

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

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

**THIS CERTIFIES THAT**

Southeast Supply Header LLC, Dentville Compressor Station  
13171 Dentville Road  
Hazlehurst, Mississippi  
Copiah County

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with the Federal Clean Air Act and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), the regulations and standards adopted and promulgated thereunder, and the State Implementation Plan for operating permits for synthetic minor sources.

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**



**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Issued:** MAY 22 2018

**Permit No.:** 0600-00073

**Effective Date:** As specified herein.

**Expires:** APR 30 2023

**Section 1.**

**A. GENERAL CONDITIONS**

1. This permit is for air pollution control purposes only. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
2. This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.4.D. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.4.D.)
3. Any activities not identified in the application are not authorized by this permit. (Ref.: Miss. Code Ann. 49-17-29 1.b)
4. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)
7. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)
8. The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:
  - a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and
  - b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission.

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

9. Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control. (Ref.: Miss. Code Ann. 49-17-39)
10. Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
11. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(7).)
12. This permit does not authorize a modification as defined in Regulation 11 Miss. Admin. Code Pt. 2, Ch.2., "Permit Regulations for the Construction and/or Operation of Air Emission Equipment." A modification may require a Permit to Construct and a modification of this permit. Modification is defined as "Any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:
  - a. Routine maintenance, repair, and replacement;
  - b. Use of an alternative fuel or raw material by reason of an order under Sections 2(a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
  - c. Use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
  - d. Use of an alternative fuel or raw material by a stationary source which:
    - (1) The source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or

- (2) The source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40CFR 51.66;
- e. An increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or
- f. Any change in ownership of the stationary source.

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

**B. GENERAL OPERATIONAL CONDITIONS**

- 1. Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in Regulation, 11 Miss. Admin. Code Pt. 2, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.10.)
- 2. Any diversion from or bypass of collection and control facilities is prohibited, except as provided for in 11 Miss. Admin. Code Pt. 2, R. 1.10., "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants." (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)
- 3. Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits. (Ref.: Miss. Code Ann. 49-17-29 1.a(i and ii))
- 4. Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.
  - a. Upsets
    - (1) For an upset defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:

- (i) An upset occurred and that the source can identify the cause(s) of the upset;
  - (ii) The source was at the time being properly operated;
  - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
  - (iv) That within 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
  - (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
- (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
  - (3) This provision is in addition to any upset provision contained in any applicable requirement.
  - (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.

**b. Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.)**

- (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
- (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).

- (3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

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

5. Compliance Testing: Regarding compliance testing:

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

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

**C. PERMIT RENEWAL / MODIFICATION / TRANSFER / TERMINATION**

- 1. For renewal of this permit, the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board. If the applicant submits a timely and complete application pursuant to this paragraph and the Permit Board, through no fault of the applicant, fails to act on the application on or before the expiration date of the existing permit, the applicant shall continue to operate the stationary source under the terms and conditions of the expired permit, which shall remain in effect until final action on the application is taken by the Permit Board. Permit expiration terminates the source's ability to operate unless a timely and complete renewal application has been submitted. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.8.)
- 2. The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee

may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).)

3. The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).)
4. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:
  - a. Persistent violation of any terms or conditions of this permit.
  - b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
  - c. A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.C.)
5. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B.)

## SECTION 2 EMISSION POINT DESCRIPTION

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

<b>Emission Point</b>	<b>Description</b>
AA-001a	8,000 HP Cooper Bessemer Model 16W330-C3 two stroke lean burn (2SLB) spark ignition (SI) natural gas-fired non-emergency engine (Facility Ref. No. ENG01) equipped with an oxidation catalyst utilized for driving Emission Point AA-001b
AA-001b	Reciprocating Compressor driven by Emission Point AA-001a
AA-002	760 HP Caterpillar Model G3412C 2SLB SI natural gas-fired emergency backup power generating engine (Facility Ref. No. EGEN01)
AA-003	Natural Gas In-line Catalytic Instrument Heater (Facility Ref. No. H01)
AA-004	Natural Gas In-line Catalytic Instrument Heater (Facility Ref. No. H02)
AA-005	Parts Washer (Facility Ref. No. PW01)
AA-006	8,000 Gallon Horizontal Vertical Fixed Roof Coolant Storage Tank (Facility Ref. No. TK01)
AA-008	2,000 Gallon Vertical Fixed Roof Used Oil Storage Tank (Facility Ref. No. TK03)
AA-009	2,000 Gallon Vertical Fixed Roof Used Oil Storage Tank (Facility Ref. No. TK03a)
AA-010	2,000 Gallon Vertical Fixed Roof Produced Water Storage Tank (Facility Ref. No. TK04)
AA-013	Truck Loading Area (Facility Ref. No. TL01-TL03)
AA-014	Piping Components (Facility Ref. No. PC)
AA-015	Natural Gas Releases (Facility Ref. No. GR)



**SECTION 3**  
**EMISSION LIMITATIONS AND STANDARDS**

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
Facility-Wide	Air Construction Permit issued August 18, 2014 and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)	3.1	Fuel	Fire natural gas only
AA-001a	11 Miss. Admin. Code Pt. 2, R. 1.3. D(1)(b)	3.2	PM	$E=0.8808 \cdot I^{-0.1667}$
AA-002	11 Miss. Admin. Code Pt. 2, R. 1.3. D(1)(a)	3.3	PM	0.6 lb/MMBTU
AA-003 and AA-004	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1)	3.4	SO <sub>2</sub>	4.8 lb/MMBTU
AA-001a and AA-002	NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ  40 CFR Part 63.6580; 40 CFR Part 63.6585(a) and (c); and 40 CFR Part 63.6590(c)(1)	3.5	HAPs	Applicability
	NSPS for Stationary Spark Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart JJJJ  40 CFR Part 60.4230(a)(4)(i) and (iv)	3.6	NO <sub>x</sub> , CO, and VOC	Applicability
AA-001a	40 CFR Part 60.4233(e); 40 CFR Part 60.4234; and Table 1 to 40 CFR Part 60, Subpart JJJJ	3.7	NO <sub>x</sub> , CO, and VOC	1.0 g/bhp/hr NO <sub>x</sub> or 82 ppmvd @ 15% O <sub>2</sub> , 2.0 g/bhp/hr CO or 270 ppmvd @ 15% O <sub>2</sub> , 0.7 g/bhp/hr VOC or 60 ppmvd @ 15% O <sub>2</sub> ,
	Air Construction Permit issued August 18, 2014, and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)	3.8	HAPs	Operational Restriction
AA-001b	NSPS for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification or Reconstruction Commenced After August 23, 2011, and on or before September 18, 2015, 40 CFR Part 60, Subpart OOOO  40 CFR Part 60.5360 and 40 CFR Part 60.5365(c)	3.9	VOC	Applicability
	40 CFR Part 60.5370(a) and (b)	3.10	VOC	Continuous Compliance

AA-002	40 CFR Part 60.4233(e); 40 CFR Part 60.4234; and Table 1 to 40 CFR Part 60, Subpart JJJJ	3.11	NO <sub>x</sub> , CO, and VOC	2.0 g/bhp/hr NO <sub>x</sub> or 160 ppmvd @ 15% O <sub>2</sub> , 4.0 g/bhp/hr CO or 540 ppmvd @ 15% O <sub>2</sub> , 1.0 g/bhp/hr VOC or 86 ppmvd @ 15% O <sub>2</sub> ,
	40 CFR Part 60.4237(a)	3.12	NO <sub>x</sub> , CO, and VOC	Operational Restriction
	40 CFR Part 63.6640(f) and 63.6675	3.13	HAP	Emergency operations

- 3.1 For the entire facility, the permittee shall fire natural gas only. The firing of unprocessed field gas is prohibited. (Ref.: Air Construction Permit issued August 18, 2014, and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10))
- 3.2 For Emission Point AA-001a, the permittee shall not have particulate emissions from fossil fuel burning installations of greater than 10 MMBTU/hr heat input that exceeds the emission rate 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))

- 3.3 For Emission Point AA-002, the permittee shall not have particulate emissions from fossil fuel burning installations of less than 10 MMBTU/hr heat input that exceeds 0.6 lb/MMBTU. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3. D(1)(a))
- 3.4 For Emission Points AA-003 and AA-004, 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))
- 3.5 Emission Points AA-001a and AA-002 are subject to the National Emission Standards for Hazardous Air Pollutants (HAP) for Stationary Combustion Engines, 40 CFR Part 63, Subpart ZZZZ.

Emission Point AA-001a is considered a new, spark ignition, 4-stroke lean-burn, non-emergency engine with a site rating greater than 500 HP that is located at an Area Source of HAP emissions. As such, the engine must meet the requirements of 40 CFR Part 63, Subpart ZZZZ by meeting the requirements of 40 CFR Part 60, Subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under 40 CFR Part 63, Subpart ZZZZ or the General Provisions of Subpart A.

Emission Point AA-002 is considered a new, spark ignition, 4-stroke lean-burn, emergency engine with a site rating greater than 500 HP that is located at an Area Source of HAP emissions. As such, the engine must meet the requirements of 40 CFR Part 63,

Subpart ZZZZ by meeting the requirements of 40 CFR Part 60, Subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under 40 CFR Part 63, Subpart ZZZZ or the General Provisions of Subpart A.

(Ref.: 40 CFR Part 63.6580, 63.6585(a) and (c), and 63.6590(c)(1))

- 3.6 Emission Points AA-001a and AA-002 are subject to the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart JJJJ. (Ref: 40 CFR Part 60.4230(a)(4)(i) and (iv))
- 3.7 For Emission Point AA-001a, Nitrogen Oxide (NO<sub>x</sub>) emissions are limited to 1.0 grams per horsepower-hour (g/bhp-hr) or 82 ppmvd @ 15% O<sub>2</sub>, Carbon Monoxide (CO) emissions are limited to 2.0 g/bhp-hr or 270 ppmvd @ 15% O<sub>2</sub>, and Volatile Organic Compound (VOC) emissions are limited to 0.7 g/bhp-hr or 60 ppmvd @ 15% O<sub>2</sub>. The engine must be operated and maintained such that the engine achieves these emission standards over the entire life of the engine. (Ref: 40 CFR Part 60.4233(e), 60.4234, and Table 1 of Subpart JJJJ)
- 3.8 For Emission Point AA-001a, the engine shall only be operated with emissions routed to the oxidation catalyst. (Ref.: Air Construction Permit issued August 18, 2014, and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10))
- 3.9 Emission Point AA-001b is subject to the Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification or Reconstruction Commenced After August 23, 2011, and on or before September 18, 2015, 40 CFR Part 60, Subpart OOOO. (Ref: 40 CFR Part 60.5360 and 60.5365(c))
- 3.10 For Emission Point AA-001b, the permittee shall be in compliance with the standards of 40 CFR Part 60, Subpart OOOO at all times, including periods of startup, shutdown, and malfunction, maintain and operate the compressor 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. (Ref: 40 CFR Part 60.5370(a) and (b))
- 3.11 For Emission Point AA-002, Nitrogen Oxide (NO<sub>x</sub>) emissions are limited to 2.0 grams per horsepower-hour (g/bhp-hr) or 160 ppmvd @ 15% O<sub>2</sub>, Carbon Monoxide (CO) emissions are limited to 4.0 g/bhp-hr or 540 ppmvd @ 15% O<sub>2</sub>, and Volatile Organic Compound (VOC) emissions are limited to 1.0 g/bhp-hr or 86 ppmvd @ 15% O<sub>2</sub>. The engine must be operated and maintained such that the engine achieves these emission standards over the entire life of the engine. (Ref: 40 CFR Part 60.4233(e), 60.4234, and Table 1 of Subpart JJJJ)

- 3.12 For Emission Point AA-002, the permittee must install and operate a non-resettable hour meter on the emergency engine. (Ref: 40 CFR Part 60.4237(a))
- 3.13 For Emission Point AA-002, the permittee must operate the emergency stationary engine according to the requirements cited below. In order for the engine to be considered an emergency stationary engine, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described below, is prohibited. If the engine is not operated according to these requirements, the engine will not be considered emergency engines under 40 CFR Part 60, Subpart JJJJ and must meet all requirements for non-emergency engines.
- (a) There is no time limit on the use of the emergency stationary engine in emergency situations.
  - (b) The engine may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of each engine beyond 100 hours per calendar year.
  - (c) The engine may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing.

(Ref.: 40 CFR Part 60.4243(d)(1)-(3))

**SECTION 4**  
**WORK PRACTICES**

<b>Emission Point</b>	<b>Applicable Requirement</b>	<b>Condition Number(s)</b>	<b>Pollutant/Parameter</b>	<b>Work Practice</b>
AA-001b	40 CFR Part 60.5385(a)(1)-(2) and 40 CFR Part 60.5410(c)(4)	4.1	VOC	Shall replace the rod packing before the compressor has operated for 26,000 hours. Or prior to 36 months from the date of the most recent rod packing replacement.

4.1 For Emission Point AA-001b, the permittee shall replace the reciprocating compressor rod packing according to the following:

(a) Before the compressor has operated for 26,000 hours. The number of hours of operation must be continuously monitored beginning upon initial startup of the reciprocating compressor affected facility, or the date of the most recent reciprocating compressor rod packing replacement, whichever is later; or

(b) Prior to 36 months from the date of the most recent rod packing replacement, or 36 months from the date of startup for a new reciprocating compressor for which the rod packing has not yet been replaced.

(Ref: 40 CFR Part 60.5385(a)(1)-(2) and 60.5410(c)(4))

## SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain records for a minimum of 5 years.
	Air Construction Permit issued August 18, 2014, and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)	5.2	Fuel	Keep records of type and quantity
AA-001a and AA-002	40 CFR Part 60.4243(b)(2)(ii)	5.3	NO <sub>x</sub> , CO, and VOC	Maintenance plan and records
	40 CFR Part 60.4243(b)(2)(ii), 40 CFR Part 60.4244(a)-(g) and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)	5.4	NO <sub>x</sub> , CO, and VOC	Performance Stack Test Requirements
	40 CFR Part 60.4245(a)(1), (2), and (4)	5.5	NO <sub>x</sub> , CO, and VOC	Keep records
AA-001b	40 CFR Part 60.5385(b)-(c), 60.5410(c)(1), and 60.5415(c)(1))	5.6	VOC	Rod packing replacement monitoring
	40 CFR Part 60.5415(c)(3)	5.7	VOC	Continuous Compliance
	40 CFR Part 60.5385(d), 60.5415(c)(2), and 60.5420(c)(3))	5.8	VOC	Rod packing replacement monitoring records
AA-002	40 CFR Part 60.4245(b)	5.9	Hours	Keep records of operations

- 5.1 The permittee shall retain all required records, monitoring data, supporting information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to MDEQ as required by Applicable Rules and Regulations or this permit upon request. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.9.)
- 5.2 For the entire facility, the permittee shall monitor and record the type and quantity of fuel used. These records shall be maintained in accordance with paragraph 5.1. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11))
- 5.3 For Emission Points AA-001a and AA-002, the permittee must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. (Ref.: 40 CFR Part 60.4243(b)(2)(ii))
- 5.4 For Emission Points AA-001a and AA-002, the permittee must follow the procedures listed below for the performance stack tests:
- (a) Each performance test must be conducted within 10 percent of 100 percent peak (or the highest achievable) load and according to the requirements in 40 CFR Part

- 60.8 and under the specific conditions that are specified by Table 2 of 40 CFR Part 60, subpart JJJJ.
- (b) Performance tests may not be conducted during periods of startup, shutdown, or malfunction, as specified in 40 CFR Part 60.8(c). If the stationary SI internal combustion engine is non-operational, the engine does not have to be started up solely to conduct a performance test; however, the performance test must be conducted immediately upon startup of the engine.
  - (c) Three separate test runs must be conducted for each performance test required in this section, as specified in 40 CFR Part 60.8(f). Each test run must be conducted within 10 percent of 100 percent peak (or the highest achievable) load and last at least 1 hour.
  - (d) To determine compliance with the NO<sub>x</sub> mass per unit output emission limitation, convert the concentration of NO<sub>x</sub> in the engine exhaust using Equation 1 of 40 CFR Part 60.4244(d).
  - (e) To determine compliance with the CO mass per unit output emission limitation, convert the concentration of CO in the engine exhaust using Equation 2 of 40 CFR Part 60.4244(e).
  - (f) For purposes of 40 CFR Part 60.4244, when calculating emissions of VOC, emissions of formaldehyde should not be included. To determine compliance with the VOC mass per unit output emission limitation, convert the concentration of VOC in the engine exhaust using Equation 3 of 40 CFR Part 60.4244(f).
  - (g) If the permittee chooses to measure VOC emissions using either Method 18 of 40 CFR part 60, appendix A, or Method 320 of 40 CFR Part part 63, appendix A, then the permittee has the option of correcting the measured VOC emissions to account for the potential differences in measured values between these methods and Method 25A. The results from Method 18 and Method 320 can be corrected for response factor differences using Equations 4 and 5 of 40 CFR 60.4244 (g). The corrected VOC concentration can then be placed on a propane basis using Equation 6 of 40 CFR Part 60.4244(g).

In addition, the permittee must conduct subsequent performance testing on Emission Point AA-001a, after the initial performance test, every 8,760 hours or annually, whichever comes first, thereafter to demonstrate compliance.

The permittee must conduct subsequent performance testing on Emission Point AA-002, after the initial performance test, every 8,760 hours or 3 years, whichever comes first, thereafter to demonstrate compliance.

A test protocol shall be submitted at least thirty (30) days prior to the proposed test date to insure that all test methods and procedures are acceptable to MDEQ Compliance Division. Also, MDEQ must be notified at least ten (10) days prior to the scheduled test date so that an observer may be scheduled to witness the test(s).

(Ref.: 40 CFR Part 60.4243(b)(2)(ii), 60.4244(a)-(g) and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11))

- 5.5 For Emission Points AA-001a and AA-002, the permittee shall keep records of the following information:
- (a) All notifications submitted to comply with 40 CFR Part 60, subpart JJJJ and all documentation supporting any notification;
  - (b) Maintenance conducted on the engine; and
  - (c) Documentation that the engine meets the applicable emission standards.
- (Ref: 40 CFR Part 60.4245(a)(1),(2), and (4))
- 5.6 For Emission Point AA-001b, the permittee shall continuously monitor the number of hours of operation or track the number of months since the last rod packing replacement. (Ref.: 40 CFR Part 60.5385(b)-(c), 60.5410(c)(1), and 60.5415(c)(1))
- 5.7 For Emission Point AA-001b, the permittee shall demonstrate continuous compliance by replacing the rod packing at the required frequency listed in Condition 4.1. (Ref.: 40 CFR Part 60.5415(c)(3))
- 5.8 For Emission Point AA-001b, the permittee shall maintain the following records:
- (a) Records of the cumulative number of hours of operation or number of months since initial startup, or the previous replacement of the reciprocating compressor rod packing, whichever is later;
  - (b) Records of the date and time of the reciprocating compressor rod packing replacement; and
  - (c) Records of deviations in cases where the reciprocating compressor was not operated in compliance with the requirements specified in 40 CFR Part 60.5385.
- (Ref.: 40 CFR Part 60.5385(d), 60.5415(c)(2), and 60.5420(c)(3))
- 5.9 For Emission Point AA-002, the permittee shall maintain records of the hours of operation of the engine that is recorded through the non-resettable hour meter. (Ref.: 40 CFR Part 60.4245(b))



## SECTION 6 REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	Report permit deviations within five (5) working days.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.2	Submit certified annual monitoring report.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.3	All documents submitted to MDEQ shall be certified by a Responsible Official.
AA-001a and AA-002	40 CFR Part 60.4245(d) and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)	6.4	Submit performance stack test results
AA-001b	40 CFR Part 60.5410(c)(3), 60.5415(c)(2), and 60.5420(b))	6.5	Submit initial and annual reports

- 6.1 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 6.2 Except as otherwise specified herein, the permittee shall submit a certified annual synthetic minor monitoring report postmarked no later than 31st of January for the preceding calendar year. This report shall address any required monitoring specified in the permit. All instances of deviations from permit requirements must be clearly identified in the report. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 6.3 Any document required by this permit to be submitted to the MDEQ shall contain a certification signed by a responsible official stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 6.4 For Emission Points AA-001a and AA-002, the permittee must submit a copy of each performance test as required by Condition 5.4 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 Part 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 Part 60.4245(d) and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 6.5 For Emission Point AA-001b, the permittee must submit the initial annual report and annual follow-up reports for the compressor as specified below.
- (a) 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 Part 60.5410.
  - (b) Subsequent annual reports are due no later than same date each year as the initial annual report.
  - (c) Each report must contain the following:
    - 1. The company name and address of the affected facility.
    - 2. An identification of each affected facility 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.
    - 5. All monitoring records identified in Condition 5.10.

(Ref.: 40 CFR Part 60.5410(c)(3), 60.5415(c)(2), and 60.5420(b))