

**STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
TITLE V PERMIT**

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Texas Gas Transmission, LLC,
Lake Cormorant Compressor Station
2672 Wilson Mill Road
DeSoto 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 Title V of the Federal Clean Air Act (42 U.S.C.A. § 7401 - 7671) and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

Permit Issued: _____

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

**AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

Expires:[Date not to exceed 5 yrs from issuance]

Permit No.: 0680-00009

TABLE OF CONTENTS

SECTION 1.	GENERAL CONDITIONS	3
SECTION 2.	EMISSION POINTS & POLLUTION CONTROL DEVICES	13
SECTION 3.	EMISSION LIMITATIONS & STANDARDS	14
SECTION 4.	COMPLIANCE SCHEDULE	26
SECTION 5.	MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS....	27
SECTION 6.	ALTERNATIVE OPERATING SCENARIOS	36
SECTION 7.	TITLE VI REQUIREMENTS.....	37

APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT

APPENDIX B LIST OF REGULATIONS REFERENCED IN THIS PERMIT

Draft/Proposed

SECTION 1. GENERAL CONDITIONS

- 1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(a).)
- 1.2 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(b).)
- 1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. 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. 6.3.A(6)(c).)
- 1.4 (a) This permit shall be reopened and revised under any of the following circumstances:
- (1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of 3 or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.
 - (2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
 - (3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.
 - (4) The Administrator or the Permit Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- (b) Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as

Draft/Proposed

practicable.

- (c) Reopenings shall not be initiated before a notice of such intent is provided to the Title V source by the DEQ at least 30 days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.G)

- 1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to 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. 6.3.A(6)(e).)
- 1.6 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(d).)
- 1.7 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(5).)
- 1.8 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.)
 - (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating

Draft/Proposed

volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).)

- (b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D(2).)
 - (c) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.)
 - (d) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.C.)
- 1.9 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(8).)
- 1.10 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)
- 1.11 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:

Draft/Proposed

- (a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
 - (d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(2).)
- 1.12 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(1).)
- 1.13 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(2).)
- 1.14 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(1).)
- 1.15 Nothing in this permit shall alter or affect the following:
- (a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
 - (b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - (c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.

Draft/Proposed

- (d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(2).)
- 1.16 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.H.)
- 1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C(2)., R. 6.4.B., and R. 6.2.A(1)(c).)
- 1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:
- (a) the changes are not modifications under any provision of Title I of the Act;
 - (b) the changes do not exceed the emissions allowable under this permit;
 - (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:
 - (1) a brief description of the change(s),
 - (2) the date on which the change will occur,
 - (3) any change in emissions, and
 - (4) any permit term or condition that is no longer applicable as a result of the change;
 - (d) the permit shield shall not apply to any Section 502(b)(10) change. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F(1).)
- 1.19 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

Draft/Proposed

accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in 11 Miss. Admin. Code Pt. 2, Ch. 3., "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)

- 1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 11 Miss. Admin. Code Pt. 2, Ch. 2., "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations 11 Miss. Admin. Code Pt. 2, Ch. 6., "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny 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:
 - (1) 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
 - (2) the source is approved to use under any permit issued under 40 CFR 52.21 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 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or

Draft/Proposed

(f) any change in ownership of the stationary source."

- 1.21 Any change in ownership or operational control must be approved by the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.D(4).)
- 1.22 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.B(1).)
- 1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.
- (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.
 - (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.
 - (c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.G.)
- 1.24 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies.
- (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

Draft/Proposed

improper operation, or operator error.

- (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.
- (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
 - (1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - (2) the permitted facility was at the time being properly operated;
 - (3) 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
 - (4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.G.)

1.25 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.

- (a) Upsets
 - (1) For an upset defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed

Draft/Proposed

contemporaneous operating logs or other relevant evidence the following:

- (i) An upset occurred and that the source can identify the cause(s) of the upset;
 - (ii) The source was at the time being properly operated;
 - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
 - (iv) That within 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
 - (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
- (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
 - (3) This provision is in addition to any upset provision contained in any applicable requirement.
 - (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- (b) Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
 - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or

Draft/Proposed

work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).

- (3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

1.26 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation 11 Miss Admin. Code Pt. 2, R. 1.8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities

Draft/Proposed

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-002	14,050 HP (at ISO conditions) 12,090 HP (at NEMA conditions) General Electric regenerative cycle natural gas-fired compressor turbine (Model Number M3122R, Reference Number TB04)
AA-003	2,000 HP Cooper-Bessemer 2-stroke lean burn (2SLB) spark ignition natural gas-fired non-emergency compressor engine (Model Number GMW-8TF, Reference Number RC01)
AA-004	2,000 HP Cooper-Bessemer 2-stroke lean burn (2SLB) spark ignition natural gas-fired non-emergency compressor engine (Model Number GMW-8TF, Reference Number RC02)
AA-005	2,000 HP Cooper-Bessemer 2-stroke lean burn (2SLB) spark ignition natural gas-fired non-emergency compressor engine (Model Number GMW-8TF, Reference Number RC03)
AA-006	2,000 HP Cooper-Bessemer 2-stroke lean burn (2SLB) spark ignition natural gas-fired non-emergency compressor engine (Model Number GMW-8TF, Reference Number RC04)
AA-007	2,000 HP Cooper-Bessemer 2-stroke lean burn (2SLB) spark ignition natural gas-fired non-emergency compressor engine (Model Number GMWA-8, Reference Number RC05)
AA-008	2,000 HP Cooper-Bessemer 2-stroke lean burn (2SLB) spark ignition natural gas-fired non-emergency compressor engine (Model Number GMWA-8, Reference Number RC06)
AA-009	2,000 HP Cooper-Bessemer 2-stroke lean burn (2SLB) spark ignition natural gas-fired non-emergency compressor engine (Model Number GMWA-8, Reference Number RC07)
AA-010	300 HP Ingersoll-Rand 4-stroke rich burn (4SRB) spark ignition natural gas-fired non-emergency electrical power generator engine (Model Number PVGH-6, Reference Number AX01)
AA-011	300 HP Ingersoll-Rand 4-stroke rich burn (4SRB) spark ignition natural gas-fired non-emergency electrical power generator engine (Model Number PVGH-6, Reference Number AX02)
AA-012	300 HP Ingersoll-Rand 4-stroke rich burn (4SRB) spark ignition natural gas-fired non-emergency electrical power generator engine (Model Number PVGH-6, Reference Number AX03)
AA-021	347 HP Waukesha 4-stroke rich burn (4SRB) spark ignition natural gas-fired emergency electric generator engine (Model Number F2895GL, Reference Number AX04)
AA-026	925 HP Waukesha 4-stroke lean burn (4SLB) spark ignition natural gas-fired emergency electric generator engine (Reference Number AX06)
AA-027	10,011 HP (at ISO conditions) 8,683 HP (at NEMA conditions) Solar simple-stroke natural gas-fired compressor turbine (Reference Number TB05)
AA-029	3.78 MMBTU/hr natural gas-fired boiler
AA-030	2.1 MMBTU/hr natural gas-fired boiler
AA-032	35 HP 4-stroke rich burn (4SRB) spark ignition natural gas-fired non-emergency Auxiliary Air Compressor engine (Reference Number AX05)
AA-033	0.55 MMBTU/hr natural gas-fired evaporator

Draft/Proposed

SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. Facility-Wide Emission Limitations & Standards

- 3.A.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.A.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 Paragraph 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)

Draft/Proposed

B. Emission Point Specific Emission Limitations & Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
AA-002 through AA-009 and AA-027	11 Miss. Admin. Code Pt. 2, R. 1.3. D(1)(b)	3.B.1	PM	$E=0.8808 * I^{-0.1667}$
AA-010, AA-011, AA-012, AA-021, AA-026, AA-029, AA-030, AA-032, and AA-033	11 Miss. Admin. Code Pt. 2, R. 1.3. D(1)(a)	3.B.2	PM	0.6 lb/MMBTU
AA-029, AA-030, and AA-033	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1)	3.B.3	SO2	4.8 lb/MMBTU
AA-002 and AA-027	40 CFR 60.330(a)-(c)	3.B.4	SO2 and NOx	Applicability
AA-002 and AA-027	40 CFR 60.333(b)	3.B.5	SO2	≤ 0.8 percent by weight
AA-002 and AA-027	40 CFR Part 63.6085 and 63.6090(b)(4)	3.B.6	HAP	MACT applicability only, not affected by the requirements of this standard.
AA-027	40 CFR 60.332(a)(2)	3.B.7	NOx	$STD = 0.015[(14.4)/Y] + F$
AA-003 through AA-009	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)	3.B.8	Operating Condition	Operating load set point limited to 90% of the rated BHP
AA-003 through AA-012, AA-021, AA-026, and AA-032	NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ 40 CFR Part 63.6580, 40 CFR Part 63.6585(a)-(b), 40 CFR Part 63.6590(a)(1)(i)-(ii), and 40 CFR Part 63.6590(b)(3)(i) and (iii)	3.B.9	HAP	MACT applicability
AA-010 through AA-012	40 CFR Part 63.6602 and Item 11 of Table 2c to Subpart ZZZZ	3.B.10	Formaldehyde	Concentration of 10.3 ppmvd or less at 15 percent O ₂
AA-010	40 CFR Part 63.6665 and Table 8 to Subpart ZZZZ	3.B.11	HAP	General Provisions

Draft/Proposed

through AA-012, AA-021, and AA-032	40 CFR Part 63.6605(a)	3.B.12	HAP	Continuous Compliance
	40 CFR Part 63.6605(b)	3.B.13	HAP	Minimizing Emissions
	40 CFR Part 63.6625(h) and Table 2c to Subpart ZZZZ	3.B.14	HAP	Operational Requirement
AA-021	40 CFR Part 63.6602 and Item 6 and Footnotes 1 - 3 of Table 2c to Subpart ZZZZ	3.B.15	HAP	Operational Requirements
AA-021 and AA-026	40 CFR Part 63.6640(f) and 63.6675	3.B.16	HAP	Emergency operations
AA-021 and AA-032	40 CFR Part 63.6625(j) and Footnote 2 of Table 2c to Subpart ZZZZ	3.B.17	HAP	Operational Requirements
	40 CFR Part 63.6625(e), 63.6640(a), and Item 9 of Table 6 to Subpart ZZZZ	3.B.18	HAP	Operational Requirements
AA-032	40 CFR Part 63.6602 and Item 7 of Table 2c to Subpart ZZZZ	3.B.19	HAP	Operational Requirements
AA-029 And AA-030	40 CFR Part 63.7485, 63.7490(a)(1) and (d), 63.7499(l), and 63.7500(a)(1)	3.B.20	HAP	MACT applicability
	40 CFR Part 63.7500(a)(3)	3.B.21	HAP	Operating Requirements

3.B.1 For Emission Points AA-002 through AA-009 and AA-027, the permittee shall not have particulate emissions from fossil fuel burning installations of greater than 10 MMBTU/hr heat input that exceeds the emission rate as determined by the relationship:

$$E = 0.8808 * I^{-0.1667}$$

where E is the emission rate in pounds per million BTU per hour heat input and I is the heat input in millions of BTU per hour. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3. D(1)(b))

3.B.2 For Emission Points AA-010, AA-011, AA-012, AA-021, AA-026, AA-029, AA-030, AA-032, and AA-033, the permittee shall not have particulate emissions from fossil fuel burning installations of less than 10 MMBTU/hr heat input that exceeds 0.6 Lb/MMBTU. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3. D(1)(a))

3.B.3 For Emission Points AA-029, AA-030, and AA-033, the maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1))

3.B.4 For Emission Points AA-002 and AA-027, the permittee is subject to the Standards of Performance for Stationary Gas Combustion Turbines, 40 CFR 60, Subpart GG. These combustion turbines qualify as stationary gas turbines with a heat input at peak load equal

Draft/Proposed

to or greater than 10.7 gigajoules (10 million Btu) per hour, based on the lower heating value of the fuel fired, which commenced construction, modification, or reconstruction after October 3, 1977. (Ref.: 40 CFR 60.330(a)-(c))

- 3.B.5 For Emission Points AA-002 and AA-027, the permittee shall not burn any fuel which contains sulfur in excess of 0.8 percent by weight. (Ref.: 40 CFR 60.333(b))
- 3.B.6 For Emission Points AA-002 and AA-027, the permittee is subject to the National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines, 40 CFR Part 63, Subpart YYYYY. These units are existing stationary combustion turbines and, as such, are not required to meet the requirements of this Subpart or the General Provisions of 40 CFR Part 63, Subpart A. (Ref.: 40 CFR Part 63.6085 and 63.6090(a)(1) and (b)(4))
- 3.B.7 For Emission Point AA-027, the permittee shall not cause to be discharged into the atmosphere any gases which contain nitrogen oxides in excess of

$$STD = 0.0150[(14.4)/Y] + F$$

where:

STD = allowable NO_x emissions (percent by volume at 15 percent oxygen and on a dry basis).

Y = manufacturer's rated heat rate at manufacturer's rated peak load (kilojoules per watt hour), or actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt hour.

F = NO_x emission allowance for fuel bound nitrogen as defined by the following table:

Fuel-bound nitrogen (percent by weight)	F (NO _x percent by volume)
$N \leq 0.015$	0
$0.015 < N \leq 0.1$	0.04 (N)
$0.1 < N \leq 0.25$	$0.004 + 0.0067(N - 0.1)$
$N > 0.25$	0.005

where: N = the nitrogen content of the fuel (percent by weight)

Draft/Proposed

(Ref.: 40 CFR 60.332(a)(2))

- 3.B.8 For Emission Points AA-003 through AA-009, the operating load set point shall be limited to 90% of the rated brake-horsepower beginning May 1 and ending no sooner than September 30 each year. This is a voluntary condition agreed to by the facility in order to reduce NO_x emissions during the peak Ozone season. If the permittee wishes to no longer comply with this requirement, the permittee shall submit documentation to the Office of Pollution Control as specified in Condition 5.C.2. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2))
- 3.B.9 For Emission Points AA-003 through AA-012, AA-021, AA-026, and AA-032, the permittee is subject to the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ.

Emission Points AA-003 through AA-009 are existing, non-emergency, spark ignition, 2-stroke lean burn (2SLB) stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions and, as such, are not required to meet the requirements of 40 CFR Part 63, Subpart ZZZZ or the General Provisions in Subpart A.

Emission Points AA-010, AA-011, and AA-012 are existing, non-emergency, spark ignition, 4-stroke rich burn (4SRB) stationary RICE with a site rating between 100 and 500 brake HP located at a major source of HAP emissions and, as such, are required to meet the requirements of 40 CFR Part 63, Subpart ZZZZ and the General Provisions in Subpart A.

Emission Point AA-021 is an existing, spark ignition, 4-stroke rich burn (4SRB) emergency stationary RICE with a site rating of less than 500 brake HP located at a major source of HAP emissions and, as such, is required to meet the requirements of 40 CFR Part 63, Subpart ZZZZ and the General Provisions in Subpart A.

Emission Point AA-026 is an existing, spark ignition, 4-stroke lean burn (4SLB) emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions and, as such, is only required to meet the definition of “emergency stationary RICE” in 40 CFR Part 63, Subpart ZZZZ.

Emission Unit AA-032 is an existing, non-emergency, spark ignition, 4-stroke rich burn (4SRB) stationary RICE with a site rating of less than 100 brake HP located at a major source of HAP emissions and, as such, is required to meet the requirements of 40 CFR Part 63, Subpart ZZZZ and the General Provisions in Subpart A.

(Ref.: 40 CFR Part 63.6580, 63.6585(a)-(b), 63.6590(a)(1)(i)-(ii), and 63.6590(b)(3)(i) and

Draft/Proposed

(iii))

- 3.B.10 For Emission Points AA-010, AA-011, and AA-012, the permittee shall limit the concentration of formaldehyde in each stationary RICE exhaust to 10.3 ppmvd or less at 15 percent O₂. (Ref.: 40 CFR Part 63.6602 and Item 11 of Table 2c to Subpart ZZZZ,)
- 3.B.11 For Emission Points AA-010, AA-011, AA-012, AA-021, and AA-032, the permittee shall comply with the applicable General Provisions specified in Table 8 to 40 CFR Part 63, Subpart ZZZZ. (Ref.: 40 CFR Part 63.6665 and Table 8 to Subpart ZZZZ)
- 3.B.12 For Emission Points AA-010, AA-011, AA-012, AA-021, and AA-032, the permittee shall be in compliance with the emission limitations, operating limitations, and other applicable requirements of 40 CFR Part 63, Subpart ZZZZ at all times. (Ref.: 40 CFR Part 63.6605(a))
- 3.B.13 For Emission Points AA-010, AA-011, AA-012, AA-021, and AA-032, the permittee shall, at all times, operate and maintain each engine, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require any further efforts to be made to reduce emissions if levels required by 40 CFR Part 63, Subpart ZZZZ have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the DEQ which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the engine(s). (Ref.: 40 CFR Part 63.6605(b))
- 3.B.14 For Emission Points AA-010, AA-011, AA-012, AA-021 and AA-032, the permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 2c to Subpart ZZZZ apply. (Ref.: 40 CFR Part 63.6625(h) and Table 2c to Subpart ZZZZ)
- 3.B.15 For Emission Point AA-021, the permittee shall:
- (a) Change oil and filter every 500 hours of operation or annually, whichever comes first, or use an oil analysis program, as described in Condition 3.B.17;
 - (b) Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
 - (c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

Draft/Proposed

If the emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements on the required schedule, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. The permittee shall report any failure to perform the work practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable, in accordance with Condition 5.A.5. The permittee can petition the DEQ pursuant to the requirements of 40 CFR Part 63.6(g) for alternative work practices.

(Ref.: 40 CFR Part 63.6602 and Item 6 and Footnotes 1 - 3 of Table 2c to Subpart ZZZZ)

- 3.B.16 For Emission Points AA-021 and AA-026, the permittee shall operate the emergency engines according to the requirements below:
- (a) There is no limit on the use of the engines during emergency situations.
 - (b) The engines may be operated for a maximum of 100 hours per calendar year for maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the DEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (c) counts as part of the 100 hours per calendar year allowed by this paragraph.
 - (c) The engines may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

If an emergency engine is not operated according to the requirements in (a) - (c) above, the engine will not be considered an emergency engine under this subpart and will need to meet all applicable requirements for a non-emergency engine. (Ref.: 40 CFR Part

Draft/Proposed

63.6640(f) and 63.6675)

- 3.B.17 For Emission Points AA-021 and AA-032, the permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Conditions 3.B.15 and 3.B.19 for each respective engine. The oil analysis must be performed at the same frequency specified for changing the oil in Condition 3.B.15 and 3.B.19 for each respective engine. The analysis program must at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the permittee must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee must change the oil within 2 business days or before commencing operation, whichever is later. The permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. (Ref.: 40 CFR Part 63.6625(j) and Footnote 2 of Table 2c to Subpart ZZZZ)
- 3.B.18 For Emission Points AA-021 and AA-032, the permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop and follow the permittee's own maintenance plan, shall must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. (Ref.: 40 CFR Part 63.6625(e), 63.6640(a), and Item 9 of Table 6 to Subpart ZZZZ)
- 3.B.19 For Emission Unit AA-032, the permittee shall,
- (a) Change oil and filter every 1,440 hours of operation or annually, whichever comes first, or use an oil analysis program, as described in Condition 3.B.17;
 - (b) Inspect spark plugs every 1,440 hours of operation or annually, whichever comes first, and replace as necessary;
 - (c) Inspect all hoses and belts every 1,440 hours of operation or annually, whichever comes first, and replace as necessary, as described in Table 2c to Subpart ZZZZ.

The permittee can petition the DEQ pursuant to the requirements of 40 CFR Part 63.6(g) for alternative work practices. (Ref.: 40 CFR Part 63.6602 and Item 7 and Footnotes 2 and

Draft/Proposed

3 of Table 2c to Subpart ZZZZ)

- 3.B.20 For Emission Points AA-029 and AA-030, the permittee is subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63, Subpart DDDDD.

Emission Points AA-029 and AA-030 are existing boilers in the “units designed to burn gas 1 fuel” subcategory, as listed in 40 CFR Part 63.7499(l) and defined in 40 CFR Part 63.7575. As such, these units are only required to comply with the work practice standards in Condition 3.D.1. (Ref: 40 CFR Part 63.7485, 63.7490(a)(1) and (d), 63.7499(l), and 63.7500(a)(1)). These units are permitted to burn only natural gas, except during periods of natural gas curtailment or supply interruption as defined by 40 CFR 63.7575.

- 3.B.21 For Emission Points AA-029 and AA-030, the permittee shall, at all times, operate and maintain each boiler, including any monitoring equipment, in a manner consistent with safe and good air pollution control practices for minimizing emissions. (Ref.: 40 CFR Part 63.7500(a)(3))

Draft/Proposed

C. Insignificant and Trivial Activity Emission Limitations & Standards

Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.C.1	PM	0.6 lbs/MMBTU
11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.C.2	SO ₂	4.8 lbs/MMBTU

- 3.C.1 The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).)
- 3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)

Draft/Proposed

D. Work Practice Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-029 and AA-030	40 CFR Part 63.7500(e), 63.7515(d), 63.7540(a)(10)(i)-(vi), (12), and (13) and Item 1 of Table 3 of Subpart DDDDD	3.D.1	HAP	Perform Tune-ups every 5-years

3.D.1 For Emission Points AA-029 and AA-030, the permittee shall complete a tune-up every five years beginning from the date of the initial tune-up. Each subsequent tune-up shall be completed no more than 61 months after the previous one. If a unit is not operating on the required date of the tune-up, the tune-up shall be conducted within 30 calendar days of startup. The tune-up on each boiler shall be completed in accordance with (a) through (f) below:

- (a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the burner inspection may be delayed until the next scheduled unit shutdown). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;
- (b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;
- (c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the inspection may be delayed until the next scheduled unit shutdown);
- (d) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_x requirement to which the unit is subject;
- (e) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis

Draft/Proposed

before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and

- (f) Maintain on-site and submit, if requested by DEQ, an annual report containing the following information:
 - (1) The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up;
 - (2) A description of any corrective actions taken as a part of the tune-up; and
 - (3) The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.

(Ref.: 40 CFR Part 63.7500(a)(1) and (e), 63.7515(d), 63.7540(a)(10)(i)-(vi),(12), and(13), and Item 1 of Table 3 of Subpart DDDDD)

Draft/Proposed

SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:
- (a) the identification of each term or condition of the permit that is the basis of the certification
 - (b) the compliance status
 - (c) whether compliance was continuous or intermittent
 - (d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period
 - (e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(5)(a), (c), & (d).)

Draft/Proposed

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. General Monitoring, Recordkeeping and Reporting Requirements

- 5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.
- 5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:
- (a) the date, place as defined in the permit, and time of sampling or measurements
 - (b) the date(s) analyses were performed
 - (c) the company or entity that performed the analyses
 - (d) the analytical techniques or methods used
 - (e) the results of such analyses and
 - (f) the operating conditions existing at the time of sampling or measurement. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(1).)
- 5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information 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 for continuous monitoring instrumentation, and copies of all reports required by the permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(2).)
- 5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 6.2.E. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)
- 5.A.5 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) days of the time the deviation began. (Ref.: 11 Miss. Admin. Code Pt. 2, R.

Draft/Proposed

6.3.A(3)(c)(2).)

- 5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the DEQ and the EPA.
- 5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

Draft/Proposed

B. Specific Monitoring and Recordkeeping Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Monitoring and Recordkeeping Requirement
AA-002 and AA-027	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)	5.B.1	Sulfur	Keep records of gas quality characteristics
AA-027	40 CFR 60.8, 60.335 and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)	5.B.2	NO _x	Conduct annual performance stack testing
AA-003 through AA-009	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)	5.B.3	Operating Load Set point	Maintain Operating Load Set point records May 1 through September 30 for each year.
AA-010 through AA-012, AA-021, and AA-032	40 CFR Part 63.6655(a)	5.B.4	HAP	Recordkeeping
	40 CFR Part 63.6660 and 63.10(b)(1)	5.B.5	HAP	Maintain Records
AA-021 and AA-032	40 CFR Part 63.6655(d) and (e)	5.B.6	HAP	Recordkeeping
AA-029 and AA-030	40 CFR Part 63.7505(a) and 63.7540(a)(12)	5.B.7	HAP	Continuous Compliance
	40 CFR Part 63.7555(a)(1) and (h), 63.7560, and 63.10(b)(2)	5.B.8	HAP	Recordkeeping
AA-021	40 CFR Part 63.6655(f)	5.B.9	HAP	Hours of Operation

5.B.1 For Emission Points AA-002 and AA-027, the permittee shall assure the natural gas being combusted in the turbines complies with the definition of natural gas cited in 40 CFR 60.331(u) by maintaining on site the gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the natural gas, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf (equivalent to 338 ppmv) or less. The permittee shall make a copy of the current, valid tariff sheet available upon request by DEQ personnel and maintain this data in accordance with Permit Condition 5.A.3. (11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)).

5.B.2 For Emission Point AA-027, the permittee shall demonstrate compliance with NO_x emissions by conducting an annual performance test during the first calendar quarter of each year. Stack testing for NO_x emissions shall be performed in accordance with the requirements specified in 40 CFR 60.8, 60.335, and EPA Test Method 20. Compliance

Draft/Proposed

testing shall be performed while the turbine is operating at the load corresponding to the worst case NO_x concentration based on the initial performance testing. (Ref.: 40 CFR 60.8, 60.335 and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2))

5.B.3 For Emission Points AA-003 through AA-009, the facility shall maintain records of the operating load set point for the period beginning May 1 and ending September 30 for each year. The daily average of the operating load set point during the specified period shall be made available for review upon request during any inspection visit by Office of Pollution Control personnel. The records of the operating load set points shall be kept in accordance with Condition 5.A.3. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2))

5.B.4 For Emission Points AA-010, AA-011, AA-012, AA-021, and AA-032, the permittee shall maintain the following records:

- (a) A copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status submitted, according to the requirement in 40 CFR Part 63.10(b)(2)(xiv);
- (b) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment;
- (c) Records of performance tests and performance evaluations as required in 40 CFR Part 63.10(b)(2)(viii);
- (d) Records of all required maintenance performed on the air pollution control and monitoring equipment;
- (e) Records of actions taken during periods of malfunction to minimize emissions in accordance with Condition 3.B.13, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

(Ref.: 40 CFR Part 63.6655(a))

5.B.5 For Emission Points AA-010, AA-011, AA-012, AA-021, and AA-032, the permittee shall maintain records in a form suitable (i.e. hard copy or electronic) and readily available for expeditious review for 5 years following the date of each occurrence, measurement, corrective action, report, or record.

(Ref.: 40 CFR Part 63.6660 and 63.10(b)(1))

Draft/Proposed

- 5.B.6 For Emission Points AA-021 and AA-032, the permittee shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate that each RICE and after-treatment control device (if any) was operated and maintained according to the manufacturer's emission-related operation and maintenance instructions or according to the permittee's maintenance plan. (Ref.: 40 CFR Part 63.6655(d) and (e))
- 5.B.7 For Emission Points AA-029 and AA-030, the permittee shall demonstrate continuous compliance with the applicable work practice standards by conducting tune-ups in accordance with Condition 3.D.1 (Ref.: 40 CFR Part 63.7505(a) and 63.7540(a)(12))
- 5.B.8 For Emission Points AA-029 and AA-030, the permittee shall maintain the following records in a form suitable and readily available for expeditious review:
- (a) A copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart DDDDD, including all documentation supporting the Notification of Compliance Status or semiannual compliance reports;
 - (b) Each boiler is designed to burn natural gas. If an alternative fuel is burned during a period of gas curtailment or supply emergency, then records must be kept of the total hours per calendar year the boiler operated during periods of gas curtailment or supply emergency.

These records shall be retained for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. Each record shall be kept on site for a minimum of 2 years after the event and may be kept offsite for the remaining 3 years. (Ref.: 40 CFR Part 63.7555(a)(1) and (h), 63.7560, and 63.10(b)(2))

- 5.B.9 For Emission Point AA-021, the permittee shall keep records of the hours of operation of the stationary RICE as recorded through the non-resettable hour meter. The records shall indicate how many hours are spent in emergency operation, including what classified the operation as emergency, and how many hours are spent in non-emergency operation. (Ref.: 40 CFR Part 63.6655(f))

Draft/Proposed

C. Specific Reporting Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Reporting Requirement
AA-002 and AA-027	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)	5.C.1	Fuel Content	Submit fuel records
AA-003 through AA-009	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)	5.C.2	NO _x	Voluntary NO _x requirement withdrawal submittal requirements
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)	5.C.3	NO _x	Submit semiannual compliance reports
AA-010 through AA-012, AA-021, and AA-032	40 CFR Part 63.6640(b)	5.C.4	HAP	Submit deviation reports
	40 CFR Part 63.6640(e)	5.C.5	HAP	Submit deviation reports
AA-010 through AA-012	40 CFR Part 63.6650(a) and (b)(5), (c), (d), and Item 1 to Table 7 of 40 CFR Part 63, subpart ZZZZ	5.C.6	HAP	Submit semiannual compliance reports
AA-027	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)	5.C.7	NO _x	Submit stack test reports, notifications, and protocols
AA-029 and AA-030	40 CFR Part 63.7550(a), (b), and (c)(5)(i)-(iii),(xiv), and (xvii) and Table 9 of Subpart DDDDD	5.C.8	HAP	Submit reports of tune ups
	40 CFR Part 63.7545(f)	5.C.9	HAP	Submit notification of alternate fuel

5.C.1 For Emission Points AA-002 and AA-027, the permittee shall submit a copy of the Gas Quality Section of the current valid purchase contract, tariff sheet or transportation contract for natural gas combusted in the turbines by January 31st each year. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2))

5.C.2 For Emission Points AA-003 through AA-009, if the permittee wishes to withdraw from complying with operational restriction to reduce NO_x emissions during the peak ozone season described in Condition 3.B.8, the permittee shall submit written notification to the Department ten (10) days prior to withdrawal. The withdrawal notice shall specify whether the withdrawal from the requirement is permanent or temporary. If the withdrawal is for a temporary duration, the notice shall specify the timeframe for which the withdrawal is desired. Upon receipt of the notification, the voluntary limit as specified in Condition 3.B.8 and the attendant monitoring and reporting in Conditions 5.B.3 and 5.C.3 will no longer be applicable to the facility for the specified duration. (Ref.: 11 Miss. Admin. Code Pt. 2, R.

Draft/Proposed

6.3.A(3)(a)(2))

- 5.C.3 For Emission Points AA-003 through AA-009, the permittee shall submit semiannual reports of any deviations from the Voluntary NO_x requirement described in Condition 3.B.8. If no deviations occurred during the reporting period, the permittee shall make a declaration that no deviations occurred during the reporting period. Each semiannual report shall be submitted in accordance with Condition 5.A.4. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2))
- 5.C.4 For Emission Points AA-010 through AA-012, AA-021, and AA-032, the permittee shall report each instance in which the emission and operating limitations specified in Conditions 3.B.10, 3.B.15, and 3.B.19 were not met. These instances are deviations and shall be reported in accordance with Condition 5.A.5. (Ref.: 40 CFR Part 63.6640(b))
- 5.C.5 For Emission Points AA-010 through AA-012, AA-021, and AA-032, the permittee shall report each instance in which the applicable General Provisions of Subpart A, as identified in Table 8 to 40 CFR Part 63, Subpart ZZZZ, were not met. These instances are deviations and shall be reported in accordance with Condition 5.A.5. (Ref.: 40 CFR Part 63.6640(e))
- 5.C.6 For Emission Points AA-010 through AA-012, the permittee shall submit semiannual compliance reports in accordance with Condition 5.A.4. Each compliance report shall contain the following information:
- (a) Company name and address.
 - (b) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.
 - (c) Date of report and beginning and ending dates of the reporting period.
 - (d) If an engine had a malfunction during the reporting period, the compliance report shall include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report shall also include a description of actions taken by the permittee during a malfunction of the engine to minimize emissions in accordance with Condition 3.B.13, including actions taken to correct a malfunction.
 - (e) If there are no deviations from the emission limitation, a statement that there were no deviations from the emission limitation during the reporting period.
 - (f) If there was a deviation from the emission limitation, the report shall also include the

Draft/Proposed

following:

- (1) The total operating time of the stationary RICE at which each deviation occurred during the reporting period.
- (2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

(Ref.: 40 CFR Part 63.6650(a), (b)(5), (c), (d), and Item 1 to Table 7 of 40 CFR Part 63, subpart ZZZZ)

5.C.7 For Emission Point AA-027, the permittee shall submit a written report of the results of each performance test before the close of business on the 60th day following the completion of the performance test. For all required testing, the permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the DEQ. Also, the permittee shall notify the DEQ in writing at least ten (10) days prior to the intended test date(s) so that an observer may be afforded the opportunity to witness the test. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2))

5.C.8 For Emission Points AA-029 and AA-030, after a tune-up required by Condition 3.D.1 has been completed, the permittee shall submit the information listed in (a) through (e), below, in accordance with the next report required per Condition 5.A.4

- (a) Company and Facility name and address.
- (b) Process unit information.
- (c) Date of report and beginning and ending dates of reporting period.
- (d) The date of the most recent tune-up for each source. Include the date of the most recent burner inspection, if it was not done on a 5-year period and was delayed until the next scheduled or unscheduled shutdown.
- (e) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

(Ref.: 40 CFR Part 63.7550(a), (b), and (c)(5)(i)-(iii),(xiv), and (xvii) and Table 9 of Subpart DDDDD))

Draft/Proposed

5.C.9 For Emission Points AA-029 and AA-030, if the permittee burns an alternative fuel during a period of natural gas curtailment or supply interruption, a notification shall be submitted to the DEQ within 48 hours of the declaration of each period of natural gas curtailment or supply interruption, as defined by §63.7575. The notification shall include the information specified below:

- (a) Company name and address.
- (b) Identification of the affected unit.
- (c) Reason that natural gas or equivalent fuel is unable to be used, including the date when the natural gas curtailment was declared or the natural gas supply interruption began.
- (d) Type of alternative fuel intended for use.
- (e) Dates when the alternative fuel use is expected to begin and end.

(Ref.: 40 CFR Part 63.7545(f))

Draft/Proposed

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

Draft/Proposed

SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act – Stratospheric Ozone Protection. The full text of the referenced regulations may be found on-line at <http://ecfr.gpoaccess.gov> under Title 40, or DEQ shall provide a copy upon request from the permittee.

- 7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A – Production and Consumption Controls.
- 7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.
- 7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E – The Labeling of Products Using Ozone-Depleting Substances, for the following containers and products:
 - (a) All containers in which a class I or class II substance is stored or transported
 - (b) All products containing a class I substance and
 - (c) All products directly manufactured with a process that uses a class I substance, unless otherwise exempted by this subpart or, unless EPA determines for a particular product that there are no substitute products or manufacturing processes for such product that do not rely on the use of a class I substance, that reduce overall risk to human health and the environment, and that are currently or potentially available. If the EPA makes such a determination for a particular product, then the requirements of this subpart are effective for such product no later than January 1, 2015.
- 7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F – Recycling and Emissions Reduction:
 - (a) Servicing, maintaining, or repairing appliances
 - (b) Disposing of appliances, including small appliances and motor vehicle air conditioners or
 - (c) Refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery

equipment, approved recycling and recovery equipment testing organizations, persons selling class I or class II refrigerants or offering class I or class II refrigerants for sale, and persons purchasing class I or class II refrigerants.

- 7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any acceptable alternative that is listed in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR Part 82, Subpart G – Significant New Alternatives Policy Program. The permittee shall also comply with any use conditions for the acceptable alternative substance.
- 7.6 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart H – Halon Emissions Reduction:
- (a) Any person testing, servicing, maintaining, repairing, or disposing of equipment that contains halons or using such equipment during technician training
 - (b) Any person disposing of halons
 - (c) Manufacturers of halon blends or
 - (d) Organizations that employ technicians who service halon-containing equipment.

APPENDIX A

List of Abbreviations Used In this Permit

11 Miss. Admin. Code Pt. 2, Ch. 1.	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
11 Miss. Admin. Code Pt. 2, Ch. 2.	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
11 Miss. Admin. Code Pt. 2, Ch. 3.	Regulations for the Prevention of Air Pollution Emergency Episodes
11 Miss. Admin. Code Pt. 2, Ch. 4.	Ambient Air Quality Standards
11 Miss. Admin. Code Pt. 2, Ch. 5.	Regulations for the Prevention of Significant Deterioration of Air Quality
11 Miss. Admin. Code Pt. 2, Ch. 6.	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
11 Miss. Admin. Code Pt. 2, Ch. 7.	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lbs/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards For Hazardous Air Pollutants, 40 CFR 61 or National Emission Standards For Hazardous Air Pollutants for Source Categories, 40 CFR Part 63
NMVOG	Non-Methane Volatile Organic Compounds
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM ₁₀	Particulate Matter less than 10 µm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
	VOC Volatile Organic Compound

APPENDIX B

LIST OF REGULATIONS REFERENCED IN PERMIT

The full text of the regulations referenced in this permit may be found on-line at <http://www.deq.state.us.us> and <http://ecfr.gpoaccess.gov>, or the Mississippi Department of Environmental Quality (MDEQ) will provide a copy upon request. A list of regulations referenced in this permit is shown below:

11 Miss. Admin. Code Pt. 2, Ch. 1, Mississippi Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants (Amended December 14, 2011)

11 Miss. Admin. Code Pt. 2, Ch. 6, Mississippi Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Air Emissions Operating Permit Regulations for the Purpose of Title V of the Federal Clean Air Act (Amended December 14, 2011)

40 CFR Part 82 - Title VI of the Clean Air Act (Stratospheric Ozone Protection)

40 CFR Part 60, Subpart A – General Provisions

40 CFR Part 60, Subpart GG – Standards of Performance for Stationary Gas Turbines

40 CFR Part 63, Subpart A – General Provisions

40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

40 CFR Part 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters