

STATE OF MISSISSIPPI AND FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL

PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT AT A
SYNTHETIC MINOR SOURCE

THIS CERTIFIES THAT

Monroe Gas Storage Company LLC, Monroe Gas Storage Project
60103 Phillips School House Road
Amory, Mississippi
Monroe 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 the Federal Clean Air Act and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), the regulations and standards adopted and promulgated thereunder, and the State Implementation Plan for operating permits for synthetic minor sources.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

Becky Simonson

AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: June 18, 2020

Modified: April 10, 2024

Permit No.: 1840-00083

Effective Date: As specified herein.

Expires: May 31, 2025

Section 1.

A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
2. This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.4.D.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.4.D.)
3. Any activities not identified in the application are not authorized by this permit.
(Ref.: Miss. Code Ann. 49-17-29 1.b)
4. 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 constructing or operating without a valid permit.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
5. 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).)
6. 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 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).)
7. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)
8. The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:
 - a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and
 - b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission.
(Ref.: Miss. Code Ann. 49-17-21)

9. 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)

10. 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. 2.1.D(7).)

11. This permit does not authorize a modification as defined in Regulation 11 Miss. Admin. Code Pt. 2, Ch.2., "Permit Regulations for the Construction and/or Operation of Air Emission Equipment." A modification may require a Permit to Construct and a modification of this permit. Modification is defined as "Any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

- a. Routine maintenance, repair, and replacement;
- b. Use of an alternative fuel or raw material by reason of an order under Sections 2(a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
- c. Use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
- d. Use of an alternative fuel or raw material by a stationary source which:
 - (1) The source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 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;
- e. An increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I or 40 CFR 51.166; or
- f. Any change in ownership of the stationary source.

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

B. GENERAL OPERATIONAL CONDITIONS

1. Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in Regulation, 11 Miss. Admin. Code Pt. 2, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.10.)

2. Any diversion from or bypass of collection and control facilities is prohibited, except as provided for in 11 Miss. Admin. Code Pt. 2, R. 1.10., "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants."

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

3. Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits.

(Ref.: Miss. Code Ann. 49-17-29 1.a(i and ii))

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

a. Upsets

- (1) For an upset defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., 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.

b. Startups and Shutdowns (as defined by 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.)

5. 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).)

C. PERMIT RENEWAL / MODIFICATION / TRANSFER / TERMINATION

1. For renewal of this permit, the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board. If the applicant submits a timely and complete application pursuant to this paragraph and the Permit Board, through no fault of the applicant, fails to act on the application on or before the expiration date of the existing permit, the applicant shall continue to operate the stationary source under the terms and conditions of the expired permit, which shall remain in effect until final action on the application is taken by the Permit Board. Permit expiration terminates the source's ability to operate unless a timely and complete renewal application has been submitted.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.8.)

2. The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

3. 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).)

4. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:
 - a. Persistent violation of any terms or conditions of this permit.
 - b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
 - c. A change in 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.)

5. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board.

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

**SECTION 2
EMISSION POINT DESCRIPTION**

The permittee is authorized to operate air emissions equipment, as described in the following table.

Emission Point	Description
AA-001	4735 HP natural gas-fired internal combustion compressor engine with emissions controlled by an oxidation catalyst (4SLB manufactured July 30, 2007)
AA-002	4735 HP natural gas-fired internal combustion compressor engine with emissions controlled by an oxidation catalyst (4SLB manufactured December 4, 2007)
AA-003	4735 HP natural gas-fired internal combustion compressor engine with emissions controlled by an oxidation catalyst (4SLB manufactured November 20, 2007)
AA-004	1818 HP natural gas-fired emergency generator (2008)
AA-005	3.5 MMBTU/hr natural gas-fired triethylene glycol regenerator reboiler
AA-006	450 MMSCFD triethylene glycol dehydration unit controlled by the thermal oxidizer (AA-007)
AA-007	Thermal Oxidizer controlling exhaust from the dehydration unit (AA-006)
AA-008	Maintenance Emissions
AT-001	Tank Emissions including: <ul style="list-style-type: none"> • Two (2) 4200-gallon, fixed roof, oily water storage tanks (T-1101 and T-1201) • 12600-gallon, fixed roof, oily water storage tank (T-4001) • 4200-gallon, fixed roof, engine lube waste oil storage tank (T-4002) • 4200-gallon, fixed roof, virgin coolant storage tank (T-4003) • 33600-gallon, fixed roof, produced water storage tank (T-4004) • 4200-gallon, fixed roof, triethylene glycol storage tank (T-4005) • 4200-gallon, fixed roof, waste coolant storage tank (T-4006) • 4200-gallon, fixed roof, virgin engine lube oil storage tank (T-4007) • 600-gallon, fixed roof, diesel storage tank (T-4008) • 8,820-gallon, fixed roof, oily water storage tank (T-4009)

**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	≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2	Equivalent Opacity	≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 1.4.B(2).	3.3	H ₂ S	One (1) grain per 100 standard cubic feet
AA-001 AA-002 AA-003 AA-004	40 CFR 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines) 40 CFR 63.6585 and 63.6590(c)(1), Subpart ZZZZ	3.4		Applicability
	40 CFR 60, Subpart JJJJ (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines) 40 CFR 60.4230(a)(4)(i), Subpart JJJJ	3.5		Applicability
	40 CFR 60.4233(e), 60.4234, 60.4243(b)(1), and Table 1, Subpart JJJJ	3.6	NO _x	≤ 2.0 g/HP-hr
			CO	≤ 4.0 g/HP-hr
			VOC	≤ 1.0 g/HP-hr
		3.7	Fuel	Natural gas only
	AA-001 AA-002 AA-003	Permit to Construct issued May 19, 2008	3.8	Operation
AA-004	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.9	Install non-resettable hour meter	
AA-006	Permit to Construct issued May 19, 2008 Synthetic Minor Limitation	3.10	Only operate with emissions controlled by the thermal oxidizer	
AA-007	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.11	Temperature	Maintain minimum operating temperature

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 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 period 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% 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 any one hours.

(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 not permit the emission of any gas stream which contains hydrogen sulfide (H₂S) 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 no less than 1600°F for a period of no less than 0.5 seconds or processed in such a manner which is equivalent to or more effective for the removal of hydrogen sulfide.

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

- 3.4 For Emission Points AA-001, AA-002, AA-003, and AA-004, the permittee is subject to and shall comply with all applicable requirements of the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) and the General Provisions (40 CFR 63, Subpart A) as outlined in Table 8 of 40 CFR 63, Subpart ZZZZ.

These emission points are new stationary RICE located at an area source that shall meet the requirements of 40 CFR 63, Subpart ZZZZ, by meeting the requirements of 40 CFR 60, Subpart JJJJ. No further requirements apply under 40 CFR 63, Subpart ZZZZ.

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

- 3.5 For Emission Points AA-001, AA-002, AA-003, and AA-004, the permittee is subject to and shall comply with all applicable requirements of the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (40 CFR 60, Subpart JJJJ) and the General Provisions (40 CFR 60, Subpart A) as outlined in Table 3 of 40 CFR 60, Subpart JJJJ.

Emission Points AA-001, AA-002, and AA-003 meet the definition of "stationary internal combustion engine" in 40 CFR 60.4248, Subpart JJJJ. Emission Point AA-004 meets the definition of "emergency stationary internal combustion engine" in 40 CFR 60.4248, Subpart JJJJ. All four engines are affected sources under 40 CFR 60.4230(a)(4)(i), or owners and operators of engines greater than 500 HP and constructed after July 1, 2007.

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

- 3.6 For Emission Points AA-001, AA-002, AA-003, and AA-004, the permittee shall operate and maintain the engines such that they achieve the following emission standards over the entire life of the engine:

- (a) Nitrogen Oxides (NO_x) ≤ 2.0 g/HP-hr
- (b) Carbon Monoxide (CO) ≤ 4.0 g/HP-hr
- (c) Volatile Organic Compounds (VOC) ≤ 1.0 g/HP-hr

The permittee shall demonstrate compliance with these emission standards by purchasing a certified engine.

(Ref.: 40 CFR 60.4233(e), 60.4234, 60.4243(b)(1), and Table 1, Subpart JJJJ)

- 3.7 For Emissions Points AA-001, AA-002, AA-003, and AA-004, the permittee shall only combust pipeline natural gas.

(Ref.: Permit to Construct issued May 19, 2008)

- 3.8 For Emission Points AA-001, AA-002, and AA-003, the permittee shall only operate the compressor engines with emissions controlled by the oxidation catalyst.

(Ref.: Permit to Construct issued May 19, 2008)

- 3.9 For Emission Point AA-004, the permittee shall install and maintain a non-resettable hour meter.

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

- 3.10 For Emission Point AA-006, the permittee shall only operate the glycol dehydration unit with emissions controlled by the thermal oxidizer (Emission Point AA-007).

(Ref.: Permit to Construct issued May 19, 2008)

- 3.11 For Emission Point AA-007, the permittee shall maintain a minimum operating temperature in the combustion chamber based upon the results of the Initial Performance Test. The minimum temperature shall be revised based on the results of subsequent performance tests. The minimum temperature limit shall be the 3-hour average temperature established by performance tests less 100°F or no less than 1300°F, whichever is higher, and shall be determined for each consecutive 3-hour period.

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

**SECTION 4
WORK PRACTICES**

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Work Practice
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	4.1		Operate as efficiently as possible
AA-004	40 CFR 60, Subpart JJJJ (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines) 40 CFR 60.4243(d), Subpart JJJJ	4.2	Operation and Maintenance	Emergency operation

4.1 For the entire facility, the permittee shall operate air emission equipment as efficiently as possible to provide the maximum reduction of air contaminants.

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

4.2 For Emission Point AA-004, the permittee shall operate the engine according to the following requirements. In order for the engine to be considered an emergency stationary ICE under 40 CFR 60, Subpart JJJJ, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year is prohibited. If the permittee does not operate the engine according to the following requirements, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

(a) There is no time limit on the use of emergency stationary ICE in emergency situations.

(b) The permittee may operate the emergency stationary ICE for any combination of the purposes specified in paragraphs (1) and (2) below for a maximum of 100 hours per calendar year.

(1) Emergency stationary ICE 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 Administrator 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 emergency ICE beyond 100 hours per calendar year.

(2) Emergency stationary ICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see § 60.17), or other authorized entity as determined by the Reliability

Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.

- (c) Emergency stationary ICE 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 paragraph (b)(2).

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

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 five (5) years
		5.2	Monitoring	Weekly Visual Emission Evaluations (VEE)
		5.3	Recordkeeping	Maintain VEE records
		5.4	Fuel & Temperature	Recordkeeping
AA-001 AA-002 AA-003 AA-004 AA-006 AA-007	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.5	Monitoring	Hours of operation
AA-001 AA-002 AA-003 AA-004	40 CFR 60, Subpart JJJJ (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines) 40 CFR 60.4245(a), Subpart JJJJ	5.6	Recordkeeping	Engine information
AA-001 AA-002 AA-003	40 CFR 60.4244, Subpart JJJJ 40 CFR 63.6620, Subpart ZZZZ 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.7	Monitoring	Performance test
		5.8	Hours of Operation	Recordkeeping of time catalyst was not properly operating
AA-004		5.9		
AA-007	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.10	Monitoring	Performance test
		5.11		Chamber temperature
		5.12	Recordkeeping	Malfunctons, maintenance, repairs, etc.
		5.13		Periods of operating the dehydrator without thermal oxidizer

5.1 For the entire facility, 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 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 MDEQ 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 the entire facility, the permittee shall perform weekly 10-minute Visual Emission Evaluations (VEEs/Observations). Observations shall be conducted during daylight hours and while the equipment is in operation. If visible emissions are observed from

any stack which vents to the atmosphere, excluding condensed water vapor, the permittee shall promptly perform an EPA Method 9 on that emission point.

(Ref.: 11 Miss. Admin. Code Pt. 2.2.B(11).)

- 5.3 For the entire facility, the permittee shall maintain sufficient records to document weekly Visual Emission Evaluations (VEEs/Observations) or EPA Method 9 evaluations. The permittee shall also record any corrective actions that were performed after the VEE or Method 9 evaluations. These records shall be kept in log form and shall be made available upon request by MDEQ personnel.

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

- 5.4 For the entire facility, the permittee shall maintain the following records in order to demonstrate compliance with the limitations specified in Section 3:

- (a) The cubic feet of natural gas burned, as fuel, on a monthly basis.
- (b) Fuel quality data to support the emission calculations.
- (c) The cubic feet of gas controlled by the thermal oxidizer.
- (d) Thermal oxidizer operating temperature in the combustion chamber.

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

- 5.5 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-006, and AA-007, the permittee shall record the hours of operation of the equipment.

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

- 5.6 For Emission Points AA-001, AA-002, AA-003, and AA-004, the permittee shall keep records of the information below:

- (a) All notifications submitted to comply with Subpart JJJJ and all documentation supporting any notification.
- (b) Maintenance conducted on the engine.
- (c) Documentation from the manufacturer that the engines are certified to meet the emission standards.

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

- 5.7 For Emission Points AA-001, AA-002, and AA-003, the permittee shall conduct performance tests for CO, NO_x, and VOC, once every five (5) years not to exceed 61 months from the previous performance test. The permittee shall conduct the performance test in accordance with 40 CFR 60.4244, Subpart JJJJ. The permittee shall also conduct an initial performance test for formaldehyde in accordance with 40 CFR 63.6620, Subpart ZZZZ. Subsequent performance tests for formaldehyde are based on the following results:

- (a) If the initial performance test results in formaldehyde emissions greater than or equal to 75% of the major source threshold, the permittee shall conduct performance tests for formaldehyde once every two (2) years not to exceed 25 months from the previous performance test in accordance with 40 CFR 63.6620, Subpart ZZZZ.

- (b) If the initial performance test results in formaldehyde emissions greater than or equal to 25% but less than 75% of the major source threshold, the permittee shall conduct performance tests for formaldehyde once every five (5) years not to exceed 61 months from the previous test in accordance with 40 CFR 63.6620, Subpart ZZZZ.
 - (c) If the initial performance test results in formaldehyde emissions less than 25% of the major source threshold, the permittee is not required to perform subsequent performance tests unless requested by MDEQ.

(Ref.: 40 CFR 60.4244, Subpart JJJ, 40 CFR 63.6620, Subpart ZZZZ, and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 5.8 For Emission Points AA-001, AA-002, and AA-003, the permittee shall keep records of the date, time, and duration of any operation of the compressor engines in which the oxidation catalyst was not operating properly.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 5.9 For Emission Point AA-004, the permittee shall keep records of the hours of operation of the engine recorded using each engine's non-resettable hour meter. These records must indicate how many hours are spent in emergency operation, including what classified the operation as an emergency, and how many hours are spent in nonemergency operation. Records should also include any time spent operating for the purposes identified in Conditions 4.2(b) and (c), and should contain an explanation of the non-emergency situation, date, and start and end time of engine operation for this purpose.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 5.10 For Emission Point AA-007, the permittee shall conduct performance tests for VOC once every five (5) years not to exceed 61 months from the previous performance test. The permittee shall conduct the performance test in accordance with Method 18 of 40 CFR 60, Appendix A, or Method 320 of 40 CFR 63, Appendix A.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 5.11 For Emission Point AA-007, the permittee shall monitor chamber temperature of the thermal oxidizer and maintain proper burner operation and efficiency.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 5.12 For Emission Point AA-007, the permittee shall keep on site a log of the following:
- (a) All inspections, maintenance, calibration checks, and repairs performed on the thermal oxidizer and associated monitoring equipment.
 - (b) The occurrence and duration of each deviation from the minimum 3-hour average operating temperature including the date and time of commencement and completion of the deviation.
 - (c) Corrective action taken during periods which deviated from the minimum operating temperature limit.
 - (d) All measurements as may be necessary to determine the conditions of performance tests and performance evaluations.

(e) The date and time identifying each period during which the monitoring system was inoperative and/or failed including the nature of any repairs or adjustments made as a result.

(f) The nature and cause of any malfunction (if known).

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

5.13 For Emission Point AA-007, the permittee shall keep records of the date, time, and duration of any operation of the dehydrator (Emission Point AA-006) in which the thermal oxidizer is non-operational.

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

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	Report permit deviations within five (5) working days
		6.2	Submit certified annual monitoring report
		6.3	All documents submitted to MDEQ shall be certified by a Responsible Official
		6.4	Submit test protocol
AA-004		6.5	Annual hours of engine operation

- 6.1 For the entire facility, 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. 2.2.B(11).)
- 6.2 For the entire facility, except as otherwise specified herein, the permittee shall submit a certified annual synthetic minor monitoring report postmarked no later than 31st of January for the preceding calendar year. This report shall address any required monitoring specified in the permit. Specifically this report should contain at a minimum, the information required by Conditions 5.4, 5.5, 5.8, 5.11, 5.12, and 5.13. All instances of deviations from permit requirements must be clearly identified in the report. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 6.3 For the entire facility, any document required by this permit to be submitted to the MDEQ 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).)
- 6.4 For the entire facility, the permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to MDEQ. Also, the permittee shall notify MDEQ in writing at least ten (10) days prior to the intended test date(s) so that an observer may be afforded the opportunity to witness the test.

The permittee shall submit a copy of each performance test report within 60 days after the test has been completed.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 6.5 For Emission Point AA-004, the permittee shall report the annual hours the engine operated in emergency use, including what constituted the emergency, and the annual

hours operated in non-emergency use. These annual hours shall be submitted in accordance with Condition 6.2.

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