

**STATE OF MISSISSIPPI  
AIR POLLUTION CONTROL  
TITLE V PERMIT**

**TO OPERATE AIR EMISSIONS EQUIPMENT**

**THIS CERTIFIES THAT**

**American Midstream (Mississippi), LLC  
Bazor Ridge Treating Facility  
595 Ceaman Pittman Road  
Waynesboro, Mississippi  
Wayne County**

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with Title V of the Federal Clean Air Act (42 U.S.C.A. § 7401 - 7671) and 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.

**Permit Issued:** JUN 26 2013

**Effective Date:** As specified herein.

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

  
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**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Expires:** MAY 31 2018

**Permit No.: 2840-00034**



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**APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT**

**APPENDIX B AMERICAN MIDSTREAM MISSISSIPPI, LLC- BAZOR RIDGE  
TREATING FACILITY’S COMPLIANCE ASSURANCE  
MONITORING (CAM) PLAN**

**APPENDIX C AMERICAN MIDSTREAM MISSISSIPPI, LLC- BAZOR RIDGE  
TREATING FACILITY’S COMPLIANCE STRATEGY PLAN FOR  
COMPLYING WITH 40 CFR PART 60, SUBPART KKK**



## SECTION 1. GENERAL CONDITIONS

- 1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (Ref.: APC-S-6, Section III.A.6.a.)
- 1.2 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. (Ref.: APC-S-6, Section III.A.6.b.)
- 1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. 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.: APC-S-6, Section III.A.6.c.)
- 1.4 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: APC-S-6, Section III.A.6.d.)
- 1.5 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 permittee or, for information to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: APC-S-6, Section III.A.6.e.)
- 1.6 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.: APC-S-6, Section III.A.5.)
- 1.7 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation APC-S-6.
  - (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual

emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission. (Ref.: APC-S-6, Section VI.A.2.)

- (b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee. (Ref.: APC-S-6, Section VI.A.2.) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time. (Ref.: APC-S-6, Section VI.D.2.)
  - (c) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due. (Ref.: APC-S-6, Section VI.D.)
  - (d) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition. (Ref.: APC-S-6, Section VI.C.)
- 1.8 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (Ref.: APC-S-6, Section III.A.8.)
- 1.9 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (Ref.: APC-S-6, Section II.E.)

- 1.10 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:
- (a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - (c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
  - (d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. (Ref.: APC-S-6, Section III.C.2.)
- 1.11 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere. (Ref.: APC-S-1, Section 3.9(a))
- 1.12 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970. (Ref.: APC-S-1, Section 3.9(b))
- 1.13 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source. (Ref.: APC-S-6, Section III.F.1.)
- 1.14 Nothing in this permit shall alter or affect the following:
- (a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
  - (b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - (c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.

- (d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act. (Ref.: APC-S-6, Section III.F.2.)
  
- 1.15 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan. (Ref.: APC-S-6, Section III.H.)
  
- 1.16 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application. (Ref.: APC-S-6, Section IV.C.2., Section IV.B., and Section II.A.1.c.)
  
- 1.17 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:
  - (a) the changes are not modifications under any provision of Title I of the Act;
  - (b) the changes do not exceed the emissions allowable under this permit;
  - (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:
    - (1) a brief description of the change(s),
    - (2) the date on which the change will occur,
    - (3) any change in emissions, and
    - (4) any permit term or condition that is no longer applicable as a result of the change;
  - (d) the permit shield shall not apply to any Section 502(b)(10) change. (Ref.: APC-S-6, Section IV.F.)
  
- 1.18 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 APC-S-3, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: APC-S-3)

- 1.19 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations APC-S-2, "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations APC-S-6, "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny 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 40 CFR 51.166;
  - (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."
- 1.20 Any change in ownership or operational control must be approved by the Permit Board. (Ref.: APC-S-6, Section IV.D.4.)

- 1.21 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission. (Ref.: APC-S-6, Section III.B.1)
- 1.22 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.
- (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.
  - (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.
  - (c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator. (Ref.: APC-S-1, Section 3.7)
- 1.23 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies.
- (a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
  - (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.

- (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
  - (1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
  - (2) the permitted facility was at the time being properly operated;
  - (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
  - (4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein. (Ref.: APC-S-6, Section III.G.)

1.24 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, shutdowns and maintenance.

- (a) Upsets (as defined by APC-S-1, Section 2.37)
  - (1) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
    - (i) an upset occurred and that the permittee can identify the cause(s) of the upset;
    - (ii) the source was at the time being properly operated;
    - (iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;

- (iv) the permittee submitted notice of the upset to the DEQ within 5 working days of the time the upset began; and
  - (v) the notice of the upset shall contain a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.
- (2) In any enforcement proceeding, the permittee 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.
- (b) Startups and Shutdowns (as defined by APC-S-1, Sections 2.34 & 2.29)
- (1) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows:
- (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above;
  - (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or
  - (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.
- (2) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.
- (3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply.
- (c) Maintenance.
- (1) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent

or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following:

- (i) the permittee can identify the need for the maintenance;
  - (ii) the source was at the time being properly operated;
  - (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;
  - (iv) the permittee submitted notice of the maintenance to the DEQ within 5 working days of the time the maintenance began or such other times as allowed by DEQ; and
  - (v) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.
- (2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.
- (3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. (Ref.: APC-S-1, Section 10)

1.25 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation APC-S-1, Section 8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.



SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-000	The Entire Facility
AA-001	800 HP (Heat Input Capacity 5.6 MMBTU/hr) Overhead Gas Compressor Spark Ignition 4-stroke rich burn remote engine (operates >24 hr/yr) fueled by sweet Natural Gas only and equipped with a NSCR (Non Selective Catalytic Reduction) Catalytic Converter for emission control.
AA-004	1,478 HP (Heat Input Capacity 11.20 MMBTU/hr) Sales Gas Compressor Spark Ignition 4-stroke rich burn remote engine (operates >24 hr/yr) fueled by sweet Natural Gas only and equipped with a NSCR Catalytic Converter for emission control.
AA-010	1,478 HP (Heat Input Capacity 12.40 MMBTU/hr) Acid Gas Injection Compressor Spark Ignition 4-stroke rich burn remote engine (operates >24 hr/yr) fueled by sweet Natural Gas only and equipped with a NSCR Catalytic Converter for emission control.
AA-012	1,478 HP (Heat Input Capacity 14.30 MMBTU/hr) Electrical Generator Spark Ignition 4-stroke rich burn remote engine (operates >24 hr/yr) fueled by sweet Natural Gas only and equipped with a NSCR Catalytic Converter for emission control.
AA-014	1,478 HP (Heat Input Capacity 14.30 MMBTU/hr) Electrical Generator Spark Ignition 4-stroke rich burn remote engine (operates >24 hr/yr) fueled by sweet Natural Gas only and equipped with a NSCR Catalytic Converter for emission control.
AA-021	2.0 MMBTU/hr Regeneration Gas Heater fueled by sweet Natural Gas only.
AA-024	7.50 MMBTU/hr Condensate Stabilizer Reboiler fueled by sweet Natural Gas only.
AA-028	Plant Flare equipped a with 0.2 MMBTU/hr natural gas fired pilot. The plant flare is used primarily to control hydrogen sulfide and volatile organic compound emissions resulting from those conditions described in Condition 1.23 and 1.24, and to control emissions from the loading of process generated water into trucks, compressor scrubber dumps, relief valve vents, and Natural Gas Liquids (NGL) truck off loading overheads.
AA-030	Condensate Vapor Combustor (Heat Input Capacity 11.6 MMBTU/hr) fueled by sweet Natural Gas and used to control condensate loading emissions (VOC's).
AA-031	800 HP (Heat Input Capacity 5.0 MMBTU/hr) Inlet Compressor Spark Ignition 4-stroke rich burn remote engine (operates >24 hr/yr) fueled by sweet Natural Gas only and equipped with a NSCR Catalytic Converter for emission control.
AA-032	800 HP (Heat Input Capacity 5.0 MMBTU/hr) Inlet Compressor Spark Ignition 4-stroke rich burn remote engine (operates >24 hr/yr) fueled by sweet Natural Gas only and equipped with a NSCR Catalytic Converter for emission control.
AA-033	800 HP (Heat Input Capacity 5.0 MMBTU/hr) Inlet Compressor Spark Ignition 4-stroke rich burn remote engine (operates >24 hr/yr) fueled by sweet Natural Gas only and equipped with a NSCR Catalytic Converter for emission control.
AA-034	Plantwide emissions associated with Equipment Leaks from but not limited to pumps, pressure relief devices,

Emission Point	Description
	<b>open-ended valves or lines, valves, compressors, flanges or other connectors.</b>
AA-035	<b>1,340 HP (Heat Input Capacity 10.0 MMBTU/hr) Spark Ignition 4-stroke lean burn compressor engine fueled by sweet Natural Gas only and equipped with an oxidation catalyst device for emission control.</b>
AA-036	<b>29.4 MMBTU/hr Natural Gas Fired Steam Boiler equipped with a 30 ppm Low NOx Burner.</b>
AA-037	<b>21.0 MMBTU/hr Natural Gas Fired Steam Boiler equipped with a 30 ppm Low NOx Burner.</b>



## SECTION 3. EMISSION LIMITATIONS & STANDARDS

### A. Facility-Wide Emission Limitations & Standards

- 3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).
- (a) 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.
  - (b) 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.: APC-S-1, Section 3.1)
- 3.A.2 Except as otherwise specified or limited herein, 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, equivalent to that provided in Paragraph 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: APC-S-1, Section 3.2)

B. Emission Point Specific Emission Limitations & Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-001, AA-004, AA-010, AA-012, AA-014, AA-031, AA-032, and AA-033	40 CFR Part 63, Subpart ZZZZ, Sections 63.6585 and 63.6590(a)(1)(iii)	3.B.11	HAP	Applicability
	40 CFR Part 63, Subpart ZZZZ, Sections 63.6595(a)(1), 63.6603, 63.6625(h) and (j), Table 2d, and APC-S-2, Section II.B.10  Beginning October 19, 2013	3.B.12	HAP	Work Practice Standards
	40 CFR Part 63, Subpart ZZZZ, Sections 63.6640(a) and Table 6  Beginning October 19, 2013	3.B.13		
AA-001	Federally Enforceable Permit to Construct Issued January 21, 2000 and modified September 25, 2000	3.B.1	NOx	1.63 lbs/hr and 7.12 TPY
			CO	1.63 lbs/hr and 7.12 TPY
			VOC	0.81 lbs./hr and 3.56 TPY
	APC-S-1, Section 3.4.(a)(1)	3.B.8	PM	0.6 lbs/ MMBTU
	APC-S-1, Section 4.1.a	3.B.5	SO <sub>2</sub>	4.8 lbs./MMBTU
AA-004, AA-010, AA-012, and AA-014	Federally Enforceable Permit to Construct Issued January 21, 2000 and modified September 25, 2000	3.B.1	NOx	3.26 lbs/hr and 14.26 TPY (Allowable for each emission point)
			CO	3.26 lbs/hr and 14.26 TPY (Allowable for each emission point)
			VOC	1.63 lbs./hr and 7.13 TPY (Allowable for each emission point)
	APC-S-1, Section 3.4.a.2	3.B.6	PM	$E = 0.8808 * I^{-0.1667}$
	APC-S-1, Section 4.1.a	3.B.5	SO <sub>2</sub>	4.8 lbs./MMBTU

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-021	Federally Enforceable Permit to Construct Issued January 21, 2000 and modified September 25, 2000	3.B.1	NOx	0.1lbs/hr and 0.43 TPY
			CO	0.16 lbs/hr and 0.72 TPY
			VOC	0.011 lbs./hr and 0.05 TPY
	APC-S-1, Section 3.4.(a)(1)	3.B.8	PM	0.6 lbs/ MMBTU
	APC-S-1, Section 4.1.a	3.B.5	SO <sub>2</sub>	4.8 lbs./MMBTU
AA-024	Federally Enforceable Permit to Construct Issued January 21, 2000 and modified September 25, 2000	3.B.1	NOx	0.35 lbs/hr and 1.53 TPY
			CO	0.586 lbs/hr and 2.57 TPY
			VOC	0.038 lbs./hr and 0.17 TPY
	APC-S-1, Section 3.4.(a)(1)	3.B.8	PM	0.6 lbs/ MMBTU
	APC-S-1, Section 4.1.a	3.B.5	SO <sub>2</sub>	4.8 lbs./MMBTU
AA-028	APC-S-1, Section 3.4(a)(1)	3.B.8	PM	0.6 lbs./MMBTU
	APC-S-1, Section 4.2(b)	3.B.7	Temperature Restriction	≥ than 1600 degrees F for period not less than 0.5 seconds
			SO <sub>2</sub>	Ground level concentration in continuous compliance with National Ambient Air Quality Standards.
	APC-S-2, Section II.B.10 and Title V Operating Permit issued on June 26, 2013	3.B.9	Opacity	0%
	APC-S-2, Section II.B.10 and Title V Operating Permit issued on June 26, 2013	3.B.10	Operating Restriction	The flare must be operated at all times when emissions are being vented to it.
AA-030	Federally Enforceable Permit to Construct Issued January 21, 2000 and modified September 25, 2000	3.B.1	NOx	2.56 lbs/hr and 9.34 TPY
			CO	0.518 lbs/hr and 1.89 TPY
			VOC	0.82 lbs./hr and 2.99 TPY
	APC-S-1, Section 3.4.a.2	3.B.6	PM	$E = 0.8808 * I^{-0.1667}$
	APC-S-1, Section 4.1.a	3.B.5	SO <sub>2</sub>	4.8 lbs./MMBTU

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-031, AA-032, and AA-033	Federally Enforceable Permit to Construct Issued December 8, 2004	3.B.2	NOx	3.52 lbs/hr and 15.42 TPY (Allowable for each emission point)
			CO	5.28 lbs/hr and 23.13 TPY (Allowable for each emission point)
	APC-S-1, Section 3.4.a.2	3.B.8	PM	0.6 lbs/ MMBTU
	APC-S-1, Section 4.1.a	3.B.5	SO <sub>2</sub>	4.8 lbs./MMBTU
AA-034	40 CFR 60 Subpart KKK	3.B.3	VOC	Equipment Leaks from onshore natural gas processing plants. See Appendix C.
AA-035	APC-S-1, Section 3.4.(a)(1)	3.B.8	PM	0.6 lbs/ MMBTU
	APC-S-1, Section 4.1.a	3.B.5	SO <sub>2</sub>	4.8 lbs./MMBTU
	40 CFR Part 63, Subpart ZZZZ, Sections 63.6585 and 63.6590(c)(1)	3.B.14	HAP	Applicability. Must comply with applicable requirements of 40 CFR Part 60, Subpart JJJJ
	40 CFR Part 60, Subpart JJJJ	3.B.14	HAP	Applicability. Exempted per 60. 4230(a)(4)(ii)
	APC-S-2, Section II.B.10 and Title V Operating Permit issued on June 26, 2013	3.B.15	Operating Limitation	< 1350 HP
AA-036 and AA-037	APC-S-1, Section 3.4.a.2	3.B.6	PM	$E = 0.8808 * I^{0.1667}$
	APC-S-1, Section 4.1.a	3.B.5	SO <sub>2</sub>	4.8 lbs./MMBTU
	40 CFR 60, Subpart Dc, Section 60.48c(g)	3.B.4	Fuel	Fuel Monitoring

- 3.B.1 For Emission Points AA-001, AA-004, AA-010, AA-012, AA-014, AA-021, and AA-024, the permittee shall comply with the limits established in the Federally Enforceable Permit to Construct issued on January 21, 2000 and modified September 25, 2000. These limits are specifically stated in Table 3.B for each emission point.
- 3.B.2 For Emission Points AA-031, AA-032, and AA-033, the permittee shall comply with the limits established in the Federally Enforceable Permit to Construct issued on December 8, 2004. These limits are specifically stated in Table 3.B for each emission point.
- 3.B.3 Emission Point AA-034, the permittee shall comply with New Source Performance Standards for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants (Ref.: 40 CFR Part 60, Subpart KKK, Section 60.633 and 60.635).
- 3.B.4 Emission Points AA036, and AA-037, the permittee shall comply with New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units (Ref.: 40 CFR Part 60, Subpart Dc, Section 60.48c(g)).
- 3.B.5 For Emission Points AA-001, AA-004, AA-010, AA-012, AA-014, AA-021, AA-024, AA-30, AA-031, AA-032, AA-033, AA-035, AA-036, and AA-037, 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.: APC-S-1, Section 4.1.a)
- 3.B.6 For Emission Points AA-004, AA-010, AA-012, AA-014, AA-030, AA-036, and AA-037 the maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations equal to or greater than 10 million BTU per hour heat input but less than 10,000 million BTU per hour heat input shall not exceed an emission rate as determined by the relationship
- $$E = 0.8808 * I^{0.1667}$$
- Where  $E$  is the emission rate in pounds per million BTU per hour heat input and  $I$  is the heat input in millions of BTU per hour. (Ref.: APC-S-1, Section 3.4.a(2))
- 3.B.7 For Emission Point AA-028, the permittee shall control a H<sub>2</sub>S emission by incineration at a temperature not less than 1600<sup>0</sup> F for a period of not less than 0.5 seconds, or processed in such a manner which is equivalent to or more effective for the removal of H<sub>2</sub>S. Furthermore sulfur dioxide (SO<sub>2</sub>) emissions resulting from this incineration shall not result in a ground level concentration that does not comply with the National Ambient Air Quality Standards for sulfur dioxide. (APC-S-1, Section 4.2(b))
- 3.B.8 For Emission Point AA-001, AA-021, AA-024, AA-028, AA-031, AA-032, AA-033, and AA-035, the maximum permissible emission of ash/or particulate matter from a

fossil fuel burning installation of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input. (Ref.: APC-S-1, Section 3.4(a)(1))

- 3.B.9 For Emission Point AA-028, the permittee shall operate the flare such that there are no visible emissions with the exception for periods not to exceed a total of 5 minutes during any 2 consecutive hours. (Ref.: APC-S-2, Section II.B.10 and Title V Operating Permit issued June 26, 2013))
- 3.B.10 For Emission Point AA-028, the permittee shall operate the flare at all times that emissions are being vented to the flare. (Ref.: APC-S-2, Section II.B.10 and Title V Operating Permit issued June 26, 2013)
- 3.B.11 Emission Points AA-001, AA-004, AA-010, AA-012, AA-014, AA-031, AA-032, and AA-033 are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ. These engines are existing remote units located at an area source. (Ref.: 40 CFR Part 63, Subpart ZZZZ, Sections 63.6585 and 63.6590(a)(1)(iii))
- 3.B.12 Beginning on or before October 19, 2013, for Emission Points AA-001, AA-004, AA-010, AA-012, AA-014, AA-031, AA-032, and AA-033, the permittee shall maintain each engine according to the following requirements:
  - (a) Change oil and filter every 2,160 hours of operation or annually, whichever comes first, or perform an oil analysis at the same frequency in order to extend the oil change requirement. At a minimum, the parameters listed in (1)–(3), below, shall be analyzed; and, if any of the limits are exceeded, change the oil within two business days of receiving the results of the analysis. If the engine is not in operation when the results are received, change the oil within two business days or before commencing operation, whichever is later. The oil analysis program must be included in the engine’s maintenance plan;
    - (1) Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new.
    - (2) Viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new.
    - (3) Percent water content (by volume) is greater than 0.5.
  - (b) Inspect spark plugs every 2,160 hours of operation or annually, whichever comes first, and replace as necessary;

- (c) Inspect all hoses and belts every 2,160 hours of operation or annually, whichever comes first, and replace as necessary.

The permittee shall minimize the time spent at idle during startup and minimize the startup time to a period needed for appropriate and safe loading of each engine, not to exceed 30 minutes, after which time all applicable emission limits apply.

The permittee shall evaluate the remote status of each engine no later than October 19, 2013 and again every 12 months and submit the results in accordance with Condition 5.C.3. If the evaluation indicates that the engine no longer qualifies as a remote engine, the permittee shall comply with the requirements for non-remote engines within one year of the evaluation.

(Ref.: 40 CFR Part 63, Subpart ZZZZ, Sections 63.6595(a)(1), 63.6603, 63.6625(h) and (j), Table 2d, and APC-S-2, Section II.B.10)

- 3.B.13 Beginning on or before October 19, 2013, for Emission Points AA-001, AA-004, AA-010, AA-012, AA-014, AA-031, AA-032, and AA-033, the permittee shall operate and maintain each engine and after treatment control device according to the manufacturer's emission-related operation and maintenance instructions or develop and follow 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 Part 63, Subpart ZZZZ, Sections 63.6640(a), and Table 6)

- 3.B.14 Emission Point AA-035 is subject to the NESHAP for RICE, 40 CFR Part 63, Subpart ZZZZ. This is a new stationary RICE located at an area source; therefore, compliance with Subpart ZZZZ is achieved by meeting all applicable requirements of the New Source Performance Standards for Stationary Spark Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart JJJJ.

Due to the engine's type, size and date of manufacture, the engine is not subject to Subpart JJJJ; therefore, the unit does not have any further requirements.

(Ref.: 40 CFR Part 63, Subpart ZZZZ, Sections 63.6585 and 63.6590(c)(1), and 40 CFR Part 60, Subpart JJJJ, Section 60.4230(a)(4)(ii))

- 3.B.15 For Emission Point AA-035, the permittee shall operate the compressor engine at less than 1350 horsepower. (Ref.: APC-S-2, Section II.B.10 and Title V Operating Permit issued June 26, 2013)

C. Insignificant and Trivial Activity Emission Limitations & Standards

Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
APC-S-1, Section 3.4(a)(1)	3.C.1	PM	0.6 lbs/MMBTU
APC-S-1, Section 4.1(a)	3.C.2	SO <sub>2</sub>	4.8 lbs/MMBTU

3.C.1 The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input.

3.C.2 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.



## SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:
- (a) the identification of each term or condition of the permit that is the basis of the certification;
  - (b) the compliance status;
  - (c) whether compliance was continuous or intermittent;
  - (d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
  - (e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit. (Ref.: APC-S-6, Section III.C.5.a.,c.,&d.)
- 4.3 The permittee is subject to and shall comply with the applicable requirements of 40 CFR Part 63, Subpart ZZZZ, the NESHAP for RICE. The permittee shall comply with the requirements of Subpart ZZZZ as specified in Conditions 3.B.11, 3.B.12, 3.B.13, 3.B.14, 5.B.11, 5.B.12, 5.C.2, and 5.C.3 of this permit no later than **October 19, 2013**.



## SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

### A. General Monitoring, Recordkeeping and Reporting Requirements

- 5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.
- 5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:
- (a) the date, place as defined in the permit, and time of sampling or measurements;
  - (b) the date(s) analyses were performed;
  - (c) the company or entity that performed the analyses;
  - (d) the analytical techniques or methods used;
  - (e) the results of such analyses; and
  - (f) the operating conditions existing at the time of sampling or measurement. (Ref.: APC-S-6, Section III.A.3.b.(1)(a)-(f))
- 5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information 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 for continuous monitoring instrumentation, and copies of all reports required by the permit. (Ref.: APC-S-6, Section III.A.3.b.(2))
- 5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with APC-S-6, Section II.E. (Ref.: APC-S-6, Section III.A.3.c.(1))
- 5.A.5 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) days of the time the deviation began. (Ref.: APC-S-6, Section III.A.3.c.(2))

- 5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the DEQ and the EPA.
- 5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

**B. Specific Monitoring and Recordkeeping Requirements**

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-028	Opacity	Daily Visible Observations	5.B.7	APC-S-6, Section III.A.3(a)
AA-028	SO <sub>2</sub> /Flare Pilot existing	Monitoring, Recordkeeping, and Reporting	5.B.8	APC-S-6, Section III.A.3(a)
AA-028	SO <sub>2</sub> /Emission Calculations and Daily Operations	Monitoring, Recordkeeping, and Reporting	5.B.9	APC-S-6, Section III.A.3(a) and Title V Operating Permit issued June 26, 2013 and APC-S-2, Section II.B(10)
AA-036 and AA-037	Daily or Monthly Fuel Monitoring	Monitoring, Recordkeeping, and Reporting	5.B.1	40 CFR Part 60, Subpart Dc Section 60.48c(g)
AA-034	VOC/Equipment Leaks	Monitoring in accordance with the Compliance Strategy Plan attached as Appendix D	5.B.2	40 CFR Part 60, Subpart KKK, Section 60.633 & 60.635
AA-001, AA-004, AA-010, AA-012, AA-014, AA-021, AA-024, and AA-030	NO <sub>x</sub> , CO and VOC	Stack testing in accordance with EPA Reference Method 7E, 10, and either 25 or 25A	5.B.3	APC-S-6, Section III.A.3(a)
AA-031, AA-032, and AA-033	NO <sub>x</sub> , and CO	Stack testing in accordance with EPA Reference Method 7E, and 10	5.B.4	APC-S-6, Section III.A.3(a)
AA-004, AA-010, AA-012, AA-014, AA-031, AA-032, and AA-033	NO <sub>x</sub> , and CO/ catalyst bed temperature	Monitoring, Reporting and Recordkeeping (See CAM Plan Appendix C)	5.B.5	APC-S-6, Section III.A.3(a) and 40 CFR 64.3(a)

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-004, AA-010, AA-012, AA-014, AA-031, AA-032, and AA-033	NOx, and CO/ Inspection/Preventative Maintenance (IPM) checklist	Monitoring, Reporting and Recordkeeping (See CAM Plan Appendix C)	5.B.6	APC-S-6, Section III.A.3(a) and 40 CFR 64.3(a)
AA-001	NOx, and CO/ Inspection/Preventative Maintenance (IPM) checklist	Monitoring, Reporting and Recordkeeping	5.B.13	APC-S-6, Section III.A.3(a)
AA-001, AA-004, AA-010, AA-012, AA-014, AA-018, AA-021, AA-024, and AA-030	NOx,CO, and VOC/Emission Calculations	Monitoring, Recordkeeping, and Reporting	5.B.10	APC-S-6, Section III.A.3(a)
AA-031, AA-032, and AA-033	NOx, and CO	Monitoring, Recordkeeping, and Reporting	5.B.14	APC-S-6, Section III.A.3(a)
AA-001, AA-004, AA-010, AA-012, AA-014, AA-031, AA-032, and AA-033	HAP	Recordkeeping	5.B.11	Sections 63.6603(f), 63.6625(j), 63.6655(a), (d), and (e)
			5.B.12	Section 63.6660

- 5.B.1 For Emission Points AA-036 and AA-037, the permittee shall monitor and maintain records of the amounts of natural gas combusted during each day or the amount combusted during each calendar month. Furthermore, the permittee shall maintain these records in accordance with Condition 5.A.3, and shall submit these records in accordance with Condition 5.A.4. (40 CFR 60, Subpart Dc, Section 60.48c(g) and 60.48c(j)).
- 5.B.2 For Emission Point AA-034, the permittee is subject to and shall comply with all applicable monitoring requirements listed in 40 CFR 60, Subpart KKK, Section 60.633 and 60.635. A copy of the permittee's Compliance Strategy Plan is attached to this document as Appendix D.
- 5.B.3 For Emission Points AA-001, AA-004, AA-010, AA-012, AA-014, AA-021, AA-024, and AA-030, the permittee shall demonstrate compliance with nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), and volatile organic compounds (VOCs) emission limitations by performing stack test(s) in accordance with EPA Reference Methods 7E, 10 and either 25 or 25A, respectively, or their approved equivalents and submittal of a stack test report on or before December 1, 2016. Furthermore, for Emission Points AA-004, AA-010, AA-012, and AA-014 during the said test catalyst bed temperature shall be recorded during the duration of the stack test.

For all emission points, the permittee shall submit said test report(s) within 45 days of performance of the test

For all emission points, the permittee shall operate the emission points during the test within 20% of maximum rated capacity or at rate identified in the test protocol.

The permittee shall submit a test protocol at least thirty (30) days prior to the scheduled test date to ensure that all test methods and procedures are acceptable to the DEQ. Also, at least TEN (10) DAYS notice should be given, so that an observer may be scheduled to witness the test(s). (Ref.: APC-S-6, Section III.A.3(a))

- 5.B.4 For Emission Points AA-031, AA-032, and AA-033, the permittee shall demonstrate compliance with nitrogen oxides (NO<sub>x</sub>), and carbon monoxide (CO) emission limitations by performing stack test(s) in accordance with EPA Reference Methods 7E and 10 or their approved equivalents and submittal of a stack test report on or before December 1, 2016. The catalyst bed temperature shall be recorded during the duration of the stack test and included in the test report.

For all emission points, the permittee shall submit said test report(s) within 45 days of performance of the test

For all emission points, the permittee shall operate the emission points during the test within 20% of maximum rated capacity or at rate identified in the test protocol.

The permittee shall submit a test protocol at least thirty (30) days prior to the scheduled test date to ensure that all test methods and procedures are acceptable to the DEQ. Also, at least TEN (10) DAYS notice should be given, so that an observer may be scheduled to witness the test(s). (Ref.: APC-S-6, Section III.A.3(a))

- 5.B.5 For Emission Points AA-004, AA-010, AA-012, AA-014, AA-031, AA-032, and AA-033, the permittee shall continuously monitor the catalyst bed temperature using in-line thermocouples. An excursion is defined as a 3-hour rolling average of the catalyst (inlet) bed temperature where the bed temperature is not in the range of 750 degrees F to 1250 degrees F. Records of this monitoring shall be maintained in log form and shall be made available upon request by DEQ personnel. A summarized report of this monitoring shall be maintained in accordance with Condition 5.A.3 and submitted in accordance with Condition 5.A.4. A copy of the Compliance Assurance Monitoring (CAM) Plan is attached to this document as Appendix C. (Ref.: APC-S-6, Section III.A.3(a) and 40 CFR 64.3(a))
- 5.B.6 For Emission Points AA-004, AA-010, AA-012, AA-014, AA-031, AA-032, and AA-033, the permittee shall perform daily and monthly inspections in accordance with the permittee's Inspection/Preventative Maintenance (IPM) checklist. The IPM includes but is not limited to checking engine and catalyst systems (including the air to fuel ratio controller, thermocouples, oxygen sensors and over-temperature protection devices). The permittee shall maintain these records and any corrective action taken in a log form. Records of these inspections including any corrective action taken shall be made available upon request by DEQ personnel. A summarized report of this monitoring shall be maintained in accordance with Condition 5.A.3 and submitted in accordance with 5.A.4. A copy of the Compliance Assurance Monitoring (CAM) Plan is attached to this document as Appendix C. (Ref.: APC-S-6, Section III.A.3(a) and 40 CFR 64.3(a))
- 5.B.7 For Emission Point AA-028, the permittee shall perform daily checks for the existence of visible emissions while the flare is in operation and record these checks in log form. If visible emission are detected, the permittee shall perform a visible observation for a period of 2-hours using EPA Reference Method 22. Should visible emissions exceed 5-minutes during the 2-hour observation period, the permittee shall initiate corrective action. The permittee shall maintain these records and any corrective action taken in a log form. Records of these inspections including any corrective action taken shall be made available upon request by DEQ personnel. A summarized report of this monitoring shall be maintained in accordance with Condition 5.A.3 and submitted in accordance with 5.A.4. (Ref.: APC-S-6, Section III.A.3(a))
- 5.B.8 For Emission Point AA-028, the permittee shall monitor the existence of the flare pilot flame by using an igniter panel present on the flare which uses thermocouples to detect the presence of a flame. The permittee shall maintain records of all downtime of the flare pilot and what corrective action was taken. Records of these inspections

including any corrective action taken shall be made available upon request by DEQ personnel. A summarized report of this monitoring shall be maintained in accordance with Condition 5.A.3 and submitted in accordance with 5.A.4. (Ref.: APC-S-6, Section III.A.3(a))

- 5.B.9 For Emission Point AA-028, the permittee shall calculate the monthly and 12-month consecutive total Sulfur Dioxide (SO<sub>2</sub>) emissions from the flare. Furthermore the permittee shall maintain records of the following: (1) volume of gas vented during each flaring event, (2) daily hours of operations sufficient to document all periods of operation and downtime, (3) the reason for the flaring event, and (4) a gas analysis representative of the gas being sent to the flare, specifically reflecting the hydrogen sulfide (H<sub>2</sub>S) concentration. Records of these calculations and gas analysis shall be maintained in accordance with Condition 5.A.3 and a summarized report shall be submitted in accordance with Condition 5.A.4. The records shall be made available upon request by DEQ personnel. (Ref.: APC-S-6, Section III.A.3(a), APC-S-2, Section II.B(10) and Title V Operating Permit issued June 26, 2013)
- 5.B.10 For Emission Points AA-001, AA-004, AA-010, AA-012, and AA-014, the permittee shall maintain records of daily hours of operation, daily fuel consumption, and any other relative data for these emission points sufficient to calculate the nitrogen oxide (NO<sub>x</sub>), carbon monoxide (CO) and volatile organic compound (VOC) emissions monthly on a consecutive 12-month basis. For Emission Points AA-021, AA-024, and AA-30, the permittee shall maintain records of daily hours of operation, monthly calculated fuel consumption, and any other relative data for these emission points sufficient to calculate the nitrogen oxide (NO<sub>x</sub>), carbon monoxide (CO) and volatile organic compound (VOC) emission monthly on a consecutive 12-month basis. These records shall be maintained in log form in accordance with Condition 5.A.3 and shall be submitted in accordance with Condition 5.A.4. The records shall be made available upon request by DEQ personnel. (Ref.: APC-S-6, Section III.A.3(a))
- 5.B.11 For Emission Points AA-001, AA-004, AA-010, AA-012, AA-014, AA-031, AA-032, and AA-033, the permittee shall keep the following records:
- (a) Documentation of the initial and annual evaluation of the status of the engines (i.e. remote or non-remote) as required by Condition 3.B.12;
  - (b) A copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart ZZZZ;
  - (c) Documentation of the occurrence and duration of each malfunction of operation or air pollution control and monitoring equipment;



- (d) Documentation of all required maintenance performed on the air pollution control and monitoring equipment;
- (e) Documentation of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation;
- (f) Documentation of the maintenance conducted on each engine in order to demonstrate that the units and after-treatment control devices are being operated and maintained according to the manufacturer's emission-related operation and maintenance instructions or your own maintenance plan, as required by Condition 3.B.13;
- (g) If using an oil analysis program as described in Condition 3.B.12, documentation of the parameters that were analyzed, the results of the analysis, and the oil changes for the engine;

(Ref.: 40 CFR Part 63, Subpart ZZZZ, Section 63.6603(f), 63.6625(j), 63.6655(a), (d), and (e))

5.B.12 For Emission Points AA-001, AA-004, AA-010, AA-012, AA-014, AA-031, AA-032, and AA-033, the permittee shall keep all records for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record in accordance with Section 63.6660 of Subpart ZZZZ and Condition 5.A.3 of this permit.

5.B.13 For Emission Points AA-001, the permittee shall perform daily and monthly inspections of the emission point. This includes but not limited to checking engine and catalyst systems (including the air to fuel ratio controller, thermocouples, oxygen sensors and over-temperature protection devices. The permittee shall maintain these records and any corrective action taken in a log form. Records of these inspections including any corrective action taken shall be made available upon request by DEQ personnel. A summarized report of this monitoring shall be maintained in accordance with Condition 5.A.3 and submitted in accordance with 5.A.4. (Ref.: APC-S-6, Section III.A.3(a))

5.B.14 For Emission Points AA-031, AA-032, and AA-033, the permittee shall maintain records of daily hours of operation, fuel consumption, and any other relative data for these emission points sufficient to calculate the nitrogen oxide (NO<sub>x</sub>), and carbon monoxide (CO) on a hourly basis and monthly on a consecutive 12-months basis. These records shall be maintained in log form in accordance with Condition 5.A.3 and shall be submitted in accordance with Condition 5.A.4. The records shall be made available upon request by DEQ personnel. (Ref.: APC-S-6, Section III.A.3(a))

C. Specific Reporting Requirements

- 5.C.1 For Emission Point AA-034, the permittee is subject to and shall comply with all applicable reporting requirements listed in 40 CFR 60, Subpart KKK, Section 60.636.
- 5.C.2 For Emission Points AA-001, AA-004, AA-010, AA-012, AA-014, AA-031, AA-032, and AA-033, the permittee shall report each instance in which the maintenance practices listed in Condition 3.B.12 were not met. These instances are deviations and must be reported within five business days in accordance with Condition 5.A.5. (Ref.: 40 CFR Part 63, Subpart ZZZZ, Section 63.6640(b))
- 5.C.3 For Emission Points AA-001, AA-004, AA-010, AA-012, AA-014, AA-031, AA-032, and AA-033, the permittee shall submit the results of the initial and annual evaluation of each engine's remote status according to the schedule outlined in Condition 4.2. (APC-S-2, Section II.B.10)

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.



## SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act – Stratospheric Ozone Protection. The full text of the referenced regulations may be found on-line at <http://ecfr.gpoaccess.gov> under Title 40, or DEQ shall provide a copy upon request from the permittee.

- 7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A – Production and Consumption Controls.
- 7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.
- 7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E – The Labeling of Products Using Ozone-Depleting Substances, for the following containers and products:
  - (a) All containers in which a class I or class II substance is stored or transported;
  - (b) All products containing a class I substance; and
  - (c) All products directly manufactured with a process that uses a class I substance, unless otherwise exempted by this subpart or, unless EPA determines for a particular product that there are no substitute products or manufacturing processes for such product that do not rely on the use of a class I substance, that reduce overall risk to human health and the environment, and that are currently or potentially available. If the EPA makes such a determination for a particular product, then the requirements of this subpart are effective for such product no later than January 1, 2015.
- 7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F – Recycling and Emissions Reduction:
  - (a) Servicing, maintaining, or repairing appliances;
  - (b) Disposing of appliances, including small appliances and motor vehicle air conditioners;  
or
  - (c) Refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, persons

selling class I or class II refrigerants or offering class I or class II refrigerants for sale, and persons purchasing class I or class II refrigerants.

- 7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any acceptable alternative that is listed in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR Part 82, Subpart G – Significant New Alternatives Policy Program. The permittee shall also comply with any use conditions for the acceptable alternative substance.
- 7.6 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart H – Halon Emissions Reduction:
- (a) Any person testing, servicing, maintaining, repairing, or disposing of equipment that contains halons or using such equipment during technician training;
  - (b) Any person disposing of halons;
  - (c) Manufacturers of halon blends; or
  - (d) Organizations that employ technicians who service halon-containing equipment.

# APPENDIX A

## List of Abbreviations Used In this Permit

APC-S-1	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
APC-S-2	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
APC-S-3	Regulations for the Prevention of Air Pollution Emergency Episodes
APC-S-4	Ambient Air Quality Standards
APC-S-5	Regulations for the Prevention of Significant Deterioration of Air Quality
APC-S-6	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
APC-S-7	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lbs/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards For Hazardous Air Pollutants, 40 CFR 61 or National Emission Standards For Hazardous Air Pollutants for Source Categories, 40 CFR 63
NMVOG	Non-Methane Volatile Organic Compounds
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter less than 10 Fm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound





# **APPENDIX B**

**AMERICAN MIDSTREAM MISSISSIPPI, LLC- BAZOR RIDGE TREATING  
FACILITY'S COMPLIANCE ASSURANCE MONITORING  
(CAM PLAN)**



# **APPENDIX C**

**AMERICAN MIDSTREAM MISSISSIPPI, LLC- BAZOR RIDGE TREATING  
FACILITY'S COMPLIANCE STRATEGY PLAN FOR COMPLYING  
WITH 40 CFR PART 60, SUBPART KKK**