



## State of Mississippi



### FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL PERMIT

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

#### **THIS CERTIFIES**

Gulf Pine Energy L P, Strong 17-7 Number 1 Facility  
Off Strong Road  
Aberdeen, MS  
Monroe 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. set., 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**

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**Mississippi Department of Environmental Quality**

Issued/Modified:

Permit No. 1840-00090

Expires:

Agency Interest # 70489

\*\*\* Draft Permit \*\*\*

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## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Gulf Pine Energy L P, Strong 17-7 Number 1 Facility

Subject Item Inventory

Permit Number:1840-00090

Activity ID No.: PER20160002

### Subject Item Inventory:

ID	Designation	Description
AI70489	70489	Oil and Gas Production
EQPT1	AA-001	0.5 MMBtu/hr Field Gas Heater Treater
CONT1	AA-002	Flare/Combustor to control emissions from Heater Treater and Three Phase Separator
EQPT2	AA-003	80 HP Field Gas Pump Well Jack
AREA1	AA-004	Fugitive Equipment Leaks
EQPT3	AA-005	Three Phase Separator
EQPT4	AA-006	Truck Loading
EQPT5	AA-007	16,800 Gallon Vertical Fixed Roof Crude Oil Storage Tank
EQPT6	AA-008	16,800 Gallon Vertical Fixed Roof Crude Oil Storage Tank
EQPT7	AA-009	16,800 Gallon Vertical Fixed Roof Produce Water Storage Tank

### Subject Item Groups:

ID	Description	Components
GRPT1	Crude Oil and Produce Water Storage Tanks	EQPT5 16,800 Gallon Vertical Fixed Roof Crude Oil Storage Tank
		EQPT6 16,800 Gallon Vertical Fixed Roof Crude Oil Storage Tank
		EQPT7 16,800 Gallon Vertical Fixed Roof Produce Water Storage Tank

#### KEY

ACT = Activity

AREA = Area

CONT = Control Device

IA = Insignificant Activity

AI = Agency Interest

CAFO = Concentrated Animal Feeding Operation

EQPT = Equipment

IMPD = Impoundment

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Gulf Pine Energy L.P., Strong 17-7 Number 1 Facility

Subject Item Inventory

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### **KEY**

MAFO = Animal Feeding Operation

RPNT = Release Point

WDPT = Withdrawal Point

PCS = PCS

TRMT = Treatment

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### AI0000070489 (70489) Oil and Gas Production:

#### Limitation Requirements:

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Condition No.	Parameter	Condition
L-1	Carbon Monoxide	Carbon Monoxide: The permittee shall limit carbon monoxide (CO) emissions to no more than 99.9 tons per 12 month rolling total. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]
L-2	VOC	VOC: The permittee shall limit volatile organic compounds (VOC) emissions to no more than 99.9 tons per 12 month rolling total. [11 Miss. Admin. Code Pt. 2, R. 2.2 .B(10)]
L-3	HAP, Total (Limit)	HAP, Total (Limit): The permittee shall limit hazardous air pollutants (HAP) emissions to no more than 9.9 tons per 12 month rolling total for any single HAP and no more than 24.9 tons per 12 month rolling total for total combined HAPs. [11 Miss. Admin. Code Pt. 2, R. 2.2 B.10]
L-4	Fuel Combusted	Fuel Combusted: For all combustion units operating at this facility, the permittee shall combust only produced natural gas. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]
L-5		The facility is subject to 40 CFR 60, Subpart OOOOa, New Source Performance Standards for Crude Oil and Natural Gas Production, Transmission and Distribution. The permittee shall comply with the fugitive emission requirements listed in 40 CFR 60.5365a(i). The permittee shall reduce GHG (in the form of a limitation on emissions of methane) and VOC emissions by complying with requirements listed in 40 CFR 60.5397a(a) through (j). [40 CFR 60.5397a, 40 CFR 60_Subpart OOOO.a]

#### Monitoring Requirements:

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Condition No.	Parameter	Condition
M-1		The permittee shall calculate the gas to oil ratio (GOR) from the production of crude oil and gas, annually. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]

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### AI0000070489 (continued):

#### Monitoring Requirements:

Condition No.	Parameter	Condition
M-2		The permittee shall conduct an annual produced field gas analysis, including hydrogen sulfide concentration, sulfur content, methane concentration (volume), gross heating value, molecular weight and speciated VOC constituents. The first produced field gas analysis shall be conducted no later than 60 days after certifying construction. Additionally, an updated produced field gas analysis must be conducted within 90 days from startup of any well that starts up after the most recent analysis. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]
M-3		The permittee shall demonstrate initial compliance with the standards by developing an emission monitoring plan that covers the collection of fugitive emission components at well sites within each company defined area in accordance with 40 CFR 60.5410a(j). The permittee shall submit initial annual report for each collection of fugitive emission components at a well site as required by 40 CFR 60.5420a(b)(1) and (7). [40 CFR 60.5410a(j)]
M-4		The permittee shall demonstrate continuous compliance with the standards by developing an emission monitoring plan that covers the collection of fugitive emission components at well sites within each company defined area in accordance with 40 CFR 60.5415a(h). [40 CFR 60.5415a(h)]

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**AI0000070489 (continued):**

**Record-Keeping Requirements:**

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Condition No.	Condition
R-1	<p>The permittee shall keep the following records:</p> <ul style="list-style-type: none"><li>(1) Monthly and rolling 12 month total for: produced crude oil (barrels), produced water (barrels), volume of gas flared (cubic feet/day), percentage of each VOC and HAP by weight, density of each VOC and HAP, carbon monoxide (CO) emissions (lbs and tons), volatile organic compound (VOC) emissions (lbs and tons), total hazardous air pollutants (HAP) emissions (lbs and tons) and individual HAP emissions (lbs and tons)</li><li>(2) Results of all field gas analysis performed during the reporting period</li><li>(3) Gas to Oil Ratio (GOR) annual value</li><li>(4) log/record of weekly visible emission observation on the flare.</li></ul> <p>The permittee shall maintain a copy of this record on site for at least five years and shall make them available upon request by the Mississippi Department of Environmental Quality (MDEQ) personnel. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]</p>

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### AI0000070489 (continued):

#### Submittal/Action Requirements:

Condition No.	Condition
S-1	<p>The permittee shall report annually by January 31st for the preceding calendar year:</p> <ul style="list-style-type: none"><li>(1) Monthly and rolling 12 month total for: produced crude oil (barrels), produced water (barrels), produced field gas (MMSCF), volume of gas flared (cubic feet/day), percentage of each VOC and HAP by weight, density of each VOC and HAP, carbon monoxide (CO) emissions (lbs and tons), volatile organic compound (VOC) emissions (lbs and tons), total hazardous air pollutants (HAP) emissions (lbs and tons) and individual HAP emissions (lbs and tons), including sample calculations;</li><li>(2) Results of all field gas analysis performed during the reporting period</li><li>(3) Gas to Oil Ratio (GOR) annual value</li><li>(4) date, start time and duration of any upsets or bypasses of control devices at the facility. If no bypasses or upsets have occurred, the facility should submit negative declarations;</li><li>(5) results of all EPA Method 22 analysis conducted on the control flare. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]</li></ul>
S-2	<p>The permittee shall submit annual reports containing information specified in 40 CFR 60.5420a(b)(7) and (c)(15). [40 CFR 60.5420a]</p>
S-3	<p>General Condition: 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).]</p>
S-4	<p>Except as otherwise specified herein, the permittee shall Submit a certified annual synthetic minor monitoring report: Due annually, by the 31st of January for preceding calendar year. This report shall address any required monitoring specified in the permit. [11 Miss. Admin.Code Pt. 2, R.2.2.B(11).]</p>



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### AI0000070489 (continued):

#### Narrative Requirements:

Condition No.	Condition
T-1	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49-17-29 1.b]
T-2	General Condition: The permittee shall at all times maintain in good working order and operate as efficiently as possible all air pollution control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit. [11 Miss. Admin. Code Pt. 2, R. 2.5.A.]
T-3	General Condition: Solids removed in the course of control of air emissions shall 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. [Miss. Code Ann. 49-17-29 1.a(i and ii)]
T-4	General Condition: Any diversion from or bypass of collection and control facilities is prohibited 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", [11 Miss. Admin.Code Pt. 2, R.1.10.]
T-5	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.10.]
T-6	General Condition: 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. [Miss. Code Ann. 49-17-21]
T-7	General Condition: 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) 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 any condition that required either a temporary or permanent reduction or elimination of authorized air emissions. [11 Miss. Admin.Code Pt. 2, R. 2.2.C.]

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### AI0000070489 (continued):

#### Narrative Requirements:

Condition No.	Condition
T-8	General Condition: This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for this 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 condition of the permit. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(b).]
T-9	General Condition: 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]
T-10	General Condition: The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(15)(c).]
T-11	General Condition: 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).]
T-12	General Condition: 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.]
T-13	General Condition: This permit is for air pollution control purposes only. [11 Miss. Admin.Code Pt. 2, R. 2.1.D(1).]
T-14	General Condition: This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.4.D [11 Miss. Admin.Code Pt. 2, R. 2.4.D.]
T-15	General Condition: 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).]

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### AI0000070489 (continued):

#### Narrative Requirements:

Condition No.	Condition
T-16	General Condition: 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).]
T-17	General Condition: This permit does not authorize a modification as defined in 11 Miss. Admin. Code Pt. 2, Ch. 2 "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment". Modification is defined as "Any physical change in or change in the method of operation of a facility which increases actual emissions or 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 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 52.51 or under regulations approved pursuant to 40 CFR 51.166; (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 52.51, or under regulations approved pursuant to 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).]
T-18	General Condition: 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).]
T-19	General Condition: 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.]

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### AI0000070489 (continued):

#### Narrative Requirements:

Condition No.	Condition
T-20	General Condition: 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).]
T-21	<p>General Condition: Emergencies</p> <p>(a) Except as otherwise specified herein, an emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.</p> <p>(b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.</p> <p>(c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence as follows: (i) an emergency occurred and that the permittee can identify the cause(s) of the emergency; (ii) the permitted facility was at the time being properly operated; (iii) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and (iv) the permittee submitted notice of the emergency to MDEQ within two (2) working days of the time when emission limitations were exceeded due to the emergency which contained a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(d) In any enforcement proceeding, the permittee seeking to establish the occurrence of any emergency has the burden of proof.</p> <p>(e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein [11 Miss. Admin.Code Pt. 2, R.2.2.B(10).]</p>
T-22	<p>General Condition: Upsets</p> <p>(a) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows: (i) an upset occurred and that the permittee can identify the cause(s) of the upset; (ii) the source was at the time being properly operated; (iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (iv) the permittee submitted notice of the upset to the DEQ within five (5) working days of the time the upset began which contained a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.</p> <p>(c) This provision is in addition to any upset provision contained in any applicable requirement. [11 Miss. Admin.Code Pt. 2, R.1.10.]</p>

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### AI0000070489 (continued):

#### Narrative Requirements:

Condition No.	Condition
T-23	<p>General Condition: Startups and Shutdowns</p> <p>(a) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows: (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above; (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.</p> <p>(c) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply. [11 Miss. Admin.Code Pt. 2, R.1.10.]</p>
T-24	<p>General Condition: Maintenance</p> <p>(a) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following: (i) the permittee can identify the need for the maintenance; (ii) the source was at the time being properly operated; (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (iv) the permittee submitted notice of the maintenance to MDEQ within five (5) working days of the time the maintenance began or such other times as allowed by MDEQ, which contained a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.</p> <p>(c) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. [11 Miss. Admin.Code Pt. 2, R.1.10.]</p>
T-25	<p>General Condition: 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.]</p>

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### EQPT0000000001 (AA-001) 0.5 MMBtu/hr Field Gas Heater Treater:

#### Limitation Requirements:

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Condition No.	Parameter	Condition
L-1	Particulate Matter	Particulate Matter: Particulate matter emissions from the heater treater burner stack shall not exceed 0.6 pounds per MMBtu/hour heat input. [11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)a]
L-2	Opacity	Opacity: The permittee shall not have emissions of opacity greater than or equal to 40% as determined by EPA Reference Method 9, 40 CFR 60, Appendix A. [11 Miss. Admin. Code Pt. 2, R. 1.3.A(1)]
L-3	Sulfur Dioxide	Sulfur Dioxide: The maximum discharge of sulfur dioxide shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. [11 Miss. Admin. Code Pt. 2, R. 1.4.A(1)]
L-4		The permittee shall only operate with the emissions routed to and controlled by the flare. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]

#### Narrative Requirements:

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Condition No.	Condition
T-1	Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]

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### CONT0000000001 (AA-002) Flare/Combustor to control emissions from Heater Treater and Three Phase Separator:

#### Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Hydrogen sulfide	Hydrogen sulfide: The permittee shall not permit the emission of any gas stream which contains hydrogen sulfide in excess of one grain per 100 standard cubic feet. Gas streams containing hydrogen sulfide in excess of one grain per 100 standard cubic feet shall be incinerated at temperatures of not less than 1600 degrees F for a period of not less than 0.5 seconds, or processed in such manner which is equivalent to or more effective for the removal of hydrogen sulfide. [11 Miss. Admin. Code Pt. 2, R. 1.4.B(2)]
L-2	Opacity	Opacity: The permittee shall operate the flare with no visible emissions as determined by EPA Reference Method 22, except for periods not to exceed a total of five (5) minutes during any consecutive two (2) hours. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]
L-3		The permittee shall maintain a flare pilot flame, auto ignitor, or any other equivalent device at all times when emissions are routed to the flare. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]
L-4		The net heating value of the gas being combusted may be determined by the annual field gas analysis. Analysis must demonstrate that the heat content of the flare gas is 300 Btu/scf or greater if the flare is steam-assisted; or the net heating value of the gas being combusted is 200 Btu/scf or greater if the flare is non-assisted. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]

#### Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		The permittee shall monitor the presence of the flare pilot flame by one of the following methods: using a thermo-couple or any other equivalent device to detect the presence of a flame; or visually observe the presence of the flare flame daily. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]

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### CONT0000000001 (continued):

#### Monitoring Requirements:

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Condition No.	Parameter	Condition
M-2		The permittee shall visual observe the flare flame for a minimum of five (5) minutes during operations weekly. If smoke is observed, corrective action must be taken. The permittee shall perform a follow-up visual observation for a period of two (2) hours using EPA Method 22 immediately after corrections are made to demonstrate compliance with the visible emission limitations. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]
M-3		The net heating value of the gas being combusted may be determined by the annual field gas analysis. Analysis must demonstrate that the heat content of the flare gas is 300 Btu/scf or greater if the flare is steam-assisted; or the net heating value of the gas being combusted is 200 Btu/scf or greater if the flare is non-assisted. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]

#### Record-Keeping Requirements:

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Condition No.	Condition
R-1	The permittee shall keep records of all maintenance performed on the flare in order to operate the flare in a manner consistent with good air pollution practices to minimize emissions and make said records available on request. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]
R-2	The permittee shall record on a log sheet anytime the facility is operating without a flame present and the corrective action taken. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]
R-3	Flare emissions shall be calculated monthly and determined for each 12-month rolling total as tons/year. The permittee shall maintain a copy of this record on site for at least five years and shall make them available upon request by the Mississippi Department of Environmental Quality (MDEQ) personnel. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]
R-4	The permittee shall maintain a record and/or log documenting all visual observations/test, the nature and cause of any visible emissions, any corrective action(s) taken to prevent or minimize the emissions, the date and time when visible observations were conducted and the date and time when corrective action was taken. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]

\*\*\* Draft Permit \*\*\*



## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Gulf Pine Energy L P, Strong 17-7 Number 1 Facility

Facility Requirements

Permit Number:1840-00090

Activity ID No.: PER20160002

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### EQPT000000002 (AA-003) 80 HP Field Gas Pump Well Jack:

#### Limitation Requirements:

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Condition No.	Parameter	Condition
L-1	Particulate Matter	Particulate Matter: Particulate matter emissions from the pump well jack shall not exceed 0.6 pounds per MMBtu/hour heat input. [11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)a]
L-2	Opacity	Opacity: The permittee shall not have emissions of opacity greater than or equal to 40% as determined by EPA Reference Method 9, 40 CFR 60, Appendix A. [11 Miss. Admin. Code Pt. 2, R. 1.3.A(1)]
L-3	Sulfur Dioxide	Sulfur Dioxide: The maximum discharge of sulfur dioxide shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. [11 Miss. Admin. Code Pt. 2, R. 1.4.A(1)]
L-4		The permittee is subject to the New Source Performance Standard for Stationary Spark Ignition Internal Combustion Engines in 40 CFR 60, Subpart JJJJ, and the General Provisions in Subpart A. [40 CFR 60_SUBPART JJJJ]

#### Monitoring Requirements:

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Condition No.	Parameter	Condition
M-1		The permittee must demonstrate compliance by purchasing a certified engine to the emission standards specified in 40 CFR 60.4233 Table 4. The permittee shall keep records of maintenance performed on the engine and must keep a maintenance plan. The permittee shall operate and maintain the stationary engine according to the manufacturer's emission-related written instructions. [40 CFR 60.4233(d), 40 CFR 60.4243(b)]

**Permit to Operate Air Emissions Equipment at a Synthetic Minor Source**

Gulf Pine Energy L P, Strong 17-7 Number 1 Facility

Facility Requirements

Permit Number:1840-00090

Activity ID No.: PER20160002

**EQPT0000000002 (continued):**

**Record-Keeping Requirements:**

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Condition No.	Condition
R-1	The permittee shall provide documentation from the manufacturer that the engine is certified to meet the emission standards in 40 CFR 60.4233. The permittee shall comply with the applicable notifications, reporting, and recordkeeping requirements in 40 CFR 60.4245. [11 Miss. Admin. Code Pt. 2, R. 4245.a]

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**Narrative Requirements:**

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Condition No.	Condition
T-1	Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]

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**Permit to Operate Air Emissions Equipment at a Synthetic Minor Source**

Gulf Pine Energy L P, Strong 17-7 Number 1 Facility

Facility Requirements

Permit Number:1840-00090

Activity ID No.: PER20160002

**AREA0000000001 (AA-004) Fugitive Equipment Leaks:**

Narrative Requirements:

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Condition No.	Condition
T-1	Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]

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**Permit to Operate Air Emissions Equipment at a Synthetic Minor Source**

Gulf Pine Energy L P, Strong 17-7 Number 1 Facility

Facility Requirements

Permit Number:1840-00090

Activity ID No.: PER20160002

**EQPT0000000003 (AA-005) Three Phase Separator:**

Limitation Requirements:

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Condition No.	Parameter	Condition
L-1		Any produced gas from the separator that is not used for facility fuel shall be routed to and controlled by the flare. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]

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Narrative Requirements:

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Condition No.	Condition
T-1	Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]

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**Permit to Operate Air Emissions Equipment at a Synthetic Minor Source**

Gulf Pine Energy L P, Strong 17-7 Number 1 Facility

Facility Requirements

Permit Number:1840-00090

Activity ID No.: PER20160002

**EQPT0000000004 (AA-006) Truck Loading:**

Narrative Requirements:

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Condition No.	Condition
T-1	Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]

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**Permit to Operate Air Emissions Equipment at a Synthetic Minor Source**

Gulf Pine Energy L P, Strong 17-7 Number 1 Facility

Facility Requirements

Permit Number:1840-00090

Activity ID No.: PER20160002

**GRPT0000000001 (AT-001) Crude Oil and Produce Water Storage Tanks:**

Narrative Requirements:

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Condition No.	Condition
T-1	Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]

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## GENERAL INFORMATION

Gulf Pine Energy L P, Strong 17-7 Number 1 Facility  
Off Strong Road  
Aberdeen, MS  
Monroe County

### Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
70489	Gulf Pine Energy, L.P.	Official Site Name	9/14/2016	
2809500090	Gulf Pine Energy L P, Strong 17-7 Number 1 Facility	Air-AIRS AFS	9/19/2016	

**Basin:** Tombigbee River Basin

### Location Description:

\*\*\* Draft Permit \*\*\*