

State of Mississippi



FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL PERMIT

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

THIS CERTIFIES

Enterprise Gas Processing LLC, Pascagoula Gas Processing Plant
6800 Stennis Boulevard
Moss Point, MS
Jackson 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: MAR 3 1 2018

Expires: JAN 3 1 2019

Permit No. 1280-00115

Agency Interest # 6557

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Enterprise Gas Processing LLC, Pascagoula Gas Processing Plant Subject Item Inventory Permit Number:1280-00115 Activity ID No.: PER20160002

Subject Item Inventory:

ID	Designation	Description
EQPT1	AA-001	Stabilizer Reboiler (H-1035); natural gas fired with a rated capacity of 9.5 MMBTU/hr.
EQPT2	AA-002	Regeneration Gas Heater (H-2241); natural gas fired with a rated capacity of 12.0 MMBTU/hr.
EQPT3	AA-003	Hot Oil Heater Train A (H-8211A); natural gas fired with a rated capacity of 35.2 MMBTU/hr.
EQPT4	AA-004	Hot Oil Heater Train B (H-8211B); natural gas fired with a rated capacity of 35.2 MMBTU/hr.
CONT1	AA-005	Low Flow Flare (N-5020); natural gas fired pilot with rated capacity of 1.683 MMBTU/hr. Controls process vents in the plant and controls emissions during startups and shutdowns.
CONT2	AA-006	High Flow Flare (N-5011); natural gas fired pilot with rated capacity of 16.5 MMBTU/hr. Used in emergency situations only.
EQPT5	AA-007	Emergency Generator (G-7001); diesel fired generator with rated capacity of 1.16 MMBTU/hr (1170 hp).
EQPT6	AA-008	Truck Loading (TL-1) with 2 loading bays. Emissions are controlled by a thermal oxidizer.
AREA2	AA-010	Truck Loading with 2 loading bays. Emissions are controlled by a thermal oxidizer.
AREA1	AA-012	Facility wide fugitives from valves, flanges, connectors, open end lines, pumps, seals, compressors, pressure relief valves, drains, instruments, meters.
EQPT14	AA-013	133 hp Emergency Use Fire Water Pump Engine
EQPT8	AA-101	Condensate Storage Tank (T-1051); fixed roof storage tank with capacity of 210,000 gallons that stores mixed hydrocarbons.
EQPT9	AA-102	Waste Water Storage Tank (T-5402); fixed roof storage tank with capacity of 12,600 gallons that stores water and mixed hydrocarbons.
EQPT10	AA-103	Methanol Storage Tank (T-7606); fixed roof storage tank with capacity of 1,000 gallons.
EQPT11	AA-104	Condensate Storage Tank (T-1151); fixed roof storage tank with capacity of 210,000 gallons that stores mixed hydrocarbons.
EQPT13	AA-105	550 gallon Gasoline Storage Tote (2-07)
EQPT16	AA-106	550 gallon Diesel Fuel Storage Tote
EQPT17	AA-107	550 gallon Diesel Fuel Storage Tote
EQPT15	AA-108	125 gallon Diesel Tank for Emergency Firewater Pump
EQPT18	AA-109	Condensate Bottoms Tank (T-5403)
EQPT23	AA-110	525 gallon Plant Emergency Generator Diesel Tank

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ID	Designation	Description
EQPT19	AA-112	Residue Compressor Blowndown to atmosphere prior to starting compressors up.
EQPT20	AA-113	Condensate Filter Change
EQPT21	AA-114	Plant Surface Coating Operations
AI6557		Gas Processing Plant
EQPT24	AA-009	Regen Gas Heater; natural gas fired with rated capacity of 13.25 MMBTU/hr

Subject Item Groups:

ID	Description	Components
GRPT1 Fuel Burning Requirements		EQPT24 Regen Gas Heater; natural gas fired with rated capacity of 13.25 MMBTU/hr
		EQPT1 Stabilizer Reboiler (H-1035); natural gas fired with a rated capacity of 9.5 MMBTU/hr.
		EQPT2 Regeneration Gas Heater (H-2241); natural gas fired with a rated capacity of 12.0 MMBTU/hr.
		EQPT3 Hot Oil Heater Train A (H-8211A); natural gas fired with a rated capacity of 35.2 MMBTU/hr.
		EQPT4 Hot Oil Heater Train B (H-8211B); natural gas fired with a rated capacity of 35.2 MMBTU/hr.
GRPT2	NSPS Subpart A Control Devices	CONT1 Low Flow Flare (N-5020); natural gas fired pilot with rated capacity of 1.683 MMBTU/hr. Controls process vents in the plant and controls emissions during startups and shutdowns.
		CONT2 High Flow Flare (N-5011); natural gas fired pilot with rated capacity of 16.5 MMBTU/hr. Used in emergency situations only.
GRPT3	Truck Loading	EQPT6 Truck Loading (TL-1) with 2 loading bays. Emissions are controlled by a thermal oxidizer.
		AREA2 Truck Loading with 2 loading bays. Emissions are controlled by a thermal oxidizer.
GRPT5	RICE MACT Requirements	EQPT5 Emergency Generator (G-7001); diesel fired generator with rated capacity of 1.16 MMBTU/hr (1170 hp).
		EQPT14 133 hp Emergency Use Fire Water Pump Engine

Receiving Stream Relationships:

Enterprise Gas Processing LLC, Pascagoula Gas Processing Plant Subject Item Inventory

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Subject Item	Relationship	Receiving Stream
AI 6557 Gas Processing Plant	Discharges Into	Bayou Casotte

<u>KEY</u>	
ACT = Activity	AI = Agency Interest
AREA = Area	CAFO = Concentrated Animal Feeding Operation
CONT = Control Device	EQPT = Equipment
IA = Insignificant Activity	IMPD = Impoundment
MAFO = Animal Feeding Operation	PCS = PCS
RPNT = Release Point	TRMT = Treatment
WDPT = Withdrawal Point	

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AREA000000001 (AA-012) Facility wide fugitives from valves, flanges, connectors, open end lines, pumps, seals, compressors, pressure relief valves, drains, instruments, meters.:

Record-Keeping Requirements:

Condition	
No.	Condition
R-1	The permittee shall comply with the following: (a) Comply with the requirements of paragraphs (b) and (c) in addition to the requirements of 40 CFR 60.486. (b) The following recordkeeping requirements shall apply to pressure relief devices subject to the requirements of 40 CFR 60.633(b)(1). (1) When each leak is detected as specified in 40 CFR 60.633(b)(2), a weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment. The identification on the pressure relief device may be removed after it has been repaired. (2) When each leak is detected as specified in 40 CFR 60.633(b)(2), the following information shall be recorded in a log and shall be kept for 2 years in a readily accessible location: (i) The instrument and operator identification numbers and the equipment identification number. (ii) The date the leak was detected and the dates of each attempt to repair the leak. (iii) Repair methods applied in each attempt to repair the leak. (iv) Above 10,000 ppm; if the maximum instrument reading measured by the methods specified in paragraph (a) of this section after each repair attempt is
	10,000 ppm or greater. (v) ¿Repair delayed; and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak. (vi) The signature of the owner or operator (or designate) whose decision it was that repair could not be effected without a process shutdown. (vii) The expected date of successful repair of the leak if a leak is not repaired within 15 days. (viii) Dates of process unit shutdowns that occur while the equipment is unrepaired. (ix) The date of successful repair of the leak. (x) A list of identification numbers for equipment that are designated for no detectable emissions under the provisions of 40 CFR 60.482-4(a). The designation of equipment subject to the provisions of 40 CFR 60.482-4(a) shall be signed by the owner or operator. (c) Comply with the following requirement in addition to the requirement of 40 CFR 60.486(j): Information and data used to demonstrate that a reciprocating compressor is in wet gas service to apply for the exemption in 40 CFR 60.633(f) shall be recorded in a log that is kept in a readily accessible location. [40 CFR 60.635]

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AREA000000001 (continued):

Submittal/Action Requirements:

Condition No.	Condition
S-1	The permittee shall comply with the following reporting requirements: (a) Comply with the requirements of paragraphs (b) and (c) in addition to the requirements of 40 CFR 60.487. (b) Include the following information in the initial semiannual report in addition to the information required in 40 CFR 60.487(b) (1)-(4): Number of pressure relief devices subject to the requirements of 40 CFR 60.633(b) except for those pressure relief devices designated for no detectable emissions under the provisions of 40 CFR 60.482-4(a) and those pressure relief devices complying with 40 CFR 60.482-4(c). (c) Include the following information in all annual reports in addition to the information required in 40 CFR 60.487(c)(2) (i) through (vi): (1) Number of pressure relief devices for which leaks were detected as required in 40 CFR 60.633(b)(2) and (2) Number of pressure relief devices for which leaks were not repaired as required in 40 CFR 60.633(b)(3). [40 CFR 60.636]

Condition No.	Condition
T-1	Emission Point AA-012 is subject to and shall comply with all applicable requirements of the New Source Performance Standards, as described in 40 CFR 60, Subpart KKK, Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants. [40 CFR 60.630(a)(1)]

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AREA000000001 (continued):

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Condition				
No.	Condition			
T-2	The permittee shall comply with the following standards: (a) Comply with the requirements of 40 CFR 60.482-1 (a), (b), and (d) and 60.482-2 through 60.482-10, except as provided in 40 CFR 60.633, as soon as practicable, but no later than 180 days after initial startup. (b) Elect to comply with the requirements of 40 CFR 60.483-1 and 60.483-2. (c) Apply for permission to use an alternative means of emission limitation that achieves a reduction in emissions of VOC at least equivalent to that achieved by the controls required in this subpart. In doing so, the permittee shall comply with requirements of 40 CFR 60.634.			

- (d) Comply with the provisions of 40 CFR 60.485 except as provided in 40 CFR 60.633(f).(e) Comply with the provisions of 40 CFR 60.486 and 60.487 except as provided in 40 CFR 60.633, 60.635, and 60.636.
- (f) The permittee shall use the following provision instead of 40 CFR 60.485(d)(1): Each piece of equipment is presumed to be in VOC service or in wet gas service unless an owner or operator demonstrates that the piece of equipment is not in VOC service or in wet gas service. For a piece of equipment to be considered not in VOC service, it must be determined that the VOC content can be reasonably expected never to exceed 10.0 percent by weight. For a piece of equipment to be considered in wet gas service, it must be determined that it contains or contacts the field gas before the extraction step in the process. For purposes of determining the percent VOC content of the process fluid that is contained in or contacts a piece of equipment, procedures that conform to the methods described in ASTM E169-63, 77, or 93, E168-67, 77, or 92, or E260-73, 91, or 96 (incorporated by reference as specified in 40 CFR 60.17) shall be used. [40 CFR 60.632]

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AREA000000001 (continued):

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Condition No.	Condition		
T-3	The permittee shall comply with the following: (a) Comply with the following exceptions to the provisions of subpart VV. (b)(1) Each pressure relief device in gas/vapor service may be monitored quarterly and within 5 days after each pressure release to detect leaks by the methods specified in 40 CFR 60.485(b) except as provided in 40 CFR 60.632(c), paragraph (b)(4), and 40 CFR 60.482-4 (a) through (c) of subpart VV. (2) If an instrument reading of 10,000 ppm or greater is measured, a leak is detected. (3)(i) When a leak is detected, it shall be repaired as soon as practicable, but no later than 15 calendar days after it is detected, except as provided in 40 CFR 60.482-9. (ii) A first attempt at repair shall be made no later than 5 calendar days after each leak is detected. (4)(i) Any pressure relief device that is located in a nonfractionating plant that is monitored only by nonplant personnel may be monitored after a pressure release the next time the monitoring personnel are on site, instead of within 5 days as specified in paragraph (b)(1) and 40 CFR 60.482-4(b)(1) of subpart VV. (ii) No pressure relief device described in paragraph (b)(4)(i) shall be allowed to operate for more than 30 days after a pressure release without monitoring. (c) Sampling connection systems are exempt from the requirements of 40 CFR 60.482-5. (d) Pumps in light liquid service, valves in gas/vapor and light liquid service, and pressure relief devices in gas/vapor service that are located at a nonfractionating plant that does not have the design capacity to process 283,200 standard cubic meters per day (scmd) (10 million standard cubic feet per day) or more of field gas are exempt from the routine monitoring requirements of 40 CFR 60.482-7(a), and paragraph (b)(1). (e) Reciprocating compressors in wet gas service are exempt from the compressor control requirements of 40 CFR 60.482-3. (f) Flares used to comply with this subpart shall comply with the requirements of 40 CFR 60.482-(a)(1) and 60.482-7(a), and paragraph (b)(1).		

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EQPT0000000021 (AA-114) Plant Surface Coating Operations:

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		Monitoring Requirements For the entire facility, the permittee shall determine for each coating, adhesive, solvent or other VOC or HAP containing material used: (a) The quantity used (gallons); (b) The percentage of VOCs by weight; (c) The percentage of each individual HAP and total HAP by weight; (d) The density (lbs/gal); The permittee may utilize data supplied by the manufacturer, or analysis of VOC and HAP content by EPA Test Method 24, 40 CFR 60, Appendix A and/or EPA Test Method 311, 40 CFR 63, Appendix A, and/or an alternate EPA approved test method. [11 Miss. Admin. Code Pt. 2, R.2.2.B(11).]

Record-Keeping Requirements:

Condition No.	Condition
R-1	Recordkeeping Requirements For the entire facility, the permittee shall maintain sufficient records to document: (a) The identification of each coating, adhesive, solvent or other VOC or HAP containing material and the total gallons of each coating, adhesive, solvent or other VOC or HAP containing material used on a monthly basis and in each consecutive 12-month period; (b) The VOC and HAP content(s) of each coating, adhesive, solvent or other VOC or HAP containing material used. A description of the method used to determine the VOC and HAP content shall accompany this data; (c) The density of each coating, adhesive, solvent or other VOC or HAP containing material used; (d) The total VOC emission rate, the emission rate of each individual HAP and the total HAP emission rate in tons/yr for each consecutive 12-month period. [11 Miss. Admin. Code Pt. 2, R.2.2.B(10).]
P 2	Recordkeening Requirements

R-2 Recordkeeping Requirements

The permittee shall maintain copies of all records and reports on site for at least five (5) years and shall make them available upon request by Mississippi Department of Environmental Quality (MDEQ) personnel. [11 Miss. Admin. Code Pt. 2, R.2.2.B(10).]

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GRPT0000000001 Fuel Burning Requirements:

Limitation Requirements:

Condition		
No.	Parameter	Condition
L-1		The permittee shall only use natural gas as fuel. [11 Miss. Admin. Code Pt. 2, R.2.2.B(10).]
L-2		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. 1.3.8.B.]
L-3		The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations greater than 10 million BTU per hour heat input 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. [11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).]
L-4		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).]
L-5		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. [11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a)]

Record-Keeping Requirements:

Fuel Combusted:

Condition No.	Condition
R-1	Fuel Combusted: For Emission Points AA-002, AA-003, and AA-004, the permittee shall maintain records of the amount of natural gas combusted during each calendar month. [40 CFR 60.48c(g)(2)]

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GRPT0000000001 (continued):

Condition No.	Condition
T-1	For Emission Points AA-002, AA-003, and AA-004, the permittee is subject to and shall comply with the applicable requirements of the New Source Performance Standards specified in 40 CFR Part 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) and in 40 CFR Part 60, Subpart A (General Provisions). [40 CFR 60.40c(a)]

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GRPT0000000002 NSPS Subpart A -- Control Devices:

Limitation Requirements:

Condition		
No.	Parameter	Condition
L-1		For Emission Points AA-005 and AA-006, flares shall be designed for and operated with no visible emissions as determined by the methods specified in 40 CFR 60.18(f), except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. [40 CFR 60.18(c)(1)]
L-2		For Emission Points AA-005 and AA-006, flares shall be operated with a flame present at all times, as determined by the methods specified in 40 CFR 60.18(f). [40 CFR 60.18(c)(2)]
L-3		For Emission Points AA-005 and AA-006, flares shall only be used with the net heating value of the gas being combusted being 11.2 MJ/scm (300 Btu/scf) or greater. The net heating value of the gas being combusted shall be determined by the methods specified in 40 CFR 60.18(f)(3). [40 CFR 60.18(c)(3)(ii)]
L-4		For Emission Points AA-005 and AA-006, air assisted flares shall be designed and operated with an exit velocity less than the velocity, Vmax, as determined by a 15-minute block average exit velocity. [40 CFR 60.18(c)(5)]
L-5		For Emission Points AA-005 and AA-006, flares used to comply with 40 CFR 60.18 shall be steam-assisted, air-assisted, or non-assisted. [40 CFR 60.18(c)(6)]
L-6		For Emission Points AA-005 and AA-006, operators of flares used to comply with the provisions of 40 CFR 60, Subpart A shall monitor these control devices to ensure that they are operated and mainted in conformance with their design. Applicable subparts will provide provisions stating how owners or operators of flare shall monitor these control devices. [40 CFR 60.18(d)]
L-7		For Emission Points AA-005 and AA-006, flares used to comply with the provisions of 40 CFR 60, Subpart A shall be operated at all times when emissions are vented to them. [40 CFR 60.18(e)]

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GRPT0000000002 (continued):

Limitation Requirements:

Condition	on	
No.	Parameter	Condition
L-8		For Emission Points AA-005 and AA-006, the permittee shall comply with the following conditions to determine the compliance of the flares:
		(1) Method 22 shall be used to determine visible emissions,
		(2) A thermocouple or any other equivalent device shall be used to monitor the presence of a pilot flame in the flare, (3) The net heating value of the gas being combusted in a flare shall be calculated using the equation in 40 CFR 60.18(f)(3). (4) The actual exit velocity of a flare shall be determined by dividing the volumetric flowrate (in units of standard temperature and pressure), as determined by Reference Methods 2, 2A, 3C, or 2D, as appropriate; by the unobstructed (free) cross sectional areas of the flare tip, (5) The maximum permitted velocity, Vmax, for air-assisted flares shall be determined by the equation in 40 CFR 60.18(f)(6). [40 CFR 60.18(f)]
Monit	oring Requirements:	
Condition	on	
No.	Parameter	Condition
M-1		For Emission Points AA-005 and AA-006, the permittee shall monitor and maintain daily records of the type, quantity, quality,

and heating values (BTU/scf) of fuel combusted. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]

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GRPT0000000003 Truck Loading:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		For Emission Points AA-008 and AA-010, at least 95% of loading operations shall take place while operating the thermal oxidizer for the combustion of VOC emissions (normal operation), and no more than 5% of loading operations shall take place without the operation of the thermal oxidizer, where VOC emissions are vented to the atmosphere. [11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)]

Record-Keeping Requirements:

Condition No.	Condition
R-1	For Emission Points AA-008 and AA-010, the permittee shall track each loadout operation and the operation of the thermal oxidizer and keep a spreadsheet of emissions to be summarized monthly and provided to the MDEQ in annual reports as specified in 11 Miss Admin. Code Pt. 2.R.6.2.E The Process Historial Database (PHD) in conjunction with the control room DCS will track the loading via run status indication for the thermal oxidizer: standby, running, or shutdown. The run status of the thermal oxidizer unit, coupled with existing condensate loading pump run indication, will provide indication that loading is taking place and if the thermal oxidizer is in operation. An appropriate VOC emissions rate per barrel of condensate loaded will be used both for normal and abnormal loading cases. For each load, the spreadsheet will determine the appliable case and calculate the emissions using the appropriate emissions rate and the total barrels of condensate loaded. This will result in a total VOC emissions estimate from condensate truck loading on a monthly basis.

Totalized VOC emissions will be calculated in the spreadsheet, summarized by month, with annual totals submitted in the report to the MDEQ. [11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11)]

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GRPT0000000005 RICE MACT Requirements:

Limitation Requirements:

Condition		
No.	Parameter	Condition
L-1		For Emission Points AA-007, AA-011, and AA-013, 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 ZZZZ and A). [40 CFR 63.6585]
L-2		For an emergency stationary CI RICE the permittee shall:
		(a) change oil and filter every 500 hours of operation or annually, whichever comes first,
		(b) inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and
		(c) inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. [40 CFR 63.6603(Table 2d)]
L-3		The permittee shall operate and maintain the emergency stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR 63.6625(e)]
L-4		The permittee shall install a non-resettable hour meter if one is not already installed. [40 CFR 63.6625(f)]
L-5		The permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to the subpart apply. [40 CFR 63.6625(h)]

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GRPT0000000005 (continued):

Limitation Requirements:

L-6

No. Parameter Condition	Condition			
	No.	Parameter	Condition	

The permittee shall operate the emergency stationary RICE in accordance with the following requirements:

- (a) There is no time limit on the use of the emergency stationary RICE in emergency situations
- (b) The emergency stationary RICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year.
- (c) The emergency stationary RICE may be operated up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that owners and operators may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by the conditions of this requirement, as long as the power provided by the financial arrangement is limited to emergency power.

Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in the conditions of this requirement, is prohibited. If the engine is not operated according to conditions (a)-(c) in this requirement, the engine will not be considered an emergency engine under the subpart and will need to meet all requirements for non-emergency engines. [40 CFR 63.6640(f)]

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GRPT0000000005 (continued):

Record-Keeping Requirements:

Condition	
No.	Condition
R-1	The permittee shall keep the following records:
	(a) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in §63.10(b)(2)(xiv),
	(b) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment,
	(c) Records of performance tests and performance evaluations as required in §63.10(b)(2)(viii),
	(d) Records of all required maintenance performed on the air pollution control and monitoring equipmen, t
	(e) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [40 CFR 63.6655(a)]
R-2	The permittee shall operate and maintain the emergency stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or develop and follow their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in manner consistent with good air pollution control practice for minimizing emissions. [40 CFR 63.6655(d)]
R-3	The permittee shall keep records of the maintenance conducted on the emergency stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to your the permittee's maintenance plan. [40 CFR 63.6655(e)]
R-4	The permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, the permittee shall keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response. [40 CFR 63.6655(f)]

Enterprise Gas Processing LLC, Pascagoula Gas Processing Plant Facility Requirements Permit Number:1280-00115 Activity ID No.: PER20160002

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GRPT0000000005 (continued):

Submittal/Action Requirements:

CFR 63.6650(c)]

Condition No.	Condition
S-1	The permittee shall report each instance in which the operating limit in Table 2d of the subpart was not met. These instances are deviations from the emission and operating limitations of the subpart. These deviations must be reported according to the requirements in 40 CFR 63.6550. [40 CFR 63.6640(b)]
S-2	The permittee shall submit an annual compliance report covering the annual reporting period from January 1 through December 31. The first compliance report shall be postmarked or delivered no later than January 31 following the end of the first calendar year after the compliance date, and each subsequent report shall be postmarked or delivered no later than January 31. [40 CFR 63.6650(a)]
S-3	The Compliance report shall contain the following information:
	(a) Company name and address.
	(b) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.
	(c) Date of report and beginning and ending dates of the reporting period.
	(d) If you had a malfunction during the reporting period, the compliance report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by the permittee during a malfunction of an affected source to minimize emissions in accordance with §63.6605(b), including actions taken to correct a malfunction.
	(e) The total operating time of the stationary RICE at which the deviation occurred during the reporting period.
	(f) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. [40]

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GRPT0000000005 (continued):

Condition No.	Condition
T-1	For Emission Point AA-011, the permittee shall comply with the National Emission Standard for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) by meeting the applicable requirements of 40 CFR 60, Subpart IIII, for compression ignition engines. No further requirements apply for such engines under this subpart. [40 CFR 63.6590(c)(1)]

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AI0000006557 Gas Processing Plant:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		Facility-Wide Emission Limitations
		The permittee shall limit volatile organic compound (VOC) emissions to no more than 99.9 tons/year (tpy) as determined for each consecutive 12-month period. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]
L-2		Facility-Wide Emission Limitations
		The permittee shall limit hazardous air pollutant (HAP) emissions to no more than 9.9 tons/year (tpy) of any single HAP and no more than 24.9 tpy of total combined HAP as determined for each consecutive 12-month period. [11 Miss. Admin. Code Pt. 2, R. 2.2B(10)]

Record-Keeping Requirements:

Condition No.	Condition
R-1	The permittee shall record all VOC and HAP emissions monthly, including all data used to determine monthly emissions. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]

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).]

Enterprise Gas Processing LLC, Pascagoula Gas Processing Plant Facility Requirements Permit Number:1280-00115 Activity ID No.: PER20160002

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AI000006557 (continued):

Submittal/Action Requirements:

Condition No.	Condition
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).]
S-3	The permittee shall record monthly emissions for each emission point and a submit a12-month rolling total to be included in the annual synthetic monor monitoring report. [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.]

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AI000006557 (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).]

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AI000006557 (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).]

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AI000006557 (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 emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act emitted 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 (if) 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).]

Enterprise Gas Processing LLC, Pascagoula Gas Processing Plant Facility Requirements Permit Number:1280-00115 Activity ID No.: PER20160002

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AI000006557 (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

- 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
- (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:
- (i) an emergency occurred and that the permittee can identify the cause(s) of the emergency; (ii) the permitted facility was at the time being properly operated; (iii) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and (iv) the permittee submitted notice of the emergency to MDEQ within two (2) working days of the time when emission
- 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.]

Enterprise Gas Processing LLC, Pascagoula Gas Processing Plant Facility Requirements Permit Number:1280-00115 Activity ID No.: PER20160002

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AI0000006557 (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.

GENERAL INFORMATION

Enterprise Gas Processing LLC, Pascagoula Gas Processing Plant
6800 Stennis Boulevard
Moss Point, MS
Jackson County

Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
6557	Enterprise Gas Processing, LLC	Official Site Name	3/29/2016	
2805900115	Enterprise Gas Processing, LLC, Pascagoula	Air-AIRS AFS	10/12/2000	
128000115	Amoco Production Company, Pascagoula Gas Plant	Air-State Operating	5/13/1998	
128000115	Amoco Production Company, Pascagoula Gas Plant	Air-Construction	5/13/1998	
128000115	Amoco Production Company, Pascagoula Gas Plant	Air-State Operating	11/3/1997	11/3/1997
128000115	Amoco Production Company, Pascagoula Gas Plant	Air-Construction	11/3/1997	
MSR001320	Amoco Production Company, Pascagoula Gas Plant	GP-Baseline	6/9/1998	11/3/2000
MS0057568	Amoco Production Company, Pascagoula Gas Plant	Water - NPDES	11/19/2001	2/4/2002
6557	Amoco Production Company	Historic Site Name	11/3/1997	12/31/2001
MS0057568	BP America Production Company, Pascagoula Gas Processing Plant	Water - NPDES	2/5/2002	10/2/2006
MSG130021	Amoco Production Company, Pascagoula Gas Plant	GP-Hydrostatic Testing	5/1/2002	12/17/2002
MSR001320	Amoco Production Company, Pascagoula Gas Plant	GP-Baseline	11/3/2000	3/26/2003
MSG130056	BP America Production Company, Pascagoula Gas Processing Plant	GP-Hydrostatic Testing	3/14/2003	11/2/2006
128000115	BP America Production Company, Pascagoula Gas Processing Plant	Air-Synthetic Minor Operating	5/19/2004	1/22/2009
MS0057568	BP America Production Company, Pascagoula Gas Processing Plant	Water - NPDES	10/2/2006	9/30/2011
128000115	BP America Production Company, Pascagoula Gas Processing Plant	Air-Synthetic Minor Operating	1/22/2009	12/31/2013
WQC1997194	Amoco Production Company, Proposed Placement of Fill in Wetlands	WQC Number	12/18/1997	
MS9703963F	Amoco Production Company, Proposed Placement of Fill in Wetlands	COE Public Notice/ Permit Number	11/14/1997	12/16/1997
MSS061719	BP America Production Company, Pascagoula Gas Processing Plant	Water - NPDES	12/19/2011	3/31/2016
128000115	BP America Production Company, Pascagoula Gas Processing Plant	Air-Synthetic Minor Operating	2/18/2014	3/31/2016
6557	BP America Production Company	Historic Site Name	12/31/2001	3/29/2016
MSS061719	Enterprise Gas Processing LLC, Pascagoula Gas Processing Plant	Water - NPDES	3/31/2016	11/30/2016
128000115	Enterprise Gas Processing LLC, Pascagoula Gas Processing Plant	Air-Synthetic Minor Operating	3/31/2016	1/31/2019

GENERAL INFORMATION

Basin: Coastal Streams Basin

Location Description: PG- Plant Entrance (General). Data collected by Diane Gledhill on 11/28/2005. Elevation 88.7 feet. *Accuracy 24.6'.