

**STATE OF MISSISSIPPI
AND FEDERALLY ENFORCEABLE
AIR POLLUTION CONTROL**

PERMIT

**TO OPERATE AIR EMISSIONS EQUIPMENT AT A
SYNTHETIC MINOR SOURCE**

THIS CERTIFIES THAT

Southeast Supply Header LLC, Collins Booster Station
Smyrna Road
Collins, Mississippi
Covington 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

AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: _____

Permit No.: 0640-00051

Effective Date: As specified herein.

Expires: [No more than 5 years from the issue date.]

Draft/Proposed August 29, 2024

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	3,550 Horsepower (HP) (30.285 MMBtu/hr) Natural gas-fired Four Stroke Lean Burn (4SLB) Spark Ignition (SI) Reciprocating Internal Combustion Compressor Engine with Oxidation Catalyst
AA-002	3,550 HP (30.285 MMBtu/hr) Natural gas-fired 4SLB SI Reciprocating Internal Combustion Compressor Engine with Oxidation Catalyst
AA-004	Four (4) 0.0025 MMBtu/hr-each Natural gas-fired Catalytic Heaters
AA-005	1,050 gallon Lube Oil Tank
AA-006	Truck Loading Area
AA-007	Parts Washer
AA-008	1,050 gallon Coolant Tank
AA-011	126 HP Natural gas-fired Four Stroke Rich Burn (4SRB) SI Reciprocating Internal Combustion Emergency Generator Engine
AA-012	30 HP Natural gas-fired 4SRB SI Reciprocating Internal Combustion Emergency Generator Engine
AA-013	1,050 gallon Produced Water Tank
AA-014	Process Piping Fugitives
AA-015	Facility Gas Releases

**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(1).	3.1	Opacity	40%
AA-001, AA-002, AA-004, AA-011, and AA-012	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.2	Fuel	Operational Requirement
AA-001, AA-002, AA-011, and AA-012	NESHAP for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart ZZZZ 40 CFR 63.6580, 63.6585(a) and (c), and 63.6590(a)(2)(iii) and (c)(1), Subpart ZZZZ	3.3	HAP	General Applicability
	NSPS for Stationary Spark Ignition Internal Combustion Engines, 40 CFR 60, Subpart JJJJ 40 CFR 60.4230(a)(4)(i) and (iv), Subpart JJJJ	3.4	NO _x , CO, and VOC	General Applicability
AA-001 and AA-002	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.5	PM (Filterable only)	$E = 0.8808 * I^{-0.1667}$
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10), as established in Air Construction Permit issued November 6, 2007	3.6	NO _x , CO, and HCOH	5.48 lb/hr NO _x , not to exceed 24.0 tpy 6.43 lb/hr CO, not to exceed 28.18 tpy 0.68 lb/hr HCOH, not to exceed 2.98 tpy
	40 CFR Part 60.4233(e) and Table 1 of Subpart JJJJ	3.7	NO _x , CO, and VOC	2.0 g/bhp-hr NO _x or 160 ppmvd @ 15% O ₂ 4.0 g/bhp-hr CO or 540 ppmvd @ 15% O ₂ 1.0 g/bhp-hr VOC or 86 ppmvd @ 15% O ₂
AA-004	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.8	SO ₂	4.8 lbs/MMBtu
AA-004, AA-011, and AA-012	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.9	PM (Filterable only)	0.6 lbs/MMBtu
AA-011 and AA-012	40 CFR 60.4243(d), Subpart JJJJ	3.10	Operations	Operational Requirement
	40 CFR Part 60.4237(c), Subpart JJJJ	3.11	Hour Meter	Operational Requirement

3.1. For the entire facility, 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 40 percent opacity subject to the exceptions provided below.

- a) Startup operations may produce emissions which exceed 40 percent opacity for up to 15 minutes per startup in any one hour and not to exceed three startups per stack in any 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 24 hour period does not exceed 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.)

- 3.2. For Emission Points AA-001, AA-002, AA-004, AA-011, and AA-012, the permittee shall combust pipeline quality natural gas only.

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

- 3.3 For Emission Points AA-001, AA-002, AA-011, and AA-012, the permittee is subject to the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ.

Emission Points AA-001 and AA-002 are considered new spark ignition (SI) four stroke lean burn (4SLB) non-emergency engines with a site rating greater than 500 HP that are located at an area source of HAP emissions and, as such, meet the requirements of 40 CFR Part 63, Subpart ZZZZ by meeting the requirements of 40 CFR Part 60, Subpart JJJJ. No other requirements of 40 CFR Part 63, Subpart ZZZZ or the General Provisions in Subpart A apply to the engines.

Emission Points AA-011 and AA-012 are considered new emergency SI stationary RICE with a site rating less than 500 brake HP located at an area source of HAP emissions. As such, the emergency engines must meet the requirements of 40 CFR 63, Subpart ZZZZ by meeting the requirements of 40 CFR 60, Subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under 40 CFR 63, Subpart ZZZZ or the General Provisions in Subpart A

(Ref.: 40 CFR 63.6580, 63.6585(a) and (c), and 63.6590(a)(2)(iii) and (c)(1), Subpart ZZZZ)

- 3.4 For Emission Points AA-001, AA-002, AA-011, and AA-012, the permittee is subject to the New Source Performance Standards for Stationary Spark Ignition Internal Combustion Engines in 40 CFR Part 60, Subpart JJJJ and the General Provisions in Subpart A.

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

- 3.5 For Emission Points AA-001 and AA-002, the maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of equal to or greater than 10 million BTU per hour per heat input shall not exceed an emission rate as 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).)

- 3.6 For Emission Points AA-001 and AA-002, nitrogen oxide (NO_x) emissions are limited from each source to 5.48 pounds per hour (lb/hr) and 24.0 tons per year (tpy), carbon monoxide (CO) emissions are limited from each source to 6.43 lb/hr and 28.18 tpy, and formaldehyde emissions are limited from each source to 0.68 lb/hr and 2.98 tpy.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Air Construction Permit issued November 6, 2007)

- 3.7 For Emission Points AA-001 and AA-002, NO_x emissions are limited from each source to 2.0 grams per horsepower-hour (g/bhp-hr) or 160 ppmvd @ 15% O₂, CO emissions are limited from each source to 4.0 g/bhp-hr or 540 ppmvd @ 15% O₂, and volatile organic compound (VOC) emissions are limited from each source to 1.0 g/bhp-hr or 86 ppmvd @ 15% O₂. The permittee must operate and maintain each engine such that it achieves these emission standards over the entire life of the engine:

(Ref.: 40 CFR Part 60.4233(e) and Table 1 of Subpart JJJJ)

- 3.8 For Emission Point AA-004, the maximum discharge of sulfur 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).)

- 3.9 For Emission Points AA-004, AA-011, and AA-012, 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 per million BTU per hour heat input.

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

- 3.10 For Emission Points AA-011 and AA-012, the permittee must operate the emergency stationary engine according to the requirements cited below. In order for the engines to be considered an emergency stationary engine, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50

hours per year, as described below, is prohibited. If the engines are not operated according to these requirements, the engines will not be considered emergency engines under 40 CFR 60, subpart JJJJ and must meet all requirements for non-emergency engines.

- a) There is no time limit on the use of the emergency stationary engine in emergency situations.
- b) The engine may be operated for a maximum of a 100 hours per calendar year 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 DEQ 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.

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

- 3.11 For Emission Points AA-011 and AA-012, the permittee must install and operate a non-resettable hour meter on each engine.

(Ref.: 40 CFR 60.4237(c), Subpart JJJJ)

**SECTION 4
WORK PRACTICES**

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Work Practice
AA-001 and AA-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10), as established in Air Construction Permit issued November 6, 2007	4.1	Operations	Operational Requirement
AA-011 and AA-012	40 CFR Part 63.6605, Subpart ZZZZ	4.2	Operations	Operational Requirement

4.1. For Emission Points AA-001 and AA-002, the permittee shall only operate the compressor engines when the catalytic oxidizer is operating properly. In the event of failure or malfunction of the catalytic oxidizer, the permittee shall cease operations until such time as repairs are made and the proper efficiency of the catalytic oxidizer is restored. The permittee shall keep a log on site of all inspections, maintenance and repairs performed on the catalytic oxidizers.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10), as established in Air Construction Permit issued November 6, 2007)

4.2. For Emission Points AA-011 and AA-012, the permittee shall be in compliance with all applicable requirements in 40 CFR 63, Subpart ZZZZ at all times. At all times, the engines, including associated air pollution control equipment and/or monitoring equipment, must be operated and maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require any further efforts be made to reduce emissions if levels required by 40 CFR 63, Subpart ZZZZ have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the 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 source.

(Ref.: 40 CFR 63.6605, Subpart ZZZZ)

**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 and AA-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11), as established in Air Construction Permit issued November 6, 2007	5.2	Fuel	Monitoring and recordkeeping requirements
	40 CFR 60.4243(b)(2)(ii), Subpart JJJ and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.3	NO _x , CO, and VOC	Performance stack testing, portable analyzer testing, and recordkeeping requirements
AA-011 and AA-012	40 CFR Part 60.4243(b)(2)(i), Subpart JJJ	5.4	Operations	Recordkeeping requirements
	40 CFR Part 60.4245(a)(1), (a)(2), and (b), Subpart JJJ	5.5	Hours	Monitoring and recordkeeping requirements

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 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 Emission Points AA-001 and AA-002, the permittee shall monitor and keep records of fuel usage on a monthly basis, including the type and quantity of fuel used

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)., as established in Air Construction Permit issued November 6, 2007)

5.3 For Emission Points AA-001 and AA-002, 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 practices for minimizing emissions.

In addition, the permittee must conduct subsequent performance testing for NO_x, CO, and VOC emissions, after the initial performance test, every 8,760 hours or 3 years, whichever comes first, thereafter, to demonstrate compliance with the emission limitations in Conditions 3.6 and 3.7, according to the requirements of 40 CFR 60.4244.

In those years that a performance stack test is not required due to the annual hours threshold not being met, then the permittee shall demonstrate compliance with Conditions

3.6 and 3.7 by conducting a performance test using a portable emissions analyzer for NO_x and CO emissions in exhaust gases. Tests shall be conducted at least once per semiannual period when operating under representative conditions for that period. Testing shall be conducted using a portable emissions analyzer in accordance with the protocol that has been approved by MDEQ. Testing is required for any engine that operates for more than 100 hours during that semiannual period. The engine shall be tested no sooner than 60 calendar days nor later than 210 calendar days after the most recent portable emissions analyzer test.

If a performance test using a portable emissions analyzer shows emissions exceeding the emission limit, the permittee shall inspect the catalyst bed of the source with the exceedance for fouling and record the inspection. The performance test shall be performed again within 15 days of the exceedance.

The permittee does not have to perform a performance test using the portable emissions analyzer if an emission point is nonoperational during the semiannual period for which a performance test using the portable emissions analyzer is due. The permittee shall record that the unit(s) were nonoperational and keep those records available for expeditious review.

(Ref.: 40 CFR 60.4243(b)(2)(ii), Subpart JJJJ and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 5.4 For Emission Points AA-011 and AA-012, the permittee must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.

(Ref.: 40 CFR 60.4243(b)(2)(i), Subpart JJJJ)

- 5.5 For Emission Points AA-011 and AA-012, the permittee shall keep records of the hours of operation of the engine that are recorded through the non-resettable hour meter. 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)

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.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.2	Submit certified annual monitoring report.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.3	All documents submitted to MDEQ shall be certified by a Responsible Official.
AA-001 and AA-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.4	Submit annual reports
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.5	Submit performance stack test notifications, protocols, and test results
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.6	Submit portable analyzer notifications, protocols, and test results
AA-011 and AA-012	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.7	Submit annual reports

6.1 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 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. 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 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 Emission Points AA-001 and AA-002, as part of the annual monitoring report required by this permit, the permittee shall submit records of inspections and maintenance and repairs performed on the catalytic oxidizers as required by Condition 4.1, records of fuel usage as required by Condition 5.2, and maintenance records as required by Condition 5.3. These records shall be submitted in accordance with Condition 6.2.

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

- 6.5 For Emission Points AA-001 and AA-002, the permittee shall submit a test protocol at least thirty (30) days prior to the scheduled test date to ensure that all test methods and procedures are acceptable to the DEQ.

After the initial submittal of a written test protocol in conjunction with the initial compliance test(s), the permittee may request that the resubmittal of testing protocol be waived for subsequent testing by certifying in writing at least 30 days prior to subsequent testing that all conditions for testing remain unchanged such that the original protocol can and will be followed.

The DEQ must be notified at least ten (10) days prior to the scheduled test date so that an observer may be scheduled to witness the test(s).

The permittee must submit a copy of each performance test as conducted in 40 CFR 60.4244 within 60 days after the test has been completed. Performance test reports using EPA Method 18, EPA Method 320, or ASTM D6348-03 (incorporated by reference—see 40 CFR 60.17) to measure VOC require reporting of all QA/QC data. For Method 18, report results from sections 8.4 and 11.1.1.4; for Method 320, report results from sections 8.6.2, 9.0, and 13.0; and for ASTM D6348-03 report results of all QA/QC procedures in Annexes 1-7.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Air Construction Permit issued November 6, 2007, and 40 CFR 60.4245(d), Subpart JJJJ)

- 6.6 For Emission Point AA-001 and AA-002, the permittee must notify MDEQ within 48 hours prior to conducting the performance test using a portable emissions analyzer so that an observer may be afforded the opportunity to witness the test.

The permittee shall submit the performance test within 60 days after the test date. The submittal shall include a copy of the testing protocol and any corrective action, if required for the performance test.

After the initial submittal of a written test protocol in conjunction with the initial compliance test(s), the resubmittal of testing protocol is waived for subsequent testing as long as all conditions for testing remain unchanged from the original protocol.

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

- 6.7 For Emission Points AA-011 and AA-012, as part of the annual monitoring report required by this permit, the permittee shall submit reports showing the hours of the operation of the engines in emergency and non-emergency service that are recorded through the non-resettable hour meter. Records must indicate the time of operation of the engine and the reason the engine was in operation during that time. Records must also include the emergency and non-emergency hours of operation on a 12-month rolling basis. These records shall be submitted in accordance with Condition 6.2.

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