

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

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

THIS CERTIFIES THAT

Enterprise Gas Processing, LLC, Pascagoula Gas Processing Plant
6800 Stennis Boulevard
Moss Point, Mississippi
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. 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: FEB 11 2019

Permit No.: 1280-00115

Effective Date: As specified herein.

Expires: JAN 31 2024

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
Fuel Burning Equipment	
AA-002	12 MMBTU/hr Natural Gas-Fired Train A/B Regeneration Gas Heater (H-2241). Subject to NSPS Dc
AA-003	35.2 MMBTU/hr Natural Gas-Fired Hot Oil Heater Train A (H-8211). Subject to NSPS Dc
AA-004	35.2 MMBTU/hr Natural Gas-Fired Hot Oil Heater Train B (H-8214). Subject to NSPS Dc
AA-005	32.78 MMBTU/hr Low Flow Flare (N-5020) used to control emissions from process vents, maintenance, startup/shutdown, and emergencies.
AA-006	16.5 MMBTU/hr High Flow Flare (N-5011) used for emergencies only.
AA-007	1170 hp Diesel (Compression Ignition) Emergency Generator (G-7001) manufactured in 1998. Subpart to MACT ZZZZ
AA-008	Truck Loading (TL-1) equipped with a Vapor Combustion Unit (VCU) to control 98% of emissions. Hose disconnects are uncontrolled.
AA-009	13.25 MMBTU/hr Natural Gas-Fired Train C Regeneration Gas Heater (H-2341). Subject to NSPS Dc
AA-013	133 hp Diesel (Compression Ignition) Emergency Fire Water Pump Engine manufactured in 1998. Subject to MACT ZZZZ
AA-014	13.15 MMBTU/hr Natural Gas-Fired Stabilizer Hot Oil Heater (H-1035B). Subject to NSPS Dc.
AA-015	20.18 MMBTU/hr Natural Gas Stabilizer Hot Oil Heater (H-1235B). Subject to NSPS Dc
Miscellaneous	
AA-012	Plant Wide Fugitives – Subject to NSPS KKK
AA-012A	New Stabilizer Unit Overhead Reciprocating Compressor (C-1221) – Subject to NSPS OOOOa
AA-012B	New Stabilizer Unit Overhead Reciprocating Compressor (C-1222) – Subject to NSPS OOOOa
AA-112	Residue Compressor, blowdown to atmosphere prior to starting compressors up.
AA-113	Condensate Filter Change
AA-114	Plant Surface Coating Operations
Storage Tanks	
AA-101	210,000 gallon Fixed Roof Condensate Storage Tank (T-1051)

Emission Point	Description
AA-102	12,600 gallon Fixed Roof Wastewater Storage Tank (T-5402)
AA-103	2,000 galloon Fixed Roof Methanol Storage Tank (T-7706)
AA-104	210,000 gallon Fixed Roof Condensate Storage Tank (T-1151)
AA-105	550 gallon Gasoline Storage Tote
AA-106	550 gallon Gasoline Storage Tote
AA-107	550 gallon Diesel Storage Tote
AA-108	125 gallon Diesel Storage Tank for Emergency Fire Water Pump
AA-109	1,000 gallon Fixed Roof Condensate Bottoms Storage Tank (T-5403)
AA-110	525 gallon Diesel Storage Tank for Emergency Generator

SECTION 3 EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.1	VOC	99.9 tons/year
		3.2	Individual HAP	9.9 tons/year
			Total HAP	24.9 tons/year
	11 Miss. Admin. Code Pt. 2, R. 1.3.A. and B.	3.3	Opacity	< 40%
AA-002 AA-003 AA-004 AA-009 AA-014 AA-015	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.4	Fuel	Natural Gas Only
AA-002 AA-003 AA-004 AA-009 AA-014 AA-015	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.5	SO ₂	4.8 lb/MMBTU
AA-002 AA-003 AA-004 AA-005 AA-006 AA-009 AA-014 AA-015	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.6	PM (filterable only)	$E = 0.8808 * I^{-0.1667}$
AA-002 AA-003 AA-004 AA-009 AA-014 AA-015	40 CFR 60, Subpart Dc – Standards of Performance for Industrial, Commercial, and Institutional Steam Generating Units 40 CFR 60.40c(a)	3.7	PM/SO ₂	Applicability
AA-008	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.8	VOC/HAP	< 29,200 bbls/yr without the operation of the VCU
AA-007 AA-013	40 CFR 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants: Reciprocating Internal Combustion Engines (RICE) 40 CFR 63.6585(c) and 63.6590(a)(1)(iii)	3.9	HAP	Applicability

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
AA-007 AA-013	40 CFR 63.6603(a) and 63.6625(i) and Item 4 of Table 2d, Subpart ZZZZ	3.10	Work Practice Standards	Maintenance Requirement
	40 CFR 63.6604(b), Subpart ZZZZ	3.11	Fuel	Shall use Diesel fuel that meets the requirements in 40 CFR 80.150(b) for non-road diesel.
	40 CFR 63.6605, Subpart ZZZZ	3.12	General Requirements	Compliance at all times
			Good Air Pollution Control Practices	Operate and maintain the engines in a manner consistent with safety and good air pollution control practices for minimizing emissions.
	40 CFR 63.6625(e)(3), Subpart ZZZZ	3.13	General Requirements	Operate according to manufacturer's emission-related written instructions or develop maintenance plan
	40 CFR 63.6625(f), Subpart ZZZZ	3.14	Hours of Operation	Install a non-resettable hour meter
	40 CFR 63.6640(f)(1), (2), and (4), Subpart ZZZZ	3.15	Operating Time	No limit on use during emergency situations. May operate for 100 hours per year for Maintenance and Readiness Testing
AA-012	40 CFR 60, Subpart KKK – Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants 40 CFR 60.630(a) and (e)	3.16	VOC	Applicability
AA-012	40 CFR 60.632(a), (b), (d), and (e), Subpart KKK	3.17	VOC	Comply with 40 CFR 60.482-1(a), (b), and (d) and 60.482-2 through 60.482-10, Subpart VV or comply with 40 CFR 60.483-1 and 60.483-2, Subpart VV
				Comply with 40 CFR 60.485, 60.486, and 60.487, Subpart VV
	40 CFR 60.633, Subpart KKK	3.18		Exceptions
AA-005 AA-006	40 CFR 60.18(c)(1), Subpart A	3.19	VOC/HAP	No Visible Emissions
	40 CFR 60.18(c)(2), Subpart A			Flame present at all times
	40 CFR 60.18(c)(3)(ii), Subpart A			Net heating value of gas greater than 300 BTU/scf
	40 CFR 60.18(c)(5), Subpart A			Exit velocity less than velocity, V_{max}

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
AA-005 AA-006	40 CFR 60.18(c)(6), Subpart A			Steam-assisted, air-assisted, or non-assisted
	40 CFR 60.18(e), Subpart A			Operated at all times when emissions may be vented to them
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.20		Operate in accordance with manufacture's specifications.
AA-012	40 CFR 60.482-1(a), (b), and (d), Subpart VV	3.21	VOC	Standards: General
	40 CFR 60.482-2, Subpart VV	3.22		Standards: Pumps in light liquid service
	40 CFR 60.482-3, Subpart VV	3.23		Standards: Compressors
	40 CFR 60.482-4, Subpart VV	3.24		Standards: Pressure relief devices in gas/vapor service
	40 CFR 60.482-5, Subpart VV	3.25		Standards: Sampling connection systems
	40 CFR 60.482-6, Subpart VV	3.26		Standards: Open-ended valves or lines
	40 CFR 60.482-7, Subpart VV	3.27		Standards: Valves in gas/vapor service and in light liquid service
	40 CFR 60.482-8, Subpart VV	3.28		Standards: Pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service and connectors
	40 CFR 60.482-9, Subpart VV	3.29		Standards: Delay of repair
	40 CFR 60.482-10(d), Subpart VV	3.30		Standards: Closed vent systems and control devices
	40 CFR 60.483-1, Subpart VV	3.31		Alternative standards for valves – allowable percentage of valves leaking
	40 CFR 60.483-2, Subpart VV	3.32		Alternative standards for valves – skip period leak detection and repair
AA-012A AA-012B	40 CFR 60, Subpart OOOOa – Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015	3.33	GHG/VOC	Applicability
	40 CFR 60.5365a(c)			
	40 CFR 60.5370a(a), Subpart OOOOa	3.34		Compliance upon Startup

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
AA-012A AA-012B	40 CFR 60.5370a(b), Subpart OOOOa	3.35	GHG/VOC	Good Air Pollution Control Practices
	40 CFR 60.5385a, Subpart OOOOa	3.36		GHG and VOC Standards
	40 CFR 60.5411a(a), Subpart OOOOa	3.37		Closed Vent System Requirements
	40 CFR 60.5411a(d), Subpart OOOOa	3.38		

- 3.1 For the Entire Facility, the permittee shall limit volatile organic compound (VOC) emissions to no more than 99.9 tons/year as determined for each consecutive 12-month period.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

- 3.2 For the Entire Facility, the permittee shall limit hazardous air pollutant (HAP) emissions to no more than 9.9 tons/year of any single HAP and no more than 24.9 tons/year of total combined HAP as determined for each consecutive 12-month period.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

- 3.3 For the Entire Facility, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity. This shall not apply to vision obscuration caused by uncombined water droplets.

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.

Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.A and 1.3.B)

- 3.4 For Emission Points AA-002, AA-003, AA-004, AA-009, AA-014, and AA-015, the permittee shall burn natural gas only.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

- 3.5 For Emission Points AA-002, AA-003, AA-004, AA-009, AA-014, and AA-015, the maximum discharge of sulfur oxides from any fuel burning installation in which the fuel

is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)

- 3.6 For Emission Points AA-002, AA-003, AA-004, AA-005, AA-006, AA-009, AA-014, and AA-015, the maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations shall not exceed an emission rate as determined by the relationship

$$E = 0.8806 * I^{0.1667}$$

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).)

- 3.7 For Emission Points AA-002, AA-003, AA-004, AA-009, AA-014, and AA-015, the permittee is subject to and shall comply with all applicable requirements of the New Source Performance Standard (NSPS) for Small Industrial, Commercial, Institutional Steam Generating Units (40 CFR 60, Subpart Dc) and the General Provisions (40 CFR 60, Subpart A).

(Ref.: 40 CFR 60.40c, Subpart Dc)

- 3.8 For Emission Point AA-008, the permittee shall perform no more than 29,200 barrels/year of loading operations without the operation of the Vapor Combustion Unit (VCU). The VCU must be in operation for all loading operations other than the 29,200 barrels/year at Emission Point AA-008.

(Ref.: Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

- 3.9 For Emission Points AA-007 and AA-013, the permittee is subject to and shall comply with all applicable requirements of National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) and the General Provisions (40 CFR 63, Subpart A).

Emission Points AA-007 and AA-013 are existing emergency stationary RICE at an area source of HAP.

(Ref.: 40 CFR 63.6585(c) and 63.6590(a)(1)(iii), Subpart ZZZZ)

- 3.10 For Emission Points AA-007 and AA-013, the permittee shall comply with the requirements in Table 2d.

- (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 replace as necessary.
- (c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement listed above. The oil analysis must be performed at the same frequency specified above for changing the oil. The analysis program shall contain the information contained in 40 CFR 63.6625(i). The permittee shall keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

(Ref.: 40 CFR 63.6603(a) and 63.6625(i) and Item 4 of Table 2d, Subpart ZZZZ)

- 3.11 For Emission Points AA-007 and AA-013, the permittee shall use diesel fuel that meets the requirements in 40 CFR 80.510(b) for non-road diesel fuel.

(Ref.: 40 CFR 6604(b), Subpart ZZZZ)

- 3.12 For Emission Points AA-007 and AA-013, the permittee shall comply with the following:

- (a) Be in compliance with the emission limitations, operating limitation, and other requirements in Subpart ZZZZ that apply at all times.
- (b) Operate and maintain the engine in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the MDEQ which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(Ref.: 40 CFR 63.6605, Subpart ZZZZ)

- 3.13 For Emission Points AA-007 and AA-013, the permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your 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.

(Ref.: 40 CFR 63.6625(e)(3), Subpart ZZZZ)

- 3.14 For Emission Points AA-007 and AA-013, the permittee shall install a non-resettable hour meter if one is not already installed.

(Ref.: 40 CFR 63.6625(f), Subpart ZZZZ)

- 3.15 For Emission Points AA-007 and AA-013, the permittee shall operate the emergency stationary RICE according to the requirements in (a) through (c) below. In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year is prohibited. If you do not operate the engine according to the requirements below, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

- (a) There is no time limit on the use of emergency stationary RICE in emergency situations.
- (b) The permittee shall operate the emergency stationary RICE for any combination of the purposes specified below for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by (c) of this condition counts as part of the 100 hours per calendar year allowed. Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the MDEQ 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 calendar year.
- (c) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(Ref.: 40 CFR 63.6640(f)(1), (2), and (4), Subpart ZZZZ)

- 3.16 For Emission Point AA-012, the permittee is subject to and shall comply with all applicable requirements of Standards of Performance for Equipment Leaks of VOC from

Onshore Natural Gas Processing Plants (40 CFR 60, Subpart KKK) and the General Provisions (40 CFR 60, Subpart A).

(Ref.: 40 CFR 60.630(a) and (e), Subpart KKK)

3.17 For Emission Point AA-012, the permittee shall comply with the following:

- (a) Comply with the requirements of Condition 3.21 through 3.30, except as provided in Condition 3.18.
- (b) Elect to comply with the requirements of Conditions 3.31 and 3.32.
- (c) Comply with the provisions of Condition 5.14 except for 40 CFR 60.633(f) of Subpart KKK.
- (d) Comply with the provisions of Conditions 5.15 through 5.22 and Conditions 6.12 through 6.14 except as provided in Conditions 3.18, 5.12, 5.13, 6.11.

(Ref.: 40 CFR 60.632(a), (b), (d), and (e), Subpart KKK)

3.18 For Emission Point AA-012, the permittee shall comply with the following exceptions to the provisions of Subpart VV:

- (a) For each pressure relief device in gas/vapor service:
 - (1) Shall be monitored quarterly and within 5 days after each pressure release to detect leaks by the methods specified in Condition 5.14 except as provided in Condition 3.24.
 - (2) If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.
 - (3) 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 Condition 3.29. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.
- (b) Sampling connection systems are exempt from the requirements of Condition 3.25.
- (c) 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 Condition 3.22(a)(1), Condition 3.27(a), and Condition 3.18(a)(1).
- (d) Reciprocating compressors in wet gas service are exempt from the compressor control requirements of Condition 3.23.

- (e) Flares used to comply with this subpart shall comply with the requirements of Condition 3.19.

(Ref.: 40 CFR 60.633, Subpart KKK)

3.19 For Emission Points AA-005 and AA-006, the permittee shall comply with the following for each flare:

- (a) No visible emissions as determined by Method 22 except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.
- (b) A flame must present at all times. The permittee may use a thermocouple or any other equivalent device to detect the presence of a flame.
- (c) Flares shall be used only with the net heating value of the gas being combusted being 11.2 MJ/scm (300 Btu/scf) or greater if the flare is steam-assisted or air-assisted; or with the net heating value of the gas being combusted being 7.45 MJ/scm (200 Btu/scf) or greater if the flare is non-assisted.
- (d) Air-assisted flares shall be designed and operated with an exit velocity less than the velocity, V_{\max} as determined by 40 CFR 60.18(f)(6).
- (e) Flares used to comply with this section shall be steam-assisted, air-assisted, or non-assisted.
- (f) Flares shall be operated at all times when emissions may be vented to them.

(Ref.: 40 CFR 60.18(b), (c)(1), (c)(2), (c)(3)(ii), (c)(5), (c)(6), and (e), Subpart A)

3.20 For Emission Points AA-005 and AA-006, the permittee shall operate in accordance with manufacture's specifications.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

3.21 For Emission Point AA-012, the permittee shall comply with the following general standards in 40 CFR 60.482-1(b) and (d).

(Ref.: 40 CFR 60.482-1(a), (b) and (d), Subpart VV)

3.22 For Emission Point AA-012, the permittee shall comply with the following standards:

- (a) Pumps in light liquid service
 - (1) Each pump in light liquid service shall be monitored monthly to detect leaks by the methods specified in Condition 5.14(b), except as provided in (d), (e), and (f) of this condition. A pump that begins operation in light liquid service after the initial startup date for the process unit must be monitored for the first time within 30 days after the end of its startup

period, except for a pump that replaces a leaking pump and except as provided in (d), (e), and (f) of this condition.

- (2) Each pump in light liquid service shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal.

(b) Leak Detection

- (1) If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.
- (2) If there are indications of liquids dripping from the pump seal, permittee shall follow the procedure specified in either 40 CFR 60.482-2(b)(2)(i) or (ii). This requirement does not apply to a pump that was monitored after a previous weekly inspection if the instrument reading for that monitoring event was less than 10,000 ppm and the pump was not repaired since that monitoring event.

(c) Repair

- (1) When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in Condition 3.30.
- (2) A first attempt at repair shall be made no later than 5 calendar days after each leak is detected. First attempts at repair include, but are not limited to, the practices described in 40 CFR 60.482-2(c)(2)(i) and (ii), where practicable.

- (d) Each pump equipped with a dual mechanical seal system that includes a barrier fluid system is exempt from the requirements of (a) of this condition, provided the requirements specified in 40 CFR 60.482-2 (d)(1) through (6) are met.

- (e) Any pump that is designated, as described in Condition 5.18(a) and (b), for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the requirements of (a), (c), and (d) of this condition if the pump:

- (1) Has no externally actuated shaft penetrating the pump housing,
- (2) Is demonstrated to be operating with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background as measured by the methods specified in Condition 5.14(c), and
- (3) Is tested for compliance with 40 CFR 60.482-2(e)(2) initially upon designation, annually, and at other times requested by the MDEQ.

- (f) If any pump is equipped with a closed vent system capable of capturing and transporting any leakage from the seal or seals to a process or to a fuel gas system

or to a control device that complies with the requirements of Condition 3.30, it is exempt from (a) through (e) of this condition.

- (g) Any pump that is designated, as described in Condition 5.19(a), as an unsafe-to-monitor pump is exempt from the monitoring and inspection requirements of (a) of this condition if:
 - (1) The permittee demonstrates that the pump is unsafe-to-monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with (a) of this condition; and
 - (2) The permittee has a written plan that requires monitoring of the pump as frequently as practicable during safe-to-monitor times but not more frequently than the periodic monitoring schedule otherwise applicable, and repair of the equipment according to the procedures in (c) of this condition if a leak is detected.
- (h) Any pump that is located within the boundary of an unmanned plant site is exempt from the weekly visual inspection requirement of (a)(2) and (d) of this condition, and the daily requirements found in 40 CFR 60.482-2(d)(5), provided that each pump is visually inspected as often as practicable and at least monthly.

(Ref.: 40 CFR 60.482-2, Subpart VV)

3.23 For Emission Point AA-012, the permittee shall comply with the following:

- (a) Each compressor shall be equipped with a seal system that includes a barrier fluid system and that prevents leakage of VOC to the atmosphere, except as provided in (h), (i), and (j) of this condition.
- (b) Each compressor seal system as required in (a) of this condition shall be:
 - (1) Operated with the barrier fluid at a pressure that is greater than the compressor stuffing box pressure; or
 - (2) Equipped with a barrier fluid system degassing reservoir that is routed to a process or fuel gas system or connected by a closed vent system to a control device that complies with the requirements of Condition 3.30; or
 - (3) Equipped with a system that purges the barrier fluid into a process stream with zero VOC emissions to the atmosphere.
- (c) The barrier fluid system shall be in heavy liquid service or shall not be in VOC service.
- (d) Each barrier fluid system as described in (a) of this condition shall be equipped with a sensor that will detect failure of the seal system, barrier fluid system, or both.

- (e) The permittee shall comply with the following:
 - (1) Each sensor as required in (d) of this condition shall be checked daily or shall be equipped with an audible alarm.
 - (2) The permittee shall determine, based on design considerations and operating experience, a criterion that indicates failure of the seal system, the barrier fluid system, or both.
- (f) If the sensor indicates failure of the seal system, the barrier system, or both based on the criterion determined under (e)(2) of this condition, a leak is detected.
- (g) The permittee shall comply with the following:
 - (1) When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in Condition 3.29.
 - (2) A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.
- (h) A compressor is exempt from the requirements of (a) and (b) of this condition, if it is equipped with a closed vent system to capture and transport leakage from the compressor drive shaft back to a process or fuel gas system or to a control device that complies with the requirements of Condition 3.30, except as provided in (i) of this condition.
- (i) Any compressor that is designated, as described in Condition 5.18(a) and (b), for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the requirements of paragraphs (a) through (h) of this condition if the compressor:
 - (1) Is demonstrated to be operating with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as measured by the methods specified in Condition 5.14(c); and
 - (2) Is tested for compliance with (1) above initially upon designation, annually, and at other times requested by the MDEQ.
- (j) Any existing reciprocating compressor in a process unit which becomes an affected facility under provisions of 40 CFR 60.14 or 40 CFR 60.15 is exempt from paragraphs (a) through (e) and (h) of this condition, provided the permittee demonstrates that recasting the distance piece or replacing the compressor are the only options available to bring the compressor into compliance with the provisions of paragraphs (a) through (e) and (h) of this condition.

(Ref.: 40 CFR 60.482-3, Subpart VV)

3.24 For Emission Point AA-012, the permittee shall comply with the following:

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- (a) Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as determined by the methods specified in Condition 5.14(c).
- (b) The permittee shall comply with the following:
 - (1) After each pressure release, the pressure relief device shall be returned to a condition of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as soon as practicable, but no later than 5 calendar days after the pressure release, except as provided in Condition 3.29.
 - (2) No later than 5 calendar days after the pressure release, the pressure relief device shall be monitored to confirm the conditions of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, by the methods specified in Condition 5.14(c).
- (c) Any pressure relief device that is routed to a process or fuel gas system or equipped with a closed vent system capable of capturing and transporting leakage through the pressure relief device to a control device as described in Condition 3.30 is exempted from the requirements of (a) and (b) of this condition.
- (d) The permittee shall comply with the following:
 - (1) Any pressure relief device that is equipped with a rupture disk upstream of the pressure relief device is exempt from the requirements of (a) and (b) of this condition, provided the permittee complies with the requirements in (2) below.
 - (2) After each pressure release, a new rupture disk shall be installed upstream of the pressure relief device as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in Condition 3.29.

(Ref.: 40 CFR 60.482-4, Subpart VV)

3.25 For Emission Point AA-012, the permittee shall comply with the following:

- (a) Each sampling connection system shall be equipped with a closed-purge, closed-loop, or closed-vent system, except as provided in 40 CFR 60.482-1(c) and paragraph (c) below.
- (b) Each closed-purge, closed-loop, or closed-vent system shall comply with the requirements specified in (1) through (4).
 - (1) Gases displaced during filling of the sample container are not required to be collected or captured.

- (2) Containers that are part of a closed-purge system must be covered or closed when not being filled or emptied.
 - (3) Gases remaining in the tubing or piping between the closed-purge system valve(s) and sample container valve(s) after the valves are closed and the sample container is disconnected are not required to be collected or captured.
 - (4) Each closed-purge, closed-loop, or closed-vent system shall be designed and operated to meet requirements in 40 CFR 60.482-5(b)(4)(i), (ii), (iii), or (iv).
- (c) In situ sampling systems and sampling systems without purges are exempt from the requirements of (a) and (b) of this condition.

(Ref.: 40 CFR 60.482-5, Subpart VV)

3.26 For Emission Point AA-012, the permittee shall comply with the following:

- (a) The permittee shall comply with the following:
- (1) Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in 40 CFR 60.482-1(c) and paragraphs (d) and (e) of this condition.
 - (2) The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line.
- (b) Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.
- (c) When a double block-and-bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall comply with (a) of this condition at all other times.
- (d) Open-ended valves or lines in an emergency shutdown system which are designed to open automatically in the event of a process upset are exempt from the requirements of paragraphs (a), (b), and (c) of this condition.
- (e) Open-ended valves or lines containing materials which would autocatalytically polymerize or would present an explosion, serious overpressure, or other safety hazard if capped or equipped with a double block and bleed system as specified in paragraphs (a) through (c) of this condition are exempt from the requirements of paragraphs (a) through (c) of this condition.

(Ref.: 40 CFR 60.482-6, Subpart VV)

3.27 For Emission Point AA-012, the permittee shall comply with the following:

- (a) The permittee shall comply with the following:
 - (1) Each valve shall be monitored monthly to detect leaks by the methods specified in Condition 5.14(b) and shall comply with paragraphs (b) through (e) of this condition, except as provided in paragraphs (f), (g), and (h) of this condition, Conditions 3.21(c) and (f), 3.31 and 3.32.
 - (2) A valve that begins operation in gas/vapor service or light liquid service after the initial startup date for the process unit must be monitored according to 40 CFR 60.482-7(a)(2)(i) or (ii), except for a valve that replaces a leaking valve and except as provided in (f), (g), and (h), Conditions 3.21(c), 3.31, and 3.32.
- (b) If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.
- (c) The permittee shall comply with the following:
 - (1) Any valve for which a leak is not detected for 2 successive months may be monitored the first month of every quarter, beginning with the next quarter, until a leak is detected. As an alternative to monitoring all of the valves in the first month of a quarter, an owner or operator may elect to subdivide the process unit into 2 or 3 subgroups of valves and monitor each subgroup in a different month during the quarter, provided each subgroup is monitored every 3 months. The permittee must keep records of the valves assigned to each subgroup.
 - (2) If a leak is detected, the valve shall be monitored monthly until a leak is not detected for 2 successive months.
- (d) The permittee shall comply with the following:
 - (1) When a leak is detected, it shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in Condition 3.29.
 - (2) A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.
- (e) First attempts at repair include, but are not limited to, the best practices listed in 40 CFR 60.482-7(e) where practicable.
- (f) Any valve that is designated, as described in Condition 5.18 for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the requirements of (a) of this condition for the valve if it meets the requirements in 40 CFR 60.482-7(f).

- (g) Any valve that is designated, as described in Condition 5.19, as an unsafe-to-monitor valve is exempt from the requirements of paragraph (a) of this condition if the requirements in 40 CFR 60.482-7(g) are met.
- (h) Any valve that is designated, as described in Condition 5.19, as a difficult-to-monitor valve is exempt from the requirements of paragraph (a) of this condition if the requirements of 40 CFR 60.482-7(h) are met.

(Ref.: 40 CFR 60.482-7, Subpart VV)

3.28 For Emission Point AA-012, the permittee shall comply with the following:

- (a) If evidence of a potential leak is found by visual, audible, olfactory, or any other detection method at pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and connectors, the permittee shall follow either one of the following procedures:
 - (1) The permittee shall monitor the equipment within 5 days by the method specified in Condition 5.14(b) and shall comply with the requirements of (b) through (d) of this condition.
 - (2) The permittee shall eliminate the visual, audible, olfactory, or other indication of a potential leak within 5 calendar days of detection.
- (b) If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.
- (c) The permittee shall comply with the following:
 - (1) When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in Condition 3.30.
 - (2) The first attempt at repair shall be made no later than 5 calendar days after each leak is detected.
- (d) First attempts at repair include, but are not limited to, the best practices described under Conditions 3.22(c)(2) and 3.27(e).

(Ref.: 40 CFR 60.482-8, Subpart VV)

3.29 For Emission Point AA-012, the permittee shall comply with the following:

- (a) Delay of repair of equipment for which leaks have been detected will be allowed if repair within 15 days is technically infeasible without a process unit shutdown. Repair of this equipment shall occur before the end of the next process unit shutdown. Monitoring to verify repair must occur within 15 days after startup of the process unit.

- (b) Delay of repair of equipment will be allowed for equipment which is isolated from the process and which does not remain in VOC service.
- (c) Delay of repair for valves will be allowed if:
 - (1) The permittee demonstrates that emissions of purged material resulting from immediate repair are greater than the fugitive emissions likely to result from delay of repair, and
 - (2) When repair procedures are affected, the purged material is collected and destroyed or recovered in a control device complying with Condition 3.30.
- (d) Delay of repair for pumps will be allowed if the requirements in 40 CFR 60.482-9(d) are met.
- (e) Delay of repair beyond a process unit shutdown will be allowed for a valve, if valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the next process unit shutdown will not be allowed unless the next process unit shutdown occurs sooner than 6 months after the first process unit shutdown.
- (f) When delay of repair is allowed for a leaking pump or valve that remains in service, the pump or valve may be considered to be repaired and no longer subject to delay of repair requirements if two consecutive monthly monitoring instrument readings are below the leak definition.

(Ref.: 40 CFR 60.482-9, Subpart VV)

- 3.30 For Emission Point AA-012, flares used to comply with Subpart VV shall comply with the requirements of Conditions 3.19 and 5.23.

(Ref.: 40 CFR 60.482-10(d), Subpart VV)

- 3.31 For Emission Point AA-012, the permittee shall comply with the following as an alternative standard for valves:
- (a) The permittee shall elect to comply with an allowable percentage of valves leaking of equal to or less than 2.0 percent.
 - (b) The following requirements shall be met if the permittee wishes to comply with an allowable percentage of valves leaking:
 - (1) The permittee shall notify the MDEQ that the permittee has elected to comply with the allowable percentage of valves leaking before implementing this alternative standard, as specified in Condition 6.13.

- (2) A performance test as specified in (c) of this condition shall be conducted initially upon designation, annually, and at other times requested by the MDEQ.
 - (3) If a valve leak is detected, it shall be repaired in accordance with Condition 3.27(d) and (e).
- (c) Performance tests shall be conducted in the following manner:
- (1) All valves in gas/vapor and light liquid service within the affected facility shall be monitored within 1 week by the methods specified in Condition 5.14(b).
 - (2) If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.
 - (3) The leak percentage shall be determined by dividing the number of valves for which leaks are detected by the number of valves in gas/vapor and light liquid service within the affected facility.
- (d) Permittees who elect to comply with this alternative standard shall not have an affected facility with a leak percentage greater than 2.0 percent, determined as described in Condition 5.14(h).

(Ref.: 40 CFR 60. 483-1, Subpart VV)

3.32 For Emission Point AA-012, the permittee shall comply with the following as an alternative for valves to skip period leak detection and repair:

- (a) The permittee may elect to comply with one of the alternative work practices specified in paragraphs (b)(2) and (3) below. Also, the permittee must notify the MDEQ before implementing one of the alternative work practices, as specified in Condition 6.13.
- (b) The permittee shall comply with the following:
 - (1) The permittee shall comply initially with the requirements for valves in gas/vapor service and valves in light liquid service, as described in Condition 3.27.
 - (2) After 2 consecutive quarterly leak detection periods with the percent of valves leaking equal to or less than 2.0, the permittee may begin to skip 1 of the quarterly leak detection periods for the valves in gas/vapor and light liquid service.
 - (3) After 5 consecutive quarterly leak detection periods with the percent of valves leaking equal to or less than 2.0, the permittee may begin to skip 3 of the quarterly leak detection periods for the valves in gas/vapor and light liquid service.

- (4) If the percent of valves leaking is greater than 2.0, the permittee shall comply with the requirements as described in Condition 3.22 but can again elect to use this section.
- (5) The percent of valves leaking shall be determined as described in Condition 5.14(h).
- (6) The permittee shall keep a record of the percent of valves found leaking during each leak detection period.
- (7) A valve that begins operation in gas/vapor service or light liquid service after the initial startup date for a process unit following one of the alternative standards in this section must be monitored in accordance with Condition 3.27(a)(2) before the provisions of this section can be applied to that valve.

(Ref.: 40 CFR 60.483-2, Subpart VV)

- 3.33 For Emission Points AA-012A and AA-012B, the permittee is subject to and shall comply with all applicable requirements of Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction commenced after September 18, 2015 (40 CFR 60, Subpart OOOOa) and the General Provisions (40 CFR 60, Subpart A).

Emission Point AA-012A and AA-012B are reciprocating compressors located at a natural gas processing plant. For the purposes of this subpart each compressor is considered an affected source.

(Ref.: 40 CFR 60.5365a(c), Subpart OOOOa)

- 3.34 For Emission Points AA-012A and AA-012B, the permittee shall be in compliance with the standards of 40 CFR 60, Subpart OOOOa upon startup.

(Ref.: 40 CFR 60.5370a(a), Subpart OOOOa)

- 3.35 For Emission Points AA-012A and AA-012B, at all times, including periods of startup, shutdown, and malfunction, the permittee shall maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the MDEQ which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. The provisions for exemption from compliance during periods of startup, shutdown and malfunctions provided for in 40 CFR 60.8(c), Subpart A do not apply to this subpart.

(Ref.: 40 CFR 60.5370a(b), Subpart OOOOa)

- 3.36 For Emission Points AA-012A and AA-012B, the permittee shall reduce GHG (in the form of a limitation on emissions of methane) and VOC emissions by replacing the reciprocating compressor rod packing according to either (a) or (b), or the permittee shall comply with (c).
- (a) On or before the compressor has operated for 26,000 hours. The number of hours of operation must be continuously monitored beginning upon initial startup of your reciprocating compressor affected facility, or the date of the most recent reciprocating compressor rod packing replacement, whichever is later.
 - (b) Prior to 36 months from the date of the most recent rod packing replacement, or 36 months from the date of startup for a new reciprocating compressor for which the rod packing has not yet been replaced.
 - (c) Collect the methane and VOC emissions from the rod packing using a rod packing emissions collection system that operates under negative pressure and route the rod packing emissions to a process through a closed vent system that meets the requirements of Conditions 3.37 and 3.38.

(Ref.: 40 CFR 60.5385a, Subpart OOOOa)

- 3.37 For Emission Points AA-012A and AA-012B, if the permittee elects to comply with Condition 3.36(c) in lieu of Conditions 3.36(a) and 3.36(b), the permittee shall comply with the following closed vent system requirements for reciprocating compressors:
- (a) Design the closed vent system to route all gases, vapors, and fumes emitted from the reciprocating compressor rod packing emissions collection system to a control device or to a process. For reciprocating compressors, the closed vent system must route all gases, vapors, and fumes to a control device that meets the requirements specified in 40 CFR 60.5412a(a) through (c).
 - (b) Design and operate the closed vent system with no detectable emissions as demonstrated by Condition 5.27(b).
 - (c) Meet the requirements specified in 40 CFR 60.5411a(a)(3)(i) and (ii) if the closed vent system contains one or more bypass devices that could be used to divert all or a portion of the gases, vapors, or fumes from entering the control device.

(Ref.: 40 CFR 60.5411a(a), Subpart OOOOa)

- 3.38 For Emission Points AA-012A and AA-012B, if the permittee elects to comply with Condition 3.36(c) in lieu of Conditions 3.36(a) and 3.36(b), the permittee shall comply with the following closed vent system requirements for reciprocating compressors using a control device or routing emissions to a process: Conduct an assessment that the closed vent system is of sufficient design and capacity to ensure that all emissions are routed to the control device and that the control device is of sufficient design and capacity to accommodate all emissions from the affected facility and have it certified by a qualified professional engineer in accordance with 40 CFR 60.5411a(d)(1)(i) and (ii) .

(Ref.: 40 CFR 60.5411a(d), Subpart OOOOa)

SECTION 4
WORK PRACTICES

*“THIS SECTION WAS INTENTIONALLY LEFT BLANK SINCE NO WORK PRACTICE
STANDARDS APPLY TO THIS PERMIT ACTION”*

SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain records for a minimum of 5 years.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2	Recordkeeping	Record VOC and HAP emissions monthly
AA-002 AA-003 AA-004 AA-009 AA-014 AA-015	40 CFR 60.48c(g)(2), Subpart Dc for Emission Points AA-002, AA-003, AA-004, AA-009, AA-014, and AA-015	5.3	Fuel Consumption	Record amount of Natural Gas combusted during each calendar month
AA-002 AA-003 AA-004 AA-005 AA-006 AA-009 AA-014 AA-015	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.4	Visible Emissions	Monthly visible observations for visible emissions
AA-008	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.5	VOC	Records of each loadout operation and the operation of the VCU
AA-114	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.6	VOC/HAP	Surface Coating Monitoring
		5.7		Surface Coating Recordkeeping
AA-007 AA-013	40 CFR 63.6625(h), Subpart ZZZZ	5.8	HAP	Minimize the engine's time spent at idle
	40 CFR 63.6655(a), Subpart ZZZZ	5.9		Recordkeeping
	40 CFR 63.6655(e), Subpart ZZZZ	5.10		
	40 CFR 63.6655(f), Subpart ZZZZ	5.11		
AA-012	40 CFR 60.635(a), Subpart KKK	5.12	VOC	Recordkeeping
	40 CFR 60.635(b), Subpart KKK	5.13		
	40 CFR 60.485, Subpart VV	5.14		Test Methods and Procedures
AA-012	40 CFR 60.486(b), Subpart VV	5.15	Recordkeeping	Leak Detection
	40 CFR 60.486(c), Subpart VV	5.16		
	40 CFR 60.486(d), Subpart VV	5.17		Closed Vent Systems and Control Devices
	40 CFR 60.486(e), Subpart VV	5.18		All Equipment

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
AA-012	40 CFR 60.486(f), Subpart VV	5.19	VOC	Valves
	40 CFR 60.486(g), Subpart VV	5.20		
	40 CFR 60.486(h) and (i), Subpart VV	5.21		Recordkeeping
	40 CFR 60.486(j), Subpart VV	5.22		
AA-005 AA-006	40 CFR 60.18(f), Subpart A and 40 CFR 60.485(g), Subpart VV	5.23	Flare	Control Device Requirements
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.24		Monitor and maintain daily fuel records
AA-012A AA-012B	40 CFR 60.5410a(c), Subpart OOOOa	5.25	GHG/VOC	Initial Compliance
	40 CFR 60.5415a(c), Subpart OOOOa	5.26		Continuous Compliance
	40 CFR 60.5416a(a) and (b), Subpart OOOOa	5.27		
	40 CFR 60.5420a(c)(3), (6) through (9), and (17), Subpart OOOOa	5.28		Recordkeeping

- 5.1 The permittee shall retain all required records, monitoring data, supporting 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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.9.)

- 5.2 For the Entire Facility, the permittee shall record all VOC and HAP emissions monthly for each emission point, including all data used to determine monthly emissions.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 5.3 For Emission Points AA-002, AA-003, AA-004, AA-009, AA-014, and AA-015, the permittee shall maintain records of the amount of natural gas combusted during each calendar month.

(Ref.: 40 CFR 60.48c(g)(2), Subpart Dc)

- 5.4 For Emission Points AA-002, AA-003, AA-004, AA-005, AA-006, AA-009, AA-014, and AA-015, the permittee shall perform monthly visual observations of emissions. If any visible emissions are detected, the permittee shall take corrective action as expeditiously as practicable. Further, the permittee shall maintain a record and/or a log documenting all visual observations/tests, the nature and cause of any visible emissions, any corrective action(s) taken to prevent or minimize the emissions, and the date and time when visible emission observations were conducted.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 5.5 For Emission Point AA-008, the permittee shall track each loadout operation and the operation of the VCU and keep a spreadsheet of barrels loaded controlled and uncontrolled and provided to the MDEQ in annual reports as specified in 11 Miss Admin. Code Pt. 2.R.6.2.E.. The Process Historical Database (PHD) in conjunction with the control room DCS will track the loading via run status indication for the VCU: standby, running, or shutdown. The run status of the VCU, coupled with existing condensate loading pump run indication, will provide indication that loading is taking place and if the VCU is in operation. The permittee shall track each loadout operation and the operation of the Vapor Combustion Unit. For each load, the spreadsheet will determine the total barrels of condensate loaded and whether the VCU was in operation or not. This will result in a total barrels loaded controlled and uncontrolled for the truck loading on a monthly basis.

The total barrels loaded controlled and uncontrolled will be calculated in the spreadsheet, summarized by month, with annual totals submitted in the report to the MDEQ.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 5.6 For Emission Point AA-114, the permittee shall determine for each coating, adhesive, solvent, or other VOC or HAP 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; and
- (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 alternative EPA approved test method.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 5.7 For Emission Point AA-114, the permittee shall maintain sufficient records to document:
- (a) The identification 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; and
 - (d) The total VOC emission rate, the emission rate of each individual HAP and the total HAP emission rate in tons/year for each consecutive 12-month period.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 5.8 For Emission Points AA-007 and AA-013, 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 apply.

(Ref.: 40 CFR 63.6625(h), Subpart ZZZZ)

- 5.9 For Emission Points AA-007 and AA-013, the permittee shall keep the following records:
- (a) A copy of each notification and report 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 40 CFR 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 all required maintenance performed on the air pollution control and monitoring equipment.
 - (d) Records of actions taken during periods of malfunction to minimize emissions in accordance with Condition 3.12(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

(Ref.: 40 CFR 63.6655(a), Subpart ZZZZ)

- 5.10 For Emission Points AA-007 and AA-013, the permittee shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan.

(Ref.: 40 CFR 63.6655(e), Subpart ZZZZ)

- 5.11 For Emission Points AA-007 and AA-013, the permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must 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.

(Ref.: 40 CFR 63.6655(f), Subpart ZZZZ)

- 5.12 For Emission Point AA-012, the permittee shall comply with the recordkeeping requirements in Condition 5.14 in addition to the requirements in Conditions 5.16 through 5.23.

(Ref.: 40 CFR 60.635(a), Subpart KKK)

- 5.13 For Emission Point AA-012, the following recordkeeping requirements shall apply to pressure relief devices subject to the requirements of Condition 3.18(a)(1).

- (a) When each leak is detected as specified in Condition 3.18(a)(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.
- (b) When each leak is detected as specified in Condition 3.18(a)(2), the following information shall be recorded in a log and shall be kept for 2 years in a readily accessible location:
 - (1) The instrument and operator identification numbers and the equipment identification number.
 - (2) The date the leak was detected and the dates of each attempt to repair the leak.
 - (3) Repair methods applied in each attempt to repair the leak.
 - (4) "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.
 - (5) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak.

- (6) The signature of the owner or operator (or designate) whose decision it was that repair could not be effected without a process shutdown.
- (7) The expected date of successful repair of the leak if a leak is not repaired within 15 days.
- (8) Dates of process unit shutdowns that occur while the equipment is unrepaired.
- (9) The date of successful repair of the leak.
- (10) A list of identification numbers for equipment that are designated for no detectable emissions under the provisions of Condition 3.24(a). The designation of equipment subject to the provisions of Condition 3.24(a) shall be signed by the permittee.

(Ref.: 40 CFR 60.635(b), Subpart KKK)

5.14 For Emission Point AA-012, the permittee shall comply with the following (a) through (h) below. Compliance with Condition 3.21 through Condition 3.30 is determined by using the methods and procedures specified in this condition.

- (a) In conducting the performance tests required in 40 CFR 60.8, the permittee shall use as reference methods and procedures the test methods in 40 CFR 60, Appendix A or other methods and procedures as specified in 40 CFR 60.485, except as provided in 40 CFR 60.8(b).
- (b) The permittee shall determine compliance with the standards in Condition 3.21 through 3.32 as follows: Method 21 shall be used to determine the presence of leaking sources. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21 and 40 CFR 60.485(b)(1).
- (c) The permittee shall determine compliance with the no detectable emission standards in Conditions 3.22(e), 3.23(i), 3.24, 3.27(f), and 5.24 as follows:
 - (1) The requirements of paragraph (b) shall apply.
 - (2) Method 21 shall be used to determine the background level. All potential leak interfaces shall be traversed as close to the interface as possible. The arithmetic difference between the maximum concentration indicated by the instrument and the background level is compared with 500 ppm for determining compliance.
- (d) The permittee shall test each piece of equipment unless it demonstrates that a process unit is not in VOC service, i.e., that the VOC content would never be reasonably expected to exceed 10 percent by weight. For purposes of this demonstration, the methods and procedures in 40 CFR 60.485(d) shall be used

- (e) The permittee shall demonstrate that a piece of equipment is in light liquid service by showing that all the following conditions apply:
 - (1) The vapor pressure of one or more of the organic components is greater than 0.3 kPa at 20 °C (1.2 in. H₂O at 68 °F). Standard reference texts or ASTM D2879-83, 96, or 97 (incorporated by reference—see 40 CFR 60.17) shall be used to determine the vapor pressures.
 - (2) The total concentration of the pure organic components having a vapor pressure greater than 0.3 kPa at 20 °C (1.2 in. H₂O at 68 °F) is equal to or greater than 20 percent by weight.
 - (3) The fluid is a liquid at operating conditions.
- (f) Samples used in conjunction with (d), (e), and (g) of this condition shall be representative of the process fluid that is contained in or contacts the equipment or the gas being combusted in the flare.
- (g) The permittee shall determine compliance with the standards of flares according to Condition 5.23.
- (h) The permittee shall determine compliance with Condition 3.31 or Condition 3.32 as follows:
 - (1) The percent of valves leaking shall be determined using the equation in 40 CFR 60.485(h)(1).
 - (2) The total number of valves monitored shall include difficult-to-monitor and unsafe-to-monitor valves only during the monitoring period in which those valves are monitored.
 - (3) The number of valves leaking shall include valves for which repair has been delayed.
 - (4) Any new valve that is not monitored within 30 days of being placed in service shall be included in the number of valves leaking and the total number of valves monitored for the monitoring period in which the valve is placed in service.
 - (5) If the process unit has been subdivided in accordance with Condition 3.27(c)(1), the sum of valves found leaking during a monitoring period includes all subgroups.
 - (6) The total number of valves monitored does not include a valve monitored to verify repair.

(Ref.: 40 CFR 60.485, Subpart VV)

5.15 For Emission Point AA-012, when each leak is detected as specified in the following requirements apply:

- (a) A weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment.
- (b) The identification on a valve may be removed after it has been monitored for 2 successive months as specified in Condition 3.27(c) and no leak has been detected during those 2 months.
- (c) The identification on equipment except on a valve, may be removed after it has been repaired.

(Ref.: 40 CFR 60.486(b), Subpart VV)

5.16 For Emission Point AA-012, when each leak is detected the following information shall be recorded in a log and shall be kept for 2 years in a readily accessible location:

- (a) The instrument and operator identification numbers and the equipment identification number.
- (b) The date the leak was detected and the dates of each attempt to repair the leak.
- (c) Repair methods applied in each attempt to repair the leak.
- (d) "Above 10,000" if the maximum instrument reading measured by the methods specified in 40 CFR 60.485(a) after each repair attempt is equal to or greater than 10,000 ppm.
- (e) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak.
- (f) The signature of the permittee (or designate) whose decision it was that repair could not be effected without a process shutdown.
- (g) The expected date of successful repair of the leak if a leak is not repaired within 15 days.
- (h) Dates of process unit shutdowns that occur while the equipment is unrepaired.
- (i) The date of successful repair of the leak.

(Ref.: 40 CFR 60.486(c), Subpart VV)

5.17 For Emission Point AA-012, the following information pertaining to the design requirements for the flares described in Condition 3.30 shall be recorded and kept in a readily accessible location:

- (a) Detailed schematics, design specifications, and piping and instrumentation diagrams.

- (b) The dates and descriptions of any changes in the design specifications.
- (c) A description of the parameter or parameters monitored, as required in Condition 3.30(e), to ensure that control devices are operated and maintained in conformance with their design and an explanation of why that parameter (or parameters) was selected for the monitoring.
- (d) Periods when the closed vent systems and control devices required in Conditions 3.22, 3.23, 3.24, and 3.25 are not operated as designed, including periods when a flare pilot light does not have a flame.
- (e) Dates of startups and shutdowns of the closed vent systems and control devices required in Conditions 3.22, 3.23, 3.24, and 3.25.

(Ref.: 40 CFR 60.486(d), Subpart VV)

5.18 For Emission Point AA-012, the following information pertaining to all equipment subject to the requirements in Condition 3.21 through 3.30 shall be recorded in a log that is kept in a readily accessible location:

- (a) A list of identification numbers for equipment subject to the requirements of this subpart.
- (b) A list of identification numbers for equipment that are designated for no detectable emissions under the provisions of Conditions 3.22(e), 3.23(i) and 3.27(f). The designation of equipment as subject to the requirements listed in the conditions above shall be signed by the permittee. Alternatively, the permittee may establish a mechanism with their permitting authority that satisfies this requirement.
- (c) A list of equipment identification numbers for pressure relief devices required to comply with Condition 3.24.
- (d) The permittee shall maintain the following:
 - (1) The dates of each compliance test as required in Conditions 3.22(e), 3.23(i), 3.24, and 3.27(f).
 - (2) The background level measured during each compliance test.
 - (3) The maximum instrument reading measured at the equipment during each compliance test.
- (e) A list of identification numbers for equipment in vacuum service.
- (f) A list of identification numbers for equipment that the permittee designates as operating in VOC service less than 300 hr/yr in accordance with 40 CFR 60.482-1(e), a description of the conditions under which the equipment is in VOC

service, and rationale supporting the designation that it is in VOC service less than 300 hr/yr.

- (g) Equipment that is in vacuum service is excluded from the requirements of Conditions 3.22 through 3.30 if it is identified as required in (e) of this condition.

(Ref.: 40 CFR 60.486(e), Subpart VV)

- 5.19 For Emission Point AA-012, the following information pertaining to all valves subject to the requirements of Condition 3.27(g) and (h) and to all pumps subject to the requirements of Condition 3.22(g) shall be recorded in a log that is kept in a readily accessible location:

- (a) A list of identification numbers for valves and pumps that are designated as unsafe-to-monitor, an explanation for each valve or pump stating why the valve or pump is unsafe-to-monitor, and the plan for monitoring each valve or pump.
- (b) A list of identification numbers for valves that are designated as difficult-to-monitor, an explanation for each valve stating why the valve is difficult-to-monitor, and the schedule for monitoring each valve.

(Ref.: 40 CFR 60.486(f), Subpart VV)

- 5.20 For Emission Point AA-012, the following information shall be recorded for valves complying with Condition 3.22:

- (1) A schedule of monitoring.
- (2) The percent of valves found leaking during each monitoring period.

(Ref.: 40 CFR 60.486(g), Subpart VV)

- 5.21 For Emission Point AA-012, the following information shall be recorded in a log that is kept in a readily accessible location:

- (a) Design criterion required in Conditions 3.22(d) and 3.23(e)(2) and an explanation of the design criterion; and
- (b) Any changes to this criterion and the reasons for the changes.

The following information shall be recorded in a log that is kept in a readily accessible location for use in determining exemptions as provided in 40 CFR 60.480(d):

- (a) An analysis demonstrating the design capacity of the affected facility,
- (b) A statement listing the feed or raw materials and products from the affected facilities and an analysis demonstrating whether these chemicals are heavy liquids or beverage alcohol, and
- (c) An analysis demonstrating that equipment is not in VOC service.

(Ref.: 40 CFR 60.486(h) and (i), Subpart VV)

- 5.22 For Emission Point AA-012, information and data used to demonstrate that a piece of equipment is not in VOC service shall be recorded in a log that is kept in a readily accessible location.

(Ref.: 40 CFR 60.486(j), Subpart VV)

- 5.23 For Emission Points AA-005 and AA-006, the permittee shall comply with the following:

- (a) Method 22 shall be used to determine visible emissions.
- (b) A thermocouple or any other equivalent device shall be used to monitor the presence of a pilot flame in the flare.
- (c) The maximum permitted velocity for air assisted flares shall be computed using the equation in 40 CFR 60.485(g)(3).
- (d) The net heating value (H_r) of the gas being combusted in a flare shall be computed using the equation in 40 CFR 60.485(g)(4).
- (e) Method 18 or ASTM D6420-99 (2004) (where the target compound(s) are those listed in Section 1.1 of ASTM D6420-99, and the target concentration is between 150 parts per billion by volume and 100 parts per million by volume) and ASTM D2504-67, 77 or 88 (Reapproved 1993) (incorporated by reference—see 40 CFR 60.17) shall be used to determine the concentration of sample component “i.”
- (f) ASTM D2382-76 or 88 or D4809-95 (incorporated by reference—see 40 CFR 60.17) shall be used to determine the net heat of combustion of component “i” if published values are not available or cannot be calculated.
- (g) Method 2, 2A, 2C, or 2D, as appropriate, shall be used to determine the actual exit velocity of a flare. If needed, the unobstructed (free) cross-sectional area of the flare tip shall be used.
- (h) The maximum permitted velocity, V_{max} , for air-assisted flares shall be determined by the equation in 40 CFR 60.18(f)(6).

(Ref.: 40 CFR 60.18(f), Subpart A and 60.485(g), Subpart VV)

- 5.24 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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 5.25 For Emission Points AA-012A and AA-012B, to achieve initial compliance with the standards for each reciprocating compressor affected facility the permittee shall comply with (a) through (d) below.

- (a) If complying with Condition 3.36(a) or 3.36(b), during the initial compliance period, the permittee shall continuously monitor the number of hours of operation or track the number of months since the last rod packing replacement.
- (b) If complying with Condition 3.36(c), the permittee shall operate the rod packing emissions collection system under negative pressure and route emissions to a process through a closed vent system that meets the requirements of Conditions 3.37 and 3.38.
- (c) The permittee shall submit the initial annual report for your reciprocating compressor as required by Condition 6.15(a) and (b).
- (d) The permittee maintain the records as specified in Condition 5.28(a) for each reciprocating compressor affected facility.

(Ref.: 40 CFR 60.5410a(c), Subpart OOOOa)

5.26 For Emission Points AA-012A and AA-012B, for each reciprocating compressor affected facility complying with Condition 3.36(a) or (b), the permittee shall demonstrate continuous compliance according to (a) through (c) below. For each reciprocating compressor affected facility complying with Condition 3.36(c), the permittee shall demonstrate continuous compliance according to (d) below.

- (a) Continuously monitor the number of hours of operation for each reciprocating compressor affected facility or track the number of months since initial startup or the date of the most recent reciprocating compressor rod packing replacement, whichever is later.
- (b) Submit the annual reports as required by Condition 6.15(a) and (b) and maintain records as required in Condition 5.28(a).
- (c) Replace the reciprocating compressor rod packing on or before the total number of hours of operation reaches 26,000 hours or the number of months since the most recent rod packing replacement reaches 36 months.
- (d) Operate the rod packing emissions collection system under negative pressure and continuously comply with the cover and closed vent requirements in 40 CFR 60.541a(a) and (b).

(Ref.: 40 CFR 60.5415a(c), Subpart OOOOa)

5.27 For Emission Points AA-012A and AA-012B, if the permittee elects to comply with Condition 3.36(c) in lieu of Conditions 3.36(a) and 3.36(b), the permittee shall comply with the applicable requirements of 40 CFR 60.5416a(a) and (b).

- (a) Inspections for closed vent systems and covers installed on each reciprocating compressor affected facility. Except as provided in 40 CFR 60.5416a(b)(11) and (12), the permittee shall inspect each closed vent system according to the

procedures and schedule specified in (1) and (2), inspect each cover according to the procedures and schedule specified in (3), and inspect each bypass device according to the procedures of (4).

- (1) For each closed vent system joint, seam, or other connection that is permanently or semi-permanently sealed (e.g., a welded joint between two sections of hard piping or a bolted and gasketed ducting flange), the permittee shall meet the requirements specified in 40 CFR 60.5416a(a)(1)(i) and (ii).
 - (2) For closed vent system components other than those specified in paragraph (a)(1), the permittee shall meet the requirements of 40 CFR 60.5416a(a)(2)(i) through (iii).
 - (3) For each cover, the permittee shall meet the requirements in paragraphs 40 CFR 60.5416a(a)(3)(i) and (ii).
 - (4) For each bypass device, except as provided for in 40 CFR 60.5411a(c)(3)(ii), the permittee shall meet the requirements of 40 CFR 60.5416a(a)(4)(i) or (ii).
- (b) No detectable emissions test methods and procedures. If required to conduct an inspection of a closed vent system or cover at your reciprocating compressor affected facility as specified in 40 CFR 60.5416a(a)(1), (2), or (3), the permittee shall meet the requirements of 40 CFR 60.5416a(b)(1) through (13).

(Ref.: 40 CFR 60.5416a(a) and (b), Subpart OOOOa)

5.28 For Emission Point AA-012A and AA-012B, the permittee shall maintain the records identified as specified in 40 CFR 60.7(f) and in 40 CFR 60.5420a(c)(1) through (16). All records required by this subpart must be maintained either onsite or at the nearest local field office for at least 5 years. Any records required to be maintained by this subpart that are submitted electronically via the EPA's CDX may be maintained in electronic format.

- (a) The permittee shall maintain the records in (1) through (3).
- (1) Records of the cumulative number of hours of operation or number of months since initial startup or the previous replacement of the reciprocating compressor rod packing, whichever is later. Alternatively, a statement that emissions from the rod packing are being routed to a process through a closed vent system under negative pressure.
 - (2) Records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system as specified in Condition 3.36(c).

- (3) Records of deviations in cases where the reciprocating compressor was not operated in compliance with the requirements specified in Condition 3.36.
- (b) Records of each closed vent system inspection required under Condition 5.27(a)(1) and (2).
- (c) A record of each cover inspection required under Condition 5.27(a)(3).
- (d) If subject to the bypass requirements of Condition 5.27(a)(4), a record of each inspection or a record of each time the key is checked out or a record of each time the alarm is sounded.
- (e) If subject to the closed vent system no detectable emissions requirements of Condition 5.27(b), a record of the monitoring conducted in accordance with Condition 5.27(b).
- (f) For each closed vent system routing to a control device or process, the records of the assessment conducted according to Condition 3.38:
 - (i) A copy of the assessment conducted according to Condition 3.38;
 - (ii) A copy of the certification according to Condition 3.38; and
 - (iii) The permittee shall retain copies of all certifications, assessments and any related records for a period of five years, and make them available if directed by the delegated authority.

(Ref.: 40 CFR 60.5420a(c)(3), (6) through (9), and (17), Subpart OOOOa)

SECTION 6 REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	Report permit deviations within five (5) working days.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.2	Submit certified annual monitoring report.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.3	All documents submitted to MDEQ shall be certified by a Responsible Official.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.4	Annual VOC and HAP Emissions
AA-008	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.5	Annual Records of each loadout and operation of the VCU
AA-014 AA-015	40 CFR 60.48c(a), Subpart Dc	6.6	Subpart Dc Notifications
AA-002 AA-003 AA-004 AA-009 AA-014 AA-015	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.7	Annual Records of Fuel Combusted
AA-002 AA-003 AA-004 AA-005 AA-006 AA-009 AA-014 AA-015	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.8	Annual Report of Visible Emissions Evaluations
AA-114	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.9	Coatings Reporting
AA-007 AA-013	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). 40 CFR 63.6650(f), Subpart ZZZZ	6.10	MACT Reporting
AA-012	40 CFR 60.636, Subpart KKK	6.11	Semi-annual Reporting for NSPS Subpart KKK
	40 CFR 60.487(c), Subpart VV	6.12	Semi-annual Reporting for NSPS Subpart VV
	40 CFR 60.487(d), Subpart VV	6.13	
	40 CFR 60.487(e), Subpart VV	6.14	

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
AA-012A AA-012B	40 CFR 60.5420(b)(1), (4), and (11), Subpart OOOOa	6.15	Annual Reporting for NSPS OOOOa

- 6.1 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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 6.2 Except as otherwise specified herein, the permittee shall submit a certified annual synthetic minor monitoring report postmarked no later than 31st of January for the preceding calendar year. This report shall address any required monitoring specified in the permit. All instances of deviations from permit requirements must be clearly identified in the report. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 6.3 Any document required by this permit to be submitted to the MDEQ shall contain a certification signed by a responsible official stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 6.4 For the Entire Facility, the permittee shall submit annual compliance reports of the VOC and HAP emissions for each calendar month and each consecutive 12-month period, in accordance with Condition 6.2.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 6.5 For Emission Points AA-008, the permittee shall submit an annual report tracking each loadout operation and the operation of the VCU. This report shall include how many barrels per year that the VCU was not operational summarized on a monthly basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 6.6 For Emission Points AA-014 and AA-015, the permittee shall submit notification of the date of construction or reconstruction and actual startup, as provided by 40 CFR 60.7.

(Ref.: 40 CFR 60.48c(a), Subpart Dc)

- 6.7 For Emission Points AA-002, AA-003, AA-004, AA-009, AA-014, and AA-015, the permittee shall submit an annual compliance report summarizing the amount of natural gas combusted during each calendar month as specified in Condition 5.3, in accordance with Condition 6.2.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 6.8 For Emission Points AA-002, AA-003, AA-004, AA-005, AA-006, AA-009, AA-014, and AA-015, the permittee shall submit a report summarizing the required recordkeeping specified in Condition 5.4, in accordance with Condition 6.2. The report shall include, at a minimum, any visible emissions detected, any corrective action undertaken, results of any Method 22 visible emission observations, and any monthly inspections not performed.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 6.9 For Emission Point AA-114, the permit shall submit a monitoring report annually in accordance with Condition 6.2. This report shall provide the following:

- (a) The identification of each coating, adhesive, solvent or other VOC or HAP containing material used;
- (b) The VOC and HAP content(s) of each coating, adhesive, solvent, or other VOC or HAP containing material used;
- (c) The total gallons of each coating, adhesive, solvent or other VOC or HAP containing material used in each consecutive 12-month period;
- (d) The total VOC emission rate, the emission rate of each individual HAP and the total HAP mission rate in tons per month and tpy for each consecutive 12-month period.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 6.10 For Emission Points AA-007 and AA-013, the permittee shall report all deviations as defined in 40 CFR 63, Subpart ZZZZ, in accordance with Condition 6.2.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). and 40 CFR 63.6650(f), Subpart ZZZZ)

- 6.11 For Emission Point AA-012, the permittee shall report the following:

- (a) Include the following information in the initial semiannual report in addition to the information required in 40 CFR 60.487(b)(1) through (4): Number of pressure relief devices subject to the requirements of Condition 3.18(a) except for those pressure relief devices designated for no detectable emissions under the provisions of Condition 3.24(a) and those pressure relief devices complying with Condition 3.24(c).

- (b) Include the following information in all semiannual 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
 - (2) Number of pressure relief devices for which leaks were not repaired according to Condition 3.18(a).

(Ref.: 40 CFR 60.636, Subpart KKK)

6.12 For Emission Point AA-012, all semiannual reports to the MDEQ shall include the following information, summarized from the information in Conditions 5.15 through 5.22:

- (a) Process unit identification.
- (b) For each month during the semiannual reporting period,
 - (1) Number of valves for which leaks were detected as described in Conditions 3.27(b) or 3.32,
 - (2) Number of valves for which leaks were not repaired as required in Condition 3.27(d)(1),
 - (3) Number of pumps for which leaks were detected as described in Condition 3.22(b),
 - (4) Number of pumps for which leaks were not repaired as required in Condition 3.22(c)(1),
 - (5) Number of compressors for which leaks were detected as described in Condition 3.23(f),
 - (6) Number of compressors for which leaks were not repaired as required in Condition 3.23(g)(1), and
 - (7) The facts that explain each delay of repair and, where appropriate, why a process unit shutdown was technically infeasible.
- (c) Dates of process unit shutdowns which occurred within the semiannual reporting period.
- (d) Revisions to items reported according to 40 CFR 60.487(b) if changes have occurred since the initial report or subsequent revisions to the initial report.

(Ref.: 40 CFR 60.487(c), Subpart VV)

6.13 For Emission Point AA-012, if the permittee elects to comply with the provisions of Conditions 3.31 or 3.32, the permittee shall notify the MDEQ of the alternative standard selected 90 days before implementing either of the provisions.

(Ref.: 40 CFR 60.487(d), Subpart VV)

- 6.14 For Emission Point AA-012, the permittee shall report the results of all performance tests in accordance with 40 CFR 60.8 of the General Provisions. The provisions of 40 CFR 60.8(d) do not apply to affected facilities subject to the provisions of this subpart except that the permittee must notify the MDEQ of the schedule for the initial performance tests at least 30 days before the initial performance tests.

(Ref.: 40 CFR 60.487(e), Subpart VV)

- 6.15 For Emission Points AA-012A and AA-012B, the permittee shall submit annual reports containing the information specified in (a) and (b). The permittee shall submit annual reports following the procedure specified in (c). The initial annual report is due no later than 90 days after the end of the initial compliance period as determined according to Condition 5.25. Subsequent annual reports shall be submitted in accordance with Condition 6.2.

(a) The general information specified below:

- (1) The company name, facility site name, and address of the affected facility.
- (2) An identification of each affected facility being included in the annual report.
- (3) Beginning and ending dates of the reporting period.
- (4) A certification by a certifying official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) For each reciprocating compressor affected facility, the information specified in 40 CFR 60.5420a(b)(4)(i) and (ii).

- (1) The cumulative number of hours of operation or the number of months since initial startup or since the previous reciprocating compressor rod packing replacement, whichever is later. Alternatively, a statement that emissions from the rod packing are being routed to a process through a closed vent system under negative pressure.
- (2) Records of deviations specified in 40 CFR 60.5420a(c)(3)(iii) that occurred during the reporting period.

(c) The permittee shall submit reports to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX (<https://cdx.epa.gov/>.) The permittee must use the appropriate electronic report in CEDRI for this subpart or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the CEDRI Web site (<https://www3.epa.gov/ttn/chief/cedri/>). If

the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the permittee must submit the report to the Administrator at the appropriate address listed in 40 CFR 60.4. Once the form has been available in CEDRI for at least 90 calendar days, you must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in this subpart, regardless of the method in which the reports are submitted.

(Ref.: 40 CFR 60.5420(b)(1), (4), and (11), Subpart OOOOa)