



State of Mississippi

AIR POLLUTION CONTROL PERMIT

Permit To Construct Air Emissions Equipment



THIS CERTIFIES

Plains Pipeline LP, Liberty Truck and Storage Facility

4638 MS Highway 24 and 48

Liberty, MS

Amite County

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

Mississippi Environmental Quality Permit Board

Mississippi Department of Environmental Quality

Issued/Modified: JUL 25 2016

Expires:

Permit No. 0080-00004

Agency Interest # 4225

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Permit To Construct Air Emissions Equipment

Plains Pipeline LP, Liberty Truck and Storage Facility

Subject Item Inventory

Permit Number: 0080-00004

Activity ID No.: PER20150001

Subject Item Inventory:

ID	Designation	Description
AI4225		
AREA1	AA-001	12.6 million gallon vertical external floating roof tank for crude oil/condensate storage ("Tank 554")
AREA2	AA-002	12.6 million gallon vertical external floating roof tank for crude oil/condensate storage ("Tank 555")
AREA3	AA-003	12.6 million gallon vertical external floating roof tank for crude oil/condensate storage ("Tank 556")
AREA4	AB-001	18,480 gallon vertical fixed roof tank for crude oil/condensate storage ("Tank 1002")
AREA5	AB-002	18,480 gallon vertical fixed roof tank for crude oil/condensate storage ("Tank 1005")
AREA6	AB-003	19,740 gallon vertical fixed roof tank used for crude oil/condensate storage ("Tank 91955")
AREA7	AB-004	19,740 gallon vertical fixed roof tank used for crude oil/condensate storage ("Tank 91956")
AREA8	AB-005	19,740 gallon vertical fixed roof tank used for crude oil/condensate storage ("Tank 91972")
AREA9	AC-001	1,000 gallon horizontal fixed roof sump tank for non-pressurized discharge collection ("Sump 1")
AREA10	AC-002	1,000 gallon horizontal fixed roof sump tank for non-pressurized discharge collection ("Sump 2")
AREA11	AD-001	Facility-wide fugitive emissions

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Subject Item Inventory

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Subject Item Groups:

ID	Description	Components
GRPT1	Floating Roof Tanks	AREA1 12.6 million gallon vertical external floating roof tank for crude oil/condensate storage ("Tank 554")
		AREA2 12.6 million gallon vertical external floating roof tank for crude oil/condensate storage ("Tank 555")
		AREA3 12.6 million gallon vertical external floating roof tank for crude oil/condensate storage ("Tank 556")
GRPT2	Fixed Roof Tanks	AREA4 18,480 gallon vertical fixed roof tank for crude oil/condensate storage ("Tank 1002")
		AREA5 18,480 gallon vertical fixed roof tank for crude oil/condensate storage ("Tank 1005")
		AREA6 19,740 gallon vertical fixed roof tank used for crude oil/condensate storage ("Tank 91955")
		AREA7 19,740 gallon vertical fixed roof tank used for crude oil/condensate storage ("Tank 91956")
		AREA8 19,740 gallon vertical fixed roof tank used for crude oil/condensate storage ("Tank 91972")

KEY

ACT = Activity

AREA = Area

CONT = Control Device

IA = Insignificant Activity

MAFO = Animal Feeding Operation

RPNT = Release Point

WDPT = Withdrawal Point

AI = Agency Interest

CAFO = Concentrated Animal Feeding Operation

EQPT = Equipment

IMPD = Impoundment

PCS = PCS

TRMT = Treatment

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Limitation Requirements:

Condition No.	Parameter	Condition
L-1		For the entire facility, the permittee shall limit the emissions of Volatile Organic Compounds (VOCs) to 95.0 tons per year on a 12 month rolling average. [11 Miss. Admin. Code Pt. 2, R. 2.2.B.10.]

Submittal/Action Requirements:

Condition No.	Condition
S-1	General Condition: The permittee shall submit certification of construction: Due within thirty (30) days of completion of construction or installation of an approved stationary source or prior to startup, whichever is earlier. The notification shall certify that construction or installation was performed in accordance with the approved plans and specifications. In the event there is any change in construction from the previously approved plans and specifications or permit, the permittee shall promptly notify MDEQ in writing. If MDEQ determines the changes are substantial, MDEQ may require the submission of a new application to construct with "as built" plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an "as built" application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law. [11 Miss. Admin. Code Pt. 2, R. 2.5.D.]
S-2	Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun. [11 Miss. Admin. Code Pt. 2, R. 2.5.C (2).]
S-3	The permittee must notify DEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more. [11 Miss. Admin. Code Pt. 2, R. 2.5.C(4).]
S-4	For the entire facility, the permittee shall submit an annual report showing that the facility is in compliance with Condition L-1 of this section. The facility shall keep monthly records, which include the throughput of crude oil through each tank, the number and duration of all tank landing events, and the amount of VOCs emitted facility-wide (including the VOC emissions generated during tank landings). These records shall be available on site for inspection at the request of the MDEQ. The annual report shall be submitted no later than the 31st of January for the preceding calendar year. [11 Miss. Admin. Code Pt. 2, R. 2.2.B.11.]

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Narrative Requirements:

General Condition:

Condition No.	Condition
T-1	General Condition: The stationary source shall be designed and constructed so as to operate without causing a violation of any Applicable Rules and Regulations or this permit, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards, and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries. [11 Miss. Admin.Code Pt. 2, R.2.5.A.]
T-2	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49_17_29 1.b]
T-3	General Condition: The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits. [Miss. Code Ann. 49_17_29]
T-4	General Condition: The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed except as provided for in Regulation 11 Miss. Admin. Code Pt.2, R. 1.10 "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. [11 Miss. Admin. Code Pt. 2, R. 1.10]
T-5	General Condition: The permittee shall allow the Mississippi Environmental Quality Commission, the Mississippi Environmental Quality Permit Board, MDEQ staff and/or their authorized representatives, upon the presentation of credentials: a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring equipment or monitoring method required in this permit, and to sample any air emission. [Miss. Code Ann. 49_17_21]
T-6	General Condition: After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for good cause shown including, but not limited to, the following: a. Persistent violation of any terms or conditions of this permit; b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or c. A change in any condition that requires either a temporary or permanent reduction or elimination of previously authorized air emissions. [11 Miss. Admin.Code Pt. 2, R.2.2.C.]

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Narrative Requirements:

Condition No.	Condition
T-7	General Condition: Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control. [Miss. Code Ann. 49_17_39]
Condition No.	Condition
T-8	General Condition: This permit is for air pollution control purposes only. [11 Miss. Admin.Code Pt. 2, R.2.1.D.]
T-9	General Condition: The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for operating without a valid permit pursuant to State Law. [11 Miss. Admin.Code Pt. 2, R.2.2.B(5).]
T-10	General Condition: It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits. [11 Miss. Admin.Code Pt. 2, R.2.1.D(6).]
T-11	General Condition: The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities. [11 Miss. Admin.Code Pt. 2, R.2.1.D(7).]
T-12	General Condition: It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit, unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(a).]
T-13	General Condition: The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(b).]
T-14	General Condition: The permit does not convey any property rights of any sort, or any exclusive privilege. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(c).]

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Narrative Requirements:

Condition No.	Condition
T-15	General Condition: The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15) (d).]
T-16	General Condition: This permit shall not be transferred except upon approval of the Permit Board. [11 Miss. Admin.Code Pt. 2, R.2.16.B.]
T-17	General Condition: The provisions of this permit are severable. If any provision of the permit, or the application of any provision of the permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. [11 Miss. Admin.Code Pt. 2, R.1.1.D(7).]
T-18	General Condition: The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance or if construction is suspended for eighteen (18) months or more. [11 Miss. Admin.Code Pt. 2, R.2.5.C(1).]
T-19	General Condition: A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee. [11 Miss. Admin.Code Pt. 2, R.2.5.D(3).]
T-20	General Condition: Except as prohibited in 11 Miss. Admin. Code Pt. 2,R. 2.5.D(7) after certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by 11 Miss. Admin. Code Pt. 2, R. 2.13.G. [11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).]
T-21	General Condition: Except as otherwise specified in 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7), the application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing. [11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).]

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Narrative Requirements:

Condition No.	Condition
T-22	General Condition: Except as otherwise specified in 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7), upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate. [11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).]
T-23	General Condition: For moderate modifications that require contemporaneous enforceable emissions reductions from more than one emission point in order to net out of PSD/NSR, the applicable Title V Permit to Operate or State Permit to Operate must be modified prior to beginning operation of the modified facilities. [11 Miss. Admin.Code Pt. 2, R.2.5.D(7).]
T-24	General Condition: Regarding compliance testing: (a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time. (b) Compliance testing will be performed at the expense of the permittee. (c) Each emission sampling and analysis report shall include but not be limited to the following: 1. detailed description of testing procedures; 2. sample calculation(s); 3. results; and 4. comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit. [11 Miss. Admin.Code Pt. 2, R.2.6.B(3),(4)&(6).]
T-25	General Condition: The construction of the stationary source shall be performed in such a manner so as to reduce fugitive dust emissions from construction activities to a minimum. [11 Miss. Admin.Code Pt. 2, R.2.5.A(4).]

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GRPT0000000001 (AE-001) Floating Roof Tanks:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		For Emission Points AA-001, AA-002, and AA-003, the permittee shall limit the throughput of crude oil/condensate through all three tanks to no more than 18,396 million gallons per year. [11 Miss. Admin. Code Pt. 2, R. 2.2.B.10.]

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		For Emission Points AA-001, AA-002, and AA-003, the permittee shall conduct the testing and procedures outlined in 40 CFR 60.113b(b)(1-6) for each constructed external floating roof tank. [40 CFR 60.113b(b)(1-6)]
M-2		For Emission Points AA-001, AA-002, and AA-003, in order to demonstrate compliance with Condition L-1 of this section, the permittee shall continuously monitor and record the throughput amount of crude oil/condensate through each tank. [11 Miss. Admin. Code Pt. 2, R. 2.2.B.11.]
M-3		For Emission Points AA-001, AA-002, and AA-003, the permittee shall record the number of tank landing events for each tank and the duration of each event. [11 Miss. Admin. Code Pt. 2, R. 2.2.B.11.]

Record-Keeping Requirements:

Condition No.	Condition
R-1	For Emission Points AA-001, AA-002, and AA-003, upon completion of construction, the permittee shall complete the reporting and record-keeping requirements outlined in 40 CFR 60.115b(b)(1-4) for each external floating roof tank. [40 CFR 60.115b(b)(1-4)]
R-2	For Emission Points AA-001, AA-002, and AA-003, the permittee shall maintain records of the throughput amount of crude oil/condensate through each tank. These records shall remain on-site for at least five (5) years and shall be kept readily available upon request by the Department. [11 Miss. Admin. Code Pt. 2, R. 2.2.B.11.]

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GRPT0000000001 (AE-001) Floating Roof Tanks:

Record-Keeping Requirements:

Condition No.	Condition
R-3	The permittee shall develop a detailed report of all applicable requirements of 40 CFR Part 60, Subpart Kb including limitations, notifications, monitoring, testing, reporting, and record-keeping no later than thirty (30) days from the certification of construction date. This applicability report shall be attached to the permittee's copy of the permit and kept on-site and made available to MDEQ representatives during an inspection of the facility. [11 Miss. Admin. Code Pt. 2, R. 2.2.B.11.]

Submittal/Action Requirements:

Condition No.	Condition
S-1	The permittee shall submit a copy of the applicability report specified in Condition R-3 of this section no later than thirty (30) days from the certification of construction date. [11 Miss. Admin. Code Pt. 2, R. 2.2.B.11.]

Narrative Requirements:

Condition No.	Condition
T-1	Emission Points AA-001, AA-002, and AA-003 are affected by and shall comply with New Source Performance Standards (NSPS), 40 CFR 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 and Subpart A - General Provisions. [40 CFR 60.1, 40 CFR 60.110b]
T-2	For Emission Points AA-001, AA-002, and AA-003, the permittee shall insure that the proposed external floating roof tanks are constructed and operated in accordance with the specifications outlined in 40 CFR Part 60.112b(a)(2)(i-iii). [40 CFR 60.112b(a)(2)(i-iii).]

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GRPT0000000002 (AE-002) Fixed Roof Tanks:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		For Emission Points AB-001, AB-002, AB-003, AB-004, and AB-005, the permittee shall limit the throughput of crude oil/condensate through all five tanks to no more than 45.99 million gallons per year. [11 Miss. Admin. Code Pt. 2, R. 2.2.B.10.]

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		For Emission Points AB-001, AB-002, AB-003, AB-004, and AB-005, in order to demonstrate compliance with Conditions L-1 of this section, the permittee shall continuously monitor and record the throughput amount of crude oil/condensate through each tank. [11 Miss. Admin. Code Pt. 2, R. 2.2.B.11.]

Record-Keeping Requirements:

Condition No.	Condition
R-1	For Emission Points AB-001, AB-002, AB-003, AB-004, and AB-005, the permittee shall maintain records of the throughput amount of crude oil/condensate through each tank. These records shall remain on-site for at least five (5) years and shall be kept readily available upon request by the Department. [11 Miss. Admin. Code Pt. 2, R. 2.2.B.11.]

GENERAL INFORMATION

Plains Pipeline LP, Liberty Truck and Storage Facility
4638 MS Highway 24 and 48
Liberty, MS
Amite County

Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
4225	Plains Pipeline, LP, Liberty Truck and Storage Facility	Official Site Name	11/16/2015	
2800500004	Plains Pipeline LP, Liberty Truck and Storage Facility	Air-AIRS AFS (MDEQ USE ONLY)	10/12/2000	
008000004	Eott Energy Pipeline LP	Air-State Operating	08/11/1987	08/01/1990
4225	Eott Energy Pipeline LP	Historic Site Name	08/11/1987	04/01/2004
4225	Plains Pipeline, LP, Liberty Station	Historic Site Name	04/01/2004	11/16/2015
008000004	Plains Pipeline LP, Liberty Truck and Storage Facility	Air-Construction	07/25/2016	

Basin: South Independent Streams Basin

Location Description: Imported from I-sys