STATE OF MISSISSIPPI AIR POLLUTION CONTROL TITLE V PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Transcontinental Gas Pipeline Company LLC, Station 70 967 Highway 583 North Tylertown, Mississippi Walthall County

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with Title V of the Federal Clean Air Act (42 U.S.C.A. §7401 - 7671) (i.e., the "Federal Act") and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

Permit Issued:

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: Date not to exceed 5 years from issuance Permit No.: 2760-00010

7715 PER20240001

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SECTION 1. GENERAL CONDITIONS

1.1 The permittee must comply with all conditions of this permit. Any permit non-compliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

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

1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

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

1.3 The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

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

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

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

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

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

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

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

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

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

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

- 1.8 The permittee shall pay to the DEQ an annual fee based on a fee schedule established by the Mississippi Commission on Environmental Quality (i.e., the "Commission"). The fee schedule shall be set each year by order of the Commission in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.
 - (a) A portion of the fee shall be based on the permittee's annual quantity of emissions. The permittee shall elect for "actual emissions" or "allowable emissions" to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions.
 - (i) "Actual emissions" shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance

calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission.

- (ii) "Allowable emissions" are those emissions limited by this permit as well as those emissions not expressly limited by this permit but otherwise allowed by this permit, as represented in the Title V application.
- (iii) Not withstanding paragraphs (i) and (ii), a minimum annual fee shall be assessed in accordance with the fee schedule established by the Commission when calculating this portion of the fee.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.B(1).)

(b) A portion of the fee shall be based on the complexity of this permit, as determined by the number of air regulations applicable to the permittee on the date of the fee calculation in accordance with the fee schedule established by the Commission. Only air regulations required to be addressed by this permit may be included in the annual fee schedule.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.B(2).)

(c) By July 1 of each year, the permittee shall submit a completed annual fee reporting form to the DEQ accompanied by all necessary calculations and supporting information to verify actual emissions. If the annual fee reporting form is not filled out completely and accurately or certified in accordance with Regulation 11 Miss. Admin. Code Pt. 2, R. 6.2.E., "allowable emissions" or other information necessary to determine the appropriate annual fee shall be used in the fee calculation.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.B(3)(c).)

(d) If the Commission determines that there is not sufficient information available to the permittee to accurately complete and submit the annual fee reporting form by July 1, but such information becomes available and is submitted to the DEQ after July 1, the fee calculation and assessment may be altered according to the annual fee schedule. No fee actually paid to the DEQ shall be refunded due to a change in the fee calculation. If a fee is recalculated such that the amount assessed for an annual period is reduced and the permittee has already paid all or a portion of the fee, the revised fee assessment may not be reduced to an amount less than what the permittee has already paid regardless of the results of the recalculation.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.B(3)(d).)

(e) The fee shall be due September 1 of each year. However, the permittee may elect a quarterly payment method of four (4) equal payments with the payments due September 1, December 1, March 1 and June 1. The permittee shall notify the DEQ that the quarterly payment method will be used by September 1.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.E(1).)

(f) If at any time within the year the Commission determines that the information submitted by the permittee is insufficient or incorrect, the DEQ will notify the permittee of the deficiencies and the adjusted fee schedule. Past due fees as a result of the adjusted fee assessment will be due at the time of the next scheduled quarterly payment.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.E(1)(b).)

(g) If an annual fee is not paid within thirty (30) days after the due date, a penalty of ten (10) percent of the amount due shall at once accrue and be added thereto. If the fee is not paid in full (including any interest and penalty within sixty (60) days of the due date), the Permit Board may revoke the permit upon proper notice and hearing as required by law.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.E(1)(a).)

(h) If the permittee disagrees with the calculation or applicability of an annual fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition.

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

1.9 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

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

1.10 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that based on information and belief

formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)

- 1.11 The permittee shall allow the DEQ (or an authorized representative), upon the presentation of credentials and other documents as may be required by law, to perform the following:
 - (a) Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) Have access to and copy (at reasonable times) any records that must be kept under the conditions of this permit;
 - (c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
 - (d) As authorized by the Federal Act, sample or monitor (at reasonable times) substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

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

1.12 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere.

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

1.13 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970.

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

- 1.14 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance upon satisfying one of the following conditions:
 - (a) Such applicable requirements are included and are specifically identified in the permit; or

(b) The Permit Board, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the permittee and the permit includes such determination (or a concise summary thereof).

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

- 1.15 Nothing in this permit shall alter or affect the following:
 - (a) The provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
 - (b) The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - (c) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
 - (d) The ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act.

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

1.16 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required to register such a plan pursuant to Section 112(r) of the Federal Act.

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

1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one that is submitted at least six (6) months prior to the date of permit expiration.

If the permittee submits a timely and complete application for permit issuance (including for renewal), the failure to have a Title V permit is not a violation of the applicable regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application.

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

1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (Ref.: Section 502(b)(10) of the Federal Act) if the following criteria are met:

- (a) The changes are not modifications under any provision of Title I of the Federal Act:
- (b) The changes do not exceed the emissions allowable under this permit;
- (c) The permittee provides the Administrator and the Department with written notification in advance of the proposed changes [i.e., at least seven (7) days or such other time frame as provided in other regulations for emergencies] and the notification includes the following information:
 - (1) A brief description of the change(s),
 - (2) The date on which the change will occur,
 - (3) Any change in emissions, and
 - (4) Any permit term or condition that is no longer applicable as a result of the change;
- (d) The permit shield shall not apply to any Section 502(b)(10) change.

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

1.19 Should the Executive Director of the Mississippi Department of Environmental Quality declare an "Air Pollution Emergency Episode", the permittee will be required to operate in accordance with either the permittee's prepared "Emission Control Action Program(s)" or, in the absence of a prepared Emission Control Action Program, the appropriate requirements and "Emission Reduction Objectives" specified in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 3. – "Regulations for the Prevention of Air Pollution Emergency Episodes" – for the level of emergency declared and the permittee's source of air contamination.

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

1.20 Except as otherwise provided herein, a modification of the permittee's facility may require a Permit to Construct in accordance with the provisions specified in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 2. – "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment" – and may require modification of this permit in accordance with Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6. – "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act."

"Modification" is defined as 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 Regulation 11 Miss. Admin. Code Pt. 2, Ch. 2. and/or Ch. 5.; or
 - (2) The source is approved to use under any permit issued under Regulation 11 Miss. Admin. Code Pt. 2, Ch. 2. and/or Ch. 5.;;
- (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 Regulation 11 Miss. Admin. Code Pt. 2, Ch. 2, or Ch. 5.; or
- (f) Any change in ownership of the stationary source.

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

- 1.21 An administrative permit amendment may be made by the Permit Board authorizing changes in ownership or operational control consistent with the following procedure:
 - (a) The Permit Board shall take action within sixty (60) days after receipt of a completed request for a permit transfer, unless a public hearing is scheduled. The Permit Board may incorporate such changes without providing notice to the public or affected State(s) provided that it designates any such permit revision as having been made pursuant to this paragraph.
 - (b) A permit transfer shall be approved upon satisfaction of the following:
 - (1) The applicant for transfer approval can demonstrate to the Permit Board it has the financial resources, operational expertise, and environmental compliance history over the last five (5) years to insure compliance with the terms and conditions of the permit to be transferred, except where this conflicts with State Law, and

(2) The Permit Board determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the DEQ.

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

1.22 This permit is a Federally approved operating permit under Title V of the Federal Act. All terms and conditions in this permit, including any provisions designed to limit the permittee's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission.

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

1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance.

Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or an Emergency Air Pollution Episode Alert imposed by the Executive Director of DEQ; and must meet the following buffer zones:

- (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.
- (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within fifty (50) yards of an occupied dwelling.
- (c) Burning must not occur within 500 yards of commercial airport property, private airfields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator.

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

- 1.24 Except as otherwise specified herein, the permittee shall be subject to the following 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 non-compliance, and the corrective actions taken and;
 - (v) That as soon as practicable but no later than twenty-four (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) Start-ups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
 - (1) Start-ups and shutdowns are part of normal source operation. Emission limitations apply during start-ups and shutdowns unless source specific emission limitations or work practice standards for start-ups 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 Regulation 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for start-ups and shutdowns. Source specific emission limitations or work practice standards established for start-ups 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 start-up or shutdown, see the "Upset" requirements above.

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

1.25 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements specified in 40 CFR Part 61, Subpart M (National Emission Standard for Asbestos), as adopted by reference in Regulation 11 Miss Admin. Code Pt. 2, R. 1.8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

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

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-001	408 Horsepower (HP) (3.5 MMBTU/hr) Ingersoll-Rand PSVG-6 Natural Gas-Fired Auxiliary Generator (Facility Ref. No. 3)
AA-003	7,210 HP (101.7 MMBTU/hr) GE Natural Gas-Fired Turbine and 27 MMBTU/hr VOGT Supplemental Natural Gas-Fired Waste Heat Recovery Boiler (Facility Ref. No. 6)
AA-004	7,210 HP (101.7 MMBTU/hr) GE Natural Gas-Fired Turbine and 27 MMBTU/hr VOGT Supplemental Natural Gas-Fired Waste Heat Recovery Boiler (Facility Ref. No. 7)
AA-005	7,210 HP (101.7 MMBTU/hr) GE Natural Gas-Fired Turbine (Exhausted through VOGT Waste Heat Recovery Boilerno supplemental firing) (Facility Ref. No. 8)
AA-006	Natural Gas Starter for Emission Point AA-003
AA-007	Natural Gas Starter for Emission Point AA-004
AA-008	16,000 HP Solar Mars 100 Natural Gas-Fired Combustion Turbine
AA-009	Natural Gas Starter for Emission Point AA-005
AA-010	1,230 hp (825 kw) Natural Gas-Fired Spark Ignition (SI) Four Stroke Lean Burn (4SLB) Emergency Engine
AA-011	16,785 HP Solar Mars 100-16000S Natural Gas-Fired Combustion Turbine

SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. FACILITY-WIDE EMISSION LIMITATIONS & STANDARDS

- 3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial, or waste disposal process, which exceeds forty (40) percent opacity subject to the exceptions provided in (a) and (b):
 - (a) Start-up operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per start-up in any one hour and not to exceed three (3) start-ups 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 sixty (60) percent opacity and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour.

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

3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Condition 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets.

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

- 3.A.3 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 Regulation 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 gas-borne material leaving the building or equipment are controlled or removed prior to discharge to the open air.

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

B. <u>EMISSION POINT SPECIFIC EMISSION LIMITATIONS & STANDARDS</u>

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.B.1	PM (filterable only)	0.6 lbs/MMBTU
AA-001 and AA-010	NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ	3.B.2	НАР	Applicability
	40 CFR 63.6580, 63.6585(a) and (c), and 63.6590(a)(1)(iii), (a)(2)(iii), and (c)(1), Subpart ZZZZ	3.B.2		
AA-003 AA-004, and AA-005 (Waste Heat Boilers only)	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.B.3	SO_2	4.8 lbs/MMBTU
AA-003, AA-004, AA-005, AA-008, and AA-011	11 Miss. Admin Code Pt. 2, R. 1.3.D(1)(b).	3.B.4	PM (filterable only)	$E = 0.8808 * I^{-0.1667}$
AA-001 and AA-003 through AA-009	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permits issued February 12, 2004; June 19, 2009; August 19, 2015: and XX, XXXX	3.B.5	Fuel Restriction	Pipeline quality natural gas only
AA-006, AA-007, and AA-009	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Construction Permit issued October 8, 1996, and Construction Permit issued June 19, 2009, and modified by the Title V operating Permit issued August 15, 2015.	3.B.6	VOC	35.42 MMSCF/yr of natural gas vented from each starter
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Construction Permit issued June 19, 2009, and Title V Operating Permit issued August 15, 2015.	3.B.7	VOC	18.38 tons/yr from each starter
	(PSD avoidance limit) 11 Miss. Admin. Code Pt. 2, R.		G0	0.011.4
AA-008	2.2.B(10)., as established in the Construction Permit issued June 19, 2009	3.B.8	СО	8.8 lb/hr and 38.74 tons/yr
	(PSD avoidance limit)		NO _x	8.7 lb/hr and 38.16 tons/yr

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
AA-008 and AA-011	NSPS for Stationary Combustion Turbines, 40 CFR Part 60, Subpart KKKK	3.B.9	NO _x and SO ₂	Applicability
	40 CFR 60.4320(a), 60.4330(a)(2), and Table 1 to Subpart KKKK	3.B.10	NO _x and SO ₂	25 ppm NOx @15% O ₂ and 0.06 lb SO ₂ /MMBtu
	40 CFR 60.4333(a), Subpart KKKK	3.B.11	NO _x and SO ₂	Minimizing Emissions
	40 CFR 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines 40 CFR 60.4260(a)(4)(iv)	3.B.12	NOx, CO, and VOC	Applicability
		3.B.13	NOx	2.0 g/HP-hr
AA-010	40 CFR 60.4233(e) and Item 6 of Table 1, Subpart JJJJ		СО	4.0 g/HP-hr
AA-010	,		VOC	1.0 g-HP-hr
	40 CFR 60.4234, Subpart JJJJ	3.B.14		Comply for life of engine
	40 CFR 60.4237(a), Subpart JJJJ	3.B.15	NOx, CO, and VOC	Install a non-resettable hour meter
	40 CFR 60.4243(d), Subpart JJJJ	3.B.16		Operating Requirements
AA-011	11 Miss. Admin. Code Pt. 2, R.2.15.C, as established in the Title V Operating Permit (TVOP) issued February 8, 2023. (PSD avoidance limit)	3.B.17	Operational Restriction	Startup of New Equipment and Shutdown of Existing Equipment.
	40 CFR Part 60, Subpart OOOOb (Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification or Reconstruction Commenced After December 6, 2022) 40 CFR 60.5365b(b), Subpart OOOOb	3.B.18	GHG and VOC	Applicability
	40 CFR 60.5380b(d)(6)(iii), Subpart OOOOb	3.B.19	GHG and VOC	Operating Requirements

3.B.1 For Emission Points AA-001 and AA-010, the maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input.

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

3.B.2 For Emission Points AA-001 and AA-010, the permittee is subject to and shall comply with all requirements of the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ, and the General Provisions of 40 CFR 63, Subpart A.

Emission Point AA-001 is an existing non-emergency spark ignition (SI) RICE with a site rating of less than 500 brake HP located at an area source of HAP emissions and as such is required to meet the operational requirements of 40 CFR Part 63, Subpart ZZZZ and the General Provisions in Subpart A.

Emission Point AA-010 is a new emergency spark ignition (SI) RICE with a site rating of more than 500 brake HP located at an area source of HAP. The permittee shall meet the requirements of Subpart ZZZZ by complying with all applicable requirements of 40 CFR 60, Subpart JJJJ.

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

3.B.3 For Emission Points AA-003, AA-004, and AA-005 (waste heat boilers only), the maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.

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

3.B.4 For Emission Points AA-003, AA-004, AA-005, AA-008, and AA-011, the maximum permissible particulate matter emissions from fossil fuel burning installations equal to or greater than 10 million BTU per hour heat input but less than 10,000 million BTU per hour 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.B.5 For Emission Points AA-001 and AA-003 through AA-011, the permittee shall combust pipeline quality natural gas only.
 - (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permits issued February 12, 2004; June 19, 2009; August 19, 2015: and XX, XXXX)
- 3.B.6 For Emission Points AA-006, AA-007, and AA-009, the permittee shall limit total annual natural gas venting from each starter to 35.42 MMSCF.
 - (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permit issued June 19, 2009 and August 19, 2015)
- 3.B.7 For Emission Points AA-006, AA-007, and AA-009, the permittee shall limit VOC emissions to less than 18.38 tons/yr from each source.
 - (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Construction Permit issued June 19, 2009, and modified by the Title V operating Permit issued August 15, 2015, PSD Avoidance Limit)
- 3.B.8 For Emission Point AA-008, the permittee shall limit CO emissions to less than 8.8 lb/hr and 38.74 tons/yr and shall limit NOx emissions to less than 8.7 lb/hr and 38.16 tons/yr.
 - (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Construction Permit issued June 19, 2009, PSD Avoidance Limit)
- 3.B.9 For Emission Points AA-008 and AA-011, the permittee is subject to and shall comply with all applicable requirements of the Standards of Performance for Stationary Combustion Turbines, 40 CFR 60, Subpart KKKK. The combustion turbines each qualify as a stationary combustion turbine with a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBtu) per hour, based on the higher heating value of the fuel, which commenced modification after February 18, 2005.
 - (Ref.: 40 CFR 60.4300 and 60.4305(a), Subpart KKKK)
- 3.B.10 For Emission Points AA-008 and AA-011, the permittee shall not exceed a Nitrogen Oxides (NOx) emission rate of 25 ppm at 15% O₂ and shall not burn any fuel which contains total potential sulfur emissions in excess of 0.060 lb SO₂/MMBtu (20 grains S/100 scf).
 - (Ref.: 40 CFR 60.4320(a), 40 CFR 60.4330(a)(2) and Table 1 of Subpart KKKK)
- 3.B.11 For Emission Points AA-008 and AA-011, 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)

3.B.12 For Emission Point AA-010, the permittee is subject to and shall comply with all applicable provisions of the Standards of Performance for Stationary Spark Ignition (SI) Internal Combustion Engines (ICE) (40 CFR 60, Subpart JJJJ) and the General Provisions (40 CFR 60, Subpart A).

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

- 3.B.13 For Emission Point AA-010, the permittee shall comply with the emissions standards listed in Item 6, Table 1 of Subpart JJJJ.
 - (a) $NOx 2.0 \text{ g/HP-hr} (160 \text{ ppmvd at } 15\% \text{ O}_2)$
 - (b) $CO 4.0 \text{ g/HP-hr} (540 \text{ ppmvd at } 15\% \text{ O}_2)$
 - (c) VOC 1.0 g/HP-hr (86 ppmvd at 15% O₂)

(Ref.: 40 CFR 60.4233(e) and Item 6 of Table 1, Subpart JJJJ)

3.B.14 For Emission Point AA-010, the permittee shall operate and maintain the stationary SI ICE so that the SI ICE achieves the emission standards in Condition 3.B.13 over the entire life of the engine.

(Ref.: 40 CFR 60.4234, Subpart JJJJ)

3.B.15 For Emission Point AA-010, the permittee shall install a non-resettable hour meter.

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

- 3.B.16 For Emission Point AA-010, the permittee shall operate the emergency engine according to the following requirements. In order for the engine to be considered an emergency engine, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year is prohibited. If the engine is not operated according to the following requirements, the engine will not be considered an emergency engine under this subpart and shall 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 shall operate your emergency stationary ICE for any combination of the purposes specified in the paragraphs below for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (c) counts as part of the 100 hours per calendar year.
 - 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 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 emergency ICE beyond 100 hours per calendar year.
- (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. 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 arrangement with another entity.

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

3.B.17 For Emission Point AA-011, the permittee shall permanently shut down Emission Points AA-003 and AA-006 upon startup of new Emission Point AA-011.

Startup begins after Emission Point AA-011 completes the shakedown period, not to exceed 180 days from Certification of Construction. Commissioning activities are allowed to take place during the shakedown period. Commissioning is typically a 4- to 6-week intermittent start/stop process that ensures seamless transition prior to permanent shutdown of existing Emission Points AA-003 and AA-006 to principal operation of new Emission Point AA-011, while maintaining station reliability and customer commitments. The permittee is only allowed to operate existing emission sources (Emission Points AA-003 and AA-006) and new emission source (Emission Point AA-011) simultaneously during the shakedown period.

- (Ref.: 11 Miss. Admin. Code Pt. 2, R.2.15.C, as established in the TVOP issued February 8, 2023 [PSD Avoidance Limitation])
- 3.B.18 For Emission Point AA-011, upon startup of the centrifugal compressor, the permittee is subject to and shall comply with all applicable requirements of the Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced after December 6, 2022 (40 CFR 60, Subpart OOOOb).

(Ref.: 40 CFR 60.5365b(b), Subpart OOOOb)

3.B.19 For Emission Point AA-011, the permittee must maintain the volumetric flow rate at or below 10 scfm per seal.

(Ref.: 40 CFR 60.5380b(d)(6)(iii), Subpart OOOOb)

C. INSIGNIFICANT AND TRIVIAL ACTIVITY EMISSION LIMITATIONS & STANDARDS

Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.C.1	PM	0.6 lb./MMBTU
11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.C.2	SO_2	4.8 lb./MMBTU

3.C.1 The maximum permissible emission of ash and/or particulate matter (PM) from fossil fuel burning installations of less than ten (10) million BTU (MMBTU) per hour heat input shall not exceed 0.6 pounds per MMBTU per hour heat input.

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

3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per MMBTU heat input.

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

D. WORK PRACTICE STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
AA-001	40 CFR 63.6603(a); 63.6625(j); and Item 10 and Footnotes 1 and 2 of Table 2d of Subpart ZZZZ	3.D.1	НАР	Maintenance Requirements
	40 CFR 63.6640(a), Subpart ZZZZ	3.D.2		Continuous Compliance
	40 CFR 63.6625(e)(8) and Item 9 of Table 6 of Subpart ZZZZ	3.D.3		Operating Requirements
	40 CFR 63.6625(h), Subpart ZZZZ	3.D.4		Minimizing Emissions
	40 CFR 63.6605(a) and (b), Subpart ZZZZ	3.D.5		General Compliance Requirements
AA-011	40 CFR 60.5370b(b), Subpart OOOOb	3.D.6	VOC and GHG	General Compliance Requirements

- 3.D.1 For Emission Point AA-001, the permittee shall comply with the following requirements:
 - (a) Change oil and filter every 1,440 hours of operation or annually, whichever comes first, or perform an oil analysis at the same frequency in order to extend the oil change requirement. If the permittee chooses to use an oil analysis in an effort to extend the oil/filter change requirement, the results of the analysis must verify the oil still meets the limits contained in (1)–(3) below. If any of these limits are exceeded, the oil must be changed within two business days of receiving the results of the analysis. If the engine is not in operation when the results are received, the oil must be changed within two business days or before commencing operation, whichever is later. The oil analysis program must be included in the engine's maintenance plan required by Condition 3.D.3;
 - (1) The Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from the Total Acid Number when new.
 - (2) The viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new.
 - (3) The percent water content (by volume) is greater than 0.5.
 - (b) Inspect air cleaner every 1,440 hours of operation or annually, whichever comes first, and replace as necessary.

(c) Inspect all hoses and belts every 1,440 hours of operation or annually, whichever comes first, and replace as necessary.

(Ref.: 40 CFR 63.6603(a); 63.6625(j); 63.6640(a); and Item 10 and Footnotes 1 and 2 of Table 2d of Subpart ZZZZ)

3.D.2 For Emission Point AA-001, the permittee shall demonstrate continuous compliance with the operating requirements in Condition 3.D.1. according to the methods in Condition 3.D.3.

(Ref.: 40 CFR 63.63.6640(a), Subpart ZZZZ)

3.D.3 For Emission Point AA-001, the permittee shall operate and maintain the engine according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practices for minimizing emissions.

(Ref.: 40 CFR 63.6625(e)(8) and Item 9 of Table 6 of Subpart ZZZZ)

3.D.4 For Emission Point AA-001, the permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

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

3.D.5 For Emission Point AA-001, the permittee shall, at all times, be in compliance with the applicable requirements of 40 CFR Part 63, Subpart ZZZZ, and operate and maintain the engine, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard 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(a) and (b), Subpart ZZZZ)

3.D.6 For Emission Point AA-011, the permittee shall at all times, including periods of startup, shutdown, and malfunction, maintain and operate the affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating 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, opacity observations, review of operating and maintenance procedures, and inspection of the source. The provisions for exemption from compliance during periods of startup, shutdown and malfunctions provided for in 40 CFR 60.8(c) do not apply to this subpart.

(Ref.: 40 CFR 60.5370b(b) Subpart OOOOb)

SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with terms and conditions contained in this permit (including emission limitations, standards, or work practices) by January 31 of each year for the preceding calendar year. If the permit was reissued or modified during the course of the preceding calendar year, the compliance certification shall address each version of the permit. Each compliance certification shall include the following information:
 - (a) The identification of each term or condition of the permit that is the basis of the certification;
 - (b) The compliance status;
 - (c) Whether compliance was continuous or intermittent;
 - (d) The method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
 - (e) Such other facts as may be specified as pertinent in specific conditions elsewhere in this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(5)(a), (c), and (d).)

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

- A. <u>GENERAL MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS</u>
- 5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.

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

- 5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring the following information:
 - (a) The date, place as defined in the permit, and time of sampling or measurements;
 - (b) The date(s) analyses were performed;
 - (c) The company or entity that performed the analyses;
 - (d) The analytical techniques or methods used;
 - (e) The results of such analyses; and
 - (f) The operating conditions existing at the time of sampling or measurement.

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

5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

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

5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 of each calendar year for the preceding sixmonth period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with Regulation 11 Miss. Admin. Code Pt. 2, R. 6.2.E.

For applicable periodic reporting requirements in 40 CFR Parts 60, 61, and 63, the permittee shall comply with the deadlines in this condition for reporting conducted on a semiannual basis. Additionally, any required quarterly reports shall be submitted by the end of the month following each calendar quarter period (i.e., April 30, July 31,

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

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

(Ref.: 40 CFR 60.19(c), 61.10(g), and 63.10(a)(5))

5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements (including those attributable to upsets), the probable cause of such deviations, and any corrective actions or preventive measures taken. The report shall be made within five (5) working days of the time the deviation began.

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

5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements (if applicable). All test methods shall be those respective versions (or their equivalents) approved by the EPA.

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

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

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

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

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

B. <u>SPECIFIC MONITORING AND RECORDKEEPING REQUIREMENTS</u>

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Monitoring/Recordkeeping Requirement
AA-001	40 CFR 63.6655(a)(1), (2), and (5), 63.6655(e)(2), and 63.6660, Subpart ZZZZ	5.B.1	НАР	General recordkeeping
AA-001 and AA-003 through AA-011	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.2	Fuel type	Monitor type of fuel combusted
AA-006 AA-007 AA-009	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.3	Gas and VOC	Monitor volume of gas vented by each starter and emissions
AA-006 AA-007 AA-009	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.4	VOC	Monitor quality of gas, including VOC content.
AA-008	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.5	NO _x and CO	Conduct NOx and CO performance stack tests and determine annual emissions
AA-008	40 CFR 60.4340(a), Subpart KKKK	5.B.6	NO_x	Conduct NOx performance stack tests
and AA-011	40 CFR 60.4360 and 60.4365(a), Subpart KKKK and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.7	Fuel Content	Fuel Records
AA-010	40 CFR 60.4243(b)(2)(ii) and 60.4244, Subpart JJJJ	5.B.8	NOx, CO,	Non-Certified engine requirements
	40 CFR 60.4245(a), Subpart JJJJ	5.B.9	and VOC	Recordkeeping Requirements
	40 CFR 60.4245(b), Subpart JJJJ	5.B.10	Hours of Operation	Record hours of operation through non- resettable hour meter
AA-011	40 CFR 60.5380b(a)(6), Subpart OOOOb	5.B.11	GHG and VOC	Monitoring of operations
	40 CFR 60.5380b(a)(7)-(9), Subpart OOOOb	5.B.12	GHG and VOC	Monitoring of operations
	40 CFR 60.5420b(c)(4)(i) and (iii), Subpart OOOOb	5.B.13	GHG and VOC	Recordkeeping Requirements
	40 CFR 60.5420b(c)(8)-(13), Subpart OOOOb	5.B.14	GHG and VOC	Recordkeeping Requirements

- 5.B.1 For Emission Point AA-001, the permittee shall keep the following records:
 - (a) A copy of each notification and report submitted to comply with 40 CFR 63, Subpart ZZZZ.
 - (b) Records of the occurrence and duration of each malfunction of the engine.

- (c) Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore a malfunctioning engine to its normal manner of operation.
- (d) Records of maintenance conducted on the engine to demonstrate the engine was operated and maintained in accordance with the maintenance plan.

All records shall be in a form suitable and ready for expeditious review for a period of five (5) years after each occurrence, measurement, maintenance, corrective action, report or record. These records may be kept in an electronic or hard copy format.

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

5.B.2 For Emission Points AA-001 and AA-003 through AA-011, the permittee shall monitor and maintain records of the type of fuel combusted for each source.

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

- 5.B.3 For Emission Points AA-006, AA-007, and AA-009, the permittee shall calculate and record the following on a monthly basis and for each rolling, consecutive 12-month period.
 - (a) The actual volume gas vented for each natural gas starter, and
 - (b) VOC emissions from each source,

The records shall be maintained in accordance with Condition 5.A.3.

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

5.B.4 For Emission Points AA-006, AA-007, and AA-009, the facility shall monitor the type and quality of start gas used on a quarterly basis. The start gas shall be sampled annually and analyzed for total VOC content and reported as weight percent. These records shall be maintained in accordance with Condition 5.A.3.

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

5.B.5 For Emission Point AA-008, the permittee shall demonstrate compliance with the NO_X and CO hourly emissions limitations specified in Condition 3.B.8 by performing stack testing in accordance with EPA Reference Methods 1 and 2, Method 7E, 20 or and EPA approved alternative for NO_X, and Method 10 or an EPA approved alternative for CO.

The stack tests shall be performed every 5 years, not to exceed 61 months from the previous test. The testing required by this condition may coincide with the testing

required by Condition 5.B.6.

The permittee shall demonstrate compliance with the NOX and CO annual emissions limitations specified in Condition 3.B.8 by applying the annual hours of operation to the most recent CO and NOX performance stack test result.

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

5.B.6 For Emission Points AA-008 and AA-011, the permittee shall perform annual (no more than 14 months following the previous performance test) performance tests in accordance with 40 CFR 60.4400 to demonstrate continuous compliance with the 25 ppmvd at 15% O2 Nitrogen Oxides (NOx) emission limitation specified in Condition 3.B.10. If the NOx emission result from the performance test is less than or equal to 75 percent of the NOx emission limit for the turbine, 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 NOx emission limit for the turbine, annual performance tests must be resumed.

(Ref.: 40 CFR 60.4340(a), Subpart KKKK and 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

5.B.7 For Emission Points AA-008 and AA-011, the permittee shall maintain on site the natural gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the natural gas, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf (338 ppmv) or less and is either composed of at least 70% methane by volume or has a gross calorific value between 950 and 1,100 Btu/scf. The permittee shall make a copy of the current, valid tariff sheet available upon request by DEQ personnel and maintain this data in accordance with Condition 5.A.3.

(Ref: 40 CFR 60.4360 and 60.4365(a), Subpart KKKK and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

5.B.8 For Emission Point AA-010, the permittee shall demonstrate compliance with the emission standards specified in Condition 3.B.13 by conducting an initial performance test within one year of engine startup. Subsequent performance testing shall be performed every 8760 hours or 3 years, whichever comes first. All performance testing shall be conducted in accordance with the applicable requirements of 40 CFR 60.4244. 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.

(Ref.: 40 CFR 60.4243(b)(2)(ii) and 60.4244, Subpart JJJJ)

- 5.B.9 For Emission Point AA-010, the permittee shall keep records of the following information:
 - (a) All notifications submitted to comply with this subpart and all documentation supporting any notification.
 - (b) Maintenance conducted on the engine.
 - (c) Documentation that the engine meets the emission standards.

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

- 5.B.10 For Emission Point AA-010, the permittee shall keep records of the hours of operation of the engine that is 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.
- 5.B.11 For Emission Point AA-011, the permittee must comply with the GHG and VOC requirements as specified below, using volumetric flow rate as a surrogate. The volumetric flow rate must be determined in accordance with Condition 5.B.12.
 - (a) The volumetric flow rate per seal must not exceed 10 standard cubic feet per minute (scfm) per seal. If the individual seals are manifolded to a single openended vent line, the volumetric flow rate must not exceed the sum of the individual seals multiplied by 10 scfm. If the volumetric flow rate, measured in accordance with Condition 5.B.12 exceeds 10 scfm multiplied by the number of dry seals connected to the vent, the seals connected to the measured vent must be repaired as provided in Condition 5.B.12(c).
 - (b) You must conduct your first volumetric flow rate measurement from your centrifugal compressor equipped with a dry seal on or before 8,760 hours of operation after startup.
 - (c) You must conduct subsequent volumetric flow rate measurements from your centrifugal compressor equipped with dry seals on or before 8,760 hours of operation after the previous measurement which demonstrates compliance with the 10 scfm volumetric flow rate per seal. If the individual seals are manifolded to a single open-ended vent line, the volumetric flow rate must not exceed the sum of the individual seals multiplied by 10 scfm.

(Ref.: 40 CFR 60.5380b(a)(6), Subpart OOOOb)

- 5.B.12 For Emission Point AA-011, the permittee must determine the volumetric flow rate from the centrifugal compressor equipped with dry seals as specified in paragraph (a) or (b) below. If the volumetric flow rate exceeds 10 scfm multiplied by the number of dry seals connected to the vent, the dry seals connected to the measured vent must be repaired as provided in paragraph (c).
 - (a) For centrifugal compressors equipped with dry seals in operating-mode or in standby-pressurized-mode, determine volumetric flow rate at standard conditions from each centrifugal compressor equipped with dry seals using one of the methods specified below.
 - 1. You may choose to use any of the methods set forth in 40 CFR 60.5386b(a) to screen for leaks/emissions. For the purposes of this paragraph, when using any of the methods in 40 CFR 60.5386b(a), emissions are detected whenever a leak is detected according to the method. If emissions are detected using the methods set forth in 40 CFR 60.5386b(a), then you must use one of the methods specified in paragraph (b) or (c) below to determine the volumetric flow rate. If emissions are not detected using the methods in 40 CFR 60.5386b(a), then you may assume that the volumetric emissions are zero.
 - 2. Use a temporary or permanent flow meter according to methods set forth in 40 CFR 60.5386b(b).
 - 3. Use a high-volume sampler according to the method set forth in 40 CFR 60.5386b(c).
 - (b) For conducting measurements on manifolded groups of centrifugal compressors equipped with dry seals, you must determine the volumetric flow rate from the dry seal centrifugal compressors as specified below.
 - 1. Measure at a single point in the manifold downstream of all centrifugal compressors equipped with dry seals inputs and, if practical, prior to comingling with other non-compressor emission sources.
 - 2. Determine the volumetric flow rate at standard conditions from the common stack using one of the methods specified in Condition 5.B.12(a)1.
 - (c) The seal must be repaired within 90 calendar days after the date of the volumetric emissions measurement that exceeds the applicable required flow rate per seal. You must conduct follow-up volumetric flow rate measurements from seal vents using the methods specified in paragraph (b) within 15 days after the repair to document that the rate has been reduced to less than the applicable required flow rate per seal. If the individual seals are manifolded to a single open-ended vent line or vent, the volumetric flow rate must be reduced to less than the sum of the individual seals multiplied by the applicable required flow rate per seal specified in paragraph 40 CFR 5380b(a)(4) through (6), as applicable. Delay of repair will be allowed if the conditions in paragraphs (c)1. or 2. are met.

- 1. If the repair of the wet or dry seal is technically infeasible, would require a vent blowdown, a compressor station shutdown, or would be unsafe to repair during operation of the unit, the repair must be completed during the next scheduled compressor station shutdown for maintenance, after a scheduled vent blowdown, or within 2 years of the date of the volumetric emissions measurement that exceeds the applicable required flow rate per seal, whichever is earliest. A vent blowdown is the opening of one or more blowdown valves to depressurize major production and processing equipment, other than a storage vessel.
- 2. If the repair requires replacement of the compressor seal or a part thereof, but the replacement cannot be acquired and installed within the repair timelines specified under this section due to the condition specified in paragraph (c)2.(i), the repair must be completed in accordance with paragraph (c)2.(ii) and documented in accordance with 40 CFR 60.5420b(c)(4)(iii)(F) through (H).
 - i. Seal or part thereof supplies had been sufficiently stocked but are depleted at the time of the required repair.
 - ii. The required replacement must be ordered no later than 10 calendar days after the centrifugal compressor seal is added to the delay of repair list due to parts unavailability. The repair must be completed as soon as practicable, but no later than 30 calendar days after receipt of the replacement seal or part, unless the repair requires a compressor station shutdown. If the repair requires a compressor station shutdown, the repair must be completed in accordance with the timeframe specified in paragraph (c)1.
- (d) As an alternative to meeting the requirements for centrifugal compressors with dry seals specified in paragraphs (a) through (c) above, the permittee is allowed to comply with the standard by meeting the requirements specified in paragraph (d)1. and (d)2. or (d)3.
 - 1. You must reduce methane and VOC emissions from each centrifugal compressor dry seal system by 95.0 percent.
 - 2. If you use a control device to reduce emissions, you must equip the dry seal system with a cover that meets the requirements of 40 CFR 60.5411b(b). The cover must be connected through a closed vent system that meets the requirements of 40 CFR 60.5411b(a) and (c) and the closed vent system must be routed to a control device that meets the conditions specified in 40 CFR 60.5412b.

3. As an alternative to routing the closed vent system to a control device, you may route the closed vent system to a process. If you route the emissions to a process, you must equip the dry seal system with a cover that meets the requirements of 40 CFR 60.5411b(b). The cover must be connected through a closed vent system that meets the requirements of 40 CFR 60.5411b(a) and (c).

(Ref.: 40 CFR 60.5380b(a)(7)-(9), Subpart OOOOb)

- 5.B.13 For Emission Point AA-011, the permittee must maintain the records below. All records required by 40 CFR 60, Subpart OOOOb must be maintained either onsite for at least 5 years. Any records required to be maintained by 40 CFR 60, Subpart OOOOb that are submitted electronically via the EPA's CEDRI may be maintained in electronic format. This ability to maintain electronic copies does not affect the requirement for facilities to make records, data, and reports available upon request to a delegated air agency or the EPA as part of an on-site compliance evaluation.
 - (a) For each centrifugal compressor affected facility, you must maintain records of deviations in cases where the centrifugal compressor was not operated in compliance with the requirements specified in 40 CFR 60.5380b, including a description of each deviation, the date and time each deviation began and the duration of each deviation.
 - (b) For each dry seal compressor complying with the standard in 40 CFR 60.5380b(a)(4), (5) or (6), you must maintain the records specified below.
 - 1. Records of the cumulative number of hours of operation since initial startup, since May 7, 2024, or since the previous volumetric flow rate measurement, as applicable.
 - 2. A description of the method used and the results of the volumetric flow rate measurement or emissions screening, as applicable.
 - 3. Records for all flow meters, composition analyzers and pressure gauges used to measure volumetric flow rates as specified below.
 - i. Description of standard method published by a consensus-based standards organization or industry standard practice.
 - ii. Records of volumetric flow rate emissions calculations conducted according to paragraphs 40 CFR 60.5380b(a)(4) through (6), as applicable.
 - iii. Records of manufacturer's operating procedures and measurement methods.
 - iv. Records of manufacturer's recommended procedures or an appropriate industry consensus standard method for calibration and results of calibration, recalibration, and accuracy checks.
 - v. Records which demonstrate that measurements at the remote location(s) can, when appropriate correction factors are applied,

reliably and accurately represent the actual temperature or total pressure at the flow meter under all expected ambient conditions. You must include the date of the demonstration, the data from the demonstration, the mathematical correlation(s) between the remote readings and actual flow meter conditions derived from the data, and any supporting engineering calculations. If adjustments were made to the mathematical relationships, a record and description of such adjustments.

- vi. Record of each initial calibration or a recalibration which failed to meet the required accuracy specification and the date of the successful recalibration.
- 4. Date when performance-based volumetric flow rate is exceeded.
- 5. The date of successful repair of the compressor seal, including follow-up performance-based volumetric flow rate measurement to confirm successful repair.
- 6. Identification of each compressor seal placed on delay of repair and explanation for each delay of repair.
- 7. For each compressor seal or part needed for repair placed on delay of repair because of replacement seal or part unavailability, the operator must document: the date the seal or part was added to the delay of repair list, the date the replacement seal or part was ordered, the anticipated seal or part delivery date (including any estimated shipment or delivery date provided by the vendor), and the actual arrival date of the seal or part.
- 8. Date of planned shutdowns that occur while there are any seals or parts that have been placed on delay of repair.

(Ref.: 40 CFR 60.5420b(c)(4)(i) and (iii), Subpart OOOOb)

- 5.B.14 For Emission Point AA-011, the permittee must keep the following records, as applicable.
 - (a) For records of each closed vent system inspection required under 40 CFR 60.5416b(a)(1) and (2) and (b) for each centrifugal compressor, the records below:
 - 1. A record of each closed vent system inspection or no identifiable emissions monitoring survey. You must include an identification number for each closed vent system (or other unique identification description selected by you), the date of the inspection, and the method used to conduct the inspection (i.e., visual, AVO, OGI, Method 21 of appendix A-7 to this part).
 - 2. For each defect or emissions detected during inspections required by 40 CFR 60.5416b(a)(1) and (2) or (b), you must record the location of the defect or emissions; a description of the defect; the maximum concentration reading obtained if using Method 21 of appendix A-7 to this part; the indication of emissions detected by AVO if using AVO; the date of detection; the date of each attempt to repair the emissions or defect; the

- corrective action taken during each attempt to repair the defect; and the date the repair to correct the defect or emissions is completed.
- 3. If repair of the defect is delayed as described in 40 CFR 60.5416b(b)(6), you must record the reason for the delay and the date you expect to complete the repair.
- 4. Parts of the closed vent system designated as unsafe to inspect as described in 40 CFR 60.5416b(b)(7) or difficult to inspect as described in 40 CFR 60.5416b(b)(8), the reason for the designation, and written plan for inspection of that part of the closed vent system.
- (b) For each cover inspection required under 40 CFR 60.5416b(a)(3) for each centrifugal compressor, the applicable records below.
 - 1. A record of each cover inspection. You must include an identification number for each cover (or other unique identification description selected by you), the date of the inspection, and the method used to conduct the inspection (i.e., AVO, OGI, Method 21 of appendix A-7 of Part 60).
 - 2. For each defect detected during the inspection you must record the location of the defect; a description of the defect, the date of detection, the maximum concentration reading obtained if using Method 21 of appendix A-7 of Part 60; the indication of emissions detected by AVO if using AVO; the date of each attempt to repair the defect; the corrective action taken during each attempt to repair the defect; and the date the repair to correct the defect is completed.
 - 3. If repair of the defect is delayed as described in 40 CFR 60.5416b(b)(6), you must record the reason for the delay and the date you expect to complete the repair.
 - 4. Parts of the cover designated as unsafe to inspect as described in 40 CFR 60.5416b(b)(7) or difficult to inspect as described in 40 CFR 60.5416b(b)(8), the reason for the designation, and written plan for inspection of that part of the cover.
- (c) For each bypass subject to the bypass requirements of 40 CFR 60.5416b(a)(4), you must maintain a record of the following, as applicable: readings from the flow indicator; each inspection of the seal or closure mechanism; the date and time of each instance the key is checked out; date and time of each instance the alarm is sounded.
- (d) Records for each control device used to comply with the emission reduction standard in 40 CFR 60.5380b(a)(1) or (9) for each centrifugal compressor affected facility, the records below, as applicable.
 - 1. For a control device tested under 40 CFR 60.5413b(d) which meets the criteria in 40 CFR 60.5413b(d)(11) and (e), keep records of the information listed below.

- i. Serial number of purchased device and copy of purchase order.
- ii. Location of the affected facility associated with the control device in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983.
- iii. Minimum and maximum inlet gas flow rate specified by the manufacturer.
- iv. Records of the maintenance and repair log as specified in 40 CFR 60.5413b(e)(4), for all inspection, repair, and maintenance activities for each control device failing the visible emissions test.
- v. Records of the manufacturer's written operating instructions, procedures, and maintenance schedule to ensure good air pollution control practices for minimizing emissions.
- 2. For all control devices, keep records of the information below, as applicable.
 - i. Make, model, and date of installation of the control device, and identification of the affected facility controlled by the device.
 - ii. Records of deviations in accordance with 40 CFR 60.5417b(g)(1) through (7), including a description of the deviation, the date and time the deviation began, the duration of the deviation, and the cause of the deviation.
 - iii. The monitoring plan required by 40 CFR 60.5417b(c)(2).
 - iv. Make and model number of each continuous parameter monitoring system.
 - v. Records of minimum and maximum operating parameter values, continuous parameter monitoring system data (including records that the pilot or combustion flame is present at all times), calculated averages of continuous parameter monitoring system data, and results of all compliance calculations.
 - vi. Records of continuous parameter monitoring system equipment performance checks, system accuracy audits, performance evaluations, or other audit procedures and results of all inspections specified in the monitoring plan in accordance with 40 CFR 60.5417b(c)(2). Records of calibration gas cylinders, if applicable.

- vii. Periods of monitoring system malfunctions, repairs associated with monitoring system malfunctions and required monitoring system quality assurance or quality control activities Records of repairs on the monitoring system.
- 3. For each carbon adsorption system, records of the schedule for carbon replacement as determined by the design analysis requirements of 40 CFR 60.5413b(c)(2) and (3) and records of each carbon replacement as specified in 40 CFR 60.5412b(c)(1) and 40 CFR 60.5415b(f)(1)(viii).
- 4. For enclosed combustion devices and flares, records of visible emissions observations as specified below.
 - i. Records of observations with Method 22 of appendix A-7 to this part, including observations required following return to operation from a maintenance or repair activity, which include: company, location, company representative (name of the person performing the observation), sky conditions, process unit (type of control device), clock start time, observation period duration (in minutes and seconds), accumulated emission time (in minutes and seconds), and clock end time. You may create your own form including the above information or use Figure 22-1 in Method 22 of appendix A-7 to this part.
 - ii. If you monitor visible emissions with a video surveillance camera, location of the camera and distance to emission source, records of the video surveillance output, and documentation that an operator looked at the feed daily, including the date and start time of observation, the length of observation, and length of time visible emissions were present.
- 5. For enclosed combustion devices and flares, video of the OGI inspection conducted in accordance with 40 CFR 60.5415b(f)(1)(x). Records documenting each enclosed combustion device and flare was visibly observed during each inspection conducted under 40 CFR 60.5397b using AVO in accordance with 40 CFR 60.5415b(f)(1)(x).
- 6. For enclosed combustion devices and flares, records of each demonstration of the NHV of the inlet gas to the enclosed combustion device or flare conducted in accordance with 40 CFR 60.5417b(d)(8)(iii). For each reevaluation of the NHV of the inlet gas, records of process changes and explanation of the conditions that led to the need to re-evaluation the NHV of the inlet gas. For each demonstration, record information on whether the enclosed combustion device or flare has the potential to receive inert gases, and if so, the highest percentage of inert gases that can be sent to the

enclosed combustion device or flare and the highest percent of inert gases sent to the enclosed combustion device or flare during the NHV demonstration. Records of periodic sampling conducted under 40 CFR 60.5417b(d)(8)(iii)(G).

- 7. For enclosed combustion devices and flares, if you use a backpressure regulator valve, the make and model of the valve, date of installation, and record of inlet flow rating. Maintain records of the engineering evaluation and manufacturer specifications that identify the pressure set point corresponding to the minimum inlet gas flow rate, the annual confirmation that the backpressure regulator valve set point is correct and consistent with the engineering evaluation and manufacturer specifications, and the annual confirmation that the backpressure regulator valve fully closes when not in open position.
- 8. For enclosed combustion devices and flares, records of each demonstration required under 40 CFR 60.5417b(d)(8)(iv).
- (e) For each closed vent system routing to a control device or process, the records of the assessment conducted according to 40 CFR 60.5411b(c):
 - 1. A copy of the assessment conducted according to 40 CFR 60.5411b(c)(1); and
 - 2. A copy of the certification according to 40 CFR 60.5411b(c)(1)(i) and (ii).
- (f) A copy of each performance test submitted under Condition 5.C.9 or 5.C.11 of this section.

(Ref.: 40 CFR 60.5420b(c)(8)-(13), Subpart OOOOb)

C. <u>SPECIFIC REPORTING REQUIREMENTS</u>

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Reporting Requirement
AA-001	40 CFR 63.6640(b) and 63.6650(a)-(d) and (f), Subpart ZZZZ	5.C.1	НАР	Submit deviations
AA-001, AA-003, AA-004, AA-005, and AA-009	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(1).	5.C.2	Fuel	Submit semiannual reports
AA-006, AA-007, and AA-009	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c).	5.C.3	Start Gas Volume & VOC	Submit semiannual reports
	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c).	5.C.4	Start Gas Quality	Submit semiannual reports
AA-008	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c).	5.C.5	NOx and CO	Submit semiannual reports
AA-008 and AA-011	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.C.6	Fuel	Submit semiannual reports
	40 CFR 60.4375(b), Subpart KKKK and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.C.7	NOx and CO	Submit stack test notifications, protocols, and results
AA-010	40 CFR 60.4245(d), Subpart JJJJ	5.C.8	NOx, CO, and VOC	Submit Stack Test Report
AA-011	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.C.9	Startup	Submit Certification of Construction Completion and Notification of Decommissioning of Emission Sources
	40 CFR 60.5420b(b)(1) and (11), Subpart OOOOb	5.C.10	Dry Seals	Submit semiannual reports
	40 CFR 60.5420b(b)(12), Subpart OOOOb	5.C.11	VOC and GHG	Submit performance test results
	40 CFR 60.5420b(d), Subpart OOOOb	5.C.12	VOC and GHG	Electronic Reporting
	40 CFR 60.5420b(b)(13), Subpart OOOOb	5.C.13	VOC and GHG	Electronic Reporting

5.C.1 For Emission Point AA-001, the permittee shall submit a report in accordance with Condition 5.A.4 each instance in which each applicable operating limitation in Condition 3.D.1 was not met. These deviations shall be reported according to the following requirements:

- (a) If there were no deviations from any applicable emission limitations or operating limitations, a statement shall be included that there were no deviations from the emission limitations or operating limitations during the reporting period; or
- (b) If there was a deviation from any emission limitation or operating limitation during the reporting period, then the compliance report shall contain the following information:
 - (1) Company name and address.
 - (2) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.
 - (3) Date of report and beginning and ending dates of the reporting period.
 - (4) The total operating time of the stationary RICE at which the deviation occurred during the reporting period.
 - (5) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
- (c) If there was a malfunction during the reporting period, the compliance report shall include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report shall also include a description of actions taken by the permittee during a malfunction of an affected source to minimize emissions, including actions taken to correct a malfunction.

(Ref.: 40 CFR Part 63.6640(b) and 63.6650(a) through (d) and (f), Subpart ZZZZ)

5.C.2 For Emission Points AA-001 and AA-003 through AA011, the permittee shall submit fuel usage reports summarizing the type and the quantity of fuel used in accordance with Condition 5.A.4.

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

- 5.C.3 For Emission Points AA-006, AA-007, and AA-009, the permittee shall submit semi-annual reports of the following: actual volume of natural gas vented monthly and on a 12 monthly rolling total basis.
 - (a) The actual volume gas vented for each natural gas starter on a monthly and on a 12 monthly rolling total basis, and

(b) VOC emissions from each source on a monthly and for each 12 month period on a rolling basis,

The reports must be submitted in accordance with Condition 5.A.4.

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

5.C.4 For Emission Points AA-006, AA-007, and AA-009, the permittee shall submit semi-annual reports summarizing the monitoring of the starter gas quality and the results of the annual sampling of the starter gas for VOC content. The reports must be submitted in accordance with Condition 5.A.4.

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

5.C.5 For Emission Point AA-008, the permittee shall submit a report in accordance with Condition 5.A.4 that contains the calculated NOX, CO, and VOC emissions on a monthly and for each consecutive 12 month period on a rolling basis.

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

5.C.6 For Emission Points AA-008 and AA-011, the permittee must submit a written report of the results of the performance tests required in Conditions 5.B.5 and 5.B.6 before the close of business on the 60th day following the completion of the performance test.

For all required testing, 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 the DEQ. Also, the permittee shall notify the DEQ 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.

(Ref.: 40 CFR 60.4375(b), Subpart KKKK and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

5.C.7 For Emission Points AA-008 and AA-011, the permittee shall submit a copy of the Gas Quality Section of the current valid purchase contract, tariff sheet or transportation contract for natural gas combusted in the turbine in accordance with Condition 5.A.4.

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

5.C.8 For Emission Point AA-010, the permittee shall submit a copy of each performance test 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.: 40 CFR 60.4245(d), Subpart JJJJ)

- 5.C.9 For Emission Point AA-011, the permittee shall submit the following in writing to the DEO:
 - (a) Notification that construction has begun within fifteen (15) days following commencement of actual construction.
 - (b) Certification of construction completion within thirty (30) days following completion of actual construction. The certification shall include the date the shakedown period began.
 - (c) Notification of decommissioning Emission Points AA-003 and AA-006. The notification shall be submitted within thirty (30) days following actual decommissioning of the emission sources.

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

5.C.10 For Emission Point AA-011, the permittee must submit the initial annual report for the centrifugal compressor affected facility as required below, as applicable.

The initial annual report is due no later than 90 days after the end of the initial compliance period as determined according to 40 CFR 60.5410b. Subsequent annual reports are due no later than the same date each year as the initial annual report. If the permittee 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 60, Subpart OOOOb. Annual reports may coincide with Title V compliance monitoring reports as long as all the required elements of the annual report are included. The permittee may arrange with the MDEQ a common schedule on which reports required by 40 CFR 60, Subpart OOOOb may be submitted as long as the schedule does not extend the reporting period. The annual reports shall contain the information specified in paragraphs (a) through (c) below.

- (a) The following general information
 - (1) The company name and facility site name associated with the affected facility.
 - (2) An identification of each affected centrifugal compressor being included in the annual report.
 - (3) Beginning and ending dates of the reporting period.

- (4) A certification by a certifying official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) For each centrifugal compressor which uses a closed vent system routed to a control device to meet the emissions reduction standard, you must submit the information in below.
 - (1) Dates of each inspection required under 40 CFR 60.5416b(a) and (b).
 - (2) Each defect or emissions identified during each inspection and the date of repair or the date of anticipated repair if the repair is delayed.
 - (3) Date and time of each bypass alarm or each instance the key is checked out if you are subject to the bypass requirements of 40 CFR 60.5416b(a)(4).
 - (4) You must submit the certification signed by the qualified professional engineer or in-house engineer according to 40 CFR 60.5411b(c) for each closed vent system routing to a control device or process in the reporting year in which the certification is signed.
 - (5) If you comply with the emissions standard for the centrifugal compressor with a control device, the information below, unless you use an enclosed combustion device or flare using an alternative test method approved under 40 CFR 60.5412b(d). If you use an enclosed combustion device or flare using an alternative test method approved under 40 CFR 60.5412b(d), the information in paragraphs (5)(i)-(iii), (xii), and (xvi) below.
 - (i) Identification of the control device.
 - (ii) Make, model, and date of installation of the control device.
 - (iii) Identification of the affected facility controlled by the device.
 - (iv) For each continuous parameter monitoring system used to demonstrate compliance for the control device, a unique continuous parameter monitoring system identifier and the make, model number, and date of last calibration check of the continuous parameter monitoring system
 - (v) For each instance where there is a deviation of the control device in accordance with 40 CFR 60.5417b(g)(1) through (3) or (g)(5) through (7) include the date and time the deviation began, the duration of the deviation in hours, the type of the deviation (*e.g.*, NHV operating

- limit, lack of pilot or combustion flame, condenser efficiency, bypass line flow, visible emissions), and cause of the deviation.
- (vi) For each instance where there is a deviation of the continuous parameter monitoring system in accordance with 40 CFR 60.5417b(g)(4) include the date and time the deviation began, the duration of the deviation in hours, and cause of the deviation.
- (vii) For each visible emissions test following return to operation from a maintenance or repair activity, the date of the visible emissions test or observation of the video surveillance output, the length of the observation in minutes, and the number of minutes for which visible emissions were present.
- (viii) If a performance test was conducted on the control device during the reporting period, provide the date the performance test was conducted. Submit the performance test report following the procedures specified in Condition 5.C.9.
- (ix) If a demonstration of the NHV of the inlet gas to the enclosed combustion device or flare was conducted during the reporting period in accordance with 40 CFR60.5417b(d)(8)(iii), an indication of whether this is a re-evaluation of vent gas NHV and the reason for the re-evaluation; the applicable required minimum vent gas NHV; if twice daily samples of the vent stream were taken, the number of hourly average NHV values that are less than 1.2 times the applicable required minimum NHV; if continuous NHV sampling of the vent stream was conducted, the number of hourly average NHV values that are less than the required minimum vent gas NHV; if continuous combustion efficiency monitoring was conducted using an alternative test method approved under 40 CFR 60.5412b(d), the number of values of the combustion efficiency that were less than 95.0 percent; the resulting determination of whether NHV monitoring is required or not in accordance with 40 CFR 60.5417b(d)(8)(iii)(D) or (H); and an indication of whether the enclosed combustion device or flare has the potential to receive inert gases, and if so, whether the sampling included periods where the highest percentage of inert gases were sent to the enclosed combustion device or flare.
- (x) If a demonstration was conducted in accordance with 40 CFR 60.5417b(d)(8)(iv) that the maximum potential pressure of units manifolded to an enclosed combustion device or flare cannot cause the maximum inlet flow rate established in accordance with 40 CFR 60.5417b(f)(1) or a flare tip velocity limit of 18.3 meter/second (60 feet/second) to be exceeded, an indication of whether this is a re-

- evaluation of the gas flow and the reason for the re-evaluation; the demonstration conducted; and applicable engineering calculations.
- (xi) For each periodic sampling event conducted under 40 CFR 60.5417b(d)(8)(iii)(G), provide the date of the sampling, the required minimum vent gas NHV, and the NHV value for each vent gas sample.
- (xii) For each flare and enclosed combustion device, provide the date each device is observed with OGI in accordance with 40 CFR 60.5415b(f)(1)(x) and whether uncombusted emissions were present. Provide the date each device was visibly observed during an AVO inspection in accordance with 40 CFR 60.5415b(f)(1)(x), whether the pilot or combustion flame was lit at the time of observation, and whether the device was found to be operating properly.
- (xiii) An identification of the alternative test method used.
- (xiv) For each instance where there is a deviation of the control device in accordance with 40 CFR 60.5417b(i)(6)(i) or (iii) through (v) include the date and time the deviation began, the duration of the deviation in hours, the type of the deviation (*e.g.*, NHV_{cz} operating limit, lack of pilot or combustion flame, visible emissions), and cause of the deviation.
- (xv) For each instance where there is a deviation of the data availability in accordance with 40 CFR 60.5417b(i)(6)(ii) include the date of each operating day when monitoring data are not available for at least 75 percent of the operating hours.
- (xvi) If no deviations occurred under Condition 5.C.8(b)(5)((xiv) or (xv) above, a statement that there were no deviations for the control device during the annual report period.
- (xvii) Any additional information required to be reported as specified by the Administrator as part of the alternative test method approval under 40 CFR 60.5412b(d).
- (c) For each centrifugal compressor which uses a closed vent system routed to a control device to meet the emissions reduction standard, you must submit the information in 5.C.8(c)(1) and (2).

(Ref.: 40 CFR 60.5420b(b)(1) and (11), Subpart OOOOb)

5.C.11 For Emission Point AA-011, within 60 days after the date of completing each performance test (see 40 CFR 60.8) required by 40 CFR 60, Subpart OOOOb, except

testing conducted by the manufacturer as specified in 40 CFR 60.5413b(d), the permittee must submit the results of the performance test following the procedures specified in Condition 5.C.10. Data collected using test methods that are supported by the EPA's Electronic Reporting Tool (ERT) as listed on the EPA's ERT website (https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert) at the time of the test must be submitted in a file format generated using the EPA's ERT. Alternatively, the permittee may submit an electronic file consistent with the extensible markup language (XML) schema listed on the EPA's ERT website. Data collected using test methods that are not supported by the EPA's ERT as listed on the EPA's ERT website at the time of the test must be included as an attachment in the ERT or alternate electronic file.

(Ref.: 40 CFR 60.5420b(b)(12), Subpart OOOOb)

5.C.12 For Emission Point AA-011, for notifications or reports required to be submitted following these procedures, the permittee must submit notifications or reports to the EPA via CEDRI, which can be accessed through the EPA's Central Data Exchange (CDX) (https://cdx.epa.gov/). The EPA will make all the information submitted through CEDRI available to the public without further notice to you. Do not use CEDRI to submit information you claim as CBI. Although we do not expect persons to assert a claim of CBI, if you wish to assert a CBI claim for some of the information in the report or notification, you must submit a complete file in the format specified in this subpart, including information claimed to be CBI, to the EPA following these procedures. Clearly mark the part or all of the information that you claim to be CBI. Information not marked as CBI may be authorized for public release without prior notice. Information marked as CBI will not be disclosed except in accordance with procedures set forth in 40 CFR part 2. All CBI claims must be asserted at the time of submission. Anything submitted using CEDRI cannot later be claimed CBI. Furthermore, under CAA section 114(c), emissions data is not entitled to confidential treatment, and the EPA is required to make emissions data available to the public. Thus, emissions data will not be protected as CBI and will be made publicly available. You must submit the same file submitted to the CBI office with the CBI omitted to the EPA via the EPA's CDX as described earlier in this paragraph.

(Ref.: 40 CFR 60.5420b(d), Subpart OOOOb)

5.C.13 For Emission Point AA-011, for any combustion control devices tested by the manufacturer in accordance with 40 CFR 60.5413b(d), an electronic copy of the performance test results required by 40 CFR 60.5413b(d) shall be submitted via email to Oil_and_Gas_PT@EPA.GOV unless the test results for that model of combustion control device are posted at the following website: https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry.

(Ref.: 40 CFR 60.5420b(b)(13), Subpart OOOOb)

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

None permitted.

SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act – Stratospheric Ozone Protection. The full text of the referenced regulations may be found on-line at http://www.ecfr.gov/ under Title 40, or DEQ shall provide a copy upon request from the permittee.

- 7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A Production and Consumption Controls.
- 7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B Servicing of Motor Vehicle Air Conditioners.
- 7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E The Labeling of Products Using Ozone-Depleting Substances, for the following containers and products:
 - (a) All containers in which a class I or class II substance is stored or transported;
 - (b) All products containing a class I substance; and
 - (c) All products directly manufactured with a process that uses a class I substance, unless otherwise exempted by this subpart or, unless EPA determines for a particular product that there are no substitute products or manufacturing processes for such product that do not rely on the use of a class I substance, that reduce overall risk to human health and the environment, and that are currently or potentially available. If the EPA makes such a determination for a particular product, then the requirements of this subpart are effective for such product no later than January 1, 2015.
- 7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F Recycling and Emissions Reduction:
 - (a) Servicing, maintaining, or repairing appliances containing class I, class II or non-exempt substitute refrigerants;
 - (b) Disposing of appliances, including small appliances and motor vehicle air conditioners; or
 - (c) Refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery

- equipment, approved recycling and recovery equipment testing organizations, as well as persons selling, offering for sale, and/or purchasing class I, class II, or non-exempt substitute refrigerants.
- 7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any acceptable alternative that is listed in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR Part 82, Subpart G Significant New Alternatives Policy Program. The permittee shall also comply with any use conditions for the acceptable alternative substance.
- 7.6 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart H Halon Emissions Reduction:
 - (a) Any person testing, servicing, maintaining, repairing, or disposing of equipment that contains halons or using such equipment during technician training;
 - (b) Any person disposing of halons;
 - (c) Manufacturers of halon blends; or
 - (d) Organizations that employ technicians who service halon-containing equipment.

APPENDIX A

List of Abbreviations Used In this Permit

BACT Best Available Control Technology
CEM Continuous Emission Monitor

CEMS Continuous Emission Monitoring System

CFR Code of Federal Regulations

CO Carbon Monoxide

COM Continuous Opacity Monitor

COMS Continuous Opacity Monitoring System
DEQ Department of Environmental Quality
EPA Environmental Protection Agency
gr./dscf Grains Per Dry Standard Cubic Foot

HP Horsepower

HAP Hazardous Air Pollutant

lb./hr Pounds per Hour

M or K Thousand

MACT Maximum Achievable Control Technology

MM Million

MMBTU/H Million British Thermal Units per Hour

NA Not Applicable

NAAQS National Ambient Air Quality Standards

NESHAP National Emissions Standards for Hazardous Air Pollutants, 40

CFR Part 61; or National Emission Standards for Hazardous Air

Pollutants for Source Categories, 40 CFR Part 63

NMVOC Non-Methane Volatile Organic Compounds

NO_X Nitrogen Oxides

NSPS New Source Performance Standards, 40 CFR Part 60

O&M Operation and Maintenance

PM Particulate Matter

PM₁₀ Particulate Matter less than 10 μ m in diameter PM_{2.5} Particulate Matter less than 2.5 μ m in diameter

ppm Parts per Million

PSD Prevention of Significant Deterioration

SIP State Implementation Plan

SO₂ Sulfur Dioxide

SSM Startup, Shutdown, and Malfunction

TPY Tons per Year

TRS Total Reduced Sulfur

VEE Visible Emissions Evaluation
VHAP Volatile Hazardous Air Pollutant

VOHAP Volatile Organic Hazardous Air Pollutant

VOC Volatile Organic Compound

APPENDIX B

LIST OF REGULATIONS REFERENCED IN PERMIT

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

- 11 Miss. Admin. Code Pt. 2, Ch. 1, Mississippi Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants (Amended December 14, 2011)
- 11 Miss. Admin. Code Pt. 2, Ch. 6, Mississippi Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Air Emissions Operating Permit Regulations for the Purpose of Title V of the Federal Clean Air Act (Amended December 14, 2011)
- 40 CFR Part 82 Title VI of the Clean Air Act (Stratospheric Ozone Protection)
- 40 CFR Part 60, Subpart A General Provisions
- 40 CFR Part 60, Subpart KKKK New Source Standards of Performance for Stationary Combustion Turbines
- 40 CFR Part 60, Subpart JJJJ Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
- 40 CFR Part 60, Subpart OOOOb Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification or Reconstruction Commenced After December 6, 2022
- 40 CFR Part 63, Subpart A General Provisions
- 40 CFR Part 63, Subpart ZZZZ National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines