

**STATE OF MISSISSIPPI
AND FEDERALLY ENFORCEABLE
AIR POLLUTION CONTROL
PERMIT**

**TO OPERATE AIR EMISSIONS EQUIPMENT AT A
SYNTHETIC MINOR SOURCE**

THIS CERTIFIES THAT

American Midstream Mississippi, LLC
Bazor Ridge Booster Station
595 Ceaman Pittman Road
Waynesboro, Mississippi
Wayne 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. seq., 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



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: JUL 26 2018

Permit No.: 2840-00034

Expires: JUN 30 2023

Section 1.

A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
2. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.4.D.)
3. Any activities not identified in the application are not authorized by this permit. (Ref.: Miss. Code Ann. 49-17-29 1.b)
4. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
5. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
6. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)
7. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)
8. 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.

(Ref.: Miss. Code Ann. 49-17-21)

9. 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. (Ref.: Miss. Code Ann. 49-17-39)
10. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
11. 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. 2.1.D(7).)
12. This permit does not authorize a modification as defined in Regulation 11 Miss. Admin. Code Pt. 2, Ch.2., "Permit Regulations for the Construction and/or Operation of Air Emission Equipment." A modification may require a Permit to Construct and a modification of this permit. Modification is defined as "Any 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 40CFR 51.66;
- 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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.C(15).)

B. GENERAL OPERATIONAL CONDITIONS

- 1. 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 Regulation, 11 Miss. Admin. Code Pt. 2, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.10.)
- 2. 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." (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)
- 3. 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. (Ref.: Miss. Code Ann. 49-17-29 1.a(i and ii))
- 4. Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.

a. Upsets

- (1) For an upset defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:

- i. An upset occurred and that the source can identify the cause(s) of the upset;

- ii. The source was at the time being properly operated;
 - iii. During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
 - iv. That within 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
 - v. That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
- (2) In any enforcement proceeding by the Commission, the source 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.
 - (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- b. Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
 - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).
 - (3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

5. Compliance Testing: 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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B(3), (4), and (6).)

C. PERMIT RENEWAL / MODIFICATION / TRANSFER / TERMINATION

1. 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. If the applicant submits a timely and complete application pursuant to this paragraph and the Permit Board, through no fault of the applicant, fails to act on the application on or before the expiration date of the existing permit, the applicant shall continue to operate the stationary source under the terms and conditions of the expired permit, which shall remain in effect until final action on the application is taken by the Permit Board. Permit expiration terminates the source's ability to operate unless a timely and complete renewal application has been submitted. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.8.)
2. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).)
3. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).)

4. 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. 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 federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.C.)
5. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B.)

**SECTION 2
 EMISSION POINT DESCRIPTION**

The permittee is authorized to operate air emissions equipment, as described in the following table.

Emission Point	Description
AA-001	800 Horsepower (HP) Waukesha four stroke rich burn (4SRB) spark ignition (SI) natural gas-fired non-emergency remote overhead gas compressor engine equipped with a non-selective catalytic reduction (NSCR) catalytic convertor
AA-004	1,478 HP Waukesha Inlet Gas Compressor 4SRB SI natural gas-fired non-emergency remote engine equipped with a NSCR catalytic convertor
AA-012	1,478 HP Waukesha 4SRB SI natural gas-fired non-emergency remote electrical power generator engine equipped with a NSCR catalytic convertor
AA-014	1,478 HP Waukesha 4SRB SI natural gas-fired non-emergency remote electrical power generator engine equipped with a NSCR catalytic convertor
AA-028	Plant Flare equipped a with 0.2 MMBTU/hr natural gas fired pilot. The plant flare is used to control hydrogen sulfide and volatile organic compound emissions resulting from plant emergencies, upsets, emissions from the loading of process generated water into trucks, compressor scrubber dumps, and relief valve vents.
AA-033	800 HP White Superior 4SRB SI natural gas-fired non-emergency remote inlet compressor engine equipped with a NSCR catalytic convertor
AA-034	Plant Wide Equipment Leaks
AA-035	1,340 HP Caterpillar four stroke lean burn (4SLB) SI natural gas-fired non-emergency compressor engine equipped with an oxidation catalyst
AA-036	Produced water / slop oil tank No. 1
AA-037	Produced water / slop oil tank No. 2

**SECTION 3
EMISSION LIMITATIONS AND STANDARDS**

Permit(s)	Applicable Requirement	Condition Number(s)	Pollutant Parameter	Limit/Standard
Facility-wide	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity	Facility-wide opacity limitations
		3.2	CO	99.0 tpy
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.3	NOX	
		3.4	VOC	
		3.5	HAP	9.0 tpy for any individual HAP and 24.0 tpy for total, combined HAP
AA-001, AA-028, AA-033, and AA-035	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a)	3.6	PM	0.6 lb/MMBTU
AA-004, AA-012, and AA-014	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b)	3.7	PM	$E=0.8808 \cdot 1^{-0.1667}$
AA-001	Federally Enforceable Permit to Construct Issued January 21, 2000 and modified September 25, 2000	3.8	NOx	1.63 lbs/hr and 7.14 TPY
			CO	1.63 lbs/hr and 7.14 TPY
			VOC	0.81 lbs./hr and 3.56 TPY
AA-004, AA-012, and AA-014	Federally Enforceable Permit to Construct Issued January 21, 2000 and modified September 25, 2000	3.9	NOx	3.26 lbs/hr and 14.28 TPY (per emission point);
			CO	3.26 lbs/hr and 14.28 TPY (per emission point);
			VOC	1.63 lbs./hr and 7.14 TPY (per emission point)
AA-001, AA-004, AA-012, AA-014, AA-033, and AA-035	NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ 40 CFR Part 63.6580, 40 CFR Part 63.6585(a) and (c), 40 CFR Part 63.6590(a)(1)(iii), 40 CFR Part 63.6590(c)(1), and 40 CFR Part 63.6675	3.10	HAP	Applicability
AA-001, AA-004, AA-012, AA-014, and AA-033	40 CFR Part 63.6595(a)(1), 40 CFR Part 63.6603(a), 40 CFR Part 63.6625(j), and Item 11 and Footnote 1 of Table 2d to Subpart ZZZZ	3.12	HAP	Work Practice Standards
	40 CFR Part 63.6625(h)	3.13		Minimizing Emissions during Startup
	40 CFR Part 63.6605(a) and (b)	3.14		Minimizing Emissions
AA-028	11 Miss. Admin. Code Pt. 2, R. 1.4.B(2)	3.15	Temperature	≥ than 1600 degrees F for period not

Emision Point(s)	Applicable Requirement	Condition Number(s)	Pollutant Parameter	Limit/Standard
			Restriction	less than 0.5 seconds
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).		SO ₂	Ground level concentration in continuous compliance with National Ambient Air Quality Standards.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.16	Visible Emissions	No visible emissions, except for periods not to exceed 5 minutes during any 2 consecutive hours
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.17	Operating Restriction	Must be operated at all times when receiving gas emissions
AA-033	Federally Enforceable Permit to Construct Issued December 8, 2004	3.18	NOx	3.52 lbs/hr and 15.42 TPY
			CO	5.28 lbs/hr and 23.13 TPY
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.19	NOx	4.43 lbs/hr and 19.41 TPY
			CO	5.58 lbs/hr and 24.46 TPY
AA-035	NSPS for Stationary Spark Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart JJJJ	3.20	HAP	Applicability only, not affected by the requirements of this Subpart
	40 CFR Part 60.4230(a)(4)(i)			
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.21	Operating Restriction	< 1,350 HP

- 3.1 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. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.A.)
- 3.2 For the entire facility, the permittee shall limit the emissions of carbon monoxide (CO) to no more than 99.0 tons per year for each consecutive 12-month period on a rolling basis. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 3.3 For the entire facility, the permittee shall limit the emissions of nitrogen oxides (NOx) to no more than 99.0 tons per year for each consecutive 12-month period on a rolling basis. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 3.4 For the entire facility, the permittee shall limit the emissions of volatile organic compounds (VOC) to no more than 99.0 tons per year for each consecutive 12-month period on a rolling basis. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 3.5 For the facility, the permittee shall limit the emissions of any individual hazardous air pollutant (HAP) to no more than 9.0 tpy for each consecutive 12-month period on a rolling basis. The permittee shall limit the emissions of all combined HAPs to no more than 24.0 tpy for each consecutive 12-month period on a rolling basis. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

- 3.6 For Emission Point AA-001, AA-028, AA-033, and AA-035, the maximum permissible emission of ash/or particulate matter from a fossil fuel burning installation 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))
- 3.7 For Emission Points AA-004, AA-012, and AA-014, the permittee shall not have particulate emissions from fossil fuel burning installations of greater than 10 MMBTU/hr heat input that exceeds the 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))

- 3.8 For Emission Point AA-001, the permittee shall restrict emissions of Nitrogen Oxides (NO_x) to 1.63 pounds per hour and 7.14 tons per year, emissions of Carbon Monoxide (CO) to 1.63 pounds per hour and 7.14 tons per year emissions, and emissions of Volatile Organic Compounds (VOC) to 0.81 pounds per hour and 3.56 tons per year. (Ref.: Federally Enforceable Permit to Construct Issued January 21, 2000 and modified September 25, 2000)
- 3.9 For Emission Points AA-004, AA-012, and AA-014, the permittee shall restrict emissions from each emission source to 3.26 pounds per hour and 14.28 tons per year of Nitrogen Oxides (NO_x) emissions, 3.26 pounds per hour and 14.28 tons per year of Carbon Monoxide (CO) emissions, and 1.63 pounds per hour and 7.14 tons per year of Volatile Organic Compounds (VOC) emissions. (Ref.: Federally Enforceable Permit to Construct Issued January 21, 2000 and modified September 25, 2000)
- 3.10 Emission Points AA-001, AA-004, AA-012, AA-014, AA-033, and AA-035 are subject to the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ.

Emission Points AA-001, AA-004, AA-012, AA-014, and AA-033 are existing spark ignition 4 stroke rich burn (4SRB) non-emergency remote stationary RICE with a site rating of more than 500 brake HP located at an area source of HAP emissions.

Emission Point AA-035 is a new, spark ignition, 4-stroke lean-burn, non-emergency stationary RICE with a site rating of more than 500 brake HP located at an area source of HAP emissions. As such, the engine must meet the requirements of 40 CFR part 63, Subpart ZZZZ by meeting the requirements of 40 CFR part 60 subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under 40 CFR Part 63, Subpart ZZZZ or the General Provisions in Subpart A. (Ref.: 40 CFR Part 63.6580, 63.6585(a) and (c), 63.6590(a)(1)(iii), 63.6590(c)(1), and 63.6675)