STATE OF MISSISSIPPI
AND FEDERALLY ENFORCEABLE
AIR POLLUTION CONTROL

PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT AT A SYNTHETIC MINOR SOURCE

THIS CERTIFIES THAT

Gulf South Pipeline Company LP,
Black Creek Compressor Station
4644 U S Highway 11
Purvis, Mississippi
Forrest 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

Becky Simonson

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: April 22, 2025 **Permit No.: 0800-00118**

Effective Date: As specified herein.

Expires: March 31, 2030

Section 1.

A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only.

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

2. This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.4.D.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.4.D.)

3. Any activities not identified in the application are not authorized by this permit.

   (Ref.: Miss. Code Ann. 49-17-29 1.b)

4. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)

5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)

6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)

7. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)

8. The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:

a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and

b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission.

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

9. Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control.

(Ref.: Miss. Code Ann. 49-17-39)

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(7).)

11. This permit does not authorize a modification as defined in Regulation 11 Miss. Admin. Code Pt. 2, Ch.2., "Permit Regulations for the Construction and/or Operation of Air Emission Equipment." A modification may require a Permit to Construct and a modification of this permit. Modification is defined as "Any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

a. Routine maintenance, repair, and replacement;

b. Use of an alternative fuel or raw material by reason of an order under Sections 2(a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;

c. Use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;

d. Use of an alternative fuel or raw material by a stationary source which:

(1) The source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, or 40 CFR 51.166; or

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

e. An increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I or 40 CFR 51.166; or

f. Any change in ownership of the stationary source.

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

B. GENERAL OPERATIONAL CONDITIONS

1. Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in Regulation, 11 Miss. Admin. Code Pt. 2, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.10.)

2. Any diversion from or bypass of collection and control facilities is prohibited, except as provided for in 11 Miss. Admin. Code Pt. 2, R. 1.10., "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants."

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

3. Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits.

(Ref.: Miss. Code Ann. 49-17-29 1.a(i and ii))

4. Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.

a. Upsets

(1) For an upset defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:

(i) An upset occurred and that the source can identify the cause(s) of the upset;

(ii) The source was at the time being properly operated;

(iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;

(iv) That within 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;

(v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.

(2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.

(3) This provision is in addition to any upset provision contained in any applicable requirement.

(4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.

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

(1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.

(2) Where the source is unable to comply with existing emission limitations

established under the State Implementation Plan (SIP) and defined in this regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).

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

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

5. Compliance Testing: Regarding compliance testing:

a. The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.

b. Compliance testing will be performed at the expense of the permittee.

c. Each emission sampling and analysis report shall include but not be limited to the following:

(1) Detailed description of testing procedures;

(2) Sample calculation(s);

(3) Results; and

(4) Comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

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

C. PERMIT RENEWAL / MODIFICATION / TRANSFER / TERMINATION

1. For renewal of this permit, the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board. If the applicant submits a timely and complete application pursuant to this paragraph and the Permit Board, through no fault of the applicant, fails to act on the application on or before the expiration date of the existing permit, the applicant shall continue to operate the stationary source under the terms and conditions of the expired permit, which shall remain in effect until final action on the application is taken by the Permit Board. Permit expiration terminates the

source's ability to operate unless a timely and complete renewal application has been submitted.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.8.)

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

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).)

3. The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).)

4. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:

   a. Persistent violation of any terms or conditions of this permit.

   b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

   c. A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

5. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B.)

SECTION 2
EMISSION POINT DESCRIPTION

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

Emission Point	Facility Reference	Description
AA-001	C-1	2,500 HP Compressor Engine #1 – 4SLB RICE with Oxidation Catalyst
AA-002	C-2	2,500 HP Compressor Engine #2 – 4SLB RICE with Oxidation Catalyst
AA-003	EG-1	536 HP Emergency Generator – Emergency 4SRB RICE for Backup Power
AA-004	TK01	1,100 Gallon Pipeline Condensate Tank
AA-005	TK02	1,100 Gallon Oily Water Tank
AA-006	TK03	1,100 Gallon Lubricating Oil Tank
AA-007	TK04	1,100 Gallon Ethylene Glycol Tank
AA-008	TK05	1,100 Gallon Ethylene Glycol Tank
AA-009	L-1	Condensate Truck Loading
AA-010	-	Equipment Leaks
AA-011	V-1	Natural Gas Venting
AA-012	-	Pneumatic Controllers
AA-013	H-1	Bruest Catalytic Fuel Gas Heater
AA-014	TK06	1,100 Gallon Maintenance Lube Oil Storage Tank
AA-015	TK07	1,100 Gallon Used Oil Storage Tank

SECTION 3
EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limitation/Standard
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity	Opacity shall not exceed 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2		Equivalent Opacity
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)	3.3	Fuel Requirement	Shall combust only pipeline-quality natural gas
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). (Title V Avoidance)	3.4	HAP (Formaldehyde)	Shall not exceed 9.0 tpy
AA-001 AA-002 AA-010 AA-012	40 CFR 60, Subpart OOOOa (New Source Performance Standards for the Oil and Natural Gas Sector) 40 CFR 60.6365a, Subpart OOOOa	3.5	VOC HAP	General Applicability
AA-001 AA-002	40 CFR 60.5385a(a), Subpart OOOOa	3.6	VOC	Reciprocating compressor rod replacement requirements
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b)	3.7	PM (Filterable only)	$E = 0.8808*I^{-0.1667}$
	40 CFR 60, Subpart JJJJ (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines) 40 CFR 60.4230(a)(4)(i), Subpart JJJJ	3.8	VOC HAP	General Applicability
	40 CFR 60.4233(e), Subpart JJJJ	3.9		Emission Standards
	40 CFR 60.4243(b)(2)(ii), Subpart JJJJ	3.10		Initial Compliance
AA-001 AA-002 AA-003	40 CFR 63, Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines) 40 CFR 63.6590(c)(1), Subpart ZZZZ	3.11	VOC HAP	General Applicability

	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10) (Title V Avoidance)	3.12	VOC HAP	Route all exhaust to oxidation catalyst
AA-003	40 CFR 60.4230(a)(4)(iv), Subpart JJJJ	3.13	VOC HAP	General Applicability
	40 CFR 60.4233(e), Subpart JJJJ	3.14		Emissions Standards
	40 CFR 60.4243(d), Subpart JJJJ	3.15		Emergency engine operation requirements
	40 CFR 60.4237, Subpart JJJJ	3.16		Install non-resettable hour meter
AA-010	40 CFR 60.5397a, Subpart OOOOa	3.17	VOC	Operational Requirement
	40 CFR 60.5397a(c)(7), Subpart OOOOa	3.18		
	40 CFR 60.5397a(c)(8), Subpart OOOOa	3.19		
	40 CFR 60.5397a(h), Subpart OOOOa	3.20		Fugitive emission source repair or replacement requirements
AA-012	40 CFR 60.5390a(c)(1) and (2), Subpart OOOOa	3.21	VOC	Operational Requirement

3.1. 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. 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.

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

3.2. 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. 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.

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

3.3. For the entire facility, the permittee shall only combust pipeline-quality natural gas in all stationary sources.

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

3.4. For the entire facility, the permittee shall limit the emissions of Formaldehyde to less than 9.0 tons per year for each consecutive 12-month period on a rolling basis:

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

3.5. For Emission Points AA-001 through AA-002, AA-010, and AA-012, the facility is subject to and shall comply with all applicable requirements of the Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015, 40 CFR 60, Subpart OOOOa. Emission Points AA-001 through AA-002 are reciprocating compressors and Emission Point AA-010 is the collection of fugitive emissions components from equipment leaks at a compressor station. For Emission Point AA-012, Subpart OOOOa is subject only to the natural gas driven continuous bleed pneumatic controllers with a natural gas bleed rate greater than 6 scf/h.

(Ref.: 40 CFR 60.5397a(c), (d), and (j), Subpart OOOOa)

3.6. For Emission Points AA-001 and AA-002, the permittee shall replace the reciprocating compressor rod packing according to either (a) or (b), or shall comply with (c) below:

(a) On or before the compressor has operated for 26,000 hours.

(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 60.5385a(a), Subpart OOOOa)

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

$$E = 0.8808 * I^{-0.1667}$$

where “E” is the emission rate in pounds per MMBTU per hour heat input and “I” is the heat input in MMBTU per hour.

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

3.8. For Emission Points AA-001 and AA-002, the permittee is subject to and shall comply with all applicable requirements of Standards of Performance for Stationary Spark Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart JJJJ. These emission points are classified as new, non-emergency, Spark Ignition (SI), stationary, 4-stroke lean burn (4SLB), Reciprocating Internal Combustion Engine (RICE) with maximum engine powers greater than 500 horsepower (HP) located at an area source of Hazardous Air Pollutants (HAPs).

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

3.9. For Emission Points AA-001 and AA-002, the permittee shall comply with the emissions standards below over the entire life of the engines.

Pollutant	Emission Standard (g/bhp-hr)	Emissions Standard (ppmvd at 15% O_2)

NO_X	1.0	82
CO	2.0	270
VOC	0.7	60

(Ref.: 40 CFR 60.4233(e), Table 1, Subpart JJJJ)

3.10. For Emission Points AA-001 and AA-002, the permittee shall demonstrate compliance with Condition 3.8 by purchasing an engine specified to the emission standards specified in Condition 3.9. The permittee shall also follow the maintenance plan and performance test requirements in Condition 5.4.

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

3.11. For Emission Points AA-001 through AA-003, the permittee is subject to 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE). Emission Points AA-001 through AA-003 are new RICE located at an area source of HAPs. Therefore, compliance with 40 CFR Part 63, Subpart ZZZZ shall be achieved by meeting all applicable requirements of 40 CFR Part 60, Subpart JJJJ. No further requirements apply for such engines under NESHAP Subpart ZZZZ.

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

3.12. For Emission Points AA-001 and AA-002, the permittee shall route all exhaust from each engine through their respective oxidation catalyst system. For Emission Point AA-003, the permittee shall route all exhaust from the engine through the NSCR. The permittee shall operate each control device at all times when operating. Should the control technologies become nonoperational then the respective process shall be shut down immediately, but not as to cause damage to equipment or property or cause further environmental problems. The process shall not startup until such time that the control technology becomes operational. The permittee shall maintain on hand at all times sufficient equipment as is necessary to repair and/or overhaul each control device at all times. The permittee shall maintain and perform quality assurance/quality control measures in accordance with the manufacture's specifications.

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

3.13. For Emission Point AA-003, the permittee is subject to and shall comply with all applicable conditions of Standards of Performance for Stationary Spark Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart JJJJ. This Emission Point is classified as a new, emergency, Spark Ignition (SI), stationary, 4-stroke lean burn (4SLB), Reciprocating Internal Combustion Engine (RICE) with a maximum engine power greater than 25 horsepower (HP) located at an area source of Hazardous Air Pollutants (HAPs).

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

3.14. For Emission Point AA-003, the permittee shall comply with the emissions standards below over the entire life of the engine.

Pollutant	Emission Standard (g/bhp-hr)	Emissions Standard (ppmvd at 15% O_2)
NO_X	2.0	160
CO	4.0	540
VOC	1.0	86

(Ref.: 40 CFR 60.4233(e), Table 1, Subpart JJJJ)

3.15. For Emission Point AA-003, the permittee shall operate the emergency, stationary ICE according to the requirements in (a) through (c) below:

(a) There is no time limit on the use of the engine in emergency situations.

(b) The engine may be operated for maintenance checks and readiness testing for a maximum of 100 hours per calendar year, 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 petion 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 and emergency demand response provided in (b). Except as provided in 40 CFR 60.4243(d)(3)(i), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial agreement with another entity.

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

3.16. For Emission Point AA-003, the permittee shall install a non-resettable, hour meter if one is not already installed.

(Ref.: 40 CFR 60.4237, Subpart JJJJ)

3.17. For Emission Point AA-010, the permittee shall demonstrate compliance with Subpart OOOOa by monitoring all fugitive emission components, as defined in 40 CFR Part 60.5430a. For the purposes of this condition along with Conditions 3.18, 3.19, and 3.20, fugitive emissions are defined as: Any visible emission from a fugitive emissions component observed using optical gas imaging or an instrument reading of 500 parts per million (ppm) or greater using EPA Method 21 – Volatile Organic Compound Leaks. The permittee shall develop an emissions monitoring plan that covers the collection of fugitive emissions components within each company-defined area. This monitoring plan shall include the information and elements specified in paragraphs (a) through (j) below:

(a) Frequency for conducting surveys.

(1) The permittee shall conduct an initial monitoring survey within 60 days of startup for each collection of fugitive emissions components at a new compressor station.

(2) Thereafter, a monitoring survey shall be conducted at least quarterly. Consecutive semiannual monitoring surveys must be conducted at least 60 days apart. Each monitoring survey shall observe each fugitive emissions component for fugitive emissions.

(b) Technique used in detecting fugitive emissions (i.e. EPA Method 21 from 40 CFR Part 60, Appendix A-7 or optical gas imaging).

(c) Manufacturer and model number of fugitive emission detection equipment used.

(d) Procedures and timeframes for identifying and repairing fugitive emissions components from which fugitive emissions are detected. This includes timeframes for fugitive emission components that are unsafe to repair. At a minimum, the repair schedule shall meet the requirements of Condition 3.18.

(e) Procedures and timeframes for verifying fugitive emission component repairs.

(f) Records that will be kept and the length of time these records will be kept.

(g) A representative site map shall be kept on-site at all times.

(h) A defined observation path that ensures all fugitive emissions components are within sight of the path. The observation path must account for interferences.

(i) If the permittee utilizes EPA Method 21, the plan shall also include a list of fugitive emissions components to be monitored and the method for determining location of fugitive emissions components to be monitored in the field (e.g. tagging, identification on a process and instrumentation diagram, etc.).

(j) The plan shall also include the written plan developed for all of the fugitive emission components designated as difficult-to-monitor in accordance with 40 CFR Part 60.5397(g)(3)(i) and the written plan for fugitive emission components designated as unsafe-to-monitor in accordance with 40 CFR Part 60.5397(g)(3)(ii) and (g)(4).

(Ref.: 40 CFR 60.5397a(a) and (b), Subpart OOOOa)

3.18. For Emission Point AA-010, if the permittee utilizes optical gas imaging, the monitoring plan required in Condition 3.17 shall include the information specified in subparagraphs (a) through (g) below:

(a) Verification that the optical gas imaging equipment is capable of imaging gases in the spectral range for the compound of highest concentration in the potential fugitive emissions. The optical gas imaging equipment must be capable of imaging a gas that is half methane, half propane at a concentration of 10,000 ppm at a flow rate of $\leq$ 60 grams per hour (g/hr) from a quarter inch diameter orifice. This verification is an initial verification and may either be performed by the permittee, by the manufacturer, or by a third party. For the purposes of complying with the fugitive emissions monitoring program with optical gas imaging, a fugitive emission is defined as any visible emissions observed using optical gas imaging.

(b) Procedures for a daily verification check.

(c) Procedures for determining the permittee's maximum viewing distance from the equipment and procedures for how the permittee will ensure that this distance is maintained.

(d) Procedures for determining maximum wind speed during which monitoring can be performed and procedures for how the permittee will ensure monitoring occurs only at wind speeds below this threshold.

(e) Procedures for conducting surveys, including how the permittee will ensure an adequate thermal background is present in order to view potential fugitive emissions, how the permittee will deal with adverse monitoring conditions, such as wind, and how the permittee will deal with interferences (e.g., steam).

(f) Specifications of the training and experience needed prior to performing surveys.

(g) Procedures for calibration and maintenance. At a minimum, procedures must comply with those recommended by the manufacturer.

(Ref.: 40 CFR 60.5397a(c)(7), Subpart OOOOa)

3.19. For Emission Point AA-010, if the permittee utilizes EPA Method 21 from 40 CFR Part 60, Appendix A-7, the monitoring plan required in Condition 3.17 shall include the information specified in paragraphs (a) and (b) below:

(a) Verification that all monitoring equipment meets the requirements specified in Section 6.0 of EPA Method 21 from 40 CFR Part 60, Appendix A-7. For purposes of instrument capability, the fugitive emissions definition shall be 500 ppm or greater methane using a FID-based instrument. If the permittee uses an analyzer other than a FID-based instrument, the permittee shall develop a site-specific fugitive emission definition that would be equivalent to 500 ppm methane using a FID-based instrument (e.g., 10.6 eV PID with a specified isobutylene concentration as the fugitive emission definition would provide equivalent response to your compound of interest).

(b) Procedures for conducting surveys. At a minimum, these procedures shall ensure that the surveys comply with the relevant sections of EPA Method 21 from 40 CFR Part 60, Appendix A-7, including Section 8.3.1.

(Ref.: 40 CFR 60.5397a(c)(8), Subpart OOOOa)

3.20. For Emission Point AA-010, each identified source of fugitive emissions shall be repaired or replaced in accordance with paragraphs (a) through (c) below:

(a) Each identified source of fugitive emissions shall be repaired or replaced as soon as practicable, but no later than 30 calendar days after detection of the fugitive emissions.

(b) If the repair or replacement is technically infeasible, would require a well shutdown or well shut-in, or would be unsafe to repair during operation of the unit, the repair or replacement must be completed during the next well shutdown, well shut-in, after an

unscheduled, planned or emergency vent blowdown or within 2 years, whichever is earlier.

(c) Each repaired or replaced fugitive emissions component must be resurveyed as soon as practicable, but no later than 30 days after being repaired, to ensure that there are no fugitive emissions. This survey shall comply with the requirements of subparagraphs (1) through (4), as applicable:

(1) For repairs that cannot be made during the monitoring survey when the fugitive emissions are initially found, the operator may resurvey the repaired fugitive emissions components using either Method 21 or optical gas imaging within 30 days of finding such fugitive emissions.

(2) For each repair that cannot be made during the monitoring survey when the fugitive emissions are initially found, a digital photograph must be taken of that component or the component must be tagged for identification purposes. The digital photograph must include the date that the photograph was taken, must clearly identify the component by location within the site (e.g., the latitude and longitude of the component or by other descriptive landmarks visible in the picture).

(3) If the permittee utilizes Method 21 to resurvey the repaired fugitive emissions components, then the fugitive emissions component is considered repaired when the Method 21 instrument indicates a concentration of less than 500 ppm above background or when no soap bubbles are observed when the alternative screening procedures specified in Section 8.3.3 of Method 21 are used. The permittee shall utilize the Method 21 monitoring requirements specified in Condition 3.10(h)(ii) or the alternative screening procedures specified in Section 8.3.3 of Method 21.

(4) If the permittee utilizes optical gas imaging to resurvey the repaired fugitive emissions components, then the fugitive emissions component is considered repaired when the optical gas imaging instrument shows no indication of visible emissions. The permittee shall utilize the optical gas monitoring requirements specified in Condition 3.18(g).

(Ref.: 40 CFR 60.5397a(h), Subpart OOOOa)

3.21. For Emission Point AA-012, the permittee shall adhere to the following:

(a) Each pneumatic controller affected facility shall have a bleed rate less than or equal to 6 standard cubic feet per hour.

(b) Each pneumatic controller affected facility shall be tagged with the month and year of installation, reconstruction or modification, and identification information that allows traceability to the records for that controller as required by Condition 5.14.

(Ref.: 40 CFR 60.5390a(c)(1)-(2), Subpart OOOOa)

SECTION 4
WORK PRACTICES

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Work Practice
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)	4.1	VOC HAP	Operate all equipment as efficiently as possible and perform routine maintenance

4.1. For the entire facility, in order to minimize the emissions of air pollutants, the permittee shall operate all air emissions equipment as efficiently as possible. 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. 2.2.B(10).)

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.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2		Fuel Records
		5.3		Formaldehyde recordkeeping
AA-001 AA-002	40 CFR 60.5420a(c)(3), Subpart OOOOa	5.4	VOC	Reciprocating Compressor Recordkeeping Requirement
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.5	Formaldehyde	Oxidation Catalyst Recordkeeping
		5.6		Perform a one-time stack test upon permit issuance
AA-001 AA-002 AA-003	40 CFR 60.4243(b)(2)(ii), Subpart JJJJ	5.7	VOC NO_X CO HAP	Recordkeeping
	40 CFR 60.4245(a), Subpart JJJJ	5.8		
AA-003	40 CFR 60.4245(b), Subpart JJJJ	5.9	VOC NO_X CO HAP	Record hours of operation
AA-010	40 CFR 60.5410a(j), Subpart OOOOa	5.10	VOC	Initial Compliance
	40 CFR 60.5415a(h), Subpart OOOOa	5.11		Continuous Compliance
	40 CFR 60.5420a(c), Subpart OOOOa	5.12		Recordkeeping Requirement
AA-012	40 CFR 60.5410a(d)(3)-(5), Subpart OOOOa	5.13	VOC	Initial Compliance
	40 CFR 60.5420a(c)(4)(i)-(v)	5.14		Recordkeeping

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 demonstrate compliance with Condition 3.3 by maintaining records tracking the amount and quality of natural gas combusted at the facility.

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

5.3. For the entire facility, the permittee shall demonstrate compliance with Condition 3.4 by monitoring and keeping records of Formaldehyde emissions. The permittee shall determine Formaldehyde emissions on a monthly basis and for each consecutive 12-month period on a rolling basis.

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

5.4. For Emission Points AA-001 and AA-002, the permittee shall keep the records listed below:

(a) The records of cumulative numbers of hours of operation or number of months since initial startup or the previous replacement of the reciprocating compressor rod packing, whichever is later. Alternatively, a statement that emissions from the rod packing are being routed to a process through a closed vent system under negative pressure.

(b) The records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system.

(c) The records of the deviations in cases where the reciprocating compressor was not operated in compliance with the requirements specified in Condition 3.6.

(Ref.: 40 CFR 60.5420a(c)(3), Subpart OOOOa)

5.5. For Emission Points AA-001 and AA-002, the permittee shall inspect the oxidation catalysts once every six (6) months to ensure proper operation and maintenance. If a catalyst malfunction is detected, the compressor engine shall be taken offline until such a time that repairs can be made.

All inspections, and any maintenance activities made on the oxidation catalysts, shall be kept in log form. This log shall include the date the inspection was made, any problems detected, any corrective action taken to fix the problem and the name of the person responsible for conducting the inspection.

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

5.6. For Emission Points AA-001 and AA-002, the permittee shall perform a one-time stack test of the vent stream past the control device(s) for the purpose of determining the emission rate of formaldehyde when the facility is operating at, or near, full production rate. This stack test shall be performed within 180 days of issuance of this permit. Facility formaldehyde emissions shall be determined by EPA Test Method 323 or an EPA approved equivalent, 40 CFR 51, Appendix M.

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

5.7. For Emission Points AA-001 through AA-003, the permittee shall conduct an initial performance test within 1 year of startup and subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter, to demonstrate compliance with Conditions 3.9 and 3.14. The performance test shall be conducted in accordance with all applicable requirements from 40 CFR 60.4244. In addition, the permittee shall develop and keep a maintenance plan and records of conducted maintenance, and must, to the extent practicable operate and maintain the engine in a manner that minimizes emissions.

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

5.8. For Emission Points AA-001 through AA-003, the permittee shall keep records of the information in paragraphs (a) through (d):

(a) All notifications submitted to comply with 40 CFR Subpart JJJJ and all documentation supporting any notification.

(b) Maintenance conducted on the engine.

(c) For certified stationary SI internal combustion engines, documentation from the manufacturer that the engine is certified to meet the emissions standards in 40 CFR parts 90, 1048, 1054, and 1060, as applicable.

(d) For non-certified stationary SI internal combustion engines, documentation that the engine meets the emission standards required by Conditions 3.9 and 3.14.

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

5.9. For Emission Point AA-003, the permittee shall keep records of the hours of operation of the engine through the non-resettable hour meter required by Condition 3.16. The permittee shall document how many hours are spent for emergency operation; including what classified the operation as emergency and how many hours are spent for non-emergency operation.

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

5.10. For Emission Point AA-010, to achieve initial compliance with the fugitive emission standards for each collection of fugitive emissions components at a well site and each collection of fugitive emissions components at a compressor station, the permittee shall comply with paragraphs (a) through (e) of this section:

(a) A fugitive emission plan as required in Condition 3.17.

(b) An initial monitoring survey as required in Condition 3.17(a).

(c) Maintaining of all records specified in Condition 5.10.

(d) Repair of each identified source of fugitive emissions for each affected facility as required in Condition 3.20.

(e) Submittal of initial annual report for each collection of fugitive emissions components at a well site as required in Condition 6.7.

(Ref.: 40 CFR 60.5410a(j), Subpart OOOOa)

5.11. For Emission Point AA-010, the permittee shall demonstrate continuous compliance with the fugitive emission standards for each collection of fugitive emissions components at a well site by complying with the requirements of paragraphs (a) through (d) below:

(a) The permittee shall conduct periodic monitoring surveys as required in Condition 3.17(a).

(b) The permittee shall repair or replace each identified source of fugitive emissions as required in Condition 3.20.

(c) The permittee shall maintain the records specified in Condition 5.10.

(d) The permittee shall submit annual reports for the collection of fugitive emissions components at a well site as required in Condition 6.7.

(Ref.: 40 CFR 60.5415a(h), Subpart OOOOa)

5.12. For Emission Point AA-010, the permittee shall maintain the records identified as specified in 40 CFR 60.7(f) and in all applicable paragraphs of 40 CFR 60.5420a(c). All records required by Subpart OOOOa shall be maintained either onsite or at the nearest local field office for at least 5 years. Any records required to be maintained by Subpart OOOOa that are submitted electronically via the EPA's CDX may be maintained in electronic format.

(Ref.: 40 CFR 60.5420a(c), Subpart OOOOa)

5.13. For Emission Point AA-012, to achieve initial compliance with pneumatic controller standards, the permittee shall comply with paragraphs (a) through (c) below:

(a) The controller manufacturer’s design specifications for the controller must indicate that the controller emits less than six (6) standard cubic feet of gas per hour.

(b) The pneumatic controller shall be tagged with the month and year of installation, reconstruction or modification, and identification information that allows traceability to the records for that pneumatic controller.

(c) The records shall be maintained in accordance with Condition 5.12.

(Ref.: 40 CFR 60.5410a(d)(3)-(5), Subpart OOOOa)

5.14. For Emission Point AA-012, the permittee shall keep the records listed below:

(a) The records of the date, location and manufacturer specifications for each pneumatic controller constructed, modified, or reconstructed.

(b) The records of the manufacturer’s specifications indicating that the controller is designed such that natural gas bleed rate is less than or equal to six (6) standard cubic feet per hour.

(c) The records of the deviations in cases where the pneumatic controller was not operated in compliance with the requirements specified in 40 CFR 60.5390a.

(Ref.: 40 CFR 60.5420a(c)(4)(i)-(v), Subpart OOOOa)

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.
		6.2	Submit certified annual monitoring report.
		6.3	All documents submitted to MDEQ shall be certified by a Responsible Official.
		6.4	Submit Formaldehyde emissions
		6.5	Submit results of Oxidation Catalyst inspections
AA-001 AA-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.6	Submit stack test reports
AA-001 AA-002 AA-003	40 CFR 60.4245(d), Subpart JJJJ	6.7	Submit performance tests
AA-003	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.8	Submit annual log of engine hours of operation
AA-001 AA-002 AA-010 AA-012	40 CFR 60.5420a, Subpart OOOOa	6.9	Submit annual reports

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

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

6.2 Except as otherwise specified herein, the permittee shall submit a certified annual synthetic minor monitoring report postmarked no later than 31st of January for the preceding calendar year. This report shall address any required monitoring specified in the permit. All instances of deviations from permit requirements must be clearly identified in the report. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration.

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

6.3 Any document required by this permit to be submitted to the MDEQ shall contain a certification signed by a responsible official stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

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

6.4. For the entire facility, the shall include in the annual monitoring report the Formaldehyde monitoring results required by Condition 5.3.

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

6.5. For the entire facility, the permittee shall include in the annual monitoring report the Oxidation Catalyst monitoring log required by Condition 5.5.

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

6.6. For Emission Points AA-001 and AA-002, the permittee shall submit stack test reports required by Condition 5.4 for Formaldehyde emissions within 60 days of completing the test.

As part of the test report, the permittee shall provide the average operating rate during testing of the process associated with the units being tested.

For all required testing, the permittee shall submit a written test protocol at least 30 days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to MDEQ. Also, the permittee shall notify MDEQ in writing at least 10 days prior to the intended test date(s) so that an observer may be afforded the opportunity to witness the test

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

6.7. For Emission Points AA-001 through AA-003, the permittee shall submit all performance tests required in Condition 5.5 within 60 days after the test has been completed.

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

6.8. For Emission Point AA-003, the permittee shall submit an annual monitoring report in accordance with Condition 6.2 of the log of the hours of operation required by Condition 5.7.

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

6.9. For Emission Points AA-001, AA-002, AA-010, and AA-012, the permittee shall submit annual reports containing the information specified in 40 CFR 60.5420a(b)(1), (b)(4), (b)(5), (b)(7), and (b)(11). The initial annual report is due no later than 90 days after the end of the initial compliance period, which is no later than 1 year after startup. Subsequent annual reports are due no later than the same date each year as the initial annual report. If the permittee owns or operates more than one affected facility, the permittee may submit one report for multiple affected facilities provided the report contains all of the information required as specified in 40 CFR Part 60.5420a(b)(1) through (b)(8), as applicable, except as provided in 40 CFR Part 60.5420a(b)(13).

The permittee must submit reports to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX (https://cdx.epa.gov/).) The permittee must use the appropriate electronic report in CEDRI for this subpart or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the CEDRI Web site (https://www3.epa.gov/ttn/chief/cedri/). If the reporting form specific to this subpart

is not available in CEDRI at the time that the report is due, you must submit the report to the Administrator at the appropriate address listed in 40 CFR Part 60.4. Once the form has been available in CEDRI for at least 90 calendar days, the permittee must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in 40 CFR Part 60 Subpart OOOOa regardless of the method in which the reports are submitted.

(Ref.: 40 CFR 60.5420a, Subpart OOOOa)