions greater than 40%. Opacity will be determined by 40 CFR Part 60, Appendix A, Method 9.
25. The permittee shall not cause or allow the **aggregate** point source emissions from emission points EP-010, EP-013, and EP-016 to exceed any of the following limitations:
- a) Particulate Matter (PM/PM₁₀/PM_{2.5}): 24.46 lb/hr as measured by EPA Reference Method 5, 17, or 201A and EPA Reference Method 202 found at 40 CFR Part 60, Appendix A (Methods 5 and 17) and 40 CFR Part 51, Appendix M (Methods 201A and 202).
 - b) Carbon Monoxide (CO): 40.5 lb/hr as measured by EPA Reference Method 10 found at 40 CFR Part 60, Appendix A.
 - c) Nitrogen Oxides (NO_x): 50.2 lb/hr as measured by EPA Reference Method 7E found at 40 CFR Part 60, Appendix A.
 - d) Volatile Organic Compounds (VOC; reported as propane): 33.53 lb/hr as measured by EPA Reference Method 18 or 25A found at 40 CFR Part 60, Appendix A.
26. The permittee shall not allow the plantwide total emissions of any criteria pollutant from this facility to exceed 250 tons during any consecutive 12-month period. If any threshold is exceeded, the permittee shall notify the Air Division in writing within 10 days of determining that an exceedance has occurred.
27. The total VOC destruction efficiency across each RTO shall be at least 95 percent.
28. The throughput of green wood chips processed by the green hammermills shall not exceed 1,176,556 oven-dried tons (ODT) during any consecutive 12-month period. An oven-dried ton equates to a ton of wood at zero percent (0%) moisture content.
29. The throughput of green wood chips through each rotary drum dryer shall not exceed 367,920 oven-dried tons (ODT) during any consecutive 12-month period.
30. The three furnace bypass stacks (EP-011, EP-014, EP-017) shall be utilized only as necessary. These periods must not exceed the minimum amount of time necessary for these events. Furnace bypass duration during start-up and shutdown episodes shall not exceed 50 hours per furnace bypass stack during any consecutive 12-month period. The furnace bypass duration during "idle mode" episodes shall not exceed 500 hours per furnace bypass stack during any consecutive 12-month period. Furnace bypasses are defined as follows:
- a) Furnace bypass during a cold start-up begins with the establishment of a flame in the fuel bed in the furnace and ends at the point the furnace temperature reaches 600°F and emissions are routed to the dryer for control by the WESP and RTO, with a total start-up time not to exceed 12 hours for each cold start-up.
 - b) Furnace bypass during a planned shutdown begins once the furnace achieves an idle state, defined as a maximum heat input capacity of 5 MMBtu/hr ("idle

mode”). By this time, the dryer is no longer operating. The furnace operation in “idle mode” shall not exceed 24 contiguous hours per episode.

31. The three dryer bypass stacks (EP-012, EP-015, EP-018) shall be utilized only as necessary. These periods must not exceed the minimum amount of time necessary for these events.

Emission Monitoring

32. The following emission monitoring requirements apply to this process:
- a) The permittee shall install, operate, and maintain equipment to monitor the secondary voltage of each wet electrostatic precipitator (WESP). The monitoring system shall be designed in such a manner as to be capable of compliance with the monitoring design criteria of §64.3 of 40 CFR Part 64, *Compliance Assurance Monitoring*. Each meter shall be inspected for proper operation and calibrated at least annually.
 - b) While the process and WESP are operating, the permittee shall monitor and record the secondary voltage of each WESP at least 4 times per hour (i.e. every 15 minutes). From these data points, 3-hour block averages shall be calculated and recorded.
 - c) The permittee shall operate each WESP with a minimum secondary voltage, as a 3-hour block average, as recommended by the manufacturer or established during emission testing if that value is lower. If the permittee determines through emission testing that an indicator value other than that specified above is more appropriate, the permittee shall submit a notification of the fact to the Air Division within 30 days of determining that a new indicator value(s) should be established. The notification shall include the data supporting the validity of the newly established indicator value(s). If any reading is outside of the normal operating range, an excursion would be indicated and immediate action shall be initiated to determine the cause of the excursion and return the device to its normal operating parameters.
 - d) The permittee shall install, operate, and maintain equipment to monitor the firebox/combustion chamber temperature of each regenerative thermal oxidizer (RTO). The monitoring system shall be designed in such a manner as to be capable of compliance with the monitoring design criteria of §64.3 of 40 CFR Part 64, *Compliance Assurance Monitoring*. Each thermocouple shall be inspected for proper operation and calibrated at least annually.
 - e) While the process and RTO are operating, the permittee shall monitor and record firebox/combustion chamber temperature of the RTO, at a minimum, at least 4 times per hour (i.e. every 15 minutes). From these data points, 3-hour block averages shall be calculated and recorded.
 - f) The permittee shall operate each RTO at a minimum firebox/combustion chamber temperature, as averaged over a 3-hour block period, as recommended by the manufacturer or established during emission testing if that value is lower. If the

permittee determines through emission testing that an indicator value other than that specified above is more appropriate, the permittee shall submit a notification of the fact to the Air Division within 30 days of determining that a new indicator value(s) should be established. The notification shall include the data supporting the validity of the newly established indicator value(s). If any reading is outside of the normal operating range, an excursion would be indicated and immediate action shall be initiated to determine the cause of the excursion and return the device to its normal operating parameters.

- g) While the process is operating, someone familiar with the process shall observe each RTO stack (EP-010, EP-013, EP-016) using EPA Method 22 a minimum of once weekly during daylight hours for greater than normal visible emissions as determined by previous observations.
- h) Whenever observed emissions are greater than normal from a RTO stack, corrective action to minimize emissions shall be initiated as soon as practicable but no longer than 24 hours from the time of the observation, followed by an additional EPA Method 22 observation to confirm that emissions are reduced to normal.

Recordkeeping and Reporting Requirements

33. The following recordkeeping requirements apply to this process:

- a) The permittee shall maintain records, including the dates and times, of all weekly observation results, corrective actions taken, and emissions-related maintenance performed.
- b) The permittee shall maintain records of the throughput of green wood chips (in ODT) processed by the green hammermills, including monthly and 12-month rolling totals. Within fifteen (15) days of the end of each calendar month, records of the total throughput for the last calendar month shall be recorded and the rolling 12-month total updated.
- c) The permittee shall maintain records of the throughput of each rotary drum dryer (in ODT), including monthly and 12-month rolling totals. Within fifteen (15) days of the end of each calendar month, records of the total throughput for the last calendar month shall be recorded and the rolling 12-month total updated.
- d) The permittee shall maintain records of the 3-hour block averages of the secondary voltage of each WESP.
- e) The permittee shall maintain records of the 3-hour block averages of the firebox/combustion chamber temperature of each RTO.
- f) The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the process equipment and any malfunction of the air pollution control equipment.
- g) The permittee shall maintain records of process operation during episodes of use of the furnace (EP-011, EP-014, EP-017) or dryer (EP-012, EP-015, EP-018) bypass stacks. The records of each episode shall document the date, time,

duration, cause, and corrective action. The records shall also document the monthly and 12-month rolling total hours of usage of each bypass stack. Each 12-month rolling total shall be updated within fifteen (15) days of the end of each calendar month.

- h) During any period that a furnace operates in “idle mode”, the permittee shall monitor the number of fuel pushes and calculate and record the hourly heat input rate based on a 3-hour block average. A fuel push is defined as the conveyance of a definite volume of wood fuel onto the furnace grate.
 - i) The permittee shall retain all required records in a permanent form suitable and readily available for inspection for a period of five (5) years from the date of generation of each record.
34. The permittee shall submit a written report to the Air Division on a semiannual basis, postmarked or delivered no later than August 29th and March 1st of each year, for the reporting periods of January 1st through June 30th and July 1st through December 31st, respectively. The report shall provide the following:
- a) Certify whether the emission monitoring requirements were accomplished as required, and if not, describe the date and reason any required monitoring was not accomplished.
 - b) Certify whether the weekly visual observations were accomplished as required and note the nature and date of any episodes of greater-than-normal emissions, and corrective or emissions-related maintenance actions taken.
 - c) Provide the date, time, duration, and magnitude of any instance that a WESP had an excursion from an established operating parameter (i.e. 3-hour block average secondary voltage).
 - d) Provide the date, time, duration, and magnitude of any instance that a RTO had an excursion from an established operating parameter (i.e. 3-hour block average firebox/combustion chamber temperature)
 - e) Provide the nature and date of any corrective actions taken or preventative measures adopted following an excursion.
 - f) Provide the date of the annual inspection and calibration of the voltmeters.
 - g) Provide the date, nature, and time period that a furnace or dryer bypass stack was utilized.
 - h) Provide the monthly and 12-month rolling total hours of each furnace or dryer bypass stack usage.
35. The permittee shall submit an annual compliance certification to the Air Division no later than March 1st of each year for the previous calendar year. The compliance certification shall include the following:
- a) The identification of each term or condition of this permit that is the basis of the certification.

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- b) The compliance status, whether continuous or intermittent.
- c) The method(s) used for determining the compliance status of the source, currently and over the reporting period.
- d) Other facts the Department may require to determine the compliance status of the source.

The compliance certification shall contain certification by a responsible official of truth, accuracy and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

DRAFT
Date

AIR PERMIT

PERMITTEE: ENVIVA PELLETS EPES, LLC
FACILITY NAME: ENVIVA PELLETS EPES, LLC
LOCATION: EPES, SUMTER COUNTY, ALABAMA

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
412-0017-X003	Dry Shavings Handling and Storage (Includes Dry Shavings Truck Receiving (EP-003) and Dry Shavings Storage Silo with Baghouse (EP-009) (SMS)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

ISSUANCE DATE: DRAFT

**ENVIVA PELLETS EPES, LLC
EPES, SUMTER COUNTY, ALABAMA
(PERMIT NO. 412-0017-X003)
PROVISOS**

1. This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.
2. This permit is not transferable. Upon sale or legal transfer, the new owner or operator must apply for a permit within 30 days.
3. A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.
4. The permittee shall keep this permit under file or on display at all times at the site where the facility for which the permit is issued is located and shall make the permit readily available for inspection by any or all persons who may request to see it.
5. Each point of emission, which requires testing, will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.
6. This process, including all air pollution control devices and capture systems for which this permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.
7. This permit expires and the application is cancelled if construction has not begun within 24 months of the date of issuance of the permit.
8. On completion of construction of the device(s) for which this permit is issued, written notification of the fact is to be submitted to the Chief of the Air Division. The notification shall indicate whether the device(s) was constructed as proposed in the application. The device(s) shall not be operated until authorization to operate is granted by the Chief of the Air Division. Failure to notify the Chief of the Air Division of completion of construction and/or operation without authorization could result in revocation of this permit.
9. Submittal of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require stack emission testing at any time.
10. Additions and revisions to the conditions of this Permit will be made, if necessary, to ensure that the Department's air pollution control rules and regulations are not violated.

PERMIT NO. 412-0017-X003

11. Nothing in this permit or conditions thereto shall negate any authority granted to the Air Division pursuant to the Alabama Environmental Management Act or regulations issued thereunder.
12. This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.
13. Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.

Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds:

- a. by the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;
- b. by reducing the speed of vehicular traffic to a point below that at which dust emissions are created;
- c. by paving;
- d. by the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;

Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Department prior to utilization.

14. The Air Division must be notified in writing at least 10 working days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.

To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:

- a. The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.
- b. A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of

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filter media, and probe cleaning method and solvent to be used (if test procedure requires probe cleaning).

- c. A description of the process(es) to be tested, including the feed rate, any operating parameter used to control or influence the operations, and the rated capacity.
- d. A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.

A pretest meeting may be held at the request of the source owner or the Department. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.

All test reports must be submitted to the Air Division within 60 days of the actual completion of the test, unless an extension of time is specifically approved by the Air Division.

- 15. Precautions shall be taken by the permittee and its personnel to ensure that no person shall ignite, cause to be ignited, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.
- 16. Should Air Division personnel make a determination that excessive emissions are occurring from this process such that offsite impacts are noted, the permittee shall investigate and implement additional emission controls or operational measures to correct the problem. If the permittee would need to install additional emission control equipment and/or institute additional permanent operational measures to address the problem, the permittee shall notify the Air Division in writing within 10 working days of determining that additional controls are needed.
- 17. This process shall be operated at all times using the best available operating and management practices so that provisions of the Department's rules and regulations shall not be violated.
- 18. The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.
- 19. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.
- 20. The permittee shall not cause or permit the emissions of particulate matter in any 1-hour period from this process to exceed the amount determined by use of the following equation:

$$E=3.59P^{0.62} \text{ (P < 30 tons per hour)}$$

OR

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$$E=17.31P^{0.16} \text{ (P} \geq 30 \text{ tons per hour)}$$

Where: E=Emissions in pounds per hour
P=Process weight in tons per hour

21. Any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity will be determined by 40 CFR Part 60, Appendix A, Method 9.
22. The permittee shall not cause or allow point source emissions from is process to exceed the following limitation:

Particulate Matter (PM/PM₁₀/PM_{2.5}): 0.064 lb/hr as measured by EPA Reference Method 5, 17, or 201A and EPA Reference Method 202 found at 40 CFR Part 60, Appendix A (Methods 5 and 17) and 40 CFR Part 51, Appendix M (Methods 201A and 202).
23. The permittee shall not allow the plantwide total emissions of any criteria pollutant from this facility to exceed 250 tons during any consecutive 12-month period. If any threshold is exceeded, the permittee shall notify the Air Division in writing within 10 days of determining that an exceedance has occurred.

Emission Monitoring

24. While the process is operating, someone familiar with the process shall observe the dry shavings truck receiving area (EP-003) using EPA Method 22 a minimum of once weekly during daylight hours for greater than normal emissions as determined by previous observations. Whenever observed emissions are greater than normal, the permittee shall initiate corrective action as soon as practicable but no longer than 24 hours from the time of observation, followed by an additional EPA Method 22 observation to confirm that emissions have been reduced to normal.
25. While the process is operating, someone familiar with the process shall observe the dry shavings storage silo baghouse (EP-009) using EPA Method 22 a minimum of once daily during daylight hours for the presence of visible emissions. Whenever the presence of visible emissions is observed, the permittee shall initiate corrective action as soon as practicable but no longer than 24 hours from the time of observation, followed by an additional EPA Method 22 observation to confirm that emissions have been eliminated.

Recordkeeping and Reporting Requirements

26. The permittee shall maintain records, including the dates and times, of all daily and weekly observation results, corrective actions taken, and emissions-related maintenance performed. The records shall be made available for inspection for at least five (5) years from the date of generation of each record.
27. The permittee shall submit a written report to the Air Division on a semiannual basis, postmarked or delivered no later than August 29th and March 1st of each year, for the reporting periods of January 1st through June 30th and July 1st through December 31st,

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respectively, certifying that the daily and weekly observations were accomplished as required and noting the nature and date of any episodes of greater-than-normal emissions observed, or the presence of visible emissions observed from the baghouse, and corrective or emissions-related maintenance actions taken.

28. The permittee shall submit an annual compliance certification to the Air Division no later than March 1st of each year for the previous calendar year. The compliance certification shall include the following:

- a) The identification of each term or condition of this permit that is the basis of the certification.
- b) The compliance status, whether continuous or intermittent.
- c) The method(s) used for determining the compliance status of the source, currently and over the reporting period.
- d) Other facts the Department may require to determine the compliance status of the source.

The compliance certification shall contain certification by a responsible official of truth, accuracy and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

DRAFT
Date

AIR PERMIT

PERMITTEE: ENVIVA PELLETS EPES, LLC
FACILITY NAME: ENVIVA PELLETS EPES, LLC
LOCATION: EPES, SUMTER COUNTY, ALABAMA

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
412-0017-X004	Additive Handling and Storage (Includes Pneumatic Truck Receiving; Additive Silo with Baghouse (EP-021))(SMS)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

ISSUANCE DATE: DRAFT

**ENVIVA PELLETS EPES, LLC
EPES, SUMTER COUNTY, ALABAMA
(PERMIT NO. 412-0017-X004)
PROVISOS**

1. This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.
2. This permit is not transferable. Upon sale or legal transfer, the new owner or operator must apply for a permit within 30 days.
3. A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.
4. The permittee shall keep this permit under file or on display at all times at the site where the facility for which the permit is issued is located and shall make the permit readily available for inspection by any or all persons who may request to see it.
5. Each point of emission, which requires testing, will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.
6. This process, including all air pollution control devices and capture systems for which this permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.
7. This permit expires and the application is cancelled if construction has not begun within 24 months of the date of issuance of the permit.
8. On completion of construction of the device(s) for which this permit is issued, written notification of the fact is to be submitted to the Chief of the Air Division. The notification shall indicate whether the device(s) was constructed as proposed in the application. The device(s) shall not be operated until authorization to operate is granted by the Chief of the Air Division. Failure to notify the Chief of the Air Division of completion of construction and/or operation without authorization could result in revocation of this permit.
9. Submittal of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require stack emission testing at any time.
10. Additions and revisions to the conditions of this Permit will be made, if necessary, to ensure that the Department's air pollution control rules and regulations are not violated.

PERMIT NO. 412-0017-X004

11. Nothing in this permit or conditions thereto shall negate any authority granted to the Air Division pursuant to the Alabama Environmental Management Act or regulations issued thereunder.
12. This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.
13. Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.

Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds:

- a. by the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;
- b. by reducing the speed of vehicular traffic to a point below that at which dust emissions are created;
- c. by paving;
- d. by the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;

Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Department prior to utilization.

14. The Air Division must be notified in writing at least 10 working days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.

To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:

- a. The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.
- b. A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of

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filter media, and probe cleaning method and solvent to be used (if test procedure requires probe cleaning).

- c. A description of the process(es) to be tested, including the feed rate, any operating parameter used to control or influence the operations, and the rated capacity.
- d. A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.

A pretest meeting may be held at the request of the source owner or the Department. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.

All test reports must be submitted to the Air Division within 60 days of the actual completion of the test, unless an extension of time is specifically approved by the Air Division.

- 15. Precautions shall be taken by the permittee and its personnel to ensure that no person shall ignite, cause to be ignited, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.
- 16. Should Air Division personnel make a determination that excessive emissions are occurring from this process such that offsite impacts are noted, the permittee shall investigate and implement additional emission controls or operational measures to correct the problem. If the permittee would need to install additional emission control equipment and/or institute additional permanent operational measures to address the problem, the permittee shall notify the Air Division in writing within 10 working days of determining that additional controls are needed.
- 17. This process shall be operated at all times using the best available operating and management practices so that provisions of the Department's rules and regulations shall not be violated.
- 18. The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.
- 19. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.
- 20. The permittee shall not cause or permit the emissions of particulate matter in any 1-hour period from this process to exceed the amount determined by use of the following equation:

$$E=3.59P^{0.62} \text{ (P < 30 tons per hour)}$$

OR

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$$E=17.31P^{0.16} \text{ (P} \geq 30 \text{ tons per hour)}$$

Where: E=Emissions in pounds per hour
P=Process weight in tons per hour

21. Any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity will be determined by 40 CFR Part 60, Appendix A, Method 9.
22. The permittee shall not cause or allow point source emissions from the baghouse to exceed the following limitation:

Particulate Matter (PM/PM₁₀/PM_{2.5}): 0.034 lb/hr as measured by EPA Reference Method 5, 17, or 201A and EPA Reference Method 202 found at 40 CFR Part 60, Appendix A (Methods 5 and 17) and 40 CFR Part 51, Appendix M (Methods 201A and 202).
23. The permittee shall not allow the plantwide total emissions of any criteria pollutant from this facility to exceed 250 tons during any consecutive 12-month period. If any threshold is exceeded, the permittee shall notify the Air Division in writing within 10 days of determining that an exceedance has occurred.

Emission Monitoring

24. While the process is operating, someone familiar with the process shall observe the additive storage silo baghouse (EP-021) using EPA Method 22 a minimum of once daily during daylight hours for the presence of visible emissions. Whenever the presence of visible emissions is observed, the permittee shall initiate corrective action as soon as practicable but no longer than 24 hours from the time of observation, followed by an additional EPA Method 22 observation to confirm that emissions have been eliminated.

Recordkeeping and Reporting Requirements

25. The permittee shall maintain records, including the dates and times, of all daily observation results, corrective actions taken, and emissions-related maintenance performed. The records shall be made available for inspection for at least five (5) years from the date of generation of each record.
26. The permittee shall submit a written report to the Air Division on a semiannual basis, postmarked or delivered no later than August 29th and March 1st of each year, for the reporting periods of January 1st through June 30th and July 1st through December 31st, respectively, certifying that the daily observations were accomplished as required and noting the nature and date of any episodes of the presence of visible emissions, and corrective or emissions-related maintenance actions taken.
27. The permittee shall submit an annual compliance certification to the Air Division no later than March 1st of each year for the previous calendar year. The compliance certification shall include the following:

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- a) The identification of each term or condition of this permit that is the basis of the certification.
- b) The compliance status, whether continuous or intermittent.
- c) The method(s) used for determining the compliance status of the source, currently and over the reporting period.
- d) Other facts the Department may require to determine the compliance status of the source.

The compliance certification shall contain certification by a responsible official of truth, accuracy and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

DRAFT

Date

AIR PERMIT

PERMITTEE: ENVIVA PELLETS EPES, LLC
FACILITY NAME: ENVIVA PELLETS EPES, LLC
LOCATION: EPES, SUMTER COUNTY, ALABAMA

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
412-0017-X005	Wood Pelletization Process (Includes Dry Hammermills; Pelletizing Line Nos. 1 and 2; Pellet Mills; Pellet Coolers; Process Cyclones; and Two Wet Scrubbers Venting to Two Regenerative Catalytic Oxidizers (RCO) (EP-019 Wet Scrubber-1/RCO-1, EP-020 Wet Scrubber-2/RCO-2)) (SMS)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

ISSUANCE DATE: DRAFT

**ENVIVA PELLETS EPES, LLC
EPES, SUMTER COUNTY, ALABAMA
(PERMIT NO. 412-0017-X005)
PROVISOS**

1. This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.
2. This permit is not transferable. Upon sale or legal transfer, the new owner or operator must apply for a permit within 30 days.
3. A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.
4. The permittee shall keep this permit under file or on display at all times at the site where the facility for which the permit is issued is located and shall make the permit readily available for inspection by any or all persons who may request to see it.
5. Each point of emission, which requires testing, will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.
6. All air pollution control equipment shall be operated at all times while this process is operational. In the event of scheduled maintenance, unscheduled maintenance, or a breakdown of the pollution control equipment, the process shall be shutdown as expeditiously as possible (unless this act and subsequent re-start would clearly cause greater emissions than continuing operations of the process for a short period). The Department shall be notified of all such events **that exceed 1 hour** within 24 hours. The notification shall include all pertinent facts, including the duration of the process operating without the control device and the level of excess emissions which have occurred. Records of all such events, regardless of reporting requirements, shall be made and maintained for a period of five (5) years from the date of generation. These records shall be available for inspection.
7. This process, including all air pollution control devices and capture systems for which this permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.
8. This permit expires and the application is cancelled if construction has not begun within 24 months of the date of issuance of the permit.
9. On completion of construction of the device(s) for which this permit is issued, written notification of the fact is to be submitted to the Chief of the Air Division. The notification shall indicate whether the device(s) was constructed as proposed in the

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application. The device(s) shall not be operated until authorization to operate is granted by the Chief of the Air Division. Failure to notify the Chief of the Air Division of completion of construction and/or operation without authorization could result in revocation of this permit.

- 10. Prior to a date to be specified by the Chief of the Air Division in the authorization to operate, emission tests are to be conducted on the RCO stacks (Emission Points EP-019 and EP-020) by persons familiar with and using the EPA Sampling Train and Test Procedure as described in the Code of Federal Regulations, Title 40, Part 60, for the following pollutants. Written tests results are to be reported to the Air Division within 60 days of completion of testing.

Particulates (X) Carbon Monoxide (X)
Sulfur Dioxide..... () Nitrogen Oxides (X)
Volatile Organic Compounds.....(X) Visible Emissions.....(X)

- 11. Emissions tests are to be conducted on the RCO stacks (Emission Points EP-019 and EP-020) for the following pollutants at intervals not to exceed 12 months following the date of initial compliance testing, unless a longer interval duration is approved by the Air Division. If the emission tests for at least two consecutive years show that the emissions are at or below 75% of all applicable emission limits, the frequency of testing may be reduced to once every 5 years (60 months). If a subsequent test shows that the emissions are above 75% of an applicable emission limit, the permittee must revert to annual testing until emission tests for at least two consecutive years show that the emissions are at or below 75% of all applicable emission limits. All test reports must be submitted to the Air Division within 60 days of completion of testing.

Particulates (X) Carbon Monoxide (X)
Sulfur Dioxide..... () Nitrogen Oxides (X)
Volatile Organic Compounds (X)

- 12. Submittal of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require stack emission testing at any time.
- 13. Additions and revisions to the conditions of this Permit will be made, if necessary, to ensure that the Department's air pollution control rules and regulations are not violated.
- 14. Nothing in this permit or conditions thereto shall negate any authority granted to the Air Division pursuant to the Alabama Environmental Management Act or regulations issued thereunder.
- 15. This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of

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Environmental Management that these measures are technically and economically feasible.

16. Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.

Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds:

- a. by the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;
- b. by reducing the speed of vehicular traffic to a point below that at which dust emissions are created;
- c. by paving;
- d. by the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;

Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Department prior to utilization.

17. The Air Division must be notified in writing at least 10 working days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.

To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:

- a. The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.
- b. A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedure requires probe cleaning).
- c. A description of the process(es) to be tested, including the feed rate, any operating parameter used to control or influence the operations, and the rated capacity.

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- d. A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.

A pretest meeting may be held at the request of the source owner or the Department. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.

All test reports must be submitted to the Air Division within 60 days of the actual completion of the test, unless an extension of time is specifically approved by the Air Division.

18. Precautions shall be taken by the permittee and its personnel to ensure that no person shall ignite, cause to be ignited, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.
19. Should Air Division personnel make a determination that excessive emissions are occurring from this process such that offsite impacts are noted, the permittee shall investigate and implement additional emission controls or operational measures to correct the problem. If the permittee would need to install additional emission control equipment and/or institute additional permanent operational measures to address the problem, the permittee shall notify the Air Division in writing within 10 working days of determining that additional controls are needed.
20. This process shall be operated at all times using the best available operating and management practices so that provisions of the Department's rules and regulations shall not be violated.
21. The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.
22. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.
23. The permittee shall not cause or permit the emissions of particulate matter in any 1-hour period from this process to exceed the amount determined by use of the following equation:

$$E=3.59P^{0.62} \text{ (} P < 30 \text{ tons per hour)}$$

OR

$$E=17.31P^{0.16} \text{ (} P \geq 30 \text{ tons per hour)}$$

Where: E=Emissions in pounds per hour
P=Process weight in tons per hour

24. Any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge

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- a 6-minute average opacity of particulate emissions greater than 40%. Opacity will be determined by 40 CFR Part 60, Appendix A, Method 9.
25. The permittee shall not cause or allow the **aggregate** point source emissions from emission points EP-019 and EP-020 to exceed any of the following limitations:
- a) Particulate Matter (PM/PM₁₀/PM_{2.5}): 19.3 lb/hr as measured by EPA Reference Method 5, 17, or 201A and EPA Reference Method 202 found at 40 CFR Part 60, Appendix A (Methods 5 and 17) and 40 CFR Part 51, Appendix M (Methods 201A and 202).
 - b) Carbon Monoxide (CO): 2.81 lb/hr as measured by EPA Reference Method 10 found at 40 CFR Part 60, Appendix A.
 - c) Nitrogen Oxides (NO_x): 4.42 lb/hr as measured by EPA Reference Method 7E found at 40 CFR Part 60, Appendix A.
 - d) Volatile Organic Compounds (VOC; reported as propane): 20.1 lb/hr as measured by EPA Reference Method 18 or 25A found at 40 CFR Part 60, Appendix A.
26. The permittee shall not allow the plantwide total emissions of any criteria pollutant from this facility to exceed 250 tons during any consecutive 12-month period. If any threshold is exceeded, the permittee shall notify the Air Division in writing within 10 days of determining that an exceedance has occurred.
27. The total VOC destruction efficiency across each RCO shall be at least 96.3 percent.
28. The total pellet production shall not exceed 1,201,995 oven-dried tons (ODT) during any consecutive 12-month period. An oven-dried ton equates to a ton of wood at zero percent (0%) moisture content.

Emission Monitoring

29. The following emission monitoring requirements apply to this process:
- a) The permittee shall install, operate, and maintain equipment to monitor the water flow rate through each wet scrubber. The monitoring system shall be designed in such a manner as to be capable of compliance with the monitoring design criteria of §64.3 of 40 CFR Part 64, *Compliance Assurance Monitoring*. Each meter shall be inspected for proper operation and calibrated at least annually.
 - b) While the process and wet scrubber are operating, the permittee shall monitor and record the water flow rate through each wet scrubber at least 4 times per hour (i.e. every 15 minutes). From these data points, 3-hour block averages shall be calculated and recorded.
 - c) The permittee shall operate each wet scrubber with a minimum water flow rate, as averaged over a 3-hour block period, as recommended by the manufacturer or established during emission testing if that value is lower. If the permittee determines through emission testing that an indicator value other than that specified above is more appropriate, the permittee shall submit a notification of

the fact to the Air Division within 30 days of determining that a new indicator value(s) should be established. The notification shall include the data supporting the validity of the newly established indicator value(s). If any reading is outside of the normal operating range, an excursion would be indicated and immediate action shall be initiated to determine the cause of the excursion and return the device to its normal operating parameters.

- d) The permittee shall install, operate, and maintain equipment to monitor the firebox/combustion chamber temperature of each regenerative catalytic oxidizer (RCO). The monitoring system shall be designed in such a manner as to be capable of compliance with the monitoring design criteria of §64.3 of 40 CFR Part 64, *Compliance Assurance Monitoring*. Each thermocouple shall be inspected for proper operation and calibrated at least annually.
- e) While the process and RCO are operating, the permittee shall monitor and record firebox/combustion chamber temperature of the RCO, at a minimum, at least 4 times per hour (i.e. every 15 minutes). From these data points, 3-hour block averages shall be calculated and recorded.
- f) The permittee shall operate each RCO at a minimum firebox/combustion chamber temperature, as averaged over a 3-hour block period, as recommended by the manufacturer or established during emission testing if that value is lower. If the permittee determines through emission testing that an indicator value other than that specified above is more appropriate, the permittee shall submit a notification of the fact to the Air Division within 30 days of determining that a new indicator value(s) should be established. The notification shall include the data supporting the validity of the newly established indicator value(s). If any reading is outside of the normal operating range, an excursion would be indicated and immediate action shall be initiated to determine the cause of the excursion and return the device to its normal operating parameters.
- g) Each RCO shall be operated with an active and properly functioning catalytic bed. The permittee shall check the activity level of a representative sample of the catalyst at least every 16 months and take any necessary corrective action to ensure that the catalyst is performing within its design range.
- h) While the process is operating, someone familiar with the process shall observe each RCO stack (EP-019, EP-020) using EPA Method 22 a minimum of once weekly during daylight hours for greater than normal visible emissions as determined by previous observations.
- i) Whenever observed emissions are greater than normal from a RCO stack, corrective action to minimize emissions shall be initiated as soon as practicable but no longer than 24 hours from the time of the observation, followed by an additional EPA Method 22 observation to confirm that emissions are reduced to normal.

Recordkeeping and Reporting Requirements

30. The following recordkeeping requirements apply to this process:

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- a) The permittee shall maintain records, including the dates and times, of all weekly observation results, corrective actions taken, and emissions-related maintenance performed.
 - b) The permittee shall maintain records of the total wood pellet production (in ODT), including monthly and 12-month rolling totals. Within fifteen (15) days of the end of each calendar month, records of the total throughput for the last calendar month shall be recorded and the rolling 12-month total updated.
 - c) The permittee shall maintain records of the 3-hour block averages of the water flow rate through each wet scrubber.
 - d) The permittee shall maintain records of the 3-hour block averages of the firebox/combustion chamber temperature of each RCO.
 - e) The permittee shall retain all required records in a permanent form suitable and readily available for inspection for a period of five (5) years from the date of generation of each record.
31. The permittee shall submit a written report to the Air Division on a semiannual basis, postmarked or delivered no later than August 29th and March 1st of each year, for the reporting periods of January 1st through June 30th and July 1st through December 31st, respectively. The report shall provide the following:
- a) Certify whether the emission monitoring requirements were accomplished as required, and if not, describe the date and reason any required monitoring was not accomplished.
 - b) Certify whether the weekly visual observations were accomplished as required and note the nature and date of any episodes of greater-than-normal emissions, and corrective or emissions-related maintenance actions taken.
 - c) Provide the date, time, duration, and magnitude of any instance that a wet scrubber had an excursion from an established operating parameter (i.e. 3-hour block average water flow rate).
 - d) Provide the date, time, duration, and magnitude of any instance that a RCO had an excursion from an established operating parameter (i.e. 3-hour block average firebox/combustion chamber temperature)
 - e) Provide the nature and date of any corrective actions taken or preventative measures adopted following an excursion.
 - f) Provide the date of the annual inspection and calibration of the water flow rate measurement devices.
32. The permittee shall submit an annual compliance certification to the Air Division no later than March 1st of each year for the previous calendar year. The compliance certification shall include the following:
- a) The identification of each term or condition of this permit that is the basis of the certification.
 - b) The compliance status, whether continuous or intermittent.

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- c) The method(s) used for determining the compliance status of the source, currently and over the reporting period.
- d) Other facts the Department may require to determine the compliance status of the source.

The compliance certification shall contain certification by a responsible official of truth, accuracy and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

DRAFT

Date

AIR PERMIT

PERMITTEE: ENVIVA PELLETS EPES, LLC
FACILITY NAME: ENVIVA PELLETS EPES, LLC
LOCATION: EPES, SUMTER COUNTY, ALABAMA

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
412-0017-X006	Pellet Storage (Includes Seven Pellet Storage Silos and Seven Bin Vents (one per silo) (EP-022, EP-023, EP-024, EP-025, EP-026, EP-027, EP-028))(SMS)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

ISSUANCE DATE: DRAFT

**ENVIVA PELLETS EPES, LLC
EPES, SUMTER COUNTY, ALABAMA
(PERMIT NO. 412-0017-X006)
PROVISOS**

1. This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.
2. This permit is not transferable. Upon sale or legal transfer, the new owner or operator must apply for a permit within 30 days.
3. A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.
4. The permittee shall keep this permit under file or on display at all times at the site where the facility for which the permit is issued is located and shall make the permit readily available for inspection by any or all persons who may request to see it.
5. Each point of emission, which requires testing, will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.
6. This process, including all air pollution control devices and capture systems for which this permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.
7. This permit expires and the application is cancelled if construction has not begun within 24 months of the date of issuance of the permit.
8. On completion of construction of the device(s) for which this permit is issued, written notification of the fact is to be submitted to the Chief of the Air Division. The notification shall indicate whether the device(s) was constructed as proposed in the application. The device(s) shall not be operated until authorization to operate is granted by the Chief of the Air Division. Failure to notify the Chief of the Air Division of completion of construction and/or operation without authorization could result in revocation of this permit.
9. Submittal of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require stack emission testing at any time.
10. Additions and revisions to the conditions of this Permit will be made, if necessary, to ensure that the Department's air pollution control rules and regulations are not violated.

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11. Nothing in this permit or conditions thereto shall negate any authority granted to the Air Division pursuant to the Alabama Environmental Management Act or regulations issued thereunder.
12. This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.
13. Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.

Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds:

- a. by the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;
- b. by reducing the speed of vehicular traffic to a point below that at which dust emissions are created;
- c. by paving;
- d. by the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;

Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Department prior to utilization.

14. The Air Division must be notified in writing at least 10 working days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.

To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:

- a. The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.
- b. A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of

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filter media, and probe cleaning method and solvent to be used (if test procedure requires probe cleaning).

- c. A description of the process(es) to be tested, including the feed rate, any operating parameter used to control or influence the operations, and the rated capacity.
- d. A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.

A pretest meeting may be held at the request of the source owner or the Department. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.

All test reports must be submitted to the Air Division within 60 days of the actual completion of the test, unless an extension of time is specifically approved by the Air Division.

- 15. Precautions shall be taken by the permittee and its personnel to ensure that no person shall ignite, cause to be ignited, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.
- 16. Should Air Division personnel make a determination that excessive emissions are occurring from this process such that offsite impacts are noted, the permittee shall investigate and implement additional emission controls or operational measures to correct the problem. If the permittee would need to install additional emission control equipment and/or institute additional permanent operational measures to address the problem, the permittee shall notify the Air Division in writing within 10 working days of determining that additional controls are needed.
- 17. This process shall be operated at all times using the best available operating and management practices so that provisions of the Department's rules and regulations shall not be violated.
- 18. The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.
- 19. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.
- 20. The permittee shall not cause or permit the emissions of particulate matter in any 1-hour period from this process to exceed the amount determined by use of the following equation:

$$E=3.59P^{0.62} \text{ (P < 30 tons per hour)}$$

OR

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$$E=17.31P^{0.16} \text{ (P} \geq 30 \text{ tons per hour)}$$

Where: E=Emissions in pounds per hour
P=Process weight in tons per hour

21. Any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity will be determined by 40 CFR Part 60, Appendix A, Method 9.
22. The permittee shall not cause or allow the **aggregate** point source emissions from this process to exceed the following limitation:

Particulate Matter (PM/PM₁₀/PM_{2.5}): 2.88 lb/hr as measured by EPA Reference Method 5, 17, or 201A and EPA Reference Method 202 found at 40 CFR Part 60, Appendix A (Methods 5 and 17) and 40 CFR Part 51, Appendix M (Methods 201A and 202).
23. The permittee shall not allow the plantwide total emissions of any criteria pollutant from this facility to exceed 250 tons during any consecutive 12-month period. If any threshold is exceeded, the permittee shall notify the Air Division in writing within 10 days of determining that an exceedance has occurred.

Emission Monitoring

24. While the process is operating, someone familiar with the process shall observe the pellet storage silo binvents (EP-022, EP-023, EP-024, EP-025, EP-026, EP-027, EP-028) using EPA Method 22 a minimum of once daily during daylight hours for the presence of visible emissions. Whenever the presence of visible emissions is observed, the permittee shall initiate corrective action as soon as practicable but no longer than 24 hours from the time of observation, followed by an additional EPA Method 22 observation to confirm that emissions have been eliminated.

Recordkeeping and Reporting Requirements

25. The permittee shall maintain records, including the dates and times, of all daily observation results, corrective actions taken, and emissions-related maintenance performed. The records shall be made available for inspection for at least five (5) years from the date of generation of each record.
26. The permittee shall submit a written report to the Air Division on a semiannual basis, postmarked or delivered no later than August 29th and March 1st of each year, for the reporting periods of January 1st through June 30th and July 1st through December 31st, respectively, certifying that the daily observations were accomplished as required and noting the nature and date of any episodes of the presence of visible emissions, and corrective or emissions-related maintenance actions taken.

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27. The permittee shall submit an annual compliance certification to the Air Division no later than March 1st of each year for the previous calendar year. The compliance certification shall include the following:

- a) The identification of each term or condition of this permit that is the basis of the certification.
- b) The compliance status, whether continuous or intermittent.
- c) The method(s) used for determining the compliance status of the source, currently and over the reporting period.
- d) Other facts the Department may require to determine the compliance status of the source.

The compliance certification shall contain certification by a responsible official of truth, accuracy and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

DRAFT
Date

AIR PERMIT

PERMITTEE: ENVIVA PELLETS EPES, LLC
FACILITY NAME: ENVIVA PELLETS EPES, LLC
LOCATION: EPES, SUMTER COUNTY, ALABAMA

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
412-0017-X007	Barge Loading Operations with Baghouse (EP-029)(SMS)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

ISSUANCE DATE: DRAFT

**ENVIVA PELLETS EPES, LLC
EPES, SUMTER COUNTY, ALABAMA
(PERMIT NO. 412-0017-X007)
PROVISOS**

1. This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.
2. This permit is not transferable. Upon sale or legal transfer, the new owner or operator must apply for a permit within 30 days.
3. A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.
4. The permittee shall keep this permit under file or on display at all times at the site where the facility for which the permit is issued is located and shall make the permit readily available for inspection by any or all persons who may request to see it.
5. Each point of emission, which requires testing, will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.
6. This process, including all air pollution control devices and capture systems for which this permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.
7. This permit expires and the application is cancelled if construction has not begun within 24 months of the date of issuance of the permit.
8. On completion of construction of the device(s) for which this permit is issued, written notification of the fact is to be submitted to the Chief of the Air Division. The notification shall indicate whether the device(s) was constructed as proposed in the application. The device(s) shall not be operated until authorization to operate is granted by the Chief of the Air Division. Failure to notify the Chief of the Air Division of completion of construction and/or operation without authorization could result in revocation of this permit.
9. Submittal of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require stack emission testing at any time.
10. Additions and revisions to the conditions of this Permit will be made, if necessary, to ensure that the Department's air pollution control rules and regulations are not violated.

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11. Nothing in this permit or conditions thereto shall negate any authority granted to the Air Division pursuant to the Alabama Environmental Management Act or regulations issued thereunder.
12. This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.
13. Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.

Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds:

- a. by the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;
- b. by reducing the speed of vehicular traffic to a point below that at which dust emissions are created;
- c. by paving;
- d. by the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;

Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Department prior to utilization.

14. The Air Division must be notified in writing at least 10 working days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.

To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:

- a. The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.
- b. A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of

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filter media, and probe cleaning method and solvent to be used (if test procedure requires probe cleaning).

- c. A description of the process(es) to be tested, including the feed rate, any operating parameter used to control or influence the operations, and the rated capacity.
- d. A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.

A pretest meeting may be held at the request of the source owner or the Department. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.

All test reports must be submitted to the Air Division within 60 days of the actual completion of the test, unless an extension of time is specifically approved by the Air Division.

- 15. Precautions shall be taken by the permittee and its personnel to ensure that no person shall ignite, cause to be ignited, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.
- 16. Should Air Division personnel make a determination that excessive emissions are occurring from this process such that offsite impacts are noted, the permittee shall investigate and implement additional emission controls or operational measures to correct the problem. If the permittee would need to install additional emission control equipment and/or institute additional permanent operational measures to address the problem, the permittee shall notify the Air Division in writing within 10 working days of determining that additional controls are needed.
- 17. This process shall be operated at all times using the best available operating and management practices so that provisions of the Department's rules and regulations shall not be violated.
- 18. The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.
- 19. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.
- 20. The permittee shall not cause or permit the emissions of particulate matter in any 1-hour period from this process to exceed the amount determined by use of the following equation:

$$E=3.59P^{0.62} \text{ (P < 30 tons per hour)}$$

OR

PERMIT NO. 412-0017-X007

$$E=17.31P^{0.16} \text{ (P} \geq 30 \text{ tons per hour)}$$

Where: E=Emissions in pounds per hour
P=Process weight in tons per hour

21. Any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity will be determined by 40 CFR Part 60, Appendix A, Method 9.
22. The permittee shall not cause or allow point source emissions from the baghouse to exceed the following limitation:

Particulate Matter (PM/PM₁₀/PM_{2.5}): 0.51 lb/hr as measured by EPA Reference Method 5, 17, or 201A and EPA Reference Method 202 found at 40 CFR Part 60, Appendix A (Methods 5 and 17) and 40 CFR Part 51, Appendix M (Methods 201A and 202).
23. The permittee shall not allow the plantwide total emissions of any criteria pollutant from this facility to exceed 250 tons during any consecutive 12-month period. If any threshold is exceeded, the permittee shall notify the Air Division in writing within 10 days of determining that an exceedance has occurred.

Emission Monitoring

24. While the process is operating, someone familiar with the process shall observe the barge loading baghouse (EP-029) using EPA Method 22 a minimum of once daily during daylight hours for the presence of visible emissions. Whenever the presence of visible emissions is observed, the permittee shall initiate corrective action as soon as practicable but no longer than 24 hours from the time of observation, followed by an additional EPA Method 22 observation to confirm that emissions have been eliminated.

Recordkeeping and Reporting Requirements

25. The permittee shall maintain records, including the dates and times, of all daily observation results, corrective actions taken, and emissions-related maintenance performed. The records shall be made available for inspection for at least five (5) years from the date of generation of each record.
26. The permittee shall submit a written report to the Air Division on a semiannual basis, postmarked or delivered no later than August 29th and March 1st of each year, for the reporting periods of January 1st through June 30th and July 1st through December 31st, respectively, certifying that the daily observations were accomplished as required and noting the nature and date of any episodes of the presence of visible emissions, and corrective or emissions-related maintenance actions taken.
27. The permittee shall submit an annual compliance certification to the Air Division no later than March 1st of each year for the previous calendar year. The compliance certification shall include the following:

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- a) The identification of each term or condition of this permit that is the basis of the certification.
- b) The compliance status, whether continuous or intermittent.
- c) The method(s) used for determining the compliance status of the source, currently and over the reporting period.
- d) Other facts the Department may require to determine the compliance status of the source.

The compliance certification shall contain certification by a responsible official of truth, accuracy and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

DRAFT

Date

AIR PERMIT

PERMITTEE: ENVIVA PELLETS EPES, LLC
FACILITY NAME: ENVIVA PELLETS EPES, LLC
LOCATION: EPES, SUMTER COUNTY, ALABAMA

<u>PERMIT NUMBER</u>	<u>DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE</u>
412-0017-X008	131 Brake-Hp (98 kW _m) Compression Ignition Diesel-fired Reciprocating Internal Combustion Engine (Emergency Fire Pump Engine; EP-030) (NSPS, Subpart IIII)(SMS)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

ISSUANCE DATE: DRAFT

**ENVIVA PELLETS EPES, LLC
EPES, SUMTER COUNTY, ALABAMA
(PERMIT NO. 412-0017-X008)
PROVISOS**

1. This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.
2. This permit is not transferable. Upon sale or legal transfer, the new owner or operator must apply for a permit within 30 days.
3. A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.
4. The permittee shall keep this permit under file or on display at all times at the site where the facility for which the permit is issued is located and shall make the permit readily available for inspection by any or all persons who may request to see it.
5. Each point of emission, which requires testing, will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.
6. All air pollution control equipment shall be operated at all times while this process is operational. In the event of scheduled maintenance, unscheduled maintenance, or a breakdown of the pollution control equipment, the process shall be shutdown as expeditiously as possible (unless this act and subsequent re-start would clearly cause greater emissions than continuing operations of the process for a short period). The Department shall be notified of all such events **that exceed 1 hour** within 24 hours. The notification shall include all pertinent facts, including the duration of the process operating without the control device and the level of excess emissions which have occurred. Records of all such events, regardless of reporting requirements, shall be made and maintained for a period of five (5) years from the date of generation. These records shall be available for inspection.
7. This process, including all air pollution control devices and capture systems for which this permit is issued, shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.
8. This permit expires and the application is cancelled if construction has not begun within 24 months of the date of issuance of the permit.
9. On completion of construction of the device(s) for which this permit is issued, written notification of the fact is to be submitted to the Chief of the Air Division. The notification shall indicate whether the device(s) was constructed as proposed in the application. The device(s) shall not be operated until authorization to operate is granted by the Chief of the

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Air Division. Failure to notify the Chief of the Air Division of completion of construction and/or operation without authorization could result in revocation of this permit.

10. Submittal of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require stack emission testing at any time.
11. Additions and revisions to the conditions of this Permit will be made, if necessary, to ensure that the Department's air pollution control rules and regulations are not violated.
12. Nothing in this permit or conditions thereto shall negate any authority granted to the Air Division pursuant to the Alabama Environmental Management Act or regulations issued thereunder.
13. The Air Division must be notified in writing at least 10 working days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.

To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:

- a. The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.
- b. A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedure requires probe cleaning).
- c. A description of the process(es) to be tested, including the feed rate, any operating parameter used to control or influence the operations, and the rated capacity.
- d. A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.

A pretest meeting may be held at the request of the source owner or the Department. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.

All test reports must be submitted to the Air Division within 60 days of the actual completion of the test, unless an extension of time is specifically approved by the Air Division.

14. Any performance tests required shall be conducted and data reduced in accordance with the test methods and procedures contained in each specific permit condition unless the Director (1) specifies or approves, in specific cases, the use of a reference method with minor changes in methodology, (2) approves the use of an equivalent method, or (3) approves the

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use of an alternative method, the results of which he has determined to be adequate for indicating whether a specific source is in compliance.

15. This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.
16. Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.

Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds:

- (a) by the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;
- (b) by reducing the speed of vehicular traffic to a point below that at which dust emissions are created;
- (c) by paving;
- (d) by the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;

Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Department prior to utilization.

17. Precautions shall be taken by the permittee and its personnel to ensure that no person shall ignite, cause to be ignited, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.
18. In accordance with ADEM Admin. Code. r. 335-3-4-.01(1), any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity shall be determined by 40 CFR Part 60, Appendix A, Method 9.
19. The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.
20. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.

NESHAP Requirements (40 CFR Part 63, Subpart ZZZZ)

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21. This engine is an affected source under 40 CFR Part 63, Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. In accordance with §63.6590(c), the permittee shall comply with the requirements of this part by meeting the requirements of 40 CFR part 60 subpart III. No further requirements apply for this engine under this part.

NSPS Requirements (40 CFR Part 60, Subpart III)

22. The permittee shall comply with the applicable requirements for this engine (EP-030) under 40 CFR Part 60, Subpart III, the Standards of Performance for Stationary Compression Ignition Internal Combustions Engines, which include, but may not be limited to the following:

(a) The permittee shall not cause or allow the emissions from this engine to exceed the applicable emission standards in Table 4 to Subpart III as required by §60.4205(c) and §60.4202(d). The applicable emission standards are specified in the following table:

Engine	NO_x + NMHC g/kW _m -hr (g/hp-hr)	CO g/kW _m -hr (g/hp-hr)	PM g/kW _m -hr (g/hp-hr)
EP-030 (131 brake-hp)	4.0 (3.0)	5.0 (3.7)	0.30 (0.22)

where:

NO_x = Nitrogen oxides

NMHC = Non-methane hydrocarbons

CO = Carbon monoxide

PM = Particulate matter

(b) In accordance with 40 CFR §60.4206 and §60.4211(a), the permittee shall operate and maintain this engine according to the manufacturer’s written instructions;

(c) In accordance with 40 CFR §60.4207, the permittee shall not use any diesel fuel for use in this engine that does not meet the following per-gallon standards of 40 CFR §80.510(b):

i) Sulfur content shall not exceed 15 parts per million (ppm); and

ii) Cetane index shall be a minimum of 40 or the aromatic content shall not exceed 35 volume percent;

(d) In accordance with 40 CFR §60.4209(a), the permittee shall install and operate a non-resettable hour meter;

(e) In accordance with 40 CFR §60.4211(f), the permittee shall only operate this engine as specified below:

i) Emergency situations;

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- ii) Maintenance checks and readiness testing not to exceed 100 hours per year provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine; and
 - iii) Non-emergency situations, not to exceed 50 hours per year (these 50 hours count toward the 100 hours per year allowed for maintenance checks and readiness testing). The 50 hours per year for non-emergency situations cannot be used for peak shaving 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.
- (f) To demonstrate compliance with the operational limitations, the permittee shall maintain records of the date, time, duration, and purpose of operation each time this engine is operated. These records shall be maintained in a permanent form suitable for inspection and shall be readily available for inspection upon request. These records shall be retained for a period of five (5) years from the date of generation of each record.
- (g) To demonstrate compliance with the fuel limitations, the permittee shall maintain records of the sulfur content and either the Cetane index or aromatic content of the diesel fuel that is burned in this engine. These records shall be maintained in a permanent form suitable for inspection and shall be readily available for inspection upon request. These records shall be retained for a period of five (5) years from the date of generation of each record.

Synthetic Minor Source Requirements

23. The permittee shall not cause or allow this engine to operate more than 500 hours during any consecutive 12-month period.

Monitoring, Recordkeeping, and Reporting Requirements

24. Within fifteen (15) days of the end of each calendar month, the permittee shall calculate and record the monthly and 12-month rolling total hours of operation for the engine for the previous month and 12-month period.
25. The permittee shall maintain records of the monthly and 12-month rolling total hours of operation for the engine in a permanent format suitable for inspection and shall make the records readily available for inspection upon request. The permittee shall maintain these records for a period of five (5) years from the generation of each record
26. Should the permittee exceed the operational limit for the engine, the permittee shall notify the Air Division in writing within two (2) working days of determining that the exceedance occurred.

DRAFT
Date

AIR PERMIT

PERMITTEE: ENVIVA PELLETS EPES, LLC
FACILITY NAME: ENVIVA PELLETS EPES, LLC
LOCATION: EPES, SUMTER COUNTY, AL

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
412-0017-X009	<p>Emergency Generator Engines (NSPS; SMS), which include:</p> <ul style="list-style-type: none"> 671 Brake-Hp (500 kW_m) Compression Ignition Diesel-fired Reciprocating Internal Combustion Engine (EP-031) 671 Brake-Hp (500 kW_m) Compression Ignition Diesel-fired Reciprocating Internal Combustion Engine (EP-032)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

ISSUANCE DATE: DRAFT

**ENVIVA PELLETS EPES, LLC
EPES, SUMTER COUNTY, ALABAMA
(PERMIT NO. 412-0017-X009)
PROVISOS**

1. This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.
2. This permit is not transferable. Upon sale or legal transfer, the new owner or operator must apply for a permit within 30 days.
3. A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.
4. The permittee shall keep this permit under file or on display at all times at the site where the facility for which the permit is issued is located and shall make the permit readily available for inspection by any or all persons who may request to see it.
5. Each point of emission, which requires testing, will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.
6. All air pollution control equipment shall be operated at all times while this process is operational. In the event of scheduled maintenance, unscheduled maintenance, or a breakdown of the pollution control equipment, the process shall be shutdown as expeditiously as possible (unless this act and subsequent re-start would clearly cause greater emissions than continuing operations of the process for a short period). The Department shall be notified of all such events **that exceed 1 hour** within 24 hours. The notification shall include all pertinent facts, including the duration of the process operating without the control device and the level of excess emissions which have occurred. Records of all such events, regardless of reporting requirements, shall be made and maintained for a period of five (5) years from the date of generation. These records shall be available for inspection.
7. This process, including all air pollution control devices and capture systems for which this permit is issued, shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.
8. This permit expires and the application is cancelled if construction has not begun within 24 months of the date of issuance of the permit.
9. On completion of construction of the device(s) for which this permit is issued, written notification of the fact is to be submitted to the Chief of the Air Division. The notification shall indicate whether the device(s) was constructed as proposed in the application. The

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device(s) shall not be operated until authorization to operate is granted by the Chief of the Air Division. Failure to notify the Chief of the Air Division of completion of construction and/or operation without authorization could result in revocation of this permit.

10. Submittal of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require stack emission testing at any time.
11. Additions and revisions to the conditions of this Permit will be made, if necessary, to ensure that the Department's air pollution control rules and regulations are not violated.
12. Nothing in this permit or conditions thereto shall negate any authority granted to the Air Division pursuant to the Alabama Environmental Management Act or regulations issued thereunder.
13. The Air Division must be notified in writing at least 10 working days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.

To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:

- a. The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.
- b. A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedure requires probe cleaning).
- c. A description of the process(es) to be tested, including the feed rate, any operating parameter used to control or influence the operations, and the rated capacity.
- d. A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.

A pretest meeting may be held at the request of the source owner or the Department. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.

All test reports must be submitted to the Air Division within 60 days of the actual completion of the test, unless an extension of time is specifically approved by the Air Division.

14. Any performance tests required shall be conducted and data reduced in accordance with the test methods and procedures contained in each specific permit condition unless the

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Director (1) specifies or approves, in specific cases, the use of a reference method with minor changes in methodology, (2) approves the use of an equivalent method, or (3) approves the use of an alternative method, the results of which he has determined to be adequate for indicating whether a specific source is in compliance.

15. This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.
16. Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.

Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds:

- (a) by the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;
- (b) by reducing the speed of vehicular traffic to a point below that at which dust emissions are created;
- (c) by paving;
- (d) by the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;

Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Department prior to utilization.

17. Precautions shall be taken by the permittee and its personnel to ensure that no person shall ignite, cause to be ignited, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.
18. In accordance with ADEM Admin. Code. r. 335-3-4-.01(1), any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity shall be determined by 40 CFR Part 60, Appendix A, Method 9.
19. The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.

20. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.

NESHAP Requirements (40 CFR 63, Subpart ZZZZ)

21. These engines are affected sources under 40 CFR 63, Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, but are subject to limited requirements in accordance with §63.6590(b)(1)(i). Per §63.6590(b)(1)(i), these engines do not have to meet requirements of Subpart ZZZZ or Subpart A, except for the initial notification requirements of §63.6645(f).

NSPS Requirements (40 CFR 60, Subpart IIII)

22. The permittee shall comply with the applicable requirements for these engines (EP-031/EP-032) under 40 CFR 60, Subpart IIII, the Standards of Performance for Stationary Compression Ignition Internal Combustions Engines, which include, but may not be limited to the following:

- (a) The permittee shall not cause or allow the emissions from these engines to exceed the applicable emission standards in the applicable emission standards in 40 CFR §89.112 as required by §60.4205(b) and §60.4202(a)(2). The applicable emission standards are specified in the following table:

Engine	NO_x + NMHC g/kW _m -hr (g/hp-hr)	CO g/kW _m -hr (g/hp-hr)	PM g/kW _m -hr (g/hp-hr)
EP-031 (671 brake-hp)	4.0 (3.0)	3.5 (2.6)	0.20 (0.15)
EP-032 (671 brake-hp)	4.0 (3.0)	3.5 (2.6)	0.20 (0.15)

where:

NO_x = Nitrogen oxides

NMHC = Non-methane hydrocarbons

CO = Carbon monoxide

PM = Particulate matter

- (b) In accordance with §89.113, the permittee shall not cause or allow the exhaust opacity, as measured and calculated according to 40 CFR Part 86, Subpart I, to exceed:
- i. 20 percent during the acceleration mode;
 - ii. 15 percent during the lugging mode; and
 - iii. 50 percent during the peaks in either the acceleration or lugging modes.
- (c) In accordance with 40 CFR §60.4206 and §60.4211(a), the permittee shall operate and maintain these engines according to the manufacturer's written instructions,

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change only those emission-related settings that are permitted by the manufacturer, and meet the requirements of 40 CFR Parts 89, 94, and/or 1068, as applicable;

- (d) In accordance with 40 CFR §60.4207, the permittee shall not combust any diesel fuel in these engines that does not meet the following per-gallon standards of 40 CFR §80.510(b):
 - i) Sulfur content shall not exceed 15 parts per million (ppm); and
 - ii) Cetane index shall be a minimum of 40 or the aromatic content shall not exceed 35 volume percent;
- (e) In accordance with 40 CFR §60.4209, the permittee shall install a non-resettable hour meter on each engine;
- (f) In accordance with §60.4211(f), the permittee shall only operate these engines as specified below:
 - i) Emergency situations;
 - ii) Maintenance checks and readiness testing not to exceed 100 hours per year provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine; and
 - iii) Non-emergency situations, not to exceed 50 hours per year (these 50 hours count toward the 100 hours per year allowed for maintenance checks and readiness testing). The 50 hours per year for non-emergency situations cannot be used for peak shaving 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;
- (g) To demonstrate compliance with the operational limitations, the permittee shall maintain records of the date, time, duration, and purpose of operation each time an engine is operated. These records shall be maintained in a permanent form suitable for inspection and shall be readily available for inspection upon request. These records shall be retained for at least five (5) years from the date of generation of each record;
- (h) To demonstrate compliance with the fuel limitations, the permittee shall maintain records of the sulfur content and either the Cetane index or aromatic content of the diesel fuel that is burned in these engines. These records shall be maintained in a permanent form suitable for inspection and shall be readily available for inspection upon request. These records shall be retained for at least five (5) years from the date of generation of each record.

Synthetic Minor Source Requirements

23. The permittee shall not cause or allow these engines to operate more than 500 hours (each) during any consecutive 12-month period.

Monitoring, Recordkeeping, and Reporting Requirements

24. Within fifteen (15) days of the end of each calendar month, the permittee shall calculate and record the monthly and 12-month rolling total hours of operation for each engine for the previous month and 12-month period.
25. The permittee shall maintain records of the monthly and 12-month rolling total hours of operation for each engine in a permanent format suitable for inspection and shall make the records readily available for inspection upon request. The permittee shall maintain these records for a period of five (5) years from the generation of each record.
26. Should the permittee exceed the operational limit for any engine, the permittee shall notify the Air Division in writing within two (2) working days of determining that the exceedance occurred.

DRAFT
Date