# STATE OF MISSISSIPPI AND FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL

# **PERMIT**

TO OPERATE AIR EMISSIONS EQUIPMENT AT A
SYNTHETIC MINOR SOURCE

## THIS CERTIFIES THAT

Plains Pipeline LP
Liberty Truck and Storage Facility
4638 MS Highway 24 and 48
Liberty, Mississippi
Amite County

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with the Federal Clean Air Act and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), the regulations and standards adopted and promulgated thereunder, and the State Implementation Plan for operating permits for synthetic minor sources.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: XXXXX Permit No.: 0080-00004

**Expires:** [No more than five (5) years from permit issuance]

Permit No.: 0080-00004

#### **Section 1**

### A. GENERAL CONDITIONS

- 1. This permit is for air pollution control purposes only. [Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.]
- 2. This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.1.D [11 Miss. Admin. Code Pt. 2, R. 2.1.D.]
- 3. Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49-17-29 1.b]
- 4. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit. [11 Miss. Admin. Code Pt. 2, R.2.2.B(5).]
- 5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities. [Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).]
- 6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. [11 Miss. Admin. Code Pt. 2, R.2.2.B(15)(a).]
- 7. The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).]
- 8. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).]
- 9. The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of

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records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. [Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).]

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

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

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

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

- 11. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:
  - a. Persistent violation of any terms or conditions of this permit.
  - b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
  - c. A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission [11 Miss. Admin. Code Pt. 2, R. 2.2.C.]
- 12. Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control. [Miss. Code Ann. 49-17-39]
- 13. Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation,

maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).]

- 14. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board. [11 Miss. Admin. Code Pt. 2, R. 2.16.B.]
- 15. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. [11 Miss. Admin. Code Pt. 2, R. 2.1.D(7).]
- 16. The permittee shall furnish to MDEQ within a reasonable time any information MDEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to MDEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to MDEQ along with a claim of confidentiality. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).]
- 17. This permit does not authorize a modification as defined in Regulation 11 Miss. Admin. Code Pt. 2, "Permit Regulations for the Construction and/or Operation of Air Emission Equipment." A modification may require a Permit to Construct and a modification of this permit. Modification is defined and "Any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:
  - a. routine maintenance, repair, and replacement;
  - b. use of an alternative fuel or raw material by reason of an order under Sections 2(a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
  - c. use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
  - d. use of an alternative fuel or raw material by a stationary source which:
    - i) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit

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- condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or
- ii) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.66;
- e. an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or
- f. any change in ownership of the stationary source."

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

#### **B. GENERAL OPERATIONAL CONDITIONS**

- 1. Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in Regulation, 11 Miss. Admin. Code Pt. 2, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. [11 Miss. Admin. Code Pt. 2, R.2.10.]
- 2. Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began. [11 Miss. Admin. Code Pt. 2, R.2.2.B(10).]
- 3. The permittee shall retain all required records, monitoring data, supported information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to MDEQ as required by Applicable Rules and Regulations or this permit upon request. [11 Miss. Admin. Code Pt. 2, R.2.9.]
- 4. The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed except as provided for in 11 Miss. Admin. Code Pt. 2, R. 1.10., "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants." [Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.]

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- 5. Compliance Testing: Regarding compliance testing:
  - i) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.
  - ii) Compliance testing will be performed at the expense of the permittee.
  - iii) Each emission sampling and analysis report shall include but not be limited to the following:
    - detailed description of testing procedures;
    - sample calculation(s);
    - results; and
    - comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

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

## C. GENERAL SUBMITTAL REQUIREMENTS

6. For renewal of this permit, the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board. [11 Miss. Admin. Code Pt. 2, R. 2.8.]

# SECTION 2 EMISSION POINT DESCRIPTION

The permittee is authorized to operate air emissions equipment, as described in the following table.

Emission Point(s)	Description
AA-001 (Tank 554)	12.6 million gallon vertical external floating roof tank used for storing crude oil/condensate
AA-002 (Tank 555)	12.6 million gallon vertical external floating roof tank used for storing crude oil/condensate
AA-003 (Tank 556)	12.6 million gallon vertical external floating roof tank used for storing crude oil/condensate
AB-001 (Tank 1002)	18,480 gallon vertical fixed roof tank used for storing crude oil/condensate
AB-002 (Tank 1005)	18,480 gallon vertical fixed roof tank used for storing crude oil/condensate
AB-003 (Tank 91955)	19,740 gallon vertical fixed roof tank used for storing crude oil/condensate
AB-004 (Tank 91956)	19,740 gallon vertical fixed roof tank used for storing crude oil/condensate
AB-005 (Tank 91972)	19,740 gallon vertical fixed roof tank used for storing crude oil/condensate
AC-001 (Sump 1)	1,000 gallon horizontal fixed roof sump tank used for non-pressurized discharge collection
AC-002 (Sump 2)	1,000 gallon horizontal fixed roof sump tank used for non-pressurized discharge collection
AD-001	Facility-wide fugitive emissions

## SECTION 3 EMISSION LIMITATIONS AND STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard
Entire Facility	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1		Opacity from any point source shall not exceed 40% unless otherwise specified
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2	Opacity	Visual obscuration caused by uncombined water droplets does not apply to the 40% Opacity limitation.
	Permit to Construct issued July 25, 2016	3.3	VOC	95.0 tons per year
AA-001 AA-002 AA-003	Permit to Construct issued July 25, 2016	3.4	Operational Restriction	≤18,396 million gallons per year Crude Oil/Condensate Throughput
	Permit to Construct issued July 25, 2016	3.5	Tank Landings	Minimize tank landing events
	40 CFR Part 60, Subpart Kb §60.110b(a), (b), and (d)	3.6	VOC	Applicability
	40 CFR 60.113b(b)(1) through (6)	3.7	НАР	Testing and Procedures for External Floating Roof Emission Control
AB-001 AB-002 AB-003 AB-004 AB-005	Permit to Construct issued July 25, 2016	3.8	Operational Restriction	≤45.99 million gallons per year Crude Oil/Condensate Throughput

- 3.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).
  - (a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.
  - (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour.

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

- 3.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Condition 3.1. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)
- 3.3 For the entire facility, the permittee shall limit the emissions of Volatile Organic Compounds (VOCs) to no more than 95.0 tons per year for any consecutive 12-month period on a rolling basis.

  (Ref.: Permit to Construct issued July 25, 2016)
- 3.4 For Emission Points AA-001, AA-002, and AA-003, the permittee shall limit the throughput of crude oil/condensate through all three tanks to no more than 18,396 million gallons per year for any consecutive 12-month period on a rolling basis. (Ref.: Permit to Construct issued July 25, 2016)
- 3.5 For Emission Points AA-001, AA-002, and AA-003, in order to maximize the control of air pollutants from the external floating roof tanks, the permittee shall minimize the frequency and duration of all tank landing events.

  (Ref.: Permit to Construct issued July 25, 2016)
- 3.6 Emission Points AA-001, AA-002, and AA-003 are storage vessels with a capacity greater than or equal to 75 cubic meters (~47,696 m³) that are used to store volatile organic liquids (VOL) (i.e. crude oil/condensate) which were constructed after July 23, 1984. As such, these units are subject to and shall comply with all applicable requirements of 40 CFR Part 60, Subpart Kb Standards of Performance of Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984. (Ref.: 40 CFR 60.110b(a), (b), and (d))
- For Emission Points AA-001, AA-002, and AA-003, the permittee shall complete the requirements outlined in paragraphs (a) through (f) below:
  - (a) Determine the gap areas and maximum gap widths, between the primary seal and the wall of the storage vessel and between the secondary seal and the wall of the storage vessel according to the following frequency.
    - (i) Measurements of gaps between the tank wall and the primary seal (seal gaps) shall be performed during the hydrostatic testing of the vessel or within 60 days of the initial fill with VOL and at least once every 5 years thereafter.
    - (ii) Measurements of gaps between the tank wall and the secondary seal shall be performed within 60 days of the initial fill with VOL and at least once per year thereafter.

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(iii) If any source ceases to store VOL for a period of 1 year or more, subsequent introduction of VOL into the vessel shall be considered an initial fill for the purposes of paragraphs (1)(i) and (ii) above.

- (b) Determine gap widths and areas in the primary and secondary seals individually by the following procedures:
  - (i) Measure seal gaps, if any, at one or more floating roof levels when the roof is floating off the roof leg supports.
  - (ii) Measure seal gaps around the entire circumference of the tank in each place where a 0.32-cm diameter uniform probe passes freely (without forcing or binding against seal) between the seal and the wall of the storage vessel and measure the circumferential distance of each such location.
  - (iii) The total surface area of each gap described in paragraph (2)(ii) above shall be determined by using probes of various widths to measure accurately the actual distance from the tank wall to the seal and multiplying each such width by its respective circumferential distance.
- (c) Add the gap surface area of each gap location for the primary seal and the secondary seal individually and divide the sum for each seal by the nominal diameter of the tank and compare each ratio to the respective standards in paragraph (4) of this section.
- (d) Make necessary repairs or empty the storage vessel within 45 days of identification in any inspection for seals not meeting the requirements listed in (i) and (ii) below:
  - (i) The accumulated area of gaps between the tank wall and the mechanical shoe or liquid-mounted primary seal shall not exceed 212 cm<sup>2</sup> per meter of tank diameter, and the width of any portion of any gap shall not exceed 3.81 cm.
    - (A) One end of the mechanical shoe is to extend into the stored liquid, and the other end is to extend a minimum vertical distance of 61 cm above the stored liquid surface.
    - (B) There are to be no holes, tears, or other openings in the shoe, seal fabric, or seal envelope.
  - (ii) The secondary seal is to meet the following requirements:
    - (A) The secondary seal is to be installed above the primary seal so that it completely covers the space between the roof edge and the tank wall except as provided in paragraph (2)(iii) above.
    - (B) The accumulated area of gaps between the tank wall and the secondary seal shall not exceed 21.2 cm<sup>2</sup> per meter of tank diameter, and the width of any portion of any gap shall not exceed 1.27 cm.

- (C) There are to be no holes, tears, or other openings in the seal or seal fabric.
- (iii) If a failure that is detected during inspections required in paragraph (1) above cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the MDEQ in the inspection report. Such extension request must include a demonstration of unavailability of alternate storage capacity and a specification of a schedule that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.
- (e) Notify the MDEQ 30 days in advance of any gap measurements required by paragraph (1) above to afford the MDEQ the opportunity to have an observer present.
- (f) Visually inspect the external floating roof, the primary seal, secondary seal, and fittings each time the vessel is emptied and degassed.
  - (i) If the external floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, the permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before filling or refilling the storage vessel with VOL.
  - (ii) For all the inspections required by paragraph (6) above, the permittee shall notify the MDEQ in writing at least 30 days prior to the filling or refilling of each storage vessel to afford the MDEQ the opportunity to inspect the storage vessel prior to refilling. If the inspection required by paragraph (6) above is not planned and the permittee could not have known about the inspection 30 days in advance of refilling the tank, the permittee shall notify the MDEQ at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the MDEQ at least 7 days prior to the refilling.

### (Ref.: 40 CFR 60.113b(b)(1) through (6))

3.8 For Emission Points AB-001, AB-002, AB-003, AB-004, and AB-005, the permittee shall limit the throughput of crude oil/condensate through all five tanks to no more than 45.99 million gallons per year for any consecutive 12-month period on a rolling basis.

(Ref.: Permit to Construct issued July 25, 2016)

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# SECTION 4 WORK PRACTICES

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limitation/Standard	
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# SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard
Entire Facility	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.1	VOC	Monitoring Methodology
AA-001 AA-002 AA-003	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2	Crude Oil/Condensate Throughput	Continuous monitoring of crude oil/condensate throughput
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.3	Tank Landing Events	Monitor the frequency and duration of all tank landing events
AB-001 AB-002 AB-003 AB-004 AB-005	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.4	Crude Oil/Condensate Throughput	Continuous monitoring of crude oil/condensate throughput

5.1 For the entire facility, the permittee shall demonstrate compliance with facility-wide VOC limit by using the recorded throughput of crude oil/condensate for each tank and an approved engineering methodology to calculate the facility-wide VOC emissions.

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

5.2 For Emission Points AA-001, AA-002, and AA-003, in order to demonstrate compliance with the crude oil/condensate throughput limitations, the permittee shall continuously monitor the throughput of crude oil/condensate through each tank.

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

- 5.3 For Emission Points AA-001, AA-002, and AA-003, the permittee shall monitor and record the number of tank landing events for each tank and the duration of each event. The VOC emissions from these events shall be calculated for each event using an approved engineering methodology. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 5.4 For Emission Points AB-001, AB-002, AB-003, AB-004, and AB-005, the permittee shall continuously monitor the throughput of crude oil/condensate through each tank.

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

# SECTION 6 REPORTING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard
Entire Facility	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	VOC	Facility-wide Reporting Requirements
AA-001 AA-002 AA-003	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.2	Crude Oil/Condensate Throughput	Maintain records of the crude oil/condensate throughput.
	40 CFR 60.115b(b)(3)	6.3	HAPs	Gap measurement recordkeeping requirements
	40 CFR 60.116b(a) and (b)	6.4		Recordkeeping of storage vessel dimensions and capacity
	40 CFR 60.116b(c) and (e)	6.5		Recordkeeping of volatile organic liquid storage
	40 CFR 60.115b(b)(2) and (4)	6.6		Gap measurement reporting requirements
AB-001 AB-002 AB-003 AB-004 AB-005	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.7	Crude Oil/Condensate Throughput	Maintain records of the crude oil/condensate throughput.

- 6.1 For the entire facility, the permittee shall submit an annual report showing that the facility is in compliance with the facility-wide VOC limitations. This report shall include the facility-wide throughput of crude oil/condensate, the number and duration of all tank landing events for the year, and all appropriate calculations using the required throughput values and the VOC tank landing events. If utilizing a software program to calculate emissions, the permittee can submit a summary report of the calculations provided the permittee can detail the appropriateness of the software program. The report shall be due by January 31st for the preceding calendar year.
  - (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 6.2 For Emission Points AA-001, AA-002, and AA-003, the permittee shall maintain records of the throughput amount of crude oil/condensate through each tank. These records shall be kept on-site and made available at the request of the MDEQ for at least five (5) years.
  - (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 6.3 For Emission Points AA-001, AA-002, and AA-003, the permittee shall keep a record of each gap measurement performed. Each record shall identify the storage vessel in which the measurement was performed and shall include the date of the measurement, the raw data obtained by the measurement, and the calculations described in Conditions 3.7(b) and 3.7(c).

(Ref.: 40 CFR 60.115b(b)(3))

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6.4 For Emission Points AA-001, AA-002, and AA-003, the permittee shall keep readily accessible records showing the dimension of each storage vessel and an analysis showing the capacity of each storage vessel. The permittee shall keep these records for the life of the affected vessels.

(Ref.: 40 CFR 60.116b(a) and (b))

- 6.5 For Emission Points AA-001, AA-002, and AA-003, the permittee shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period for each affected vessel. The permittee may obtain the maximum true vapor pressure by using one of the following options:
  - (i) Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517.
  - (ii) The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa.

### (Ref.: 40 CFR 60.116b(c) and (e))

- 6.6 For Emission Points AA-001, AA-002, and AA-003, the permittee shall submit a report of the results of the seal gap measurements to the MDEQ within sixty (60) days of performing said measurements. This report shall include the date of the measurements, the raw data obtained in the measurements, and the calculations described in Conditions 3.7(b) and 3.7(c).
  - In the event that the seal gap measurement detects gaps exceeding the limitations specified in Condition 3.7(d), the permittee shall submit a report to the MDEQ within thirty (30) days of the inspection. This report will identify the affected vessel(s), the information specified in Condition 3.7(b), and the date the vessel(s) were emptied or the repairs made and the date of repair. (Ref.: 40 CFR 60.115b(b)(2) and (4))
- 6.7 For Emission Points AB-001, AB-002, AB-003, AB-004, and AB-005, the permittee shall maintain records of the throughput amount of crude oil/condensate through each tank. These records shall be kept on-site and made available at the request of the MDEQ for at least five (5) years.

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