# STATE OF MISSISSIPPI
# AIR POLLUTION CONTROL
# TITLE V PERMIT

## TO OPERATE AIR EMISSIONS EQUIPMENT

## THIS CERTIFIES THAT

Formentera Operations LLC, South Cypress Creek Facility
697 Wayne Hunting Club Road
Waynesboro, Mississippi
Wayne 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) 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: June 20, 2023**

**Modified: December 31, 2024**

**Effective Date: As specified herein.**

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

Becky Simonson

**AUTHORIZED SIGNATURE**
**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Expires: May 31, 2028** **Permit No.: 2840-00006**

7774 PER20220002

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## SECTION 1. GENERAL CONDITIONS

1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance 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 This 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 provisions listed below.

(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 3 or more years. Such a reopening shall be completed no later than 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 emission 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 this permit shall follow the same procedures as apply to initial permit issuance and shall only affect 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 DEQ at least 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 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 This 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 permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.

(a) For purposes of fee assessment and collection, the permittee shall elect for actual 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. 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.

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

(b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee.

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

(c) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time.

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

(d) The fee shall be due September 1 of each year. By July 1 of each year, the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due.

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

(e) If in disagreement with the calculation or applicability of the Title V permit 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.C.)

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 where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source.

(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 pursuant to Section 112(r) of the Act to register such a plan.

(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 which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of 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. 6.4.C(2)., R. 6.4.B., and R. 6.2.A(1)(c).)

1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:

(a) the changes are not modifications under any provision of Title I of the 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 (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:

(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 the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in 11 Miss. Admin. Code Pt. 2, Ch. 3., "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared.

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

1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 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 Regulations 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 [a]ny 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, Subpart I, or 40 CFR 51.166; or

(2) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, or 40 CFR 51.166;

(e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 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).)

1.21 Any change in ownership or operational control must be approved by the Permit Board.

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

1.22 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source'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 Emergency Air Pollution Episode Alert imposed by the Executive Director 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 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 provision with respect to emergencies:

(a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

(b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.

(c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:

(1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;

(2) the permitted facility was at the time being properly operated;

(3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

(e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

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

1.25 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 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 in 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.)

1.26 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, 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 | Primary waste gas control flare for emissions from the heater treater, produced water tanks, process oil tanks and the tank truck loading process. (Ref. No. AA-001) |
| AA-005 | 400-barrel (16,800 gallon) crude oil storage tank with emissions routed to AA-001. If a sales gas line is available emissions may be routed to a VRU for compression and then to the sales gas line. (Ref. No. 9a-12-OST-CV) |
| AA-006 | 400-barrel (16,800 gallon) crude oil storage tank with emissions routed to AA-001. If a sales gas line is available emissions may be routed to a VRU for compression and then to the sales gas line. (Ref. No. 9b-12-OST-CV) |
| AA-007 | 400-barrel (16,800 gallon) crude oil storage tank with emissions routed to AA-001. If a sales gas line is available emissions may be routed to a VRU for compression and then to the sales gas line. (Ref. No. 9c-12-OST-CV) |
| AA-008 | 400-barrel (16,800 gallon) produced water storage tank with emissions routed to AA-001. If a sales gas line is available emissions may be routed to a VRU for compression and then to the sales gas line. (Ref. No. 5d-09-GBT-CV) |
| AA-009 | 400-barrel (16,800 gallon) produced water storage tank with emissions routed to AA-001. If a sales gas line is available emissions may be routed to a VRU for compression and then to the sales gas line. (Ref. No. 5e-09-WST-CV) |
| AA-012 | Fugitive Emissions from component leaks (i.e., valves, flanges, pumps, connections, etc.) (Ref. No. Fugitives) |
| AA-013 | Tank Truck Loading with emissions routed to AA-001. If a sales gas line is available emissions may be routed to a VRU for compression and then to the sales gas line. (Ref. No. 7-09-LL) |
| AA-014 | 500-barrel (21,000 gallon) power oil tank with emissions routed to AA-001, or emissions may be routed to a VRU for compression and then to a sales gas line, if available. (Ref. No. 9d-22-POT-CV) |
| AA-015 | Un-fired heater treater with produced gas routed to AA-001. If a sales gas line is available emissions may be routed to the sales gas line. (Ref. No. 8-10-LP-RG) |

# 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) & (b).

(a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.

(b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 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 For the entire facility, 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 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 gasborne 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. Emission Point Specific Emission Limitations & Standards

| Emission Point(s) | Applicable Requirement | Condition Number(s) | Pollutant/ Parameter | Limit/Standard |
|---|---|---|---|---|
| Facility | 11 Miss. Admin. Code Pt. 2, R. 1.4.B(2). | 3.B.1 | $H_2S$ | 1 grain $H_2S$ per 100 standard cubic feet (1 gr/100 scf), must incinerate if exceeded. |
| Facility | 11 Miss. Admin. Code Pt. 2, R. 2.15C., as established in the Title V Operating Permit issued on June 20, 2023 | 3.B.2 | Operation | General operating and maintenance requirements. |
| AA-001 | Operating Permit issued August 28, 1979, per the State Implementation Plan approved by EPA on August 11, 1980) | 3.B.3 | $SO_2$ | 282 lb/hr (24-hr average) |
| AA-001 | 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a). | 3.B.4 | PM/PM10 (filterable only) | ≤ 0.6 lb/MMBTU |
| AA-001 | 11 Miss. Admin. Code Pt. 2, R. 2.15C., as established in the Title V Operating Permit issued on June 20, 2023 | 3.B.5 | $H_2S$, VOC | Flare operating requirements |
| AA-001 | 40 CFR 64.2(a), Compliance Assurance Monitoring | 3.B.6 | $H_2S$ | CAM Applicability |

3.B.1 For the entire facility, the permittee shall not cause or permit the emission of any gas stream which contains hydrogen sulfide ($H_2S$) in excess of one grain per 100 standard cubic feet. Gas streams containing hydrogen sulfide in excess of one grain per 100 standard cubic feet shall be incinerated at temperatures of not less than 1600 °F for a period of not less than 0.5 seconds or processed in such a manner which is equivalent to or more effective for the removal of hydrogen sulfide. To ensure compliance with this standard, the permittee shall at all times route emissions from the heater treater, process oil tanks, produced water tanks and the truck loading operation to Emission Point AA-001 when not routed to the sales gas line.

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

3.B.2 For the entire facility, the permittee shall operate all air emission equipment as efficiently as possible in order to minimize the emissions of air pollutants. Furthermore, the permittee shall perform routine maintenance on all air emissions equipment such that the equipment may be operated in an efficient manner.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.15C., as established in the Title V Operating Permit issued on June 20, 2023 )

3.B.3 For Emission Point AA-001, the permittee shall not allow emissions of sulfur dioxide ($SO_2$) to exceed 282.0 pounds per hour (lb/hr), as determined on a 24-hour average basis.

(Ref.: Operating Permit issued August 28, 1979, per the State Implementation Plan revisions approved by EPA on August 11, 1980)

3.B.4 For Emission Point AA-001, the maximum permissible emission of ash and/or particulate matter when burning fossil fuels 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.5 For Emission Point AA-001, the permittee shall operate the flare in accordance with the requirements specified in paragraphs (a) through (e) below:

(a) The flare shall be operated at all times when emissions may be vented to it.

(b) The flare shall be operated and maintained according to the manufacturer's recommendations.

(c) The flare shall be operated with no visible emissions as determined by EPA Method 22, except for periods not to exceed a total of five (5) minutes during any two (2) consecutive hours.

(d) The permittee shall maintain a flare pilot flame or auto-igniter system at all times when emissions may be vented to the flare.

(e) The flare shall only be used with a combustion gas mixture whose net heating value is 300 BTU/scf or greater if the flare is air or steam-assisted. If the flare is non-assisted, the flare shall only be used with a combustion gas mixture whose net heating value is 200 BTU/scf or greater.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.15C., as established in the Title V Operating Permit issued on June 20, 2023)

3.B.6 For Emission Point AA-001, the permittee is subject to and shall comply with all applicable requirements of the Compliance Assurance Monitoring (CAM) program (40 CFR Part 64).

(Ref.: 40 CFR 64.2(a), Compliance Assurance Monitoring)

C. Insignificant and Trivial Activity Emission Limitations & Standards

**There are no other requirements applicable to the insignificant activities listed in the source's Title V permit application.**

## 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 permit terms and conditions, including emission limitations, standards, or work practices, by January 31 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:

(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), & (d).)

## SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. General Monitoring, Recordkeeping and Reporting Requirements

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 information the following:

(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 for the preceding six-month 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 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 (i.e., April 30th, July

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1)., 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. Said 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 versions or their equivalents approved by the DEQ and 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, upon permit issuance, the monitoring, testing, recordkeeping, and reporting requirements of Section 5 herein supersede the requirements of any preceding permit to construct and/or operate.

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

B. Specific Monitoring and Recordkeeping Requirements

| Emission Point(s) | Applicable Requirement | Condition Number | Pollutant/Parameter Monitored | Monitoring/Recordkeeping Requirement |
|---|---|---|---|---|
| AA-001 | 11 Miss. Admin. Code Pt. 2, R.6.3.A(3)(a)(2). | 5.B.1 | Flare gas flow | Record amount of gas flared (scf) per day and record the number of hours gas is flared |
| | 11 Miss. Admin. Code Pt. 2, R.6.3.A(3)(a)(2). | 5.B.2 | $H_2S$ | Monitor and record the $H_2S$ content (gr/scf) in flare gas on a monthly basis |
| | 11 Miss. Admin. Code Pt. 2, R.6.3.A(3)(a)(2).) | 5.B.3 | Heating value | Monitor and record the heating value (Btu/scf) in flare gas on an annual basis |
| | 11 Miss. Admin. Code Pt. 2, R.6.3.A(3)(a)(2). | 5.B.4 | $SO_2$ | Calculate sulfur dioxide emissions (lb/hr) from the flare flow rate (scf/hr) and the $H_2S$ content of the flared gas. |
| | 11 Miss. Admin. Code Pt. 2, R.6.3.A(3)(a)(2).) | 5.B.5 | Visible emissions | Perform monthly flare visible emissions test and take corrective action if necessary |
| | 11 Miss. Admin. Code Pt. 2, R.6.3.A(3)(a)(2).) | 5.B.6 | Flare auto-igniter | Requirements for flare auto-igniter |
| | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).) | 5.B.7 | Flare flame | Continious monitoring for the presence of flare flame and auto-igniter |
| | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).) | 5.B.8 | Operations | Recordkeeping requirements for the flare system |
| | 40 CFR 64.7(b) and (c), CAM | 5.B.9 | Operation & Maintenance | Operation and maintenance requirements for CAM monitoring system(s) |
| | 40 CFR 64.7(d), CAM | 5.B.10 | Corrective action | Corrective Action response to an excursion/exceedance of a CAM indicator |
| | 40 CFR 64.8, CAM | 5.B.11 | QIP | Upon request by DEQ, develop a Quality Improvement Plan (QIP) |
| | 40 CFR 64.9(b), CAM | 5.B.12 | CAM records | Maintain CAM records as specified |

5.B.1 For Emission Point AA-001, the permittee shall monitor and record the amount of gas flared in each 24-hour block period (e.g., a calendar day) and include the basis for the estimate (e.g., meter, production records, engineering estimate, etc.). The monitor(s) or meter(s) used to determine gas flow shall be operated, calibrated and maintained in accordance with the manufacturer's recommendations. The calibration frequency shall be at least quarterly. Records of these calibrations shall be maintained on site. All gas streams that are routed to the flare shall be included in the determination of gas flow, including gas vented due to downstream compressor shutdowns, gas sent from the VRU,

tank loading emissions, shutdowns, malfunctions, etc. The flow rate in scf/hr shall be calculated for each 24-hour block period using the total gas flow during the 24-hour period and the actual hours gases were vented to the flare during the 24-hour period.

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

5.B.2 For Emission Point AA-001, the permittee shall analyze the hydrogen sulfide content (in gr/scf) of the sour gas on a semiannual basis (not to exceed 7 months from the previous analysis) by sending the sampled gas to a certified lab for a laboratory gas analysis. The sample shall be taken where all waste streams combine but prior to combustion in the flare. The sample shall not be collected while any truck loading operations are being conducted.

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

5.B.3 For Emission Point AA-001, the permittee shall determine the net heating value (in Btu/scf) of the flare gas on an annual basis. The sample shall be taken where all waste streams combine but prior to combustion in the flare. The sample shall be collected while all waste streams are being routed to the flare.

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

5.B.4 For Emission Point AA-001, the permittee shall calculate and maintain records of the 24-hour average $SO_2$ emission rate in lb/hr. The permittee shall use the most recent semiannual $H_2S$ measurement of the flared gas and the 24-hour average gas flow to determine $SO_2$ emissions for each 24-hour block period.

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

5.B.5 For Emission point AA-001, the permittee shall perform monthly visible emissions tests for a minimum of fifteen (15) minutes using EPA Method 22 while the facility is operating with all gases being flared. If visible emissions are observed for a period greater than one (1) minute, corrective action shall be taken immediately. Immediately following completion of the corrective action(s), the permittee shall demonstrate compliance by performing an EPA Method 22 test for a period of two (2) hours and shall monitor and maintain records of the flare rate during the test. The monthly visible emissions tests shall be separated by at least fifteen (15) days between each test.

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

5.B.6 For Emission Point AA-001, the permittee shall continuously maintain and operate an auto-igniter system on the flare to ensure a flame is immediately restored when emissions are being sent to the flare. At a minimum, the permittee shall comply with the following:

(a) The auto-igniter system shall be an electric arc ignition system. The electric arc ignition system shall pulse continually and a device shall be installed and used to continuously monitor that the electric arc ignition system is operational.

(b) The auto-igniter system shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

(c) The auto-igniter system must be equipped with a malfunction alarm and remote notification system that alerts facility personnel if the auto ignition system fails to light the flame.

(d) If the auto-igniter system fails to light the flame, it must be relit as soon as safely possible and the auto-igniter system must be repaired or replaced as soon as practicable.

(e) Physical inspections of all equipment associated with the auto-igniter system shall be performed quarterly. The permittee shall respond to any observation of any auto-igniter failure and ensure the equipment is returned to proper operation as soon as practicable and safely possible after an observation or an alarm sounds.

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

5.B.7 For Emission Point AA-001, the permittee shall comply with the Compliance Assurance Monitoring (CAM) Plan contained in Appendix C of this permit. The CAM Plan requires the permittee to continuously monitor the temperature at the flare tip, and to provide continuous operation of an auto-ignitor for the flare. The permittee shall take temperature readings continuously. If the temperature reading indicates that the flame is extinguished, the permittee shall immediately take corrective action and document all actions that were taken. Any event when a flame is not present at the flare when emissions are present shall be considered an exceedance of the permit requirements of Conditions 3.B.1 and 3.B.6 and shall be reported as a permit deviation in accordance with Condition 5.A.5. Any event when the thermocouple or the auto ignitor are not functioning, other than periods of routine maintenance, but the flare flame is not extinguished shall be considered an excursion.

(Ref.: 40 CFR 64.3(a) and (b), 64.6(c), CAM)

5.B.8 For Emission Point AA-001, the permittee shall comply with the following recordkeeping requirements outlined in paragraphs (a) through (d):

(a) The permittee shall maintain a copy of the flare manufacturer operating and maintenance recommendations and detailed records of all maintenance performed on the flare.

(b) The permittee shall maintain records of all EPA Method 22 tests, and details of any corrective/preventative action(s) taken.

(c) The permittee shall maintain records of all gas analyses performed to determine the net heating value and $H_2S$ content of the gas being combusted in the flare, and the volume of gas flared per day.

(d) For the auto-igniter system and the $H_2S$ monitoring system, the permittee shall maintain records of any instances in which either system did not function, the date and times (including duration) of the occurrence, the cause of the occurrence, the corrective actions taken, preventative measures adopted to prevent reoccurrence, all instances of alarm activation, including the date and cause of alarm activation, actions taken to bring the flare into normal operating conditions, and any maintenance activities conducted on the systems.

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

5.B.9 For Emission Point AA-001, the permittee shall comply with the following requirements for the monitoring required by the approved CAM Plan (Attachment C):

(a) Proper maintenance. At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(b) Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used, including in data averaging and calculations or in fulfilling a minimum data availability requirement, as applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(Ref.: 40 CFR 64.7(b) and (c), CAM)

5.B.10 For Emission Point AA-001, upon detecting an excursion or exceedance, the permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and

prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

Determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(Ref.: 40 CFR 64.7(d), CAM

5.B.11 For Emission Point AA-001, based on the results of a determination made under Condition 5.B.10, the DEQ may require the permittee to develop and implement a Quality Improvement Plan (QIP) containing the elements specified in 40 CFR 64.8(b). The QIP shall be developed and implemented within 180 days of written notification from DEQ that a QIP is required. The DEQ may require the permittee make reasonable changes to the QIP if the QIP fails to address the cause of the control device performance problem or fails to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Implementation of a QIP shall not excuse the permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that applies.

(Ref.: 40 CFR 64.8, CAM)

5.B.12 For Emission Point AA-001, the permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written QIP required pursuant to Condition 5.B.11 and any activities undertaken to implement a QIP, data used to document the adequacy of monitoring, and monitoring maintenance or corrective actions, as applicable. As applicable, records of monitoring data and monitoring performance data should include date and time, who performed the analysis, analytical techniques or methods used, results and operating conditions at the time of the sampling or measurement. These records may be maintained in hard copy form or electronically, provided they are available for expeditious inspection and review.

(Ref.: 40 CFR 64.9(b), CAM)

C. Specific Reporting Requirements

| Emission Point(s) | Applicable Requirement | Condition Number | Pollutant/Parameter Monitored | Reporting Requirement |
|---|---|---|---|---|
| AA-001 | 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1). | 5.C.1(a) | $SO_2$<br>$H_2S$ of flared gas<br>Gas Flow | Semiannual report of 24-hr average $SO_2$ emissions (lb/hr) and supporting information |
| | 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1). | 5.C.1(b) | Visible emissions | Provide test data sheets and details of any corrective/preventative actions |
| | 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1). | 5.C.1(c) | Auto-igniter system data | Report details of any system failure, including corrective actions and maintenance |
| | 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1). and 40 CFR 64.9(a)(1) and (2) | 5.C.2 | CAM indicator parameters | Semiannual report of excursions from the CAM indicators and corrective actions taken |

5.C.1 For Emission Point AA-001, the permittee shall report the following information in accordance with Condition 5.A.4

(a) A summary of the 24-hour average SO2 emissions calculated daily during the reporting period, the $H_2S$ concentrations obtained in the monthly samples analyzed during the reporting period, the 24-hour gas flow and the hours of operation of the flare during each 24-hour period.

(b) Copies of data sheets for all EPA Method 22 tests performed during the reporting period, including details of any accompanying corrective and preventative actions taken;

(c) Auto-igniter system and $H_2S$ monitoring systems data: report of any instances in which the auto-igniter system or H2S monitoring system did not function, the date and times of the occurrence, whether or not gas was being vented, whether or not the flare flame was extinguished, the corrective actions taken, preventative measures adopted to prevent reoccurrence, all instances of alarm activation, including the date and cause of alarm activation, actions taken to bring the flare into normal operating conditions, and any maintenance activities conducted on the auto-igniter system or $H_2S$ monitoring system.

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

5.C.2 For Emission Point AA-001, the permittee shall submit reports in accordance with Condition 5.A.4 of the following information, as applicable:

(a) Summary information on the number, duration, and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken.

(b) Summary information on the number, duration, and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

(c) A description of the actions taken to implement a QIP during the reporting period as specified in Condition 5.B.11. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances.

(Ref: 40 CFR 64.9(a), CAM)

## SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 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 | Mississippi Department of Environmental Quality |
| EPA | United States 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 |
| MMBTUH | 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 61, or National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR 63 |
| NMVOC | Non-Methane Volatile Organic Compounds |
| $NO_x$ | Nitrogen Oxides |
| NSPS | New Source Performance Standards, 40 CFR 60 |
| O&M | Operation and Maintenance |
| PM | Particulate Matter |
| $PM_{10}$ | Particulate Matter less than 10 μm in diameter |
| $PM_{2.5}$ | Particulate Matter less than 2.5 μm in diameter |
| ppm | Parts per Million |
| PSD | Prevention of Significant Deterioration |
| SIP | State Implementation Plan |
| $SO_2$ | 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 THIS PERMIT

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

11 Miss. Admin. Code, Part 2, Ch. 1. – Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants (Amended November 10, 2016)

11 Miss. Admin. Code, Part 2, Ch. 2. – Permit Regulations for the Construction and/or Operation of Air Emissions Equipment (Amended July 28, 2005)

11 Miss. Admin. Code, Part 2, Ch. 6. – Air Emission Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act (Amended June 28, 2012)

40 CFR 64, Compliance Assurance Monitoring

40 CFR 82, Protection of Stratospheric Ozone

# APPENDIX C

## COMPLIANCE ASSURANCE MONITORING PLAN

# Compliance Assurance Monitoring Plan

*(Prepared in accordance with 40 CFR 64)*

| *Operator:* | *Facility:* | |
|---|---|---|
| **Formentera Operations LLC** | **South Cypress Creek Facility** | |
| *Permit No.:* | *AI No.:* | *County, State:* |
| **2840-00006** | **7774** | **Wayne County, MS** |

## I. Background Information

| | |
|---|---|
| **Emission Point Designation (Ref. No.)** | AA-001 (AA-001) |
| **Emission Point Description** | One (1) control flare controlling vapors from the storage tanks, oil tank truck loading process, and facility-wide low pressure relief gas. |
| **Regulated Pollutant** | Hydrogen Sulfide ($H_2S$) |
| **Applicable Emission Limitation or Standard Requirement** | 11 Miss. Admin. Code Pt. 2, R. 1.4.B(2).<br><br>*(It should be noted that this is a work practice standard, not a numerical limit in which the control device must meet.)* |
| **Applicable Emission Limitation or Standard** | The permittee shall not cause or permit the emission of any gas stream which contains hydrogen sulfide ($H_2S$) in excess of one grain per 100 standard cubic feet. Gas streams containing hydrogen sulfide in excess of one grain per 100 standard cubic feet shall be incinerated at temperatures of not less than 1600 °F for a period of not less than 0.5 seconds or processed in such a manner which is equivalent to or more effective for the removal of hydrogen sulfide. |
| **Monitoring Requirements** | Verify the presence of a flame |
| **Emission Control Technology** | Thermal Combustion |

## II. Monitoring Approach

| | Indicator No. 1 | Indicator No. 2 |
|---|---|---|
| **Indicator** | Operational design & controls | Visible presence of a flame |
| **Measurement Approach** | The flare is equipped with a continuous spark flame ignitor to ensure a flame is immediately restored when the flare flame is extinguished. | The temperature at the flare tip will be monitored with a thermocouple to ensure the presence of combustion. |
| **Indicator Range (Including the corrective action taken for an excursion)** | The auto-igniter system uses an electric arc ignition system which pulses continually and is equipped with a malfunction alarm and remote notification system that alerts facility personnel if the auto ignition system fails to light the flame.<br><br>An excursion is defined as any instance when auto-ignitor system malfunctions. Excursions outside of the indicator range will trigger an investigation, corrective action, and reporting, if necessary.<br><br>Not more than three (3) excursions in any semi-annual reporting period. | An excursion is defined as any instance when the flare is not combusting while vapors are routed to it. This will be determined by temperature readings.<br><br>Excursions outside of the indicator range will trigger an investigation, corrective action, and reporting, if necessary.<br><br>Not more than three (3) excursions in any semi-annual reporting period. |

## III. Performance Criteria

| | Indicator No. 1 | Indicator No. 2 |
|---|---|---|
| **Data Representativeness** | Operational design & controls | The thermocouple (or equivalent device) is located near the flare tip as an integral part of the design. |
| **Verification of Operational Status** | Malfunction alarm and remote notification system | Malfunction alarm and remote notification system |
| **QA/QC Practices and Criteria** | Calibrate the auto-igniter system in accordance with the manufacturer's recommendations at least annually and perform physical inspections of the auto-ignitor system quarterly. | Accuracy of the device will be verified on a frequency recommended by the manufacturer, at a minimum |
| **Monitoring Frequency** | Continuously | Continuously |
| **Data Collection/ Recordkeeping Procedures** | Record instances when the auto igniter system is not operating properly. Record all corrective actions taken. Retain records for at least five (5) years. | Data will be recorded each day. If no flame is observed, record the downtime hours. Record all corrective actions taken. Retain records for at least five (5) years. |
| **Averaging Period** | N/A | N/A |

A. Background

The pollutant specific emissions unit (PSEU) is the flare controlling the vapors from the storage tanks, oil tank truck loading process, and facility-wide low pressure relief gas.

B. Rationale for Selection of Performance Indicators and Selecting Indicator Ranges

*Operational Design & Controls:*

The flare is equipped with an auto-igniter system to ensure a flame is immediately restored when emissions are being sent to the flare. The auto-igniter system is equipped with a malfunction alarm and remote notification system that alerts facility personnel if the auto ignition system fails to light the flame.

*Continuous presence of combustion:*

The temperature at the flare tip indicates that the flare is operating and that the appropriate combustion of the flare gas is attained. The thermocouple takes temperature readings at the tip of the flare continuously. The thermocouple is connected to a malfunction alarm and notification system that notifies the facility personnel anytime there is problem with the temperature reading.

C. Additional Comments

The data associated with this monitoring plan, along with the standard combustion efficiency of the control flare device, is used to determine the concentration of $H_2S$ present in the non-combusted flare gas and therefore demonstrate applicability to the requirements outlined above. Excursions outside of the indicator ranges will trigger an investigation, corrective action, and reporting, if necessary.