

## State of Mississippi



# FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL PERMIT

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

#### THIS CERTIFIES

Jaxon Energy LLC, Jaxon Energy Processing Plant
455 Industrial Drive
Jackson, MS
Hinds County

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

Mississippi Environmental Quality Permit Board

Mississippi Department of Environmental Quality

Issued/Modified: JUN 1 7 2014

Expires: MAY 3 1 2019

Permit No. 1080-00258

Agency Interest # 65758

## **Table of Contents**

Subject Item Inventory	i
Facility Requirements	1
General Information.	A-
Other Relevant Documents:	

Jaxon Energy LLC, Jaxon Energy Processing Plant Subject Item Inventory Permit Number:1080-00258 Activity ID No.: PER20140002

# **Subject Item Inventory:**

ID	Designation	Description
AI65758		Hydrotreating Process
AREA1	F1-14	Fugitive Emissions
CONT1	SCB-14	Packed Bed Scrubber Controls emissions routed from the Thermal Oxidizer.
EQPT1	H1-14	Process Heater No. 1 7.29 MMBTU/hr Natural Gas Fired
EQPT2	H2-14	Process Heater No. 2 7.29 MMBTU/hr Natural Gas Fired
EQPT3	B1-14	Process Steam Boiler 0.75 MMBTU/hr Natural Gas Fired
EQPT4	RB-14	Process Amine Re-Boiler 1.0 MMBTU/hr Natural Gas Fired, off-gases routed to thermal oxidizer
EQPT5	TO-14	Process Thermal Oxidizer 3 MMBTU/hr Natural Gas Fired
EQPT6	Gen1-14	Plant Standby Power Generator 685 hp Diesel Emergency Generator Engine
EQPT7	T1-14	100,000 Gallon Fixed Roof Gasoline Storage Tank, controlled by Thermal Oxidizer
EQPT8	T2-14	100,000 Gallon Fixed Roof Diesel Storage Tank, controlled by Thermal Oxidizer
EQPT9	T3-14	100,000 Gallon Fixed Roof Diesel Storage Tank, controlled by Thermal Oxidizer
EQPT10	T4-14	100,000 Gallon Fixed Roof Light Ends Storage Tank, controlled by Thermal Oxidizer
EQPT11	T5-14	100,000 Gallon Fixed Roof Light Ends Storage Tank, controlled by Thermal Oxidizer
EQPT12	T6-14	100,000 Gallon Fixed Roof Light Ends Storage Tank, controlled by Thermal Oxidizer
EQPT13	T7-14	25,000 Gallon Fixed Roof Waste Water Storage Tank, controlled by Thermal Oxidizer
EQPT14	T8-14	25,000 Gallon Fixed Roof Slop Oil Storage Tank, controlled by Thermal Oxidizer
EQPT15	T9-14	25,000 Gallon Fixed Roof Light Ends Feed Storage Tank, controlled by Thermal Oxidizer
EQPT16	T10-14	8,000 Gallon Fixed Roof Calcium Hydroxide (slaked) Storage Tank
EQPT17	CT-14	Process Cooling Tower
EQPT18	TLO-14	Truck Loading Operations

Jaxon Energy LLC, Jaxon Energy Processing Plant Subject Item Inventory Permit Number:1080-00258 Activity ID No.: PER20140002

ID	Designation	Description
EQPT19	V1-14	Vacuum Pump, off gases routed to thermal oxidizer

## **Subject Item Groups:**

ID	Description	Components
GRPT1	Fuel Burning Requirements	EQPT1 Process Heater No. 1 7.29 MMBTU/hr Natural Gas Fired
		EQPT2 Process Heater No. 2 7.29 MMBTU/hr Natural Gas Fired
		EQPT3 Process Steam Boiler 0.75 MMBTU/hr Natural Gas Fired
		EQPT4 Process Amine Re-Boiler 1.0 MMBTU/hr Natural Gas Fired, off-gases routed to thermal oxidizer
		EQPT5 Process Thermal Oxidizer 3 MMBTU/hr Natural Gas Fired
GRPT2	Controlled Emission Units	EQPT10 100,000 Gallon Fixed Roof Light Ends Storage Tank, controlled by Thermal Oxidizer
		EQPT11 100,000 Gallon Fixed Roof Light Ends Storage Tank, controlled by Thermal Oxidizer
		EQPT12 100,000 Gallon Fixed Roof Light Ends Storage Tank, controlled by Thermal Oxidizer
		EQPT13 25,000 Gallon Fixed Roof Waste Water Storage Tank, controlled by Thermal Oxidizer
		EQPT14 25,000 Gallon Fixed Roof Slop Oil Storage Tank, controlled by Thermal Oxidizer
		EQPT15 25,000 Gallon Fixed Roof Light Ends Feed Storage Tank, controlled by Thermal Oxidizer
		EQPT19 Vacuum Pump, off gases routed to thermal oxidizer
		EQPT4 Process Amine Re-Boiler 1.0 MMBTU/hr Natural Gas Fired, off-gases routed to thermal oxidizer
		EQPT7 100,000 Gallon Fixed Roof Gasoline Storage Tank, controlled by Thermal Oxidizer
		EQPT8 100,000 Gallon Fixed Roof Diesel Storage Tank, controlled by Thermal Oxidizer
		EQPT9 100,000 Gallon Fixed Roof Diesel Storage Tank, controlled by Thermal Oxidizer

KEY	
ACT = Activity	AI = Agency Interest
AREA = Area	CAFO = Concentrated Animal Feeding Operation
CONT = Control Device	EQPT = Equipment

Jaxon Energy LLC, Jaxon Energy Processing Plant

Subject Item Inventory Permit Number:1080-00258 Activity ID No.: PER20140002

**KEY** 

IA = Insignificant Activity IMPD = Impoundment

MAFO = Animal Feeding Operation PCS = PCS

RPNT = Release Point TRMT = Treatment

WDPT = Withdrawal Point

Jaxon Energy LLC, Jaxon Energy Processing Plant Facility Requirements Permit Number:1080-00258 Activity ID No.: PER20140002

Page 1 of 15

## AI0000065758 Hydrotreating Process:

# Limitation Requirements:

Condition No.	Parameter	Condition	
L-1	Particulate Matter	Particulate Matter: 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 exceed forty (40) percent opacity subject to the exceptions provided in (a) and (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 providing 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. [11 Miss. Admin. Code Pt. 2, R. 1.3.A]	
L-2	Particulate Matter	Particulate Matter: 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 exceeds of 40% opacity, equivalent to that provided in Condition L-1. This shall not apply to vision obscuration caused by uncombined water droplets. [11 Miss. Admin. Code Pt. 2, R. 1.3.B]	
L-3		The permittee shall limit the throughput of Diesel to less than 12,960,000 gal/year (12-month rolling total). [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]	
L-4		The permittee shall limit the throughput of Gasoline to less than 3,240,000 gal/year (12-month rolling total). [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]	
L-5		The permittee shall not exceed 8,352 hours/year (12-month rolling total) for the hydrotreating process. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]	

Jaxon Energy LLC, Jaxon Energy Processing Plant Facility Requirements Permit Number:1080-00258 Activity ID No.: PER20140002

Page 2 of 15

## AI0000065758 (continued):

## Submittal/Action Requirements:

Condition No.	Condition
S-1	General Condition: Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began. [11 Miss. Admin.Code Pt. 2, R.2.2.B(10).]
S-2	Except as otherwise specified herein, the permittee shall Submit a certified annual synthetic minor monitoring report: Due annually, by the 31st of January for preceding calendar year. This report shall address any required monitoring specified in the permit. [11 Miss. Admin.Code Pt. 2, R.2.2.B(11).]

Condition No.	Condition
T-1	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49-17-29 1.b]
T-2	General Condition: The permittee shall at all times maintain in good working order and operate as efficiently as possible all air pollution control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit. [11 Miss. Admin. Code Pt. 2, R. 2.5.A.]
T-3	General Condition: Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering state waters without the proper environmental permits. [Miss. Code Ann. 49-17-29 1.a(i and ii)]
T-4	General Condition: Any diversion from or bypass of collection and control facilities is prohibited except as provided for in 11 Miss. Admin. Code Pt.2, R. 1.10, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", [11 Miss. Admin.Code Pt. 2, R.1.10.]
T-5	General Condition: Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule. [11 Miss. Admin.Code Pt. 2, R.2.10.]

Jaxon Energy LLC, Jaxon Energy Processing Plant Facility Requirements Permit Number:1080-00258 Activity ID No.: PER20140002

Page 3 of 15

## AI0000065758 (continued):

Condition	
No.	Condition
T-6	General Condition: The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:  (a) To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and  (b) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission. [Miss. Code Ann. 49-17-21]
T-7	General Condition: After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:  (a) Violation of any terms or conditions of this permit  (b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or  (c) A change in any condition that required either a temporary or permanent reduction or elimination of authorized air emissions. [11 Miss. Admin.Code Pt. 2, R. 2.2.C.]
T-8	General Condition: This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for this permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of the permit. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(b).]
T-9	General Condition: Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control. [Miss. Code Ann. 49-17-39]
T-10	General Condition: The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(15)(c).]
T-11	General Condition: Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(7).]

Jaxon Energy LLC, Jaxon Energy Processing Plant Facility Requirements Permit Number:1080-00258 Activity ID No.: PER20140002

Page 4 of 15

## AI0000065758 (continued):

Condition No.	Condition
T-12	General Condition: This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board. [11 Miss. Admin. Code Pt. 2, R. 2.16.B.]
T-13	General Condition: This permit is for air pollution control purposes only. [11 Miss. Admin.Code Pt. 2, R. 2.1.D(1).]
T-14	General Condition: This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.4.D [11 Miss. Admin.Code Pt. 2, R. 2.4.D.]
T-15	General Condition: The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. [11 Miss. Admin.Code Pt. 2, R. 2.1.D(7).]
T-16	General Condition: The permittee shall furnish to MDEQ within a reasonable time any information MDEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to MDEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to MDEQ along with a claim of confidentiality. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(15)(d).]

Jaxon Energy LLC, Jaxon Energy Processing Plant Facility Requirements Permit Number:1080-00258 Activity ID No.: PER20140002

Page 5 of 15

## AI0000065758 (continued):

Condition	
No.	Condition
T-17	General Condition: This permit does not authorize a modification as defined in 11 Miss. Admin. Code Pt. 2, Ch. 2 "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment". Modification is defined as "Any physical change in or change in the method of operation of a facility which increases actual emissions or potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:  (a) routine maintenance, repair, and replacement;  (b) use of an alternative fuel or raw material by reason of an order under Sections 2(a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;  (c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;  (d) use of an alternative fuel or raw material by a stationary source which: (i) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or (ii) the source is approved to use under any permit issued under 40 CFR 52.51 or under regulations approved pursuant to 40 CFR 51.166; or (ii) the source is approved bursuant to Subpart I or 40 CFR 51.166; or (f) any change in ownership of the stationary source" [11 Miss. Admin.Code Pt. 2, R. 2.1.D(2).]
T-18	General Condition: It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(a).]
T-19	General Condition: The permittee shall retain all required records, monitoring data, supported information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to MDEQ as required by Applicable Rules and Regulations or this permit upon request. [11 Miss. Admin.Code Pt. 2, R.2.9.]
T-20	General Condition: The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit. [11 Miss. Admin.Code Pt. 2, R.2.2.B(5).]

Jaxon Energy LLC, Jaxon Energy Processing Plant Facility Requirements Permit Number:1080-00258 Activity ID No.: PER20140002

Page 6 of 15

#### AI0000065758 (continued):

## Narrative Requirements:

Condition No.	Condition
T-21	General Condition: Emergencies  (a) Except as otherwise specified herein, an emergency means any situation arising from sudden and reasonably unforseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.  (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 as follows:

- (iii) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and (iv) the permittee submitted notice of the emergency to MDEQ within two (2) working days of the time when emission limitations were exceeded due to the emergency which contained a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of any 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 [11 Miss. Admin.Code Pt. 2, R.2.2.B(10).]

#### T-22 General Condition: Upsets

- (a) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows: (i) an upset occurred and that the permittee can identify the cause(s) of the upset; (ii) the source was at the time being properly operated; (iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (iv) the permittee submitted notice of the upset to the DEQ within five (5) working days of the time the upset began which contained a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.
- (b) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.
- (c) This provision is in addition to any upset provision contained in any applicable requirement. [11 Miss. Admin.Code Pt. 2, R.1.10.]

Jaxon Energy LLC, Jaxon Energy Processing Plant Facility Requirements Permit Number:1080-00258 Activity ID No.: PER20140002

Page 7 of 15

#### AI0000065758 (continued):

## Narrative Requirements:

[11 Miss. Admin.Code Pt. 2, R.2.8.]

Condition No.	Condition
T-23	General Condition: Startups and Shutdowns  (a) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows: (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above; (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.  (b) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.  (c) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply. [11 Miss. Admin.Code Pt. 2, R.1.10.]
T-24	General Condition: Maintenance  (a) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following: (i) the permittee can identify the need for the maintenance; (ii) the source was at the time being properly operated; (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (iv) the permittee submitted notice of the maintenance to MDEQ within five (5) working days of the time the maintenance began or such other times as allowed by MDEQ, which contained a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.  (b) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.  (c) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. [11 Miss. Admin.Code Pt. 2, R.1.10.]
T-25	General Condition: For renewal of this permit the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board.

Jaxon Energy LLC, Jaxon Energy Processing Plant Facility Requirements Permit Number:1080-00258 Activity ID No.: PER20140002

Page 8 of 15

## CONT000000001 (SCB-14) Packed Bed Scrubber -- Controls emissions routed from the Thermal Oxidizer.:

## Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Hydrogen sulfide	Hydrogen sulfide: The permittee shall not casue or permit the emission of any gas stream which contains hydrogen sulfide in excess of one grain per 100 standard cubic feet. [11 Miss. Admin. Code Pt. 2, R. 1.4.B(2)]
L-2	Sulfur Dioxide	Sulfur Dioxide: The permitee shall not cause or permit the emissions of gas containing sulfur oxides (measured as sulfur dioxide) in excess of 500 ppm (volume) from any process equipment contructed after January 25, 1972. [11 Miss. Admin. Code Pt. 2, R. 1.4.B(1)]
L-3	Sulfur Dioxide	Sulfur Dioxide: The maximum discharge of Sulfur Dioxide shall not exceed 22.4 pounds per hour as determined by EPA Test Method 6C, 40 CFR 60, Appendix A. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]
L-4		Emission Point SCB-14 shall be operated at all times emissions may be vented to it. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]

## Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		The permittee shall perform an initial performance test for SO2 within 60 days after achieving the maximum production rate at which the facility or emission source will be operated, but not later than 180 days after initial startup. EPA Test Method 6C shall be used, unless an alternative is approved by MDEQ. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]
M-2		The permittee shall conduct subsequent stack tests within 24 months following the preceding stack test. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]
M-3		The permittee shall continuously monitor the pressure across the scrubber. If the pressure drop is greater than 6 inches of water, immediate corrective action shall be taken to restore the pressure drop below 6 inches of water. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]

Jaxon Energy LLC, Jaxon Energy Processing Plant Facility Requirements Permit Number:1080-00258 Activity ID No.: PER20140002

Page 9 of 15

#### **CONT0000000001** (continued):

Record	l-k	Keepin	g Rec	quirements:
--------	-----	--------	-------	-------------

Condition No.	Condition
110.	Condition
R-1	The permittee shall record the pressure drop across the scrubber every hour that the scrubber is in operation. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]
Submitta	d/Action Requirements:
	<u>-</u>
Condition	
No.	Condition

The permittee shall submit a test protocol at least thirty (30) days prior to the scheduled test date to ensure that all test methods and procedures are acceptable to the MDEQ. The MDEQ must be notified at least ten (10) days prior to the scheduled test date so that an observer may be scheduled to witness the test(s). A stack test report containing the results of the test(s) shall be submitted within forty-five (45) days of completion of the required test(s). [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]

Jaxon Energy LLC, Jaxon Energy Processing Plant Facility Requirements Permit Number:1080-00258 Activity ID No.: PER20140002

Page 10 of 15

## EQPT000000005 (TO-14) Process Thermal Oxidizer -- 3 MMBTU/hr Natural Gas Fired:

## Limitation Requirements:

R-1

2.2.B(11)]

Condition		
Condition No.	Parameter	Condition
L-1	Hydrogen sulfide	Hydrogen sulfide: The permittee shall not casue or permit the emission of any gas stream which contains hydrogen sulfide in excess of one grain per 100 standard cubic feet.
		Gas streams containing hydrogen sulfide in excess of one grain per 100 standard cubic feet shall be incinerated at temperatures of not less than 1600 degrees F for a period of not less than 0.5 seconds. [11 Miss. Admin. Code Pt. 2, R. 1.4.B(2)]
L-2		Emission Point TO-14 shall be operated at all times emissions may be vented to it. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]
Monitor	ing Requirements:	
Condition		
No.	Parameter	Condition
M-1		The permittee shall ensure that the pilot is lit at all times by utilizing a heat sensing device and auto ignition system. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]
M-2		The permittee shall install, operate, and maintain a thermocouple for determining the temperature in the combustion chamber. If the hourly average temperature is less than 1600 degrees F, take immediate corrective action to restore the temperature above 1600 degrees F. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]
Record-	Keeping Requirements:	
Condition		
No.	Condition	

The permittee shall continuously record the temperature at least every 15 minutes to determine the hourly average temperature. [11 Miss. Admin. Code Pt. 2, R.

Jaxon Energy LLC, Jaxon Energy Processing Plant Facility Requirements Permit Number:1080-00258 Activity ID No.: PER20140002

Page 11 of 15

## EQPT000000006 (Gen1-14) Plant Standby Power Generator -- 685 hp Diesel Emergency Generator Engine:

Condition No.	Condition
T-1	For Emission Point Gen1-14, the permittee is subject to and shall comply with National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines and General Provisions (40 CFR 63, Subparts A and ZZZZ). The permittee shall comply with this subpart by complying with 40 CFR 63.6590(c). [40 CFR 63.6585(c)]
T-2	For Emission Point Gen1-14, the permittee is subject to and shall comply with Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (40 CFR 60, Subpart IIII) and General Provisions (40 CFR 60, Subpart A). [40 CFR 60.4200(a)(2)]

Jaxon Energy LLC, Jaxon Energy Processing Plant Facility Requirements Permit Number:1080-00258 Activity ID No.: PER20140002

Page 12 of 15

## EQPT0000000007 (T1-14) 100,000 Gallon Fixed Roof Gasoline Storage Tank, controlled by Thermal Oxidizer:

## Limitation Requirements:

Condition	<b>D</b>	
No.	Parameter	Condition
L-1		For Emission Point T1-14, the permittee shall equip the storage tank with a closed vent system and control device meeting the following requirements:
		(i) The closed vent system shall be designed to collect all VOC vapors and gases discharge from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background and visual inspections, as determined in part 60, supbart VV, 60.485(b).
		(ii) The control device shall be designed and operated to reduce inlet VOC emissions by 95 percent or greater. [40 CFR 60.112b(a)(3)]
Record-l	Keeping Requirements:	
Condition		
No.	Condition	
R-1	For Emission Point T1-14, the	permittee shall keep a copy of the operating plan. [40 CFR 60.115b(c)(1)]

Jaxon Energy LLC, Jaxon Energy Processing Plant Facility Requirements Permit Number:1080-00258 Activity ID No.: PER20140002

Page 13 of 15

#### **EQPT0000000007** (continued):

#### Submittal/Action Requirements:

Condition	
No.	Condition
S-1	For Emission Point T1-14, the permittee shall meet the following requirements:
	(i) Submit for approval an operating plan containing the information listed below:
	(a) Documentation demonstration that the control device will achieve the required control efficiency during maximum loading conditions. This documentation is

- (a) Documentation demonstration that the control device will achieve the required control efficiency during maximum loading conditions. This documentation is to include a description of the gas stream which enters the control device, including flow and VOC content under varying liquid level conditions (dynamic and static) and manufacturer's design specifications for the control device. If the control device or the closed vent capture system receives vapors, gases, or liquids other than fuels from sources that are not designated sources under this subpart, the efficiency demonstration is to include consideration of all vapors, gases, and liquids received by the closed vent capture system and control device. If an enclosed combustion device with a minimum residence time of 0.75 seconds and a minimum temperature of 816 degrees C is used to meet the 95 percent requirement, documentation that those conditions will exist is sufficent to meet the requirements of this paragraph.
- (b) A description of the parameter or parameters to be monitored to ensure that the control device will be oprated in conformance with its design and an explanation of the criteria used for selection of that parameter (or parameters).
- (ii) Operate the closed vent system and control device and monitor the parameters of the closed vent system and control device in accordance wih the operating plan submitted to MDEQ unless the plan was modified by MDEQ during the review process. In this case, the modified plan applies. [40 CFR 60.113b(c)]

Condition No.	Condition
T-1	For Emission Point T1-14, the permittee is subject to and shall comply with all applicable requirements of 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 (40 CFR 60, Subpart Kb) and the General Provisions (40 CFR 60, Subpart A). [40 CFR 60.110b(a)]

Jaxon Energy LLC, Jaxon Energy Processing Plant Facility Requirements Permit Number:1080-00258 Activity ID No.: PER20140002

Page 14 of 15

## **GRPT0000000001 Fuel Burning Requirements:**

# Limitation Requirements:

Condition No.	Parameter	Condition
L-1		The maximum opacity from any point source or emissions at any time shall not exceed 40% as determined by EPA Test Method 9, 40 CFR 60, Appendix A. [11 Miss. Admin. Code Pt. 2, R. 1.3.B]
L-2		The maximum permissible emission of ash and/or particulate matter from each 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. [11 Miss. admin. Code Pt. 2, R. 1.3.D(1)(a).]
L-3		The maximum discharge of sulfur oxides from each 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. [11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).]

Jaxon Energy LLC, Jaxon Energy Processing Plant Facility Requirements Permit Number:1080-00258 Activity ID No.: PER20140002

Page 15 of 15

## **GRPT0000000002** Controlled Emission Units:

## Limitation Requirements:

Condition No.	Parameter	Condition
L-1		Emissions shall be routed to the thermal oxidizer at all times. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]

## **GENERAL INFORMATION**

Jaxon Energy LLC, Jaxon Energy Processing Plant
455 Industrial Drive
Jackson, MS
Hinds County

#### **Alternate/Historic Identifiers**

ID	Alternate/Historic Name	User Group	<b>Start Date</b>	<b>End Date</b>
65758	Jaxon Energy, LLC	Official Site Name	4/8/2014	
MSR000106666	Jaxon Energy	Hazardous Waste-EPA ID	4/8/2014	
2804900258	Jaxon Energy, LLC	Air-AIRS AFS	4/17/2014	
108000258	Jaxon Energy LLC, Jaxon Energy Processing Plant	Air-Synthetic Minor Operating	6/17/2014	5/31/2019

**Basin:** Big Black River Basin

**Location Description:**