

**STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
TITLE V PERMIT
TO OPERATE AIR EMISSIONS EQUIPMENT**

THIS CERTIFIES THAT

Trunkline Gas Company, Independence Compressor Station
8354 Highway 305
Tate, 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: July 9, 2012

Modified on: June 25, 2014

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: June 30, 2017

Permit No.: 2600-00025

TABLE OF CONTENTS

| | |
|---|-----|
| SECTION 1. GENERAL CONDITIONS..... | 3 |
| SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES | 12 |
| SECTION 3. EMISSION LIMITATIONS & STANDARDS | 143 |
| SECTION 4. COMPLIANCE SCHEDULE | 19 |
| SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS | 20 |
| SECTION 6. ALTERNATIVE OPERATING SCENARIOS | 22 |
| SECTION 7. TITLE VI REQUIREMENTS | 23 |

APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT

APPENDIX B LIST OF REGULATIONS REFERENCED IN THIS PERMIT

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 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).)
- 1.5 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 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).)
- 1.7 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 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.)
- 1.8 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).)
- 1.9 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.)

- 1.10 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:
- (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).)
- 1.11 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).)
- 1.12 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).)
- 1.13 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).)
- 1.14 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.

- (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).)
- 1.15 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.)
- 1.16 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).)
- 1.17 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).)
- 1.18 Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in

the absence of an approved schedule, with the appropriate requirements specified in 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.)

- 1.19 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
 - (f) any change in ownership of the stationary source."

- 1.20 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).)

- 1.21 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).)
- 1.22 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.)
- 1.23 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 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.)

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

- (a) Upsets (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.KK.)
 - (1) 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 5 working days of the time the upset began; and
 - (v) the notice of the upset shall contain a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.
 - (2) In any enforcement proceeding, the permittee 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.
- (b) Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.HH. & R. 1.2.CC.)
- (1) 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.
 - (2) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.
 - (3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply.

(c) Maintenance.

- (1) 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 the DEQ within 5 working days of the time the maintenance began or such other times as allowed by DEQ; and
 - (v) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.
- (2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.
- (3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

- 1.25 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

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

| Emission Point | Description |
|----------------|---|
| AA-001 | 18.4 MMBtu/hr; 2,000 HP natural gas fired 2-stroke lean burn reciprocating internal combustion engine (Facility Ref. No. 5601)) |
| AA-002 | 18.4 MMBtu/hr; 2,000 HP natural gas fired 2-stroke lean burn reciprocating internal combustion engine (Facility Ref. No. 5602) |
| AA-003 | 18.4 MMBtu/hr; 2,000 HP natural gas fired 2-stroke lean burn reciprocating internal combustion engine (Facility Ref. No. 5603) |
| AA-004 | 18.4 MMBtu/hr; 2,000 HP natural gas fired 2-stroke lean burn reciprocating internal combustion engine (Facility Ref. No. 5604) |
| AA-005 | 22.4 MMBtu/hr; 3,000 HP natural gas fired 4-stroke lean burn reciprocating internal combustion engine (Facility Ref. No. 5605) |
| AA-006 | 22.4 MMBtu/hr; 3,000 HP natural gas fired 4-stroke lean burn reciprocating internal combustion engine (Facility Ref. No. 5606) |
| AA-007 | 22.4 MMBtu/hr; 3,000 HP natural gas fired 4-stroke lean burn reciprocating internal combustion engine (Facility Ref. No. 5607) |
| AA-008 | 78.8 MMBtu/hr; 10,000 HP natural gas fired 2-stroke lean burn reciprocating internal combustion engine (Facility Ref. No. 5608) |
| AA-009 | 13.2 MMBtu/hr; 1,050 HP natural gas fired combustion turbine (Facility Ref. No. 5621) |
| AA-010 | 13.2 MMBtu/hr; 1,050 HP natural gas fired combustion turbine (Facility Ref. No. 5622) |
| AA-011 | 13.2 MMBtu/hr; 1,050 HP natural gas fired combustion turbine (Facility Ref. No. 5623) |
| AA-012 | 13.2 MMBtu/hr; 1,050 HP natural gas fired combustion turbine (Facility Ref. No. 5624) |
| AA-013 | 13.2 MMBtu/hr; 1,050 HP natural gas fired combustion turbine (Facility Ref. No. 5625) |
| AA-015 | 1,000 gallon (23.8 barrels) pipeline condensate storage tank (Facility Ref. No. Tank No. 10) |
| AA-016 | 1,000 gallon (23.8 barrels) unleaded gasoline storage tank (Facility Ref. No. Tank No. 13) |
| AA-017 | 3,000 gallon pipeline condensate storage tank (Facility Ref. No. Tank No. 20) |
| AA-018 | 4.09 MMBtu/hr (530 HP) natural gas fired 4-stroke rich burn emergency reciprocating internal combustion engine (Facility Ref. No. 5648) |
| AA-019 | 1.5 MMBTU/hr natural gas fired boiler |
| AA-020 | 1.5 MMBTU/hr natural gas fired boiler |
| AA-021 | 1.5 MMBTU/hr natural gas fired boiler |
| AA-022 | 0.225 MMBTU/hr natural gas fire tube heaters |
| AA-023 | 0.225 MMBTU/hr natural gas fire tube heaters |
| AA-024 | Fugitive Emissions from pipeline components |
| AA-025 | Tank Truck Loading Operations |
| AA-026 | 0.31 MMBtu/hr (40 HP) propane fired 4-stroke rich burn emergency reciprocating internal combustion engine (Facility Ref. No. 5649) |
| AA-027 | 4200 gallon (100 barrels) pipeline condensate storage tank (Facility Ref. No. Tank No. 25) |

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.)

B. Emission Point Specific Emission Limitations & Standards

| Emission Point(s) | Applicable Requirement | Condition Number(s) | Pollutant/ Parameter | Limit/Standard |
|--|---|---------------------|----------------------|---|
| AA-001 through AA-013 AA-018 through AA-023 & AA-026 | 11 Miss. Admin. Code Pt. 2 R.1.3.A | 3.B.1 | Opacity | 40% |
| AA-001 through AA-013 | 11 Miss. Admin. Code Pt. 2 R.1.3 D(1)(b) | 3.B.2 | PM | $E=0.8808 \cdot T^{0.1667}$ |
| AA-018 through AA-023 and AA-026 | 11 Miss. Admin. Code Pt. 2, R.1.3.D(1)(a) | 3.B.3 | PM | 0.6 lbs/MMBTU |
| AA-001 through AA-013 and AA-018 through AA-023 and AA-026 | 11 Miss. Admin. Code Pt. 2, R.1.4.A(1) | 3.B.4 | SO ₂ | 4.8 lbs/MMBTU |
| AA-001 through AA-008, AA-018, and AA-026 | NESHAP, 40 CFR 63, Subpart ZZZZ | 3.B.5 | HAP | Units are affected sources under 40 CFR Part 63, Subpart ZZZZ and 40 CFR Part 63, Subpart A, General Provisions |
| AA-001 through AA-008 | NESHAP, 40 CFR 63, Subpart ZZZZ; 40 CFR 63.6585, 40 CFR 63.6590(a)(1)(i), 40 CFR 63.6590(b)(3)(i) & (ii) | 3.B.6 | HAP | Units are affected sources under 40 CFR Part 63, Subpart ZZZZ but the permittee does not have to meet any requirements of this subpart or Subpart A, General Provisions |
| AA-018 | NESHAP, 40 CFR 63, Subpart ZZZZ 40 CFR 63.6585, 40 CFR 63.6590(a)(1)(i), 40 CFR 63.6590(b)(3)(iii), 40 CFR 63.6640(f)(2), & 40 CFR 63.6675 | 3.B.7 | HAP | Meet emergency stationary RICE definition |
| AA-026 | NESHAP, 40 CFR 63, Subpart ZZZZ 40 CFR 63.6585, | 3.B.10 | HAP | Meet the requirements of this subpart by meeting the requirements of 40 CFR 60, Subpart JJJJ, as applicable |

| Emission Point(s) | Applicable Requirement | Condition Number(s) | Pollutant/ Parameter | Limit/Standard |
|-----------------------|--|---------------------|----------------------|---|
| | 40 CFR 63.6590(a)(2)(ii), & 40 CFR 63.6590(c)(6) | | | |
| AA-009 through AA-013 | NESHAP Subpart YYYY, 40 CFR 63.6085 and 40 CFR 63.6090(b)(4) | 3.B.8 | HAP | NESHAP applicability only, not affected by the requirements of this standard. |
| AA-019 through AA-023 | 40 CFR Part 63, Subpart DDDDD | 3.B.9 | HAP | Meet all applicable requirements of this subpart and of 40 CFR Part 63, Subpart A, General Provisions |

3.B.1 For emission points AA-001 through AA-013, AA- 018 through AA-023 and AA-026, the permittee shall have emissions of opacity less than or equal to 40 percent. (Reference: 11 Miss. Admin. Code Pt. 2 R.1.3.A)

3.B.2 For Emission Points AA-001 through AA-013, the maximum permissible emission of ash and/or particulate matter shall not exceed an 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.3 For Emission Point AA-018 through AA-023, 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.B.4 For Emission Points AA-001 through AA-013 and AA-018 through AA-023, 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.5 Emission Points AA-001 through AA-008, AA-018, and AA-026 are affected sources under National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ.”

3.B.6 Emission Points AA-001 through AA-008 are existing 2- and 4-stoke lean burn stationary reciprocating internal combustion engines (RICE) located at a major source of HAP emissions that are not required to meet the requirements of this standard or the

General Provisions, 40 CFR Part 63, Subpart A. (Reference: 40 CFR 63.6585, 63.6590(a)(1)(i), & 63.6590(b)(3)(i) & (ii))

- 3.B.7 Emission Point AA-018 is an existing 4-stroke rich burn emergency stationary reciprocating internal combustion engine (RICE) located at a major source of HAP emissions and shall be operated according to the requirements in paragraphs (f)(2)(i) through (iii) of 40 CFR 63.6640(f). There is no time limit on the use of the RICE in emergency situations or for routine maintenance and testing; however, operation in non-emergency situations for more than 50 hours per year is prohibited. If the RICE is not operated according to the requirements in paragraphs (f)(2)(i) through (iii), the engine will not be considered an emergency engine under this subpart and will need to meet all requirements for non-emergency engines. The permittee may operate the emergency stationary RICE for any combination of the purposes specified in paragraphs (f)(2)(i) through (iii) of 40 CFR 63.6640 for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (f)(3) and (4) of 40 CFR 63.6640 counts as part of the 100 hours per calendar year allowed by paragraph (f)(2) of 40 CFR 63.6640. (Reference: 40 CFR 63.6590(b)(1), 40 CFR 63.6640(f))
- 3.B.8 Emission Points AA-009 through AA-013 are subject to the National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines. These units satisfy the definition of existing Combustion Turbines and are not required to meet the requirements of this standard or General Provisions, 40 CFR Part 63, Subpart A. (Ref.: 40 CFR 63.6085 and 40 CFR 63.6090(b)(4))
- 3.B.9 Emission Points AA-019 through AA-023 are subject to and must comply with the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63, Subpart DDDDD and must also meet the applicable requirements of the general provisions, 40 CFR 63, Subpart A.
- (a) Emission Points AA-019 through AA-023 meet the definition of Process Heater set forth in 40 CFR 63.7575. (Ref.: 40 CFR 63.7575)
 - (b) Emission Points AA-019 through AA-023 are affected existing sources because construction commenced before June 4, 2010. (Ref.: 40 CFR 63.7490)
 - (c) Emission Points AA-019 through AA-023 must comply with Subpart DDDDD no later than January 31, 2016. (Ref.: 40 CFR 63.7495(b))
 - (d) Emission Points AA-019 through AA-023 are process heaters designed to burn pipeline quality sweet natural gas (gas 1 fuel subcategory) with heat input capacities less than 5 million British Thermal Units (MMBtu) per hour and must complete a tune-up every 5 years as specified in 40 CFR 63.7540(a)(12). (Ref.: 40 CFR 63.7500(a)&(e))

- (e) Emission Points AA-019 through AA-023 must comply with the work practice standards in 40 CFR 63, Subpart DDDDD. (Ref.: 40 CFR 63.7505(a))
- (f) Emission Points AA-019 through AA-023 must conduct a 5-year performance tune-up according to 40 C FR 63.7540(a)(12). Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up. (Ref.: 40 CFR 63.7515(d))
- (g) Emission Points AA-019 through AA-023 must submit a signed statement in the Notification of Compliance Status report that indicates a tune-up and one time energy assessment according to Table 3 of 40 CFR Part 63, Subpart DDDDD were conducted. (Ref.: 40 CFR 63.7530(d)&(e))
- (h) Emission Points AA-019 through AA-023 are process heaters with heat input capacities less than 5 MMBtu per hour, designed to burn gas 1 fuel must conduct a tune-up of the process heater every 5 years as specified in 40 CFR 63.7540(a)(10(i) through (vi). (Ref.: 40 CFR 63.7540(a)(12))
- (i) Emission Points AA-019 through AA-023 must submit all applicable notification in 40 CFR 63.7(b) and (c), 63.8(e), (f)(4) and (6), and 63.9(b) through (h) and have submitted an Initial Notification not later than 120 days after January 31, 2013. (Ref.: 40 CFR 63.7545(a)&(b))
- (j) Emission Points AA-019 through AA-023 must submit applicable reports in Table 9 40 CFR Part 63, Subpart DDDDD including a 5-year compliance report. (Ref.: 40 CFR 63.7550(a),(b),(c)(1),(c)(5)(i) through (iv) and (xiv))
- (k) Emission Points AA-019 through AA-023 must keep a record of all notifications, Compliance Status Reports and other compliance demonstrations including the 5-year tune-up and one time energy assessment. (Ref.: 40 CFR 63.7555(a)(1)&(2))
- (l) Emission Points AA-019 through AA-023 must keep records for 5 years. (Ref.: 40 CFR 63.7560)
- (m) Emission Points AA-019 through AA-023 must conduct a tune-up of the process heater every 5 years and conduct a one-time energy assessment. (Ref.: 40 CFR 63, Subpart DDDDD, Table 3, Items 1 & 4)
- (n) Emission Points AA-019 through AA-023 must submit a compliance report every 5 years. (Ref.: 40 CFR 63, Subpart DDDDD, Table 9, Item 1(a)&(b))

3.B.10 Emission Point AA-026 is a new 4-stroke rich burn emergency stationary reciprocating internal combustion engine (RICE) located at a major source of HAP emissions that is required to meet the requirements of this subpart by meeting the requirements of 40 CFR 60, Subpart JJJJ, as applicable. No other requirements of Part 63 apply. Since the permittee commenced construction of the emergency engine after June 12, 2006, the

engine was manufactured before January 1, 2009, and the engine was installed before January 1, 2011, the provisions of 40 CFR 60, Subpart JJJJ do not apply. (Reference: 40 CFR 63.6585, 63.6590(a)(2)(ii), 63.6590(c)(6), & 40 CFR 60.4230(a)(4)(iv))

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).)

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).)

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. 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.

B. Specific Monitoring and Recordkeeping Requirements

5.B.1 The permittee shall maintain the type and quantity of the fuels used on a monthly basis in accordance with paragraph 5.A.3.

5.B.2 For Emission Point AA-018, the permittee shall keep records of the hours of non-emergency and emergency operation, including what classified the operation as emergency, to verify that the emergency stationary RICE is being operated according to the requirements in paragraphs (f)(2)(i) through (iii) of 40 CFR 63.6640.

C. Specific Reporting Requirements

5.C.1 The permittee shall submit fuel usage reports summarizing the type and the quantity of fuel used in accordance with paragraph 5.A.4.

5.C.2 For Emission Points AA-009 through AA-013, the permittee shall notify the agency in writing at least ten (10) days prior to activating these emission units.

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

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 63 |
| NMVOC | 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 - Standards of Performance for New Stationary Source General Provisions Notification and Recordkeeping

40 CFR 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

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