



State of Mississippi

TATE REEVES
Governor

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

CHRIS WELLS, EXECUTIVE DIRECTOR

April 7, 2021

CERTIFIED MAIL #7012 2920 0000 4177 2211

Ms. Kimberly Tarr
Gulf South Pipeline Company, LLC Jackson Compressor Station
9 Greenway Plaza, Suite 2800
Houston, TX 77046

**Re: Gulf South Pipeline Company, LLC Jackson Compressor Station
Agreed Order No. 7097 21**

Dear Ms Tarr:

Enclosed you will find a copy of Agreed Order No. 7097 21, which has been executed by the Executive Director of the Mississippi Department of Environmental Quality, Chris Wells, on behalf of the Mississippi Commission on Environmental Quality. This order supersedes Agreed Order No. 7097 20 sent to you on March 24, 2021.

The enclosed Order assesses a civil penalty. The penalty payment, when due, should be made by check payable to the Mississippi Department of Environmental Quality and returned in the enclosed, self-addressed envelope to the MDEQ Accounts Receivable at P.O. Box 2339, Jackson, MS 39225.

If you have any questions regarding your obligations under the enclosed order, please contact Geoffrey Martin at (601) 961-5024.

Sincerely,

Michelle Clark, P.E., BCEE, Chief
Environmental Compliance and Enforcement Division

Enclosure
cc: Geoffrey Martin

Agency Interest No. 12439
ENF20210001

OFFICE OF POLLUTION CONTROL

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AN EQUAL OPPORTUNITY EMPLOYER

BEFORE THE MISSISSIPPI COMMISSION
ON ENVIRONMENTAL QUALITY

MISSISSIPPI COMMISSION ON
ENVIRONMENTAL QUALITY

COMPLAINANT

VS.

ORDER NO.

7097 21

GULF SOUTH PIPELINE COMPANY, LLC
9 GREENWAY PLAZA, SUITE 2800
HOUSTON, TEXAS 77046

RESPONDENT

AGREED ORDER

COME NOW the Mississippi Commission on Environmental Quality (Commission), acting through the staff and Executive Director of the Mississippi Department of Environmental Quality (MDEQ), Complainant, and Gulf South Pipeline Company, LLC, Respondent, in the above captioned cause and agree as follows:

1.

By letter dated February 13, 2020, Respondent was contacted by Complainant and notified of the following violations at its facility, Gulf South Pipeline Company, LLC Jackson Compressor Station, located at 1020 North Foxhall Road, Flowood, Mississippi in Rankin County:

- A. Air-Title V Operating Permit No. 2380-00096 Section 3.B.15: Failed performance test. Emission Points AA-012 and AA-013 failed to meet one of the following performance requirements listed in Section 3.B.15: (1) Reduces the mass content of either TOC or total HAP in the gases vented to the device by 95.0 percent by weight or greater; (2) Reduces the concentration of either TOC or total HAP in the exhaust gases at the outlet to the device to a level equal to or less than 20 parts per million by volume on a dry basis corrected to 3 percent oxygen; or (3) Operates at a minimum temperature of 760 degrees C, provided the control device has demonstrated that

combustion zone temperature is an indicator of destruction efficiency.

- B. Air-Title V Operating Permit No. 2380-00096 Section 5.B.8: Failure to conduct initial performance tests on Emission Points AA-012 and AA-013 within 180 days of startup of the units. The units started operation on November 30, 2018. Therefore, the initial performance tests were due by May 29, 2019. The initial performance tests were begun on May 29, 2019, but the tests were aborted when Respondent discovered passing results were not attainable.

2.

By letter dated March 6, 2020, Respondent asserted the initial performance tests were successfully completed on July 10, 2019 after the temperature set point of the combustion chamber was increased from 1,400 degrees Fahrenheit (°F) to 1,600 °F. Additionally, Respondent asserted the temperature set point of the combustion chamber has remained at 1,610 °F since the successful performance test was completed.

3.

In lieu of a formal enforcement hearing concerning the violations listed above, Complainant and Respondent agree to settle this matter as follows:

- A. Respondent agrees to pay and Complainant agrees to accept a civil penalty in the amount of \$55,125.00. Respondent shall pay this penalty to MDEQ within forty-five (45) days after this Agreed Order has been executed by the MDEQ Executive Director or his designee. The settlement payment shall be submitted to:

Mississippi Department of Environmental Quality
Attn: Accounts Receivable
P.O. Box 2339
Jackson, MS 39225

4.

Nothing in this Agreed Order shall limit the rights of MDEQ or the Commission in the event Respondent fails to comply with this Agreed Order. The Agreed Order shall be strictly construed to

apply to those matters expressly resolved herein.

5.

Nothing contained in this Agreed Order shall limit the rights of MDEQ or the Commission to take enforcement or other actions against Respondent for violations not addressed herein and for future violations of environmental laws, rules, and regulations.

6.

Respondent understands and acknowledges that it is entitled to an evidentiary hearing before the Commission pursuant to Miss. Code Ann. § 49-17-31, and that it has made an informed waiver of that right.

ORDERED, this the 7th day of April, 2021.

MISSISSIPPI COMMISSION ON ENVIRONMENTAL QUALITY

BY: [Signature]
CHRIS WELLS
EXECUTIVE DIRECTOR
MISSISSIPPI DEPARTMENT
OF ENVIRONMENTAL QUALITY

AGREED, this the 29TH day of March, 2021.

GULF SOUTH PIPELINE COMPANY, LLC

BY: [Signature]

TITLE: Vice President

STATE OF TEXAS

COUNTY OF HARRIS

PERSONALLY appeared before me, the undersigned authority in and for the jurisdiction aforesaid, the within named Kimberly Tane who first being duly sworn, did state upon his/her oath and acknowledge to me that he/she is the Vice President of Gulf South Pipeline Company, LLC and is authorized to sign and enter this Agreement.

SWORN AND SUBSCRIBED BEFORE ME, this the 29th day of March, 2021.

[Signature]
NOTARY PUBLIC

My Commission expires: 8-10-2023

