



State of Mississippi



AIR POLLUTION CONTROL PERMIT

Permit To Construct Air Emissions Equipment

THIS CERTIFIES

Gulf South Pipeline Company LP, Moss Point Compressor Station

Highway 63

Moss Point, MS

Jackson 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: NOV 07 2013

Expires:

Permit No. 1280-00143

Agency Interest # 63395

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Other Relevant Documents:	

The federal regulations referenced in this permit may be found on-line at <http://ecfr.gpoaccess.gov/> and the State of Mississippi regulations may be found on-line at <http://www.mdeq.ms.state.us/> or a copy of the regulations may be obtained by contacting the Mississippi Department of Environmental Quality, Environmental Permitting Division, Post Office Box 2261, Jackson, Mississippi 39255, phone (601) 961-5171. The following regulations were referenced in this permit:

Title 11, Part 2, Chapter 1: Mississippi Commission on Environmental Quality, Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants (Adopted May 8, 1970. Last Amended December 14, 2011);

Title 11, Part 2, Chapter 2: Mississippi Commission on Environmental Quality, Permit Regulations for the Construction and/or Operation of Air Emissions Equipment (Adopted May 8, 1970; Last Amended July 28, 2005);

40 CFR Part 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines;

40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Internal Combustion Engines.

Permit To Construct Air Emissions Equipment

Gulf South Pipeline Company LP, Moss Point Compressor Station

Subject Item Inventory

Permit Number:1280-00143

Activity ID No.: PER20130001

Subject Item Inventory:

ID	Designation	Description
AI63395	63395	Natural Gas Compressor Station
EQPT2	AA-001	Natural gas fired four stroke lean burn non-emergency reciprocating internal combustion engines, rated to deliver between 1,035 horsepower, equipped with a catalytic converter and used for compression of natural gas (Facility Ref.: RC01)
EQPT1	AA-002	Natural gas fired four stroke lean burn non-emergency reciprocating internal combustion engines, rated to deliver 1,380 horsepower, equipped with a catalytic converter and used for compression of natural gas (Facility Ref. RC02)
EQPT3	AA-003	Natural gas fired four stroke lean burn emergency engine used for power generation (Facility Ref. AX01)
EQPT4	AA-004	Natural gas fired fuel heater (Facility Ref. BL01)
EQPT5	AA-005	Above ground fixed roof tank for condensate storage with a capacity of 8,820 gallons (TK01)
EQPT6	AA-006	Above ground fixed roof tank for oily water storage with a capacity of 4,200 gallons (TK02)
EQPT7	AA-007	Above ground fixed roof tank for storage of lube oil with capacity of 2,400 gallons (TK03)
ACT1	AA-008	Natural Gas Venting from Compressor Startup and Compressor Blowdown
ACT2	AA-009	Condensate Truck Loading
AREA1	AA-010	Fugitive Leaks

Subject Item Groups:

ID	Description	Components
GRPT1	Emission Points AA-001 and AA-002 (Compressor Engines)	EQPT2 Natural gas fired four stroke lean burn non-emergency reciprocating internal combustion engines, rated to deliver between 1,035 horsepower, equipped with a catalytic converter and used for compression of natural gas (Facility Ref.: RC01)
		EQPT1 Natural gas fired four stroke lean burn non-emergency reciprocating internal combustion engines, rated to deliver 1,380 horsepower, equipped with a catalytic converter and used for compression of natural gas (Facility Ref. RC02)
GRPT2	Emission Points AA-005, AA-006 and AA-007 (Storage Tanks)	EQPT5 Above ground fixed roof tank for condensate storage with a capacity of 8,820 gallons (TK01)
		EQPT6 Above ground fixed roof tank for oily water storage with a capacity of 4,200 gallons (TK02)

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ID	Description	Components
GRPT2	Emission Points AA-005, AA-006 and AA-007 (Storage Tanks)	EQPT7 Above ground fixed roof tank for storage of lube oil with capacity of 2,400 gallons (TK03)

KEY

ACT = Activity

AREA = Area

CONT = Control Device

IA = Insignificant Activity

PCS = PCS

TRMT = Treatment

AI = Agency Interest

CAFO = Concentrated Animal Feeding Operation

EQPT = Equipment

MAFO = Animal Feeding Operation

RPNT = Release Point

WDPT = Withdrawal Point

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AI0000063395 (63395) Natural Gas Compressor Station:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		For Emission Points AA-001, AA-002, AA-003, and AA-004, the permittee shall only fire natural gas. The firing of unprocessed field gas is prohibited. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		The permittee shall monitor the type and quantity of fuel fired at the facility in cubic feet per month. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]

Record-Keeping Requirements:

Condition No.	Condition
R-1	The permittee shall maintain a record of the type and quantity of fuel fired at the facility in cubic feet per month. This record shall be made available to MDEQ personnel upon request. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]

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AI0000063395 (continued):

Submittal/Action Requirements:

Condition No.	Condition
S-1	The CERTIFICATION OF CONSTRUCTION NOTIFICATION (General Condition S-1) shall include a FEDERAL APPLICABILITY REPORT for each engine constructed at the site, including all applicable emission limitations, standards, work practices, monitoring, recordkeeping, notification and reporting requirements for each engine subject to 40 CFR Part 60, Subpart JJJJ and 40 CFR part 63, Subpart ZZZZ. The FEDERAL APPLICABILITY REPORT shall also be maintained in an accessible area on-site and made available to MDEQ personnel upon request. [11 Miss. Admin. Code Pt. 2, R. 2.5.D]
S-2	General Condition: The permittee shall submit certification of construction: Due within thirty (30) days of completion of construction or installation of an approved stationary source or prior to startup, whichever is earlier. The notification shall certify that construction or installation was performed in accordance with the approved plans and specifications. In the event there is any change in construction from the previously approved plans and specifications or permit, the permittee shall promptly notify MDEQ in writing. If MDEQ determines the changes are substantial, MDEQ may require the submission of a new application to construct with "as built" plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an "as built" application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law. [11 Miss. Admin. Code Pt. 2, R. 2.5.D]
S-3	Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun. [11 Miss. Admin.Code Pt. 2, R.2.5.C(2).]
S-4	The permittee must notify DEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more. [11 Miss. Admin.Code Pt. 2, R.2.5.C(4).]

Narrative Requirements:

General Condition:

Condition No.	Condition
T-1	General Condition: The stationary source shall be designed and constructed so as to operate without causing a violation of any Applicable Rules and Regulations or this permit, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards, and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries. [11 Miss. Admin. Code Pt. 2, R. 2.5.A.]
T-2	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49_17_29 1.b]

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AI0000063395 (continued):

Narrative Requirements:

General Condition:

Condition No.	Condition
T-3	General Condition: The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits. [Miss. Code Ann. 49_17_29]
T-4	General Condition: The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed except as provided for in Regulation 11 Miss. Admin. Code Pt.2, R. 1.10 "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. [11 Miss. Admin. Code Pt. 2, R. 1.10]
T-5	General Condition: The permittee shall allow the Mississippi Environmental Quality Commission, the Mississippi Environmental Quality Permit Board, MDEQ staff and/or their authorized representatives, upon the presentation of credentials: a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring equipment or monitoring method required in this permit, and to sample any air emission. [Miss. Code Ann. 49_17_21]
T-6	General Condition: After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for good cause shown including, but not limited to, the following: a. Persistent violation of any terms or conditions of this permit; b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or c. A change in any condition that requires either a temporary or permanent reduction or elimination of previously authorized air emissions. [11 Miss. Admin.Code Pt. 2, R.2.2.C.]
T-7	General Condition: Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control. [Miss. Code Ann. 49_17_39]
Condition No.	Condition
T-8	General Condition:This permit is for air pollution control purposes only. [11 Miss. Admin.Code Pt. 2, R.2.1.D.]

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AI0000063395 (continued):

Narrative Requirements:

Condition No.	Condition
T-9	General Condition: The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for operating without a valid permit pursuant to State Law. [11 Miss. Admin.Code Pt. 2, R.2.2.B(5).]
T-10	General Condition: It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits. [11 Miss. Admin.Code Pt. 2, R.2.1.D(6).]
T-11	General Condition: The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities. [11 Miss. Admin.Code Pt. 2, R.2.1.D(7).]
T-12	General Condition: It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit, unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(a).]
T-13	General Condition: The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(b).]
T-14	General Condition: The permit does not convey any property rights of any sort, or any exclusive privilege. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(c).]
T-15	General Condition: The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(d).]
T-16	General Condition: This permit shall not be transferred except upon approval of the Permit Board. [11 Miss. Admin.Code Pt. 2, R.2.16.B.]
T-17	General Condition: The provisions of this permit are severable. If any provision of the permit, or the application of any provision of the permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. [11 Miss. Admin.Code Pt. 2, R.1.1.D(7).]

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AI0000063395 (continued):

Narrative Requirements:

Condition No.	Condition
T-18	General Condition: The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance or if construction is suspended for eighteen (18) months or more. [11 Miss. Admin.Code Pt. 2, R.2.5.C(1).]
T-19	General Condition: A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee. [11 Miss. Admin.Code Pt. 2, R.2.5.D(3).]
T-20	General Condition: Except as prohibited in 11 Miss. Admin. Code Pt. 2,R. 2.5.D(7) after certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by APC-S-2, Section XIII.G. [11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).]
T-21	General Condition: Except as otherwise specified in 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7), the application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing. [11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).]
T-22	General Condition: Except as otherwise specified in 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7), upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate. [11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).]
T-23	General Condition: For moderate modifications that require contemporaneous enforceable emissions reductions from more than one emission point in order to net out of PSD/NSR, the applicable Title V Permit to Operate or State Permit to Operate must be modified prior to beginning operation of the modified facilities. [11 Miss. Admin.Code Pt. 2, R.2.5.D(7).]

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AI0000063395 (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. [11 Miss. Admin.Code Pt. 2, R.2.6.B(3),(4)&(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. [11 Miss. Admin.Code Pt. 2, R.2.5.A(4).]</p>

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GRPT0000000001 (Compressor Engines) Emission Points AA-001 and AA-002 (Compressor Engines):

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		Emission Points AA-001 and AA-002 shall only be operated with emissions routed to a catalytic converter. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]
L-2		<p>For Compressor Engine #2 (RC02), the maximum permissible emission of ash and/or particulate matter shall be limited as follows:</p> $E = 0.8808 * I^{0.1667}$ <p>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. [11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)b]</p>
L-3		<p>For Compressor Engine #1 (RC01), the maximum permissible emission of ash and/or particulate matter shall be limited as follows:</p> <p>Emissions from installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input. [11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)a]</p>
L-4		For Emission Points AA-001 and AA-002, the new natural gas-fired four stroke lean burn non-emergency reciprocating internal combustion engines (RICE) , located at an area source of hazardous air pollutants (HAP), the permittee is subject to and shall comply with 40 CFR Part 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air for Stationary Reciprocating Internal Combustion Engines. [40 CFR 63_Subpart ZZZZ]
L-5		For Emission Points AA-001 and AA-002, the permittee shall have emissions of opacity less than or equal to 40 percent. [11 Miss. Admin. Code Pt. 2, R. 1.3(A)]
L-6		For Emission Points AA-001 and AA-002, the permittee shall comply with the requirements of 40 CFR Part 63, Subpart ZZZZ by meeting the requirements of 40 CFR Part 60, Subpart JJJJ. No further requirements apply for these engines under 40 CFR Part 63, Subpart ZZZZ. [40 CFR 63.6590(c)(1)]

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GRPT0000000001 (continued):

Limitation Requirements:

Condition No.	Parameter	Condition
L-7		Emission Points AA-001 and AA-002 are stationary spark ignition (SI) internal combustion engines (ICE) manufactured after July 1, 2008 that have a maximum engine power greater than 500 HP; therefore, the permittee is subject to and shall comply with all applicable requirements of the New Source Performance Standards (NSPS) for Stationary Spark Ignition Internal Combustion Engines - 40 CFR Part 60, Subpart JJJJ and the General Provisions in NSPS Subpart A. [40 CFR 60.4230(a)(4)i]
L-8		For Emission Points AA-001 and AA-002, the permittee shall only fire natural gas. The firing of unprocessed field gas is prohibited. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]
L-9		Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]

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EQPT0000000003 (AA-003) Natural gas fired four stroke lean burn emergency engine used for power generation (Facility Ref. AX01):

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		For the emergency generator, the maximum permissible emission of ash and/or particulate matter shall be limited as follows: Emissions from installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input. [11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)a]
L-2		For Emission Points AA-003, the permittee shall have emissions of opacity less than or equal to 40 percent. [11 Miss. Admin. Code Pt. 2, R. 1.3.A]
L-3		For Emission Points AA-003, the new natural gas-fired four stroke lean burn emergency reciprocating internal combustion engines (RICE) located at an area source of hazardous air pollutants (HAP), the permittee is subject to and shall comply with 40 CFR Part 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air for Stationary Reciprocating Internal Combustion Engines. [40 CFR 63_Subpart ZZZZ]
L-4		For Emission Points AA-003, the permittee shall comply with the requirements of 40 CFR Part 63, Subpart ZZZZ by meeting the requirements of 40 CFR Part 60, Subpart JJJJ. No further requirements apply for these engines under 40 CFR Part 63, Subpart ZZZZ. [40 CFR 63.6590(c)(1)]
L-5		Emission Points AA-003 is a stationary spark ignition (SI) emergency internal combustion engines (ICE) manufactured after January 1, 2009 that has a maximum engine power greater than 500 HP; therefore, the permittee is subject to and shall comply with all applicable requirements of the New Source Performance Standards (NSPS) for Stationary Spark Ignition Internal Combustion Engines - 40 CFR Part 60, Subpart JJJJ and the General Provisions in NSPS Subpart A. [40 CFR 60.4230(a)(4)i]

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EQPT0000000004 (AA-004) Natural gas fired fuel heater (Facility Ref. BL01):

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		For Emission Points AA-004, the permittee shall have emissions of opacity less than or equal to 40 percent. [11 Miss. Admin. Code Pt. 2, R. 1.3.A]
L-2		For Emission Point AA-004, the maximum permissible emission of ash and/or particulate matter shall be limited as follows: Emissions from installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input. [11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)a]
L-3		Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]

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GRPT0000000002 (Above Ground Storage Tanks) Emission Points AA-005, AA-006 and AA-007 (Storage Tanks):

Limitation Requirements:

Condition		
Condition No.	Parameter	Condition
L-1		Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]

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ACT0000000001 (AA-008) Natural Gas Venting from Compressor Startup and Compressor Blowdown:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]

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ACT0000000002 (AA-009) Condensate Truck Loading:

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. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]

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AREA0000000001 (AA-010) Fugitive Leaks:

Limitation Requirements:

Condition		
Condition No.	Parameter	Condition
L-1		Such air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]

GENERAL INFORMATION

Gulf South Pipeline Company LP, Moss Point Compressor Station

Highway 63

Moss Point, MS

Jackson County

Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
63395	Gulf South Pipeline Company, LP	Official Site Name	2/20/2013	
2805900143	Gulf South Pipeline Company, LP	Air-AIRS AFS	2/21/2013	
128000143	Gulf South Pipeline Company LP, Moss Point Compressor Station	Air-Construction	11/7/2013	

Basin: Pascagoula River Basin

Location Description:

GENERAL INFORMATION

Relevant Documents:

The federal regulations referenced in this permit may be found on-line at <http://ecfr.gpoaccess.gov/> and the State of Mississippi regulations may be found on-line at <http://www.mdeq.ms.state.us/> or a copy of the regulations may be obtained by contacting the Mississippi Department of Environmental Quality, Environmental Permitting Division, Post Office Box 2261, Jackson, Mississippi 39255, phone (601) 961-5171. The following regulations were referenced in this permit:

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