



State of Mississippi



AIR POLLUTION CONTROL PERMIT

To Construct Air Emissions Equipment

THIS CERTIFIES

Gibraltar Energy Company, Saxophone 22- 1 Facility
Highway 47 North
West Point, MS
Clay County

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

Mississippi Environmental Quality Permit Board

Mississippi Department of Environmental Quality

Issued/Modified: SEP 13 2012

Expires:

Permit No. 0480-00037

Agency Interest # 36772

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To Construct Air Emissions Equipment

Gibraltar Energy Company, Saxophone 22- 1 Facility

Subject Item Inventory

Permit Number:0480-00037

Activity ID No.: PER20120001

Subject Item Inventory:

ID	Designation	Description
ACT1	AA-014	Purging Product Load Line - Loading Losses (13-08-NGL-P)
AI36772		
AREA1	AA-011	Oil Transfer to Tank Truck - Loading Losses (10-08-LL)
AREA2	AA-013	Fugitive Emissions (12-08-FE)
EQPT1	AA-001	0.250 MMBTU/HR Natural Gas Fired Glycol Regenerator-Burner Stack(1-08-GR-BS)
EQPT2	AA-002	Glycol Regenerator - Still Column Condenser Vent (2-08-GR-SCC)
EQPT3	AA-003	203 HP Natural Gas Fired Internal Combustion Engine Exhaust Stack (3-08-ICE-ES)
EQPT4	AA-004	95 HP Natural Gas Fired Internal Combustion Engine Exhaust Stack (4-08-ICE-ES)
EQPT5	AA-005	16,800 Gallon Oil Storage Tank - Common Vent(5a-08-OST-CV)
EQPT6	AA-006	22,000 Gallon Water Storage Tank - Common Vent (5b-08-WST-CV)
EQPT7	AA-007	Natural Gas Powered Chemical Injection Pump (6-08-GOP)
EQPT8	AA-008	Natural Gas Powered Chemical Injection Pump (7-08-GOP)
EQPT9	AA-009	Gas Operated Wilden M8 Pump (8-08-GOP)
EQPT10	AA-010	Blowcase Vessel - Condensed Liquids(9-08-BV)
EQPT11	AA-012	Pneumatic Controllers (11-08-PC)
EQPT12	AA-015	150 Gallon Chemical Storage Tank (14-08-CST)
EQPT13	AA--016	150 Gallon Chemical Storage Tank (15-08-CST)
EQPT14	AA-017	500 Gallon Lube Oil Tank (16-08-LOT)
EQPT16	AA-019	500 Gallon Glycol Storage Tank (18-08-GST)
EQPT17	AA-018	500 Gallon Lube Oil Tank (17-08-CST)

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Subject Item Inventory

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ID	Designation	Description
EQPT18	AA-020	Plantwide emissions associated with Equipment Leaks from but not limited to pumps, pressure relief devices, open-ended valves or lines, valves, compressors, flanges or other connectors.

Subject Item Groups:

ID	Description	Components
GRPT1	Natural Gas Powered Chemical Injection Pumps	EQPT7 Natural Gas Powered Chemical Injection Pump (6-08-GOP) EQPT8 Natural Gas Powered Chemical Injection Pump (7-08-GOP)
GRPT2	Tanks with Nominal Emissions	EQPT12 150 Gallon Chemical Storage Tank (14-08-CST) EQPT13 150 Gallon Chemical Storage Tank (15-08-CST) EQPT14 500 Gallon Lube Oil Tank (16-08-LOT) EQPT16 500 Gallon Glycol Storage Tank (18-08-GST) EQPT17 500 Gallon Lube Oil Tank (17-08-CST)

KEY

ACT = Activity

AREA = Area

CONT = Control Device

IA = Insignificant Activity

RPNT = Release Point

AI = Agency Interest

CAFO = Concentrated Animal Feeding Operation

EQPT = Equipment

MAFO = Animal Feeding Operation

TRMT = Treatment

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ACT0000000001 (AA-014) Purging Product Load Line - Loading Losses (13-08-NGL-P):

Narrative Requirements:

Condition	Condition
T-1	Such air emissions equipment shall be operated as efficiently as possible to provide the maxium reduction of air contaminants. [APC-S-2 II.B(10)]

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AI0000036772:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		<p>This facility is subject to and shall comply with all applicable requirements of the New Source Performance Standards, as described in 40 CFR 60, Subpart KKK, Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants.</p> <p>Monitoring Requirements</p> <p>(a) The facility shall comply with the requirements listed in 40 CFR 60, Subpart KKK, Sectin 60.633 and 60.635.</p> <p>Reporting Requirements</p> <p>(b) The facility shall compy with the requirements listed in 40 CFR 60, Subpart KKK, Section 60.636. [40 CFR 60_SUBPART KKK]</p>
L-2		<p>For Emission Point AA-004, the permittee is subject to and shall comply with all applicable requirements of the New Source Performance Standards, as described in 40 CFR 60, subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.</p> <p>Monitoring Requirements</p> <p>For Emission Point AA-004, the permittee shall demonstrate compliance with 40 CFR 60 Subpart JJJJ by conducting an initial performance test within one (1) year of engine startup. The permittee shall keep records of maintenance performed on the engine(Emission Point AA-004) and must keep a maintenance plan in accordance with 40 CFR 60 Subpart JJJJ. [40 CFR 60_SUBPART JJJJ]</p>

To Construct Air Emissions Equipment
Gibraltar Energy Company, Saxophone 22- 1 Facility
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AI0000036772 (continued):

Record-Keeping Requirements:

Condition No.	Condition
R-1	This facility is subject to and shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Plants, as described in 40 CFR 63, Subpart HH. Recordkeeping Requirements (a) The facility shall comply with the requirements listed in 40 CFR 63, Subpart HH, Section 60.774(d)(1). [40 CFR 63_SUBPART HH]

Submittal/Action Requirements:

General Condition:

Condition No.	Condition
S-1	General Condition - The permittee shall submit certification of construction: Due within thirty (30) days of completion of construction or installation of an approved stationary source or prior to startup, whichever is earlier. The notification shall certify that construction or installation was performed in accordance with the approved plans and specifications. In the event there is any change in construction from the previously approved plans and specifications or permit, the permittee shall promptly notify MDEQ in writing. If MDEQ determines the changes are substantial, MDEQ may require the submission of a new application to construct with "as built" plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an "as built" application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law. [APC-S-2 V.D]

Condition No.	Condition
S-2	Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun. [APC-S-2 V.C(2)]
S-3	The permittee must notify DEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more. [APC-S-2 V.C(3)]

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AI0000036772 (continued):

Narrative Requirements:

General Condition:

Condition No.	Condition
T-1	General Condition: The stationary source shall be designed and constructed so as to operate without causing a violation of any Applicable Rules and Regulations or this permit, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards, and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries. [APC-S-2 V.A]
T-2	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49_17_29 1.b]
T-3	General Condition: The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits. [Miss. Code Ann. 49_17_29]
T-4	General Condition: The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed except as provided for in Regulation APC-S-1, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. [APC-S-1 10]
T-5	General Condition: The permittee shall allow the Mississippi Environmental Quality Commission, the Mississippi Environmental Quality Permit Board, MDEQ staff and/or their authorized representatives, upon the presentation of credentials: a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring equipment or monitoring method required in this permit, and to sample any air emission. [Miss. Code Ann. 49_17_21]
T-6	General Condition: After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for good cause shown including, but not limited to, the following: a. Persistent violation of any terms or conditions of this permit; b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or c. A change in any condition that requires either a temporary or permanent reduction or elimination of previously authorized air emissions. [APC-S-2 II.C]
T-7	General Condition: Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control. [Miss. Code Ann. 49_17_39]

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AI0000036772 (continued):

Narrative Requirements:

Condition No.	Condition
T-8	General Condition: This permit is for air pollution control purposes only. [APC-S-2 I.D]
T-9	General Condition: The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for operating without a valid permit pursuant to State Law. [APC-S-2 II.B(5)]
T-10	General Condition: It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits. [APC-S-2 I.D(6)]
T-11	General Condition: The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities. [APC-S-2 II.B(7)]
T-12	General Condition: It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit, unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. [APC-S-2 II.B(15)a]
T-13	General Condition: The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [APC-S-2 II.B(15)b]
T-14	General Condition: The permit does not convey any property rights of any sort, or any exclusive privilege. [APC-S-2 II.B(15)c]
T-15	General Condition: The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. [APC-S-2 II.B(15)d]
T-16	General Condition: This permit shall not be transferred except upon approval of the Permit Board. [APC-S-2 XVI.B]

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AI0000036772 (continued):

Narrative Requirements:

Condition No.	Condition
T-17	General Condition: The provisions of this permit are severable. If any provision of the permit, or the application of any provision of the permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. [APC-S-2 I.D(7)]
T-18	General Condition: The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance or if construction is suspended for eighteen (18) months or more. [APC-S-2 V.C(1)]
T-19	General Condition: A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee. [APC-S-2 V.D(3)]
T-20	General Condition: Except as prohibited in APC-S-2, Section V.D.7, after certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by APC-S-2, Section XIII.G. [APC-S-2 V.D(4)]
T-21	General Condition: Except as otherwise specified in APC-S-2, Section V.D.7, the application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing. [APC-S-2 V.D(5)]
T-22	General Condition: Except as otherwise specified in APC-S-2, Section V.D.7, upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate. [APC-S-2 V.D(6)]
T-23	General Condition: For moderate modifications that require contemporaneous enforceable emissions reductions from more than one emission point in order to net out of PSD/NSR, the applicable Title V Permit to Operate or State Permit to Operate must be modified prior to beginning operation of the modified facilities. [APC-S-2 V.D(7)]

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AI0000036772 (continued):

Narrative Requirements:

Condition No.	Condition
T-24	<p>General Condition: Regarding compliance testing:</p> <p>(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.</p> <p>(b) Compliance testing will be performed at the expense of the permittee.</p> <p>(c) Each emission sampling and analysis report shall include but not be limited to the following:</p> <ol style="list-style-type: none">1. detailed description of testing procedures;2. sample calculation(s);3. results; and4. comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit. [APC-S-2 VI.B(3, 4 and 6)]
T-25	<p>General Condition: The construction of the stationary source shall be performed in such a manner so as to reduce fugitive dust emissions from construction activities to a minimum. [APC-S-2 V.A(4)]</p>

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AREA0000000001 (AA-011) Oil Transfer to Tank Truck - Loading Losses (10-08-LL):

Narrative Requirements:

Condition	Condition
T-1	Such air emissions shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

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AREA0000000002 (AA-013) Fugitive Emissions (12-08-FE):

Narrative Requirements:

Condition	Condition
T-1	Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

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EQPT0000000001 (AA-001) 0.250 MMBTU/HR Natural Gas Fired Glycol Regenerator-Burner Stack(1-08-GR-BS):

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Hydrogen sulfide	Hydrogen sulfide: The permittee shall not cause or permit the emissions for any gas stream which contains hydrogen sulfide in excess of one (1) grain per 100 standard cubic feet (gr/100 scf). [APC-S-1 4.2(b)]
L-2	Opacity	Opacity <= 40 %. The permittee shall have emissions of Opacity less than or equal to 40% as determined by EPA Reference Method 9, 40 CFR 60, Appendix A. [APC-S-1 3.1(a)]

Record-Keeping Requirements:

Condition No.	Condition
R-1	The permittee shall determine glycol dehydration unit natural gas flowrate or benzene emissions as specified in 63.772(b). The permittee shall maintain records to support the determination of exemption in accordance with 40 CFR 63.774(d)(1)(i) and 40 CFR 63.774(d)(1)(ii). [40 CFR 63_SUBPART HH]

Narrative Requirements:

Condition No.	Condition
T-1	Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 B(10)]

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EQPT0000000002 (AA-002) Glycol Regenerator - Still Column Condenser Vent (2-08-GR-SCC):

Narrative Requirements:

Condition	Condition
T-1	Such air equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

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EQPT0000000003 (AA-003) 203 HP Natural Gas Fired Internal Combustion Engine Exhaust Stack (3-08-ICE-ES):

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		The permittee shall have emissions of Opacity less than or equal to 40% as determined by EPA Reference Method 9, 40 CFR 60, Appendix A. [APC-S-1 3.1(a)]

Narrative Requirements:

Condition No.	Condition
T-1	Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

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EQPT0000000004 (AA-004) 95 HP Natural Gas Fired Internal Combustion Engine Exhaust Stack (4-08-ICE-ES):

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		The permittee shall have emissions of Opacity less than or equal to 40% as determined by EPA Reference Method 9, 40 CFR 60, Appendix A. [APC-S-1 3.1(a)]
L-2		The permittee shall have exhaust emissions of HC+NOx less than 2.8 g/HP-hr. [40 CFR 60_SUBPART JJJJ]
L-3		The permittee shall have exhaust emissions of CO less than 4.8 g/HP-hr. [40 CFR 60_SUBPART JJJJ]

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		The permittee shall demonstrate compliance with 40 CFR 60 Subpart JJJJ by conducting an initial performance test within one (1) year of engine startup. The permittee shall keep records of maintenance performed on the engine and must keep a maintenance plan in accordance with 40 CFR 60 Subpart JJJJ. [40 CFR 60_SUBPART JJJJ]

Submittal/Action Requirements:

Condition No.	Condition
S-1	The permittee shall provide in writing, the date of startup no later than ten days after the actual date. [APC-S-2 II.B(10)]

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EQPT0000000004 (continued):

Narrative Requirements:

Condition	Condition
T-1	Such air emissions equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

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EQPT0000000005 (AA-005) 16,800 Gallon Oil Storage Tank - Common Vent(5a-08-OST-CV):

Narrative Requirements:

Condition	Condition
T-1	Such air emissions equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

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EQPT0000000006 (AA-006) 22,000 Gallon Water Storage Tank - Common Vent (5b-08-WST-CV):

Narrative Requirements:

Condition	Condition
T-1	Such air emissions equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

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EQPT0000000012 (AA-015) 150 Gallon Chemical Storage Tank (14-08-CST):

Narrative Requirements:

Condition	Condition
T-1	Such air emissions equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

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EQPT0000000013 (AA--016) 150 Gallon Chemical Storage Tank (15-08-CST):

Narrative Requirements:

Condition	Condition
T-1	Such air emissions equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

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EQPT0000000017 (AA-018) 500 Gallon Lube Oil Tank (17-08-CST):

Narrative Requirements:

Condition	Condition
T-1	Such air emissions equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

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EQPT0000000018 (AA-020) Plantwide emissions associated with Equipment Leaks from but not limited to pumps, pressure relief devices, open-ended valves or lines, valves, compressors, flanges or other connectors. :

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		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 40 CFR Part 60.485(c). After each pressure relief, the device shall be returned to a condition of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background. Affected components shall be monitored within 5 days (unless monitored by a non-plant personnel) after each pressure release as specified in Method 21 to assure that it is not leaking (less than 500 ppmv above background) in accordance with 40 CFR 60.482.4. [40 CFR 60_SUBPART KKK]
M-2		Pressure relief device in light liquid service, as well as flanges and other connectors, shall be monitored within 5 days by the method specified in section 60.485(b) if evidence of a potential leak is found by visual, audible, olfactory or any other detection method. If a leak is detected (instrument reading of 10,000 ppm or greater) it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected. The first attempt at repair shall be made no later than 5 calendar days after each leak is detected as specified in 40 CFR 60.482-8. [40 CFR 60_SUBPART KKK]

Record-Keeping Requirements:

Condition No.	Condition
R-1	Record keeping shall be maintained in accordance with 40 CFR Part 60.486 & 40 CFR Part 60.635. [40 CFR 60_SUBPART KKK]

Submittal/Action Requirements:

Condition No.	Condition
S-1	The permittee shall submit semiannual reports to the Mississippi Department of Environmental Quality as specified in 40 CFR Part 60.487 and 40 CFR Part 60.636. [40 CFR 60_SUBPART KKK]

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EQPT0000000018 (continued):

Narrative Requirements:

Condition No.	Condition
T-1	The permittee shall conduct leak detection and repair in accordance with 40 CFR 60.482-2, 60.482-4, 60.482-7 & 60.482-8. . [40 CFR 60_SUBPART KKK]
T-2	The permittee shall insure that each open-ended valve or line is equipped with a cap, blind flange, plug or a second valve as specified in 40 CFR 60.482-6. [40 CFR 60_SUBPART KKK]
T-3	Open-ended valves or lines shall comply with the requirements of 40 CFR 60.482-6. [40 CFR 60_SUBPART KKK]

GENERAL INFORMATION

Gibraltar Energy Company, Saxophone 22- 1 Facility
Highway 47 North
West Point, MS
Clay County

Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
36772	Gibraltar Energy Company	Official Site Name	9/10/2012	
048000037	Anadarko Petroleum Corporation, Saxophone 22 1 Facility	Air-Construction	5/7/2008	9/13/2012
2802500037	Gibraltar Energy Co, Saxophone 22- 1 Facility	Air-AIRS AFS (MDEQ USE ONLY)	5/7/2008	
36772	Anadarko Petroleum Corporation	Historic Site Name	2/6/2008	9/10/2012
048000037	Gibraltar Energy Company, Saxophone 22- 1 Facility	Air-Construction	9/13/2012	

Basin: Tombigbee River Basin

Location Description: