STATE OF MISSISSIPPI
AIR POLLUTION CONTROL PERMIT

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Gulf South Pipeline Company LP,
Black Creek Compressor Station
Purvis, Mississippi
Forrest County

31°12'22.75" N
89°20'53.04" W

has been granted permission to construct air emissions equipment to comply with the emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with 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.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

Krystal Rudolph

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: **April 29, 2020** **Permit No.: 0800-00118**

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

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

3. 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 operating without a valid permit pursuant to State Law.

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

4. It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(6).)

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 the 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 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).)

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

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

9. 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).)

10. Design and Construction Requirements: The stationary source shall be designed and constructed so as to operate without causing a violation of an Applicable Rules and Regulations, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards, and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries.

    (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A.)

11. Solids Removal: The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may 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)

12. Diversion and Bypass of Air Pollution Controls: The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed 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.)

13. Fugitive Dust Emissions from Construction Activities: The construction of the stationary source shall be performed in such a manner so as to reduce fugitive dust emissions from construction activities to a minimum.

    (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A(4).)

14. Right of Entry: The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives upon 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 emissions.

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

15. Permit Modification or Revocation: After notice and opportunity for a hearing, the Permit Board may modify the permit or revoke it in whole or in part for good cause shown including, but not limited to:

a) Persistent violation of any of the 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.)

16. Public Record and Confidential Information: 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)

17. Permit Transfer: This permit shall not be transferred except upon approval of the Permit Board.

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

18. Severability: The provisions of this permit are severable. If any provision of the permit, or the application of any provision of the 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).)

19. Permit Expiration: The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance or if construction is suspended for eighteen (18) months or more.

    (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1).)

20. Certification of Construction: A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee.

    (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(3).)

21. Beginning Operation: Except as prohibited in Section 1, Condition 24 of this permit, after certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by 11 Miss. Admin. Code Pt. 2, R. 2.13.G.

    (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).)

22. Application for a Permit to Operate: Except as otherwise specified in Section 1, Condition 24 of this permit, the application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing.

    (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).)

23. Operating Under a Permit to Construct: Except as otherwise specified in Section 1, Condition 24 of this permit, upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate.

    (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).)

24. Application Requirements for a Permit to Operate for Moderate Modifications: For moderate modifications that require contemporaneous enforceable emissions reductions from more than one emission point in order to “net” out of PSD/NSR, the applicable Title V Permit to Operate or State Permit to Operate must be modified prior to beginning operation of the modified facilities.

    (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7).)

25. General Duty: All air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants.

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

26. Deviation Reporting: 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(10).)

27. 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).)

B. GENERAL NOTIFICATION REQUIREMENTS

1. Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).)

2. The permittee must notify DEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).)

3. Upon the completion of construction or installation of an approved stationary source or modification, and prior to commencing operation, the applicant shall notify the Permit Board that construction or installation was performed in accordance with the approved plans and specifications on file with the Permit Board.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).)

4. The Permit Board shall be promptly notified in writing of any change in construction from the previously approved plans and specifications or permit. If the Permit Board determines the changes are substantial, it may require the submission of a new application to construct with “as built” plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an “as built” application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).)

SECTION 2
EMISSION POINT DESCRIPTION

The permittee is authorized to construct and operate, upon certification of construction, air emissions equipment, as described in the following table.

Emission Point	Description
AA-001	2,500 HP Compressor Engine #1 – 4SLB RICE with Oxidation Catalyst
AA-002	2,500 HP Compressor Engine #2 – 4SLB RICE with Oxidation Catalyst
AA-003	637 HP Emergency Generator – Emergency 4SLB RICE for Backup Power
AA-004	1,100 Gallon Pipeline Condensate Tank (TK01)
AA-005	1,100 Gallon Oily Water Tank (TK02)
AA-006	1,100 Gallon Lubricating Oil Tank (TK03)
AA-007	1,100 Gallon Ethylene Glycol Tank (TK04)
AA-008	1,100 Gallon Ethylene Glycol Tank (TK05)
AA-009	Condensate Truck Loading
AA-010	Equipment Leaks
AA-011	Natural Gas Venting
AA-012	Pneumatic Controllers

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	Smoke	Opacity shall not exceed 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2		
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)	3.3	Fuel Requirement	Shall combust only pipeline-quality natural gas
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	3.4	VOC HAP	General Applicability
AA-001 AA-002	40 CFR 60.5385a(a), Subpart OOOOa	3.5	VOC	Reciprocating compressor rod replacement requirements
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b)	3.6	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	3.7	VOC HAP	General Applicability
	40 CFR 60.4233(e), Subpart JJJJ	3.8		Emission Standards
	40 CFR 60.4243(b)(2)(ii), Subpart JJJJ	3.9		Initial Compliance

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limitation/Standard
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	3.10	VOC HAP	General Applicability
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)	3.11	VOC HAP	Route all exhaust to oxidation catalyst
AA-003	40 CFR 60.4230(a)(4)(iv), Subpart JJJJ	3.12	VOC HAP	General Applicability
	40 CFR 60.4233(e), Subpart JJJJ	3.13		Emissions Standards
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)	3.14		Install non-resettable hour meter
AA-010	40 CFR 60.5397a, Subpart OOOOa	3.15	VOC	Operational Requirement
	40 CFR 60.5397a(c)(7), Subpart OOOOa	3.16		
	40 CFR 60.5397a(c)(8), Subpart OOOOa	3.17		
	40 CFR 60.5397a(h), Subpart OOOOa	3.18		Fugitive emission source repair or replacement requirements
AA-012	40 CFR 60.5390a(c)(1) and (2), Subpart OOOOa	3.19	VOC	Operational Requirement

3.1. For the entire facility, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) and (b).

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

(b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed sixty (60) percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four-hour period does not exceed ten minutes per billion BTU gross heating value of fuel in any one hour.

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

3.2. For the entire facility, 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 forty (40) percent opacity, equivalent to that provided in Condition 3.1. This shall not apply to vision obscuration caused by uncombined water droplets.

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

3.3. 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 Emission Points AA-001 through AA-002, AA-010, and AA-012, the facility is subject to and shall comply with all applicable conditions of 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 scfh.

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

3.5. 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.

(c) Collect the methane and VOC emissions from the rod packing using a rod packing emissions collection system that operates under negative pressure and route the rod packing emissions to a process through a closed vent system that meets the requirements of 40 CFR 60.5411a(a) and (d).

(Ref.: 40 CFR 60.5385a(a), Subpart OOOOa)

3.6. 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).)

3.7. 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)

3.8. 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)

3.9. For Emission Points AA-001 and AA-002, the permittee shall demonstrate compliance with Condition 3.7 by purchasing a engine specified to the emission standards specified in Condition 3.8. The permittee shall also follow the maintenance plan and performance test requirements in Condition 5.2.

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

3.10. 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)

3.11. For Emission Points Emission Points AA-001 through AA-003, the permittee shall route all exhaust through the oxidation catalyst system whenever the units are in operation.

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

3.12. 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)

3.13. 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)

3.14. For Emission Point AA-003, the permittee shall install a non-resettable, hour meter

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

3.15. 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 3.16, 3.17, and 3.18, 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)

3.16. For Emission Point AA-010 if the permittee utilizes optical gas imaging, the monitoring plan required in Condition 3.15 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)

3.17. 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 3.15 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)

3.18. 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 3.16(g).

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

3.19. 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 5.10

(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.
AA-001 AA-002	40 CFR 60.5420a(c)(3), Subpart OOOOa	5.2	VOC	Reciprocating Compressor Recordkeeping Requirement
AA-001 AA-002 AA-003	40 CFR 60.4243(b)(2)(ii), Subpart JJJJ	5.3	VOC NO_X CO HAP	Recordkeeping
	40 CFR 60.4245(a), Subpart JJJJ	5.4		
AA-003	40 CFR 60.4243(d), Subpart JJJJ	5.5	VOC NO_X CO HAP	Emergency engine operation requirements
	40 CFR 60.4245(b), Subpart JJJJ	5.6		Record hours of operation
AA-010	40 CFR 60.5410a(j), Subpart OOOOa	5.7	VOC	Initial Compliance
	40 CFR 60.5415a(h), Subpart OOOOa	5.8		Continuous Compliance
	40 CFR 60.5420a(c), Subpart OOOOa	5.9		Recordkeeping Requirement
AA-012	40 CFR 60.5410a(d)(3)-(5), Subpart OOOOa	5.10	VOC	Initial Compliance
	40 CFR 60.5420a(c)(4)(i)-(v)	5.11		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. 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 as specified in Condition 3.5(c).

(c) The records of the deviations in cases where the reciprocating compressor was not operated in compliance with the requirements specified in Condition 3.5

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

5.3. 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 3.8 and 3.13. 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)

5.4. 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 3.8 and 3.13.

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

5.5. 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, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of each engine beyond 100 hours per calendar year.

(c) The engine may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing 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)

5.6. 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 3.14. 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)

5.7. 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 3.15.

(b) An initial monitoring survey as required in Condition 3.15(a).

(c) Maintaining of all records specified in Condition 5.9.

(d) Repair of each identified source of fugitive emissions for each affected facility as required in Condition 3.18.

(e) Submittal of initial annual report for each collection of fugitive emissions components at a well site as required in Condition 6.5.

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

5.8. 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 3.15(a).

(b) The permittee shall repair or replace each identified source of fugitive emissions as required in Condition 3.18.

(c) The permittee shall maintain the records specified in Condition 5.9.

(d) The permittee shall submit annual reports for the collection of fugitive emissions components at a well site as required in Condition 6.5.

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

5.9. 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)

5.10. 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 5.11.

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

5.11. 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.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.2	All documents submitted to MDEQ shall be certified by a Responsible Official.
AA-001 AA-002 AA-003	40 CFR 60.4245(d), Subpart JJJJ	6.3	Submit performance tests
	40 CFR 60.4245(c), Subpart JJJJ	6.4	Initial submittal requirement
AA-001 AA-002 AA-010 AA-012	40 CFR 60.5420a, Subpart OOOOa	6.5	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. 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).)

6.3. For Emission Points AA-001 through AA-003, the permittee shall submit all performance tests required in Condition 5.3 within 60 days after the test has been completed.

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

6.4. For Emission Points AA-001 through AA-003, the permittee shall submit an initial notification as required in 40 CFR 60.7(a)(1) for all engines that have not been certified by an engine manufacturer to meet the emissions standards in Condition 3.8 and 3.13. The notification must include the following information:

(a) Name and address of the owner or operator;

(b) The address of the affected source;

(c) Engine information including make, model, engine family, serial number, model year, maximum engine power, and engine displacement;

(d) Emission control equipment; and

(e) Fuel used.

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

6.5. 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)