



## State of Mississippi



### AIR POLLUTION CONTROL PERMIT

Permit To Construct Air Emissions Equipment

#### **THIS CERTIFIES**

Plains Marketing LP, Moss Point Rail Facility  
Highway 63 and Elder Ferry Road  
Moss Point, MS  
Jackson County

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

**Mississippi Environmental Quality Permit Board**

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**Mississippi Department of Environmental Quality**

Issued/Modified:

Permit No. 1280-00142

Expires:

Agency Interest # 62750

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

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## Permit To Construct Air Emissions Equipment

Plains Marketing LP, Moss Point Rail Facility

Subject Item Inventory

Permit Number: I280-00142

Activity ID No.: PER20120001

### Subject Item Inventory:

ID	Designation	Description
AI62750	62750	Petroleum liquid storage and transportation
EQPT1	AA-001	220 HP Diesel Fire Pump Engine
EQPT2	AA-002	6,300,000 Gallon External Floating Roof Petroleum Liquid Storage Tank
EQPT3	AA-003	6,300,000 Gallon External Floating Roof Petroleum Liquid Storage Tank
EQPT4	AA-004	6,300,000 Gallon External Floating Roof Petroleum Liquid Storage Tank
EQPT5	AA-005	8,400,000 Gallon External Floating Roof Petroleum Liquid Storage Tank
AREA1	AA-006	Marine Barge Loading Operation with emissions routed to and controlled by the vapor combustion unit (VCU)

### Subject Item Groups:

ID	Description	Components
GRPT1	Storage Tanks	EQPT2 6,300,000 Gallon External Floating Roof Petroleum Liquid Storage Tank
		EQPT3 6,300,000 Gallon External Floating Roof Petroleum Liquid Storage Tank
		EQPT4 6,300,000 Gallon External Floating Roof Petroleum Liquid Storage Tank
		EQPT5 8,400,000 Gallon External Floating Roof Petroleum Liquid Storage Tank

#### KEY

ACT = Activity

AREA = Area

CONT = Control Device

IA = Insignificant Activity

RPNT = Release Point

AI = Agency Interest

CAFO = Concentrated Animal Feeding Operation

EQPT = Equipment

MAFO = Animal Feeding Operation

TRMT = Treatment

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**Permit To Construct Air Emissions Equipment**

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Subject Item Inventory

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**KEY**

TRMT = Treatment

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### AI0000062750 (62750) Petroleum liquid storage and transportation:

#### Submittal/Action Requirements:

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Condition No.	Condition
S-1	General Condition: The permittee shall submit certification of construction: Due within thirty (30) days of completion of construction or installation of an approved stationary source or prior to startup, whichever is earlier. The notification shall certify that construction or installation was performed in accordance with the approved plans and specifications. In the event there is any change in construction from the previously approved plans and specifications or permit, the permittee shall promptly notify MDEQ in writing. If MDEQ determines the changes are substantial, MDEQ may require the submission of a new application to construct with "as built" plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an "as built" application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law. [APC-S-2 V.D]
S-2	Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun. [APC-S-2 V.C(2)]
S-3	The permittee must notify DEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more. [APC-S-2 V.C(3)]

#### Narrative Requirements:

##### General Condition:

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Condition No.	Condition
T-1	General Condition: The stationary source shall be designed and constructed so as to operate without causing a violation of any Applicable Rules and Regulations or this permit, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards, and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries. [APC-S-2 V.A]
T-2	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49_17_29 1.b]
T-3	General Condition: The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits. [Miss. Code Ann. 49_17_29]

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### AI0000062750 (continued):

#### Narrative Requirements:

##### General Condition:

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Condition No.	Condition
T-4	General Condition: The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed except as provided for in Regulation APC-S-1, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. [APC-S-1 10]
T-5	General Condition: The permittee shall allow the Mississippi Environmental Quality Commission, the Mississippi Environmental Quality Permit Board, MDEQ staff 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-6	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 good cause shown including, but not limited to, the following: a. Persistent violation of any terms or conditions of this permit; b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or c. A change in any condition that requires either a temporary or permanent reduction or elimination of previously authorized air emissions. [APC-S-2 II.C]
T-7	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]

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Condition No.	Condition
T-8	General Condition:This permit is for air pollution control purposes only. [APC-S-2 I.D]
T-9	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 operating without a valid permit pursuant to State Law. [APC-S-2 II.B(5)]

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### AI0000062750 (continued):

#### Narrative Requirements:

Condition No.	Condition
T-10	General Condition: It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits. [APC-S-2 I.D(6)]
T-11	General Condition: The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities. [APC-S-2 II.B(7)]
T-12	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 the permit, unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. [APC-S-2 II.B(15)a]
T-13	General Condition: The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [APC-S-2 II.B(15)b]
T-14	General Condition: The permit does not convey any property rights of any sort, or any exclusive privilege. [APC-S-2 II.B(15)c]
T-15	General Condition: The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. [APC-S-2 II.B(15)d]
T-16	General Condition: This permit shall not be transferred except upon approval of the Permit Board. [APC-S-2 XVI.B]
T-17	General Condition: The provisions of this permit are severable. If any provision of the permit, or the application of any provision of the permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. [APC-S-2 I.D(7)]
T-18	General Condition: The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance or if construction is suspended for eighteen (18) months or more. [APC-S-2 V.C(1)]

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### AI0000062750 (continued):

#### Narrative Requirements:

Condition No.	Condition
T-19	General Condition: A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee. [APC-S-2 V.D(3)]
T-20	General Condition: Except as prohibited in APC-S-2, Section V.D.7, after certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by APC-S-2, Section XIII.G. [APC-S-2 V.D(4)]
T-21	General Condition: Except as otherwise specified in APC-S-2, Section V.D.7, the application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing. [APC-S-2 V.D(5)]
T-22	General Condition: Except as otherwise specified in APC-S-2, Section V.D.7, upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate. [APC-S-2 V.D(6)]
T-23	General Condition: For moderate modifications that require contemporaneous enforceable emissions reductions from more than one emission point in order to net out of PSD/NSR, the applicable Title V Permit to Operate or State Permit to Operate must be modified prior to beginning operation of the modified facilities. [APC-S-2 V.D(7)]
T-24	General Condition: Regarding compliance testing: (a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time. (b) Compliance testing will be performed at the expense of the permittee. (c) Each emission sampling and analysis report shall include but not be limited to the following: 1. detailed description of testing procedures; 2. sample calculation(s); 3. results; and 4. comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit. [APC-S-2 VI.B(3, 4 and 6)]

**Permit To Construct Air Emissions Equipment**

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Facility Requirements

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**AI0000062750 (continued):**

Narrative Requirements:

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Condition	Condition
T-25	General Condition: The construction of the stationary source shall be performed in such a manner so as to reduce fugitive dust emissions from construction activities to a minimum. [APC-S-2 V.A(4)]

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### EQPT0000000001 (AA-001) 220 HP Diesel Fire Pump Engine:

#### Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Carbon Monoxide	Carbon Monoxide: The permittee shall have exhaust emissions of CO less than 2.6 g/HP-hr. [40 CFR 60_Subpart IIII]
L-2	Particulate Matter	Particulate Matter: 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. [APC-S-1 3.4.a(1)]
L-3	Particulate Matter	Particulate Matter: The permittee shall have exhaust emissions of PM less than 0.15 g/HP-hr. [40 CFR 60_Subpart IIII]
L-4	Nitrogen oxides	Nitrogen oxides: The permittee shall have exhaust emissions of NMHC+NOx less than 3.0 g/HP-hr. [40 CFR 60_Subpart IIII]
L-5	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. [APC-S-1 3.1.a]
L-6	Sulfur Dioxide	Sulfur Dioxide: The permittee shall not discharge sulfur oxides from any fuel burning installations in which fuel is burned primarily to produce heat of power by indirect heat transfer in excess of 4.8 lb/MMBTU (measured as sulfur dioxide) heat input. [APC-S-1 4.1.a]
L-7		The permittee is subject to the New Source Performance Standard for Stationary Compressor Ignition Internal Combustion Engines in 40 CFR 60, Subpart IIII, and the General Provisions in Subpart A. [40 CFR 60_Subpart IIII]

#### Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		The permittee shall operate and maintain the fire pump according to the manufacturer's written instructions and procedures. In addition, the only settings that will be changed are those permitted by the manufacturer. The permittee shall comply with the emission standards by purchasing an engine certified to the emission standards for the same model year and maximum engine power. The engine shall be installed and configured according to the manufacturer's specifications. Any operation of the fire pump other than emergency operation, maintenance, and testing will be prohibited. [40 CFR 60_Subpart IIII]

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Plains Marketing LP, Moss Point Rail Facility

Facility Requirements

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**EQPT0000000001 (continued):**

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. [APC-S-2 II.B(10)]

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### AREA0000000001 (AA-006) Marine Barge Loading Operation with emissions routed to and controlled by the vapor combustion unit (VCU):

#### Limitation Requirements:

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Condition No.	Parameter	Condition
L-1		The permittee shall only operate with the emissions routed to and controlled by the vapor combustion unit (VCU). The permittee shall maintain 99% destruction efficiency. [APC-S-2 II.B(10)]

#### Monitoring Requirements:

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Condition No.	Parameter	Condition
M-1		The permittee shall monitor the vapor combustion unit to ensure that a flame is present at all times. The permittee shall monitor marine barge loading rate of petroleum liquids. The permittee shall record anytime the facility is operated without a flame present and the corrective actions taken. [APC-S-2 II.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 vapor combustion unit in order to operate in a manner consistent with good air pollution control practices to minimize emissions and shall make said records available upon request during an inspection visit by the MDEQ personnel. [APC-S-2 II.B(11)]
R-2	The vapor combustion unit shall be operated with a temperature between 1400 and 1500 degrees Fahrenheit. The permittee shall keep a record/log of temperature measurements and shall record anytime the vapor combustion unit is operated with the temperature below 1400 degrees Fahrenheit or above 1500 degrees Fahrenheit including any corrective action taken. [APC-S-2 II.B(11)]

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Facility Requirements

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**AREA0000000001 (continued):**

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. [APC-S-2 II.B(10)]

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### GRPT000000001 (AT-001) Storage Tanks:

#### Limitation Requirements:

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Condition No.	Parameter	Condition
L-1	VOC	VOC: The permittee shall limit the VOC emissions to no more than 37.98 tons per 12 month rolling total combined for all the storage tanks. [APC-S-2 II.B(10)]
L-2		The permittee is subject to the New Source Performance Standard in 40 CFR 60, Subpart Kb-Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 and the General Provisions in Subpart A. [40 CFR 60_SUBPART Kb]
L-3		The permittee shall meet the specifications for the external floating roof tanks in 40 CFR 60.112b(a)(2). [40 CFR 60_SUBPART Kb]

#### Monitoring Requirements:

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Condition No.	Parameter	Condition
M-1		The permittee shall meet the testing requirements in 40 CFR 60.113b(b). [40 CFR 60_SUBPART Kb]

#### Record-Keeping Requirements:

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Condition No.	Condition
R-1	The permittee shall maintain monthly records of the facility's throughput for petroleum liquids and tons/year of volatile organic compounds. The permittee shall maintain these records on file at the facility for five (5) years and shall make them available upon request by Office of Pollution Control personnel. [APC-S-2 II.B(11)]
R-2	The permittee shall keep records and furnish reports according to 40 CFR 60.115b and 60.116b. [40 CFR 60_SUBPART Kb]

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Facility Requirements

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**GRPT0000000001 (continued):**

**Submittal/Action Requirements:**

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Condition No.	Condition
S-1	The permittee shall submit a semi-annual report to the Office of Pollution Control indicating the facility's throughput and tons/year of volatile organic compounds for petroleum liquid for each month and each consecutive 12 month period. [APC-S-2 II.B(11)]

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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. [APC-S-2 II.B(10)]

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## GENERAL INFORMATION

Plains Marketing LP, Moss Point Rail Facility  
Highway 63 and Elder Ferry Road  
Moss Point, MS  
Jackson County

### Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
62750	Plains Marketing, L.P.	Official Site Name	11/2/2012	
2805900142	Plains Marketing, L.P.	Air-AIRS AFS	3/8/2013	

**Basin:** Pascagoula River Basin

### Location Description:

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