

STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Southern Natural Gas Company, L.L.C.
Rose Hill Compressor Station
[City TBD] Mississippi
Clarke 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

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: _____

Permit No.: 0440-00071

SECTION 1. GENERAL CONDITIONS

- 1.1 This permit is for air pollution control purposes only.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
- 1.1 Any activities not identified in the application are not authorized by this permit.
(Ref.: Miss. Code Ann. 49-17-29(1)(b))
- 1.2 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.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
- 1.3 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.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(6).)
- 1.4 The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
- 1.5 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.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)
- 1.6 The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).)
- 1.7 The permit does not convey any property rights of any sort, or any exclusive privilege.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)
- 1.8 The permittee shall furnish to the Department of Environmental Quality (DEQ) within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to

determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).)

- 1.9 *Design and Construction Requirements:* The stationary source shall be designed and constructed so as to operate without causing a violation of an Applicable Rules and Regulations, 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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A(1)-(3).)

- 1.10 The necessary facilities shall be constructed to prevent any wastes or other products or substances to be placed in a location where they are likely to cause pollution of the air or waters of the State without the proper environmental permits.

(Ref.: Miss. Code Ann. 49-17-29(1) and (2))

- 1.11 *Fugitive Dust Emissions from Construction Activities:* 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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A(4).)

- 1.12 *General Nuisances:* 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.)

1.13 *Right of Entry:* The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives upon presentation of credentials:

- (a) To enter at reasonable times 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) 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 contaminants or waste waters, fuel, process material, or other material which affects or may affect emission of air contaminants from any source.

(Ref.: Miss. Code Ann. 49-17-21)

1.14 *Permit Modification or Revocation:* After notice and opportunity for a hearing, the Permit Board may modify the permit or revoke it in whole or in part for good cause shown including, but not limited to:

- (a) Persistent violation of any of the terms or conditions of this permit;
- (b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
- (c) A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

1.15 *Public Record and Confidential Information:* Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality, Office of Pollution Control.

(Ref.: Miss. Code Ann. 49-17-39)

1.16 *Permit Transfer:* This permit shall not be transferred except upon approval of the Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B.)

1.17 *Severability:* 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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(7).)

- 1.18 *Permit Expiration:* The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance, if construction is suspended for eighteen (18) months or more, or if construction is not completed within a reasonable time. The DEQ may extend the 18-month period upon a satisfactory showing that an extension is justified.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1)., R. 2.5.C(4)., and R. 5.2.)
- 1.19 *Certification of Construction:* A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(3).)
- 1.20 *Beginning Operation:* 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 11 Miss. Admin. Code Pt. 2, R. 2.13.G.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).)
- 1.21 *Application for a Permit to Operate:* 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.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).)
- 1.22 *Operating Under a Permit to Construct:* 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.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).)
- 1.23 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.
- (a) 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 five (5) working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
 - (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
- (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
 - (3) This provision is in addition to any upset provision contained in any applicable requirement.
 - (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- (b) Startups and Shutdowns (as defined 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 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 11 Miss. Admin. Code Pt. 2, R. 1.2., occurs during startup or shutdown, see the upset requirements above.

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

1.24 *General Duty:* All air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants.

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

1.25 *Compliance Testing:* Regarding compliance testing:

- (a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.
- (b) Compliance testing will be performed at the expense of the permittee.
- (c) Each emission sampling and analysis report shall include but not be limited to the following:
 - (1) detailed description of testing procedures;
 - (2) sample calculation(s);
 - (3) results; and
 - (4) comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B(3), (4), and (6).)

SECTION 2. EMISSION POINT DESCRIPTION

The permittee is authorized to construct and operate, upon certification of construction, air emissions equipment, as described in the following table.

Emission Point	Description
AA-001	750 eKw Emergency Generator
AA-002	11,406 HP Compressor Turbine No. 1
AA-003	11,406 HP Compressor Turbine No. 2
AA-004	0.58 MMBtu/hr Catalytic Fuel Gas Heater
AA-005	2.91 MMBtu/hr Miscellaneous Space and Water Heaters
AA-006	5,000 Gallon Pipeline Condensate Tank
AA-007	Parts Degreaser
AA-008	Pipe and Equipment Fugitives
AA-009	Truck Loading
AA-010	Emergency Shutdown/Pipeline Blowdown

SECTION 3. EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity	Opacity < 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2		Equivalent Opacity
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.3	Fuel Requirement	Shall combust only pipeline-quality natural gas
AA-001	40 CFR 63, Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines) 40 CFR 63.6590(c)(1), Subpart ZZZZ	3.4	VOC HAP	General Applicability
	40 CFR 60, Subpart JJJJ (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines) 40 CFR 60.4230(a)(4)(iv), Subpart JJJJ	3.5	NO _x CO VOC	General Applicability
	40 CFR 60.4233(e), Subpart JJJJ	3.6		Emissions Standards
	40 CFR 60.4243(d), Subpart JJJJ	3.7		Emergency Engine Operation Requirement
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.8		Install a non-resettable hour meter
	AA-001 AA-004 AA-005	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a)	3.9	Particulate Matter (Filterable only)
AA-002 AA-003	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b)	3.10	Particulate Matter (Filterable only)	$E = 0.8808 * T^{-0.1667}$

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
AA-002 AA-003	40 CFR 60, Subpart KKKK Standards of Performance for Stationary Combustion Turbines 40 CFR 60.4305(a), Subpart KKKK	3.11	NO _x SO ₂	General Applicability
AA-002 AA-003	40 CFR 60.4320(a), Subpart KKKK	3.12	NO _x	Emission Standards
	40 CFR 60.4330(a)(2), Subpart KKKK	3.13	SO ₂	
AA-008	40 CFR 60, Subpart OOOOa Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 40 CFR 60.5365(j), Subpart OOOOa	3.14	VOC SO ₂	General Applicability
	40 CFR 60.5397a, Subpart OOOOa	3.15	VOC	Operational Requirement
	40 CFR 60.5397a(c)(7), Subpart OOOOa	3.16		
	40 CFR 60.5397a(c)(8), Subpart OOOOa	3.17		
	40 CFR 60.5397a(h), Subpart OOOOa	3.18		

3.1 For the entire facility, 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. Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any on hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.

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

3.2 For the entire facility, 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 3.1. This shall not apply to vision obscuration caused by uncombined water droplets.

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

- 3.3 For the entire facility, the permittee shall combust only pipeline-quality natural gas in all combustion units operating at the facility.

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

- 3.4 For Emission Point AA-001, the permittee is subject to and shall comply with all applicable requirements of 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE). Emission Point AA-001 is a new RICE located at an area source of HAP emissions. Therefore, compliance with 40 CFR Part 63, Subpart ZZZZ shall be achieved by meeting all applicable requirements of 40 CFR Part 60, Subpart JJJJ. No further requirements apply for such engines under NESHAP Subpart ZZZZ.

(Ref.: 40 CFR 63.6585, 40 CFR 63.6590(a)(2)(iii) and (c)(1), Subpart ZZZZ)

- 3.5 For Emission Point AA-001, the permittee is subject to and shall comply with all applicable requirements of Standards of Performance for Stationary Spark Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart JJJJ. This Emission Point is classified as a new, emergency, Spark Ignition (SI), stationary, 4-stroke rich burn (4SRB), Reciprocating Internal Combustion Engine (RICE) with a maximum engine power greater than 25 horsepower (HP) located at an area source of Hazardous Air Pollutants (HAPs).

(Ref.: 40 CFR 60.4230(a)(4)(iv), Subpart JJJJ)

- 3.6 For Emission Point AA-001, the permittee shall comply with the emissions standards below over the entire life of the engine.

Pollutant	Emission Standard (g/bhp-hr)	Emissions Standard (ppmvd at 15% O₂)
NO _x	2.0	160
CO	4.0	540
VOC	1.0	86

(Ref.: 40 CFR 60.4233(e), Table 1, Subpart JJJJ)

- 3.7 For Emission Point AA-001, the permittee shall operate the emergency, stationary ICE according to the requirements in (a) through (c) below:

- (a) There is no time limit on the use of the engine in emergency situations.
- (b) The engine may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the

manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of each engine beyond 100 hours per calendar year.

- (c) The engine may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in (b). Except as provided in 40 CFR 60.4243(d)(3)(i), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial agreement with another entity.

(Ref.: 40 CFR 60.4243(d), Subpart JJJJ)

- 3.8 For Emission Point AA-001, the permittee shall install a non-resettable hour meter.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10), and 40 CFR 60.4237(a), Subpart JJJJ)

- 3.9 For Emission Points AA-001, AA-004, and AA-005, the permittee shall not have particulate matter emissions from fossil fuel burning installations of less than 10 MMBtu/hr heat input that exceeds 0.6 lb/MMBtu.

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

- 3.10 For Emission Points AA-002 and AA-003, the permittee shall not have particulate emissions from fossil fuel burning installations of greater than 10 MMBtu/hr heat input that exceeds the emission rate determined by the relationship:

$$E = 0.8808 * I^{-0.1667}$$

Where “E” is the emission rate in pounds per million BTU per hour heat input and “I” is the heat input in millions of BTU per hour.

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

- 3.11 For Emission Points AA-002 and AA-003, the permittee is subject to and shall comply with all applicable requirements of Standards of Performance for Stationary Combustion Turbines, 40 CFR Part 60, Subpart KKKK. These emission points are categorized as turbines with a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBtu) per hour, which were constructed after February 18, 2005.

(Ref.: 40 CFR 60.4305(a), Subpart KKKK)

3.12 For Emission Points AA-002 and AA-003, the permittee shall limit the Nitrogen Oxide (NO_x) emissions from the turbines to less than 25 ppm at 15% O₂ or 150 ng/J of useful output (1.2 lb/MWh).

(Ref.: 40 CFR 60.4320(a) and Item 3 of Table 1, Subpart KKKK)

3.13 For Emission Points AA-002 and AA-003, the permittee shall not burn any fuel which contains the potential sulfur emissions in excess of 0.06 lbs SO₂/MMBtu heat input.

(Ref.: 40 CFR 60.4330(a)(2), Subpart KKKK)

3.14 For Emission Point AA-008, the permittee is subject to and shall comply with all applicable requirements of Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015, 40 CFR 60, Subpart OOOOa. Emission Point AA-008 is the collection of fugitive emissions components from equipment leaks at a compressor station.

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

3.15 For Emission Point AA-008, the permittee shall demonstrate compliance with Subpart OOOOa by monitoring all fugitive emission components, as defined in 40 CFR Part 60.5430a. For the purposes of this condition along with **Conditions 3.16, 3.17, and 3.18**, fugitive emissions are defined as: Any visible emission from a fugitive emissions component observed using optical gas imaging or an instrument reading of 500 parts per million (ppm) or greater using EPA Method 21 – Volatile Organic Compound Leaks. The permittee shall develop an emissions monitoring plan that covers the collection of fugitive emissions components within each company-defined area. This monitoring plan shall include the information and elements specified in paragraphs (a) through (j) below:

(a) Frequency for conducting surveys.

(1) The permittee shall conduct an initial monitoring survey within 90 days of startup for each collection of fugitive emissions components at a new compressor station.

(2) Thereafter, a monitoring survey shall be conducted at least semiannually. Consecutive semiannual monitoring surveys must be conducted at least 4 months apart and no more than 7 months apart. Each monitoring survey shall observe each fugitive emissions component for fugitive emissions.

(b) Technique used in detecting fugitive emissions (i.e. EPA Method 21 from 40 CFR Part 60, Appendix A-7 or optical gas imaging).

(c) Manufacturer and model number of fugitive emission detection equipment used.

(d) Procedures and timeframes for identifying and repairing fugitive emissions components from which fugitive emissions are detected. This includes timeframes

for fugitive emission components that are unsafe to repair. At a minimum, the repair schedule shall meet the requirements of **Condition 3.18**.

- (e) Procedures and timeframes for verifying fugitive emission component repairs.
- (f) Records that will be kept and the length of time these records will be kept.
- (g) A representative site map shall be kept on-site at all times.
- (h) A defined observation path that ensures all fugitive emissions components are within sight of the path. The observation path must account for interferences.
- (i) If the permittee utilizes EPA Method 21, the plan shall also include a list of fugitive emissions components to be monitored and the method for determining location of fugitive emissions components to be monitored in the field (e.g. tagging, identification on a process and instrumentation diagram, etc.).
- (j) The plan shall also include the written plan developed for all of the fugitive emission components designated as difficult-to-monitor in accordance with 40 CFR Part 60.5397(g)(3)(i) and the written plan for fugitive emission components designated as unsafe-to-monitor in accordance with 40 CFR Part 60.5397(g)(3)(ii) and (g)(4).

(Ref.: 40 CFR 60.5397a(a) and (b), Subpart OOOOa)

3.16 For Emission Point AA-008, if the permittee utilizes optical gas imaging, the monitoring plan required in **Condition 3.15** shall include the information specified in subparagraphs (a) through (g) below:

- (a) Verification that the optical gas imaging equipment is capable of imaging gases in the spectral range for the compound of highest concentration in the potential fugitive emissions. The optical gas imaging equipment must be capable of imaging a gas that is half methane, half propane at a concentration of 10,000 ppm at a flow rate of ≤ 60 grams per hour (g/hr) from a quarter inch diameter orifice. This verification is an initial verification and may either be performed by the permittee, by the manufacturer, or by a third party. For the purposes of complying with the fugitive emissions monitoring program with optical gas imaging, a fugitive emission is defined as any visible emissions observed using optical gas imaging.
- (b) Procedures for a daily verification check.
- (c) Procedures for determining the permittee's maximum viewing distance from the equipment and procedures for how the permittee will ensure that this distance is maintained.

- (d) Procedures for determining maximum wind speed during which monitoring can be performed and procedures for how the permittee will ensure monitoring occurs only at wind speeds below this threshold.
- (e) Procedures for conducting surveys, including how the permittee will ensure an adequate thermal background is present in order to view potential fugitive emissions, how the permittee will deal with adverse monitoring conditions, such as wind, and how the permittee will deal with interferences (e.g., steam).
- (f) Specifications of the training and experience needed prior to performing surveys.
- (g) Procedures for calibration and maintenance. At a minimum, procedures must comply with those recommended by the manufacturer.

(Ref.: 40 CFR 60.5397a(c)(7), Subpart OOOOa)

3.17 For Emission Point AA-008, if the permittee utilizes EPA Method 21 from 40 CFR Part 60, Appendix A-7, the monitoring plan required in **Condition 3.15** shall include the information specified in paragraphs (a) and (b) below:

- (a) Verification that all monitoring equipment meets the requirements specified in Section 6.0 of EPA Method 21 from 40 CFR Part 60, Appendix A-7. For purposes of instrument capability, the fugitive emissions definition shall be 500 ppm or greater methane using a FID-based instrument. If the permittee uses an analyzer other than a FID-based instrument, the permittee shall develop a site-specific fugitive emission definition that would be equivalent to 500 ppm methane using a FID-based instrument (e.g., 10.6 eV PID with a specified isobutylene concentration as the fugitive emission definition would provide equivalent response to your compound of interest).
- (b) Procedures for conducting surveys. At a minimum, these procedures shall ensure that the surveys comply with the relevant sections of EPA Method 21 from 40 CFR Part 60, Appendix A-7, including Section 8.3.1.
- (c) Procedures for calibration. The instrument shall be calibrated before use each day of its use by the procedures in Method 21 from 40 CFR Part 60, Appendix A-7. At a minimum, the permittee shall also conduct precision tests at the interval specified in in Method 21 from 40 CFR Part 60, Appendix A-7, Section 8.1.2, and a calibration drift assessment in accordance with 40 CFR 60.5397a(c)(8)(iii) at the end of each monitoring day.

(Ref.: 40 CFR 60.5397a(c)(8), Subpart OOOOa)

3.18 For Emission Point AA-008, each identified source of fugitive emissions shall be repaired or replaced in accordance with paragraphs (a) through (c) below:

- (a) Each identified source of fugitive emissions shall be repaired or replaced as soon as practicable, but no later than 30 calendar days after detection of the fugitive emissions.
- (b) If the repair or replacement is technically infeasible, would require a well shutdown or well shut-in, or would be unsafe to repair during operation of the unit, the repair or replacement must be completed during the next well shutdown, well shut-in, after an unscheduled, planned or emergency vent blowdown or within 2 years, whichever is earlier.
- (c) Each repaired or replaced fugitive emissions component must be resurveyed as soon as practicable, but no later than 30 days after being repaired, to ensure that there are no fugitive emissions. This survey shall comply with the requirements of subparagraphs (1) through (4), as applicable:
 - (1) For repairs that cannot be made during the monitoring survey when the fugitive emissions are initially found, the operator may resurvey the repaired fugitive emissions components using either Method 21 or optical gas imaging within 30 days of finding such fugitive emissions.
 - (2) For each repair that cannot be made during the monitoring survey when the fugitive emissions are initially found, a digital photograph must be taken of that component or the component must be tagged for identification purposes. The digital photograph must include the date that the photograph was taken, must clearly identify the component by location within the site (e.g., the latitude and longitude of the component or by other descriptive landmarks visible in the picture).
 - (3) If the permittee utilizes Method 21 to resurvey the repaired fugitive emissions components, then the fugitive emissions component is considered repaired when the Method 21 instrument indicates a concentration of less than 500 ppm above background or when no soap bubbles are observed when the alternative screening procedures specified in Section 8.3.3 of Method 21 are used. The permittee shall utilize the Method 21 monitoring requirements specified in 40 CFR 60.5397(c)(8)(iii) or the alternative screening procedures specified in Section 8.3.3 of Method 21.
 - (4) If the permittee utilizes optical gas imaging to resurvey the repaired fugitive emissions components, then the fugitive emissions component is considered repaired when the optical gas imaging instrument shows no indication of visible emissions. The permittee shall utilize the optical gas monitoring requirements specified in **Condition 3.16(g)**.

(Ref.: 40 CFR 60.5397a(h), Subpart OOOOa)

SECTION 4. WORK PRACTICES

Emission Point	Applicable Requirement	Condition Number(s)	Work Practice
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	4.1	Operate all equipment as efficiently as possible and perform routine maintenance
AA-002 AA-003	40 CFR 60.4333(a), Subpart KKKK	4.2	Operation and maintenance of Turbines

4.1 For the entire facility, in order to minimize the emissions of air pollutants, the permittee shall operate all air emissions equipment as efficiently as possible. 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. 2.2.B(10).)

4.2 For Emission Points AA-002 and AA-003, the permittee shall operate and maintain the stationary combustion turbines, air pollution control equipment, and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction.

(Ref.: 40 CFR 60.4333(a), Subpart KKKK)

SECTION 5. MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain records for a minimum of 5 years.
AA-001	40 CFR 60.4243(b)(2)(ii), Subpart JJJJ	5.2	VOC	Performance test requirements
	40 CFR 60.4245(a), Subpart JJJJ	5.3	VOC NO _x CO	Recordkeeping
	40 CFR 60.4245(b), Subpart JJJJ	5.4		Record hours of operation
AA-002 AA-003	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.5	CO NO _x	Perform initial stack test
	40 CFR 60.4340(a), Subpart KKKK	5.6	NO _x	Perform annual performance tests
	40 CFR 60.4360, Subpart KKKK	5.7	SO ₂	Maintain Fuel Records
AA-008	40 CFR 60.5410a(j), Subpart OOOOa	5.8	VOC	Initial Compliance
	40 CFR 60.5415a(h), Subpart OOOOa	5.9		Continuous Compliance
	40 CFR 60.5420a(c), Subpart OOOOa	5.10		Recordkeeping Requirement

5.1 The permittee shall retain all required records, monitoring data, supporting information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to DEQ as required by Applicable Rules and Regulations or this permit upon request.

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

5.2 For Emission Point AA-001, the permittee shall demonstrate compliance with the emission standards in Condition 3.6 by (a) or (b) below.

(a) Purchase an engine certified to the emission standards in Condition 3.6. The permittee shall operate and maintain the certified engine according to the manufacturer's emission-related written instructions.

(b) Purchase a non-certified engine and demonstrate compliance with the emission standards in Condition 3.6 by conducting an initial performance test in accordance with 40 CFR 60.4244 within one (1) year of engine startup. Subsequent performance test shall be conducted every 8760 hours or 3 years, whichever comes first. In addition, the permittee shall keep a maintenance plan and records of conducted maintenance and shall,

to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.

If the permittee does not operate the certified engine in accordance with (a) then the engine will be considered a non-certified engine and shall meet the requirements of (b)

(Ref.: 40 CFR 60.4243 (a) and (b), Subpart JJJJ)

5.3 For Emission Point AA-001, the permittee shall keep records of the information in paragraphs (a) through (d):

- (a) All notifications submitted to comply with 40 CFR Subpart JJJJ and all documentation supporting any notification.
- (b) Maintenance conducted on the engine.
- (c) For certified stationary SI internal combustion engines, documentation from the manufacturer that the engine is certified to meet the emission standards required by Condition 3.6
- (d) For non-certified stationary SI internal combustion engines, documentation that the engine meets the emission standards required by **Condition 3.6**.

(Ref.: 40 CFR 60.4245(a), Subpart JJJJ)

5.4 For Emission Point AA-001, the permittee shall keep records of the hours of operation of the engine through the non-resettable hour meter required by **Condition 3.9**. The permittee shall document how many hours are spent for emergency operation; including what classified the operation as emergency and how many hours are spent for non-emergency operation.

(Ref.: 40 CFR 60.4245(b), Subpart JJJJ)

5.5 For Emission Points AA-002 and AA-003, the permittee shall perform an initial stack test of Carbon Monoxide (CO) emissions in accordance with EPA Reference Method 7, or an EPA approved equivalent and NO_x emissions in accordance with Condition 5.5 , within 60 days after achieving the maximum production rate at which the facility will be operated, but no later than 180 days after initial startup.

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

5.6 For Emission Points AA-002 and AA-003, the permittee shall perform annual performance tests in accordance with 40 CFR 60.4400 to demonstrate continuous compliance with **Condition 3.13**. If the NO_x emission result from the performance test is less than or equal to 75 percent of the NO_x emission limit for the turbines, the permittee may reduce the frequency of subsequent performance tests to once every 2 years (no more than 26 calendar months following the previous performance test). If the results of any subsequent performance test exceed 75 percent of the NO_x emission limit for the turbines, the permittee must resume annual performance tests.

(Ref.: 40 CFR 60.4340(a), Subpart KKKK)

5.7 For Emission Points AA-002 and AA-003, the permittee shall maintain fuel records monitoring the total sulfur content of the fuel being fired in the turbines to demonstrate compliance with **Condition 3.13**. The sulfur content of the fuel must be determined using total sulfur methods described in 40 CFR 60.4415.

(Ref.: 40 CFR 60.4360, Subpart KKKK)

5.8 For Emission Point AA-008, to achieve initial compliance with the fugitive emission standards for each collection of fugitive emissions components at a well site and each collection of fugitive emissions components at a compressor station, the permittee shall comply with paragraphs (a) through (e) of this section:

- (a) A fugitive emission plan as required in **Condition 3.15**.
- (b) An initial monitoring survey as required in **Condition 3.15(a)**.
- (c) Maintaining of all records specified in **Condition 5.10**.
- (d) Repair of each identified source of fugitive emissions for each affected facility as required in **Condition 3.18**.
- (e) Submittal of initial annual report for each collection of fugitive emissions components at a well site as required in **Condition 6.3**.

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

5.9 For Emission Point AA-008, the permittee shall demonstrate continuous compliance with the fugitive emission standards for each collection of fugitive emissions components at a well site by complying with the requirements of paragraphs (a) through (d) below:

- (a) The permittee shall conduct periodic monitoring surveys as required in **Condition 3.15(a)**.
- (b) The permittee shall repair or replace each identified source of fugitive emissions as required in **Condition 3.18**.
- (c) The permittee shall maintain the records specified in **Condition 5.10**.
- (d) The permittee shall submit annual reports for the collection of fugitive emissions components at a well site as required in **Condition 6.3**.

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

5.10 For Emission Point AA-008, the permittee shall maintain the records identified as specified in 40 CFR 60.7(f) and in all applicable paragraphs of 40 CFR 60.5420a(c). All records required by Subpart OOOOa shall be maintained either onsite or at the nearest local field office for at least 5 years. Any records required to be maintained by Subpart OOOOa that are submitted electronically via the EPA's CDX may be maintained in electronic format.

(Ref.: 40 CFR 60.5420a(c), Subpart OOOOa)

SECTION 6. REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1(a)	Report deviations within five (5) working days
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1(b)	Certification by responsible official
	11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).	6.1(c)	Notification of beginning actual construction within 15 days
	11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).	6.1(d)	Notification when construction does not begin or is suspended
	11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).	6.1(e)	Certification of completion of construction prior to operation
	11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).	6.1(f)	Notification of changes in construction
AA-002 AA-003	40 CFR 60.4375, Subpart KKKK	6.2	Submittal requirements
AA-008	40 CFR 60.5420a, Subpart OOOOa	6.3	Submit annual reports

6.1 General Reporting Requirements:

- (a) The permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- (b) Any document required by this permit to be submitted to the DEQ shall contain a certification signed by a responsible official stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- (c) Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).)
- (d) 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.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).)

- (e) Upon the completion of construction or installation of an approved stationary source or modification, and prior to commencing operation, the applicant shall notify the Permit Board that construction or installation was performed in accordance with the approved plans and specifications on file with the Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).)

- (f) The Permit Board shall be promptly notified in writing of any change in construction from the previously approved plans and specifications or permit. If the Permit Board determines the changes are substantial, it 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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).)

- 6.2 For Emission Points AA-002 and AA-003, the permittee shall submit a written report of the results of each performance test, as required by Condition 5.5 and 5.6 before the close of business on the 60th day following the completion of the performance test.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). and 40 CFR 60.4375(b), Subpart KKKK)

- 6.3 For Emission Point AA-008, the permittee shall submit annual reports containing the information specified in 40 CFR 60.5420a(b)(1), (b)(5), (b)(7), and (b)(11). The initial annual report is due no later than 90 days after the end of the initial compliance period, which is no later than 1 year after startup. Subsequent annual reports are due no later than the same date each year as the initial annual report. If the permittee owns or operates more than one affected facility, the permittee may submit one report for multiple affected facilities provided the report contains all of the information required as specified in 40 CFR Part 60.5420a(b)(1) through (b)(8), as applicable, except as provided in 40 CFR Part 60.5420a(b)(13).

The permittee must submit reports to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX (<https://cdx.epa.gov/>.) The permittee must use the appropriate electronic report in CEDRI for this subpart or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the CEDRI Web site (<https://www3.epa.gov/ttn/chief/cedri/>). If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, you must submit the report to the Administrator at the appropriate address listed in 40 CFR Part 60.4. Once the form has been available in CEDRI for at least 90 calendar days, the permittee must begin submitting all subsequent reports via CEDRI

(Ref.: 40 CFR 60.5420a, Subpart OOOOa)