

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

**TO OPERATE AIR EMISSIONS EQUIPMENT**

**THIS CERTIFIES THAT**

Formentera Operations LLC, West Nancy Field Facility  
11570 County Road 280  
Vossburg, Mississippi  
Clarke 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:** \_\_\_\_\_

**Effective Date:** As specified herein.

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

\_\_\_\_\_  
**AUTHORIZED SIGNATURE**  
**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Expires:** [Date not to exceed 5 years from issuance]

**Permit No.:** 0440-00011

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## 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(c).)

1.4 Prior to its expiration, this permit may be reopened in accordance with the provisions listed below.

(a) This permit shall be reopened and revised under any of the following circumstances:

- (1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of 3 or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.
- (2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
- (3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.
- (4) The Administrator or the Permit Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

- (b) Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.
- (c) Reopenings shall not be initiated before a notice of such intent is provided to the Title V source by the DEQ at least 30 days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.G.)

- 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(e).)

- 1.6 This permit does not convey any property rights of any sort, or any exclusive privilege.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(d).)

- 1.7 The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(5).)

- 1.8 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 11 Miss. Admin. Code Pt. 2, Ch. 6.

- (d) 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.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).)

- (e) 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.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).)

- (f) 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.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D(2).)

- (g) 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.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.)

- (h) 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.: 11 Miss. Admin. Code Pt. 2, R. 6.6.C.)

- 1.9 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(8).)

- 1.10 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.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)

- 1.11 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:
- (d) 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;
  - (e) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - (f) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
  - (g) 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(2).)

- 1.12 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.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(1).)

- 1.13 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.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(2).)

- 1.14 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(1).)

1.15 Nothing in this permit shall alter or affect the following:

- (d) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
- (e) 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;
- (f) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
- (g) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(2).)

1.16 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.H.)

1.17 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.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C(2)., R. 6.4.B., and R. 6.2.A(1)(c).)

1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:

- (d) the changes are not modifications under any provision of Title I of the Act;
- (e) the changes do not exceed the emissions allowable under this permit;
- (f) 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;
- (g) the permit shield shall not apply to any Section 502(b)(10) change.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F(1).)

- 1.19 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 11 Miss. Admin. Code Pt. 2, Ch. 3., "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)

- 1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 11 Miss. Admin. Code Pt. 2, Ch. 2., "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment," and may require modification of this permit in accordance with Regulations 11 Miss. Admin. Code Pt. 2, Ch. 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:

- (d) routine maintenance, repair, and replacement;
- (e) 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;
- (f) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
- (g) 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, Subpart I, or 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 Part 51, Subpart I, or 40 CFR 51.166;
- (h) 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
- (i) any change in ownership of the stationary source.

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

1.21 Any change in ownership or operational control must be approved by the Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.D(4).)

1.22 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.B(1).)

1.23 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.

- (d) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.

- (e) 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.
- (f) Burning must not occur within 500 yards of commercial airport property, private airfields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.G.)

1.24 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies:

- (d) 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.
- (e) 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.
- (f) 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.

- (g) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (h) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.G.)

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

- (d) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
  - (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:
    - (i) An upset occurred and that the source can identify the cause(s) of the upset;
    - (ii) The source was at the time being properly operated;
    - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
    - (iv) That within 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
    - (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
  - (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
  - (3) This provision is in addition to any upset provision contained in any applicable requirement.

- (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- (e) Startups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
  - (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
  - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).
  - (3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

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

- 1.26 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 11 Miss Admin. Code Pt. 2, R. 1.8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.8.)

**SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES**

Emission Point	Description
AA-020	Tank truck loading process with emissions routed through a vapor recovery unit (VRU) to the flare, Emission Point AA-034 (Ref. No. TTL)
AA-025	300 barrel (12,600 gallon) fixed-roof crude oil storage tank with emissions routed through a vapor recovery unit (VRU) to Emission Point AA-034 (Ref. No. TK10)
AA-026	300 barrel (12,600 gallon) fixed-roof crude oil storage tank with emissions routed through a VRU to Emission Point AA-034 (Ref. No. TK11)
AA-027	300 barrel (12,600 gallon) fixed-roof crude oil storage tank with emissions routed through a VRU to Emission Point AA-034 (Ref. No. TK12)
AA-030	1,500 barrel (63,000 gallon) fixed-roof crude oil storage tank with emissions routed through a VRU to Emission Point AA-034 (Ref. No. 22a-10-OST-CV)
AA-031	400 barrel (16,800 gallon) fixed-roof bad crude oil storage tank with emissions routed through a VRU to Emission Point AA-034 (Ref. No. 22b-10-OST-CV)
AA-032	400 barrel (16,800 gallon) fixed-roof bad crude oil storage tank with emissions routed through a VRU to Emission Point AA-034 (Ref. No. 22c-10-OST-CV)
AA-033	Two (2), 400 barrel (16,800 gallon) fixed-roof produced water storage tanks with emissions routed through a VRU to Emission Point AA-034 (Ref. Nos. 22d-10-WST-CV and 22e-10-WST-CV)
AA-034	Control flare to combust relief gas from the vapor recovery unit (VRU) which collects emissions from the process oil tanks and the tank truck loading process. The flare also handles VRU discharge during gas line downtime and during process upsets. (Ref. No. 23-10-F)
AA-035	Fugitive emissions from process equipment and components (Ref. No. FE-01)
AA-036	300 barrel (12,600 gallon) fixed-roof crude oil storage tank with emissions routed through a VRU to Emission Point AA-034 (Ref. No. 22f-22-OST-CV)
AA-037	Water knockout with low pressure relief gas routed to Emission Point AA-034
AA-038	625 HP (5.24 MMBTU/hr) Caterpillar sweet natural gas-fired four-stroke rich-burn (4SRB) power oil pump reciprocating internal combustion engine (RICE) (Ref. No. 26-19-ICE-ES)

## 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.: 11 Miss. Admin. Code Pt. 2, R. 1.3.A.)

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 Condition 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets.

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

3.A.3 For the entire facility, the permittee shall not cause, permit, or allow the emission of particles or any contaminants in sufficient amounts or of such duration from any process as to be injurious to humans, animals, plants, or property, or to be a public nuisance, or create a condition of air pollution.

- (a) The permittee shall not cause or permit the handling, transporting, or storage of any material in a manner which allows or may allow unnecessary amounts of particulate matter to become airborne.
- (b) When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than that from which it originated or to violate any other provision of 11 Miss. Admin. Code Pt. 2, Ch. 1, the Commission may order such corrected in a way that all air and gases or air and gasborne material leaving the building or equipment are controlled or removed prior to discharge to the open air.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.C.)

**B. Emission Point Specific Emission Limitations & Standards**

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 1.4.B(2).	3.B.1	H <sub>2</sub> S	1 gr/100 scf
	11 Miss. Admin. Code Pt. 2, R. 2.15C., as established in the Title V Operating Permit issued on XX, XXX	3.B.2	Operations	Operating Requirements
AA-034 and AA-038	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.B.3	PM/PM10 (filterable only)	≤ 0.6 lb/MMBTU
AA-034	11 Miss. Admin. Code Pt. 2, R. 2.15C., as established in the Title V Operating Permit issued on XX, XXX	3.B.4	H <sub>2</sub> S and VOC	Flare operating requirements
	40 CFR 64.2(a), Compliance Assurance Monitoring	3.B.5	H <sub>2</sub> S	CAM Applicability
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10), as established in the Operating Permit issued August 28, 1979, per the State Implementation Plan approved by EPA on August 11, 1980, and modified in TVOP issued October 7, 2003	3.B.6	SO <sub>2</sub>	70 lb/hr (24-hr average)
AA-038	11 Miss. Admin. Code Pt. 2, R. 2.15C., as established in the Title V Operating Permit issued on XX, XXX	3.B.7	Operating Restriction	Operational Requirement
	NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR 63, Subpart ZZZZ  40 CFR 63.6580, 63.6585(a) and (c), and 63.6590(a)(1)(iii), Subpart ZZZZ	3.B.8	HAPs	MACT Applicability

3.B.1 For the entire facility, the permittee shall not cause or permit the emission of any gas stream which contains hydrogen sulfide (H<sub>2</sub>S) in excess of one grain per 100 standard cubic feet. Gas streams containing hydrogen sulfide in excess of one grain per 100 standard cubic feet shall be incinerated at temperatures of not less than 1600 °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 hydrogen sulfide. To ensure compliance with this standard, the permittee shall at all times route emissions from the water knockout vessel, process oil and water storage tanks and the truck loading operation to Emission Point AA-034. Gas streams containing hydrogen sulfide may also be routed to a gas sales line if available.



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

- 3.B.2 For the entire facility, the permittee shall operate all air emission equipment as efficiently as possible in order to minimize the emissions of air pollutants. Furthermore, the permittee shall perform routine maintenance on all air emissions equipment such that the equipment may be operated in an efficient manner.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.15C., as established in the Title V Operating Permit issued on XX, XXX)

- 3.B.3 For Emission Points AA-034 and AA-038, the maximum permissible emission of ash and/or particulate matter when burning fossil fuels shall not exceed 0.6 pounds per million BTU per hour heat input.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).)

- 3.B.4 For Emission Point AA-034, the permittee shall operate the flare in accordance with the requirements specified in paragraphs (a) through (e) below:

- (a) The flare shall be operated at all times when emissions may be vented to it.
- (b) The flare shall be operated and maintained according to the manufacturer's recommendations.
- (c) The flare shall be operated with no visible emissions as determined by EPA Method 22, except for periods not to exceed a total of five (5) minutes during any two (2) consecutive hours.
- (d) The permittee shall maintain a flare pilot flame or auto-igniter system at all times when emissions may be vented to the flare.
- (e) The flare shall only be used with a combustion gas mixture whose net heating value is 300 BTU/scf or greater if the flare is air or steam-assisted. If the flare is non-assisted, the flare shall only be used with a combustion gas mixture whose net heating value is 200 BTU/scf or greater.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.15C., as established in the Title V Operating Permit issued on XX, XXX)

- 3.B.5 For Emission Point AA-034, the permittee is subject to and shall comply with all applicable requirements of the Compliance Assurance Monitoring (CAM) program (40 CFR Part 64).

(Ref.: 40 CFR 64.2(a), Compliance Assurance Monitoring)

- 3.B.6 For Emission Point AA-034, the permittee shall not allow emissions of sulfur dioxide (SO<sub>2</sub>) to exceed 70 pounds per hour (lb/hr), as determined on a 24-hour average basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Operating Permit issued August 28, 1979, per the State Implementation Plan approved by EPA on August 11, 1980, and modified in TVOP issued October 7, 2003)

- 3.B.7 For Emission point AA-038, the permittee shall only combust pipeline quality natural gas or propane.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.15C., as established in the Title V Operating Permit issued on XX, XXX)

- 3.B.8 For Emission Point AA-038, the permittee is subject to and shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants (HAP) for Stationary Combustion Engines, 40 CFR 63, Subpart ZZZZ.

Emission Point AA-038 is an existing remote spark ignition four stroke rich burn (4SRB) non-emergency stationary engine with a site rating greater than 500 brake horsepower located at an area source of HAP emissions.

(Ref.: 40 CFR 63.6580, 63.6585(a) and (c), and 63.6590(a)(1)(iii), Subpart ZZZZ)

C. Insignificant and Trivial Activity Emission Limitations & Standards

Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.C.1	PM	0.6 lbs/MMBTU
11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).)

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.

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

**There are no other requirements applicable to the insignificant activities listed in the source's Title V permit application.**

D. Work Practice Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-038	40 CFR 63.6603(a), 63.6625(j), and Item 12 of Table 2d, Subpart ZZZZ	3.D.1	HAPs	Scheduled Maintenance Requirements
	40 CFR 63.6605, Subpart ZZZZ	3.D.2	Operating Requirement	Minimizing Emissions
	40 CFR 63.6625(e)(2) and Item 9 of Table 6 to Subpart ZZZZ	3.D.3	Operating Requirement	Operational Requirements
	40 CFR 63.6625(h), Subpart ZZZZ	3.D.4	Operating Requirement	Operational Requirements
	40 CFR 63.6603(f), Subpart ZZZZ	3.D.5	Operating Requirement	Annual Evaluations
	40 CFR 63.6665, Subpart ZZZZ	3.D.6	HAPs	General Provisions

3.D.1 For Emission Point AA-038, the permittee shall comply with the following requirements:

- (a) Change oil and filter every 2,160 hours of operation or annually, whichever comes first;
- (b) Inspect spark plugs every 2,160 hours of operation or annually, whichever comes first; and
- (c) Inspect all hoses and belts every 2,160 hours of operation or annually, whichever comes first.

The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in (a) above. The oil analysis shall be performed at the same frequency specified for changing the oil in (a). The analysis program shall at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the permittee shall change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator shall change the oil within 2 business days or before commencing operation, whichever is later. The permittee shall keep records of the parameters that are analyzed as part of the program, the results of the

analysis, and the oil changes for the engine. The analysis program shall be part of the maintenance plan for the engine.

(Ref.: 40 CFR 63.6603(a), 63.6625(j), and Table2d, item (11), Subpart ZZZZ)

- 3.D.2 For Emission Point AA-038, the permittee shall be in compliance with the applicable emission limitations, operating limitations, and other requirements in Subpart ZZZZ at all times and shall at all times operate and maintain each engine, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by Subpart ZZZZ have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to DEQ which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the sources.

(Ref.: 40 CFR 63.6605, Subpart ZZZZ)

- 3.D.3 For Emission Point AA-038, the permittee must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop the permittee's own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

(Ref.: 40 CFR 63.6625(e)(2) and Item 9 of Table 6 to Subpart ZZZZ)

- 3.D.4 For Emission Point AA-038, the permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

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

- 3.D.5 For Emission Point AA-038, the permittee shall evaluate the status of this engine as a remote stationary RICE every 12- months. If the evaluation indicates that this engine no longer meets the definition of remote stationary RICE in 40 CFR 63.6675, the permittee shall comply with all of the requirements for existing non-emergency, non-black start 4SRB stationary RICE >500 HP located at an area source of HAP that are not remote stationary RICE within 1 year of the annual evaluation.

(Ref.: 40 CFR 63.6603(f), Subpart ZZZZ)

- 3.D.6 For Emission Point AA-038, the permittee shall comply with applicable General Provisions specified in Table 8 to Subpart ZZZZ, which denotes the applicable General Provisions of 40 CFR 63.1 through 63.15.

(Ref.: 40 CFR 63.6665, Subpart ZZZZ)

## 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. If the permit was reissued or modified during the course of the preceding calendar year, the compliance certification shall address each version of the permit. 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(5)(a), (c), & (d).)



## 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 in this Section.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(1).)

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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.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 11 Miss. Admin. Code Pt. 2, R. 6.2.E. For applicable periodic reporting requirements in 40 CFR Parts 60, 61, and 63, the permittee shall comply with the deadlines in this condition for reporting conducted on a semiannual basis. Additionally, any required quarterly reports shall be submitted by the end of the month following each calendar quarter (i.e., April

30th, July 31st, October 31st, and January 31st), and any required annual reports shall be submitted by January 31st following each calendar year.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1), 40 CFR 60.19(c), 61.10(g), and 63.10(a)(5))

- 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) working days of the time the deviation began.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

- 5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

- 5.A.8 Unless otherwise specified in Section 4, upon permit issuance, the monitoring, testing, recordkeeping, and reporting requirements of Section 5 herein supersede the requirements of any preceding permit to construct and/or operate.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

**B. Specific Monitoring and Recordkeeping Requirements**

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Monitoring/Recordkeeping Requirement
AA-034	11 Miss. Admin. Code Pt. 2, R.6.3.A(3)(a)(2).)	5.B.1	Flared Gas	Monitoring and recordkeeping requirements
	11 Miss. Admin. Code Pt. 2, R.6.3.A(3)(a)(2).)	5.B.2	H <sub>2</sub> S	Monitoring and recordkeeping requirements
	11 Miss. Admin. Code Pt. 2, R.6.3.A(3)(a)(2).)	5.B.3	Heating value	Monitoring and recordkeeping requirements
	11 Miss. Admin. Code Pt. 2, R.6.3.A(3)(a)(2).)	5.B.4	SO <sub>2</sub>	Monitoring and recordkeeping requirements
	11 Miss. Admin. Code Pt. 2, R.6.3.A(3)(a)(2).)	5.B.5	VEEs	Monitoring and recordkeeping requirements
	11 Miss. Admin. Code Pt. 2, R.6.3.A(3)(a)(2).)	5.B.6	Operations	Operational, monitoring, and recordkeeping requirements
	40 CFR 64.3(a) and (b), 64.6(c), CAM	5.B.7	Flare flame	Operational, monitoring, and recordkeeping requirements
	11 Miss. Admin. Code Pt. 2, R.6.3.A(3)(a)(2).)	5.B.8	Operations	Recordkeeping requirements
	40 CFR 64.7(b) and (c), CAM	5.B.9	Operations	CAM requirements
	40 CFR 64.7(d), CAM	5.B.10	Operations	Corrective Action response requirements
	40 CFR 64.8, CAM	5.B.11	QIP	Quality Improvement Plan (QIP) requirements
	40 CFR 64.9(b), CAM	5.B.12	CAM records	Recordkeeping requirements
AA-038	40 CFR 63.6655(a)(1), (2), and (5), (d) and (e)(3), 63.6660, and Table 6, Subpart ZZZZ	5.B.13	HAP	Recordkeeping requirements

5.B.1 For Emission Point AA-034, the permittee shall monitor and record the amount of gas flared in each 24-hour block period (e.g., a calendar day) and include the basis for the estimate (e.g., meter, production records, engineering estimate, etc.). The monitor(s) or meter(s) used to determine gas flow shall be operated, calibrated and maintained in accordance with the manufacturer’s recommendations. The calibration frequency shall be at least quarterly. Records of these calibrations shall be maintained on site. All gas streams that are routed to the flare shall be included in the determination of gas flow, including gas vented due to downstream compressor shutdowns, gas sent from the VRU, tank loading emissions, shutdowns, malfunctions, etc. The flow rate in scf/hr shall be

calculated for each 24-hour block period using the total gas flow during the 24-hour period and the actual hours gases were vented to the flare during the 24-hour period.

(Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.A(3)(a)(2).)

- 5.B.2 For Emission Point AA-034, the permittee shall analyze the hydrogen sulfide content (in gr/scf) of the sour gas on a monthly basis. The sample shall be taken where all waste streams combine but prior to combustion in the flare. The sample shall not be collected while any truck loading operations are being conducted.

(Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.A(3)(a)(2).)

- 5.B.3 For Emission Point AA-034, the permittee shall determine the net heating value (in Btu/scf) of the flare gas on an annual basis. The sample shall be taken where all waste streams combine but prior to combustion in the flare. The sample shall be collected while all waste streams are being routed to the flare.

(Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.A(3)(a)(2).)

- 5.B.4 For Emission Point AA-034, the permittee shall calculate and maintain records of the 24-hour average SO<sub>2</sub> emission rate in lb/hr. The permittee shall use the most recent monthly H<sub>2</sub>S measurement of the flared gas and the 24-hour average gas flow to determine SO<sub>2</sub> emissions for each 24-hour block period.

(Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.A(3)(a)(2).)

- 5.B.5 For Emission point AA-034, the permittee shall perform monthly visible emissions tests for a minimum of fifteen (15) minutes using EPA Method 22 while the facility is operating with all gases being flared. If visible emissions are observed for a period greater than one (1) minute, corrective action shall be taken immediately. Immediately following completion of the corrective action(s), the permittee shall demonstrate compliance by performing an EPA Method 22 test for a period of two (2) hours and shall monitor and maintain records of the flare rate during the test. The monthly visible emissions tests shall be separated by at least fifteen (15) days between each test.

(Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.A(3)(a)(2).)

- 5.B.6 For Emission Point AA-034, the permittee shall continuously maintain and operate an auto-igniter system on the flare to ensure a flame is immediately restored when emissions are being sent to the flare. At a minimum, the permittee shall comply with the following:

- (a) The auto-igniter system shall be an electric arc ignition system. The electric arc ignition system shall pulse continually and a device shall be installed and used to continuously monitor that the electric arc ignition system is operational.

- (b) The auto-igniter system shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
- (c) The auto-igniter system must be equipped with a malfunction alarm and remote notification system that alerts facility personnel if the auto ignition system fails to light the flame.
- (d) If the auto-igniter system fails to light the flame, it must be relit as soon as safely possible and the auto-igniter system must be repaired or replaced as soon as practicable.
- (e) Physical inspections of all equipment associated with the auto-igniter system shall be performed quarterly. The permittee shall respond to any observation of any auto-igniter failure and ensure the equipment is returned to proper operation as soon as practicable and safely possible after an observation or an alarm sounds.

(Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.A(3)(a)(2).)

5.B.7 For Emission Point AA-034, the permittee shall comply with the Compliance Assurance Monitoring (CAM) Plan contained in Appendix C of this permit. The CAM Plan requires the permittee to visually monitor daily for the presence of a flare flame, to monitor hydrogen sulfide continually at the flare tip, and to provide continuous operation of an auto-igniter for the flare. When the monitoring device detects a hydrogen sulfide concentration of 10 ppm (0.655 gr/100 scf) or greater an alarm will sound, and the permittee shall immediately determine if the flare flame has been extinguished. and, if so, take corrective action and record the action taken. The permittee is required to record all events in which the concentration exceeds 10 ppm. In addition, the permittee shall visually observe for the presence of a flare flame on a daily basis. If the flame is observed to be extinguished, the permittee shall immediately take corrective action and document all actions that were taken. Any event when a flame is not present at the flare when emissions are present shall be an considered an exceedance of the permit requirements of Conditions 3.B.1 and 3.B.4 and shall be reported as a permit deviation in accordance with Condition 5.A.5. Any event when the hydrogen sulfide monitor or the auto ignitor are not functioning, other than periods of routine maintenance, but the flare flame is not extinguished shall be considered an excursion.

(Ref.: 40 CFR 64.3(a) and (b), 64.6(c), CAM)

5.B.8 For Emission Point AA-034, the permittee shall comply with the following recordkeeping requirements outlined in paragraphs (a) through (d):

- (a) The permittee shall maintain a copy of the flare manufacturer operating and maintenance recommendations and detailed records of all maintenance performed on the flare.

- (b) The permittee shall maintain records of all EPA Method 22 tests, and details of any corrective/preventative action(s) taken.
- (c) The permittee shall maintain records of all gas analyses performed to determine the net heating value and H<sub>2</sub>S content of the gas being combusted in the flare, and the volume of gas flared per day.
- (d) For the auto-igniter system and the H<sub>2</sub>S monitoring system, the permittee shall maintain records of any instances in which either system did not function, the date and times (including duration) of the occurrence, the cause of the occurrence, the corrective actions taken, preventative measures adopted to prevent reoccurrence, all instances of alarm activation, including the date and cause of alarm activation, actions taken to bring the flare into normal operating conditions, and any maintenance activities conducted on the systems.

(Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.A(3)(a)(2).)

5.B.9 For Emission Point AA-034, the permittee shall comply with the following requirements for the monitoring required by the approved CAM Plan (Attachment C):

- (a) Proper maintenance. At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- (b) Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used, including in data averaging and calculations or in fulfilling a minimum data availability requirement, as applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(Ref.: 40 CFR 64.7(b) and (c), CAM)

5.B.10 For Emission Point AA-034, upon detecting an excursion or exceedance, the permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal

operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

Determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(Ref.: 40 CFR 64.7(d), CAM)

- 5.B.11 For Emission Point AA-034, based on the results of a determination made under Condition 5.B.10, the DEQ may require the permittee to develop and implement a Quality Improvement Plan (QIP) containing the elements specified in 40 CFR 64.8(b). The QIP shall be developed and implemented within 180 days of written notification from DEQ that a QIP is required. The DEQ may require the permittee make reasonable changes to the QIP if the QIP fails to address the cause of the control device performance problem or fails to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Implementation of a QIP shall not excuse the permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that applies.

(Ref.: 40 CFR 64.8, CAM)

- 5.B.12 For Emission Point AA-034, the permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written QIP required pursuant to Condition 5.B.11 and any activities undertaken to implement a QIP, data used to document the adequacy of monitoring, and monitoring maintenance or corrective actions, as applicable. As applicable, records of monitoring data and monitoring performance data should include date and time, who performed the analysis, analytical techniques or methods used, results and operating conditions at the time of the sampling or measurement. These records may be maintained in hard copy form or electronically, provided they are available for expeditious inspection and review.

(Ref.: 40 CFR 64.9(b), CAM)

- 5.B.13 For Emission Point AA-038, the permittee shall keep the following records in a form suitable and readily available for review for a period of five (5) years following the date of each record. These records may be kept in either an electronic or a hard copy format.

(a) A copy of each notification and report submitted to comply with Subpart ZZZZ;



- (b) Records of each occurrence and duration of malfunction;
- (c) Maintain on-site for the life of the engine either a copy of the manufacturer's emission-related operation and maintenance instructions for each unit or the maintenance plan developed in accordance with 40 CFR §63.6640
- (d) Records of all maintenance conducted on each engine in order to demonstrate the engines have been operated and maintained according to the manufacturer's written instructions or by the maintenance plan developed by the permittee.
- (e) Records of any actions taken to minimize emissions during a malfunction.
- (f) Maintain records of the initial and annual evaluation of the status of this engine as a remote stationary RICE.

(Ref.: 40 CFR 63.6655(a)(1), (2), and (5), (d) and (e)(3), 63.6660, and Table 6, Subpart ZZZZ)

C. Specific Reporting Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Reporting Requirement
AA-034	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.1	SO <sub>2</sub> , H <sub>2</sub> S and Gas Flow	Submit semiannual reports
	40 CFR 64.9(a)(1) and (2)	5.C.2	Excursions	Submit semiannual reports
AA-038	40 CFR 63.6640(b), Subpart ZZZZ	5.C.3	Operations	Submit deviation reports
	11 Miss. Admin. Code Pt. 2, R. 6.3.(A)(3)(c)(1).	5.C.4	Fuel	Submit semiannual reports
	11 Miss. Admin. Code Pt. 2, R. 6.3.(A)(3)(c)(1).	5.C.5	Remote Status	Submit semiannual report

5.C.1 For Emission Point AA-034, the permittee shall report the following information in accordance with Condition 5.A.4

- (a) A summary of the 24-hour average SO<sub>2</sub> emissions calculated daily during the reporting period, the H<sub>2</sub>S concentrations obtained in the monthly samples analyzed during the reporting period, the 24-hour gas flow and the hours of operation of the flare during each 24-hour period.
- (b) Copies of data sheets for all EPA Method 22 tests performed during the reporting period, including details of any accompanying corrective and preventative actions taken;
- (c) Auto-igniter system and H<sub>2</sub>S monitoring systems data: report of any instances in which the auto-igniter system or H<sub>2</sub>S monitoring system did not function, the date and times of the occurrence, whether or not gas was being vented, whether or not the flare flame was extinguished, the corrective actions taken, preventative measures adopted to prevent reoccurrence, all instances of alarm activation, including the date and cause of alarm activation, actions taken to bring the flare into normal operating conditions, and any maintenance activities conducted on the auto-igniter system or H<sub>2</sub>S monitoring system.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.(A)(3)(c)(1).)

5.C.2 For Emission Point AA-034, the permittee shall submit reports in accordance with Condition 5.A.4 of the following information, as applicable:

- (a) Summary information on the number, duration, and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken.
- (b) Summary information on the number, duration, and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- (c) A description of the actions taken to implement a QIP during the reporting period as specified in Condition 5.B.11. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances.

(Ref: 40 CFR 64.9(a), CAM)

- 5.C.3 For Emission Point AA-038, the permittee shall report each instance in which an operating requirement was not met or a maintenance requirement was not completed in a timely manner. These instances are deviations from Subpart ZZZZ requirements and must be reported in accordance with Condition 5.A.4.

(Ref.: 40 CFR 63.6640(b), Subpart ZZZZ and 11 Miss. Admin. Code Pt. 2, R. 6.3.(A)(3)(c)(1).)

- 5.C.4 For Emission Points AA-038, the permittee shall submit a summary fuel usage report containing the type and quality of fuel fired during the reporting period. This information shall be submitted in accordance with Condition 5.A.4.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.(A)(3)(c)(1).)

- 5.C.5 For Emission Point AA-038, the permittee shall report the results of the annual review of the engine's status as required by permit Condition 3.D.5. This information shall be submitted in accordance with Condition 5.A.4.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.(A)(3)(c)(1).)

## 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://www.ecfr.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 containing class I, class II or non-exempt substitute refrigerants;
  - (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, as

well as persons selling, offering for sale, and/or purchasing class I, class II, or non-exempt substitute 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

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
lb/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
	Non-Methane Volatile Organic Compounds
NMVOG	Nitrogen Oxides
NO <sub>x</sub>	New Source Performance Standards, 40 CFR 60
NSPS	Operation and Maintenance
O&M	Particulate Matter
PM	Particulate Matter less than 10 µm in diameter
PM <sub>10</sub>	Particulate Matter less than 2.5 µm in diameter
PM <sub>2.5</sub>	Parts per Million
ppm	Prevention of Significant Deterioration
PSD	State Implementation Plan
SIP	Sulfur Dioxide
SO <sub>2</sub>	Startup, Shutdown, and Malfunction
SSM	Tons per Year
TPY	Total Reduced Sulfur
TRS	Visible Emissions Evaluation
VEE	Volatile Hazardous Air Pollutant
VHAP	Volatile Organic Hazardous Air Pollutant
VOHAP	Volatile Organic Compound
VOC	



## **APPENDIX B**

### **LIST OF REGULATIONS REFERENCED IN THIS PERMIT**

**The full text of the regulations referenced in this permit may be found on-line at <http://www.deq.state.us> and <http://ecfr.gpoaccess.gov> or the Mississippi Department of Environmental Quality will provide a copy upon request. A list of regulations referenced in this permit is shown below:**

11 Miss. Admin. Code, Part 2, Ch. 1. – Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants (Amended November 10, 2016)

11 Miss. Admin. Code, Part 2, Ch. 2. – Permit Regulations for the Construction and/or Operation of Air Emissions Equipment (Amended July 28, 2005)

11 Miss. Admin. Code, Part 2, Ch. 6. – Air Emission Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act (Amended June 28, 2012)

40 CFR Part 82 - Title VI of the Clean Air Act (Stratospheric Ozone Protection)

40 CFR Part 63, Subpart A – General Provisions

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

40 CFR Part 64, Compliance Assurance Monitoring

## **APPENDIX C**

### **COMPLIANCE ASSURANCE MONITORING PLAN**

## Compliance Assurance Monitoring Plan

*(Prepared in accordance with 40 CFR 64)*

<i>Operator:</i>		<i>Facility:</i>	
<b>Formentera Operations LLC</b>		<b>West Nancy Field Facility</b>	
<i>Permit No.:</i>		<i>AI No.:</i>	<i>County, State:</i>
<b>0440-00011</b>		<b>6375</b>	<b>Clarke County, MS</b>

### I. Background Information

<b>Emission Point Designation (Ref. No.)</b>	AA-034 (23-10-F)
<b>Emission Point Description</b>	One (1) control flare controlling vapors from the storage tanks, oil tank truck loading process, and facility-wide low pressure relief gas.
<b>Regulated Pollutant</b>	Hydrogen Sulfide (H <sub>2</sub> S)
<b>Applicable Emission Limitation or Standard Requirement</b>	11 Miss. Admin. Code Pt. 2, R. 1.4.B(2).  <i>(It should be noted that this is a work practice standard, not a numerical limit in which the control device must meet.)</i>
<b>Applicable Emission Limitation or Standard</b>	The permittee shall not cause or permit the emission of any gas stream which contains hydrogen sulfide (H <sub>2</sub> S) in excess of one grain per 100 standard cubic feet. Gas streams containing hydrogen sulfide in excess of one grain per 100 standard cubic feet shall be incinerated at temperatures of not less than 1600 °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 hydrogen sulfide.
<b>Monitoring Requirements</b>	Measure gas H <sub>2</sub> S content at the flare tip and verify presence of a flame
<b>Emission Control Technology</b>	Thermal Combustion

	<b>Indicator No. 1</b>	<b>Indicator No. 2</b>
<b>Indicator</b>	Operational design & controls	Visible presence of a flame
<b>Measurement Approach</b>	<p>The flare is equipped with a H<sub>2</sub>S monitor to indicate when the flare flame is extinguished.</p> <p>The flare is equipped with a continuous spark flame ignitor to ensure a flame is immediately restored when the flare flame is extinguished.</p>	<p>A visual observation for the presence of a flame is determined daily.</p>
<b>Indicator Range (Including the corrective action taken for an excursion)</b>	<p>Alarm will sound at 10 ppm and greater H<sub>2</sub>S.</p> <p>An excursion is defined as any instance when the flare is not lit.</p> <p>Excursions outside of the indicator range will trigger an investigation, corrective action, and reporting, if necessary.</p> <p>Not more than three (3) excursions in any semi-annual reporting period.</p>	<p>An excursion is defined as any instance when the flare is not lit.</p> <p>Excursions outside of the indicator range will trigger an investigation, corrective action, and reporting, if necessary.</p> <p>Not more than three (3) excursions in any semi-annual reporting period.</p>

III. Performance Criteria

	<b>Indicator No. 1</b>	<b>Indicator No. 2</b>
<b>Data Representativeness</b>	Visible presence of a flame	Visible presence of a flame
<b>Verification of Operational Status</b>	Visible presence of a flame and alarm system	Visible presence of a flame
<b>QA/QC Practices and Criteria</b>	Calibrate the H <sub>2</sub> S monitor in accordance with the manufacturer’s recommendations at least annually.	N/A
<b>Monitoring Frequency</b>	Continuously	Daily
<b>Data Collection/ Recordkeeping Procedures</b>	<p>Record instances when the flare flame is extinguished and the duration that the flare is not lit.</p> <p>Record all corrective actions taken.</p> <p>Retain records for at least five (5) years.</p>	<p>Record whether or not a flame was observed each day. If no flame is observed, record the downtime hours. Record all corrective actions taken. Retain records for at least five (5) years.</p>
<b>Averaging Period</b>	N/A; The flare is observed daily.	N/A; The flare is observed daily.

A. Background

The pollutant specific emissions unit (PSEU) is the flare controlling the vapors from the storage tanks, oil tank truck loading process, and facility-wide low pressure relief gas.

B. Rationale for Selection of Performance Indicators and Selecting Indicator Ranges

*Operational Design & Controls:*

The flare is equipped with a H<sub>2</sub>S monitor to indicate when the flare flame is extinguished. The monitor will sound at the indicator ranges specified. These ranges would only be met if the flare is not lit, and the vapors are venting from the flare without being combusted. In addition, the flare is equipped with a continuous spark flame ignitor to ensure a flame is immediately restored when the flare flame is extinguished.

*Visible Presence of a Flame:*

Presence of a flame indicates that the flare is operating and that the appropriate combustion of the flare gas is attained. Visual observations are made to ensure that the flare is lit, and immediate corrective action is taken if the flame is observed to be extinguished.

C. Additional Comments

The data associated with this monitoring plan, along with the standard combustion efficiency of the control flare device, is used to determine the concentration of H<sub>2</sub>S present in the non-combusted flare gas and therefore demonstrate applicability to the requirements outlined above. Excursions outside of the indicator ranges will trigger an investigation, corrective action, and reporting, if necessary.