

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

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

**THIS CERTIFIES THAT**

Greenleaf CO2 Solutions LLC, West Yellow Creek Compressor Station  
391 Gatlin Road  
Waynesboro, Mississippi  
Wayne County

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

*Krystal Rudolph*

**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Issued: September 17, 2020**

**Permit No.: 2840-00082**

**Effective Date: As specified herein.**

**Expires: August 31, 2025**

**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	Description
AA-001	1875 hp Natural Gas Fired Compressor Engine (E-1)—Spark Ignition (SI) Internal Combustion Engine (ICE) – 4SLB with Oxidation Catalyst to Control CO and Formaldehyde
AA-002	1875 hp Natural Gas Fired Compressor Engine (E-2) —Spark Ignition (SI) Internal Combustion Engine (ICE) – 4SLB with Oxidation Catalyst to Control CO and Formaldehyde
AA-003	1875 hp Natural Gas Fired Compressor Engine (E-3) —Spark Ignition (SI) Internal Combustion Engine (ICE) – 4SLB with Oxidation Catalyst to Control CO and Formaldehyde
AA-004	1875 hp Natural Gas Fired Compressor Engine (E-4)—Spark Ignition (SI) Internal Combustion Engine (ICE) – 4SLB with Oxidation Catalyst to Control CO and Formaldehyde
AA-005	268 hp (2.079 MMBTU/hr) Natural Gas Fired Micro-turbine (E-7) used for combined heat and power
AA-006	268 hp (2.079 MMBTU/hr) Natural Gas Fired Micro-turbine (E-7) used for combined heat and power
AA-007	268 hp (2.079 MMBTU/hr) Natural Gas Fired Micro-turbine (E-7) used for combined heat and power
AA-008	268 hp (2.079 MMBTU/hr) Natural Gas Fired Micro-turbine (E-7) used for combined heat and power
AA-009	268 hp (2.079 MMBTU/hr) Natural Gas Fired Micro-turbine (E-7) used for combined heat and power
AA-010	268 hp (2.079 MMBTU/hr) Natural Gas Fired Micro-turbine (E-7) used for combined heat and power
AA-011	268 hp (2.079 MMBTU/hr) Natural Gas Fired Micro-turbine (E-7) used for combined heat and power
AA-012	268 hp (2.079 MMBTU/hr) Natural Gas Fired Micro-turbine (E-7) used for combined heat and power
AA-013	268 hp (2.079 MMBTU/hr) Natural Gas Fired Micro-turbine (E-7) used for combined heat and power
AA-014	8,800 Gallon Vertical Slop Oil Tank (E-5)
AA-015	16,800 Gallon Vertical Oily Water Tank (E-6)
AA-016	Equipment Fugitive Emissions (E-7)
AA-017	1875 hp Natural Gas Fired Compressor Engine (E-16) —Spark Ignition (SI) Internal Combustion Engine (ICE) – 4SLB with Oxidation Catalyst to Control CO and Formaldehyde
AA-018	1.0 MMBTU/hr Natural Gas Fired Dehydration Unit (E-17)



**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	≤ 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	CO	≤ 99 tpy
		3.4	Total HAP	≤ 24.9 tpy
		3.4	Individual HAP	≤ 9.9 tpy
	AA-005 AA-006 AA-007 AA-008 Aa-009 AA-010 AA-011 AA-012 AA-013 AA-018	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.5	PM (filterable only)
AA-001 AA-002 AA-003 AA-004 AA-017	11 Miss Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.6	PM (filterable only)	$E = 0.8808 * I^{-0.1667}$
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.7	Operation	Only operate when emissions are vented to Oxidation Catalyst
	40 CFR 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Combustion Engines  40 CFR 60.4230(a)(4)(i)	3.8	NOx CO VOC	Applicability
	40 CFR 60.4233(e) and Table 1, Subpart JJJJ	3.9	NOx	≤ 1.0 g/hp-hr or ≤ 82 ppmv at 15% O <sub>2</sub>
			CO	≤ 2.0 g/hp-hr or ≤ 270 ppmv at 15% O <sub>2</sub>
			VOC	≤ 0.7 g/hp-hr or ≤ 60 ppmv at 15% O <sub>2</sub>
	40 CFR 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants: Reciprocating Internal Combustion Engines (RICE)	3.10	HAP	Meet requirements by complying with requirements of 40 CFR 60, Subpart JJJJ

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
	40 CFR 63.6590(c)			
AA-001 AA-002 AA-003 AA-004 AA-017	40 CFR 60, Subpart OOOOa – Standards of Performance for Crude Oil and Natural Gas Facilities which Construction, Modification, or Reconstruction began after September 18, 2015  40 CFR 60.5365a(c) and (j)	3.11	GHG VOC	Applicability
AA-001 AA-002 AA-003 AA-004 AA-017	40 CFR 60.5385a, Subpart OOOOa	3.12		Rod Packing Requirements

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) & (b).

- (a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.
- (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour.

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

3.2 For the Entire Facility, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Condition 3.1. 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 limit Carbon Monoxide (CO) emissions to no more than 99.0 tons/year as determined for each consecutive 12-month period on a rolling monthly basis.

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

- 3.4 For the Entire Facility, the permittee shall limit Total Hazardous Air Pollutants (HAP) to no more than 24.9 tons/year and individual HAP to no more than 9.9 tons/year as determined for each consecutive 12-month period on a rolling monthly basis.

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

- 3.5 For Emission Points AA-005, AA-006, AA-007, AA-008, AA-009, AA-010, AA-011, AA-012, AA-013, and AA-018, the maximum permissible emission of ash and/or particulate matter shall not exceed 0.6 pounds per million BTU per hour heat input.

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

- 3.6 For Emission Points AA-001, AA-002, AA-003, AA-004, and AA-017, the maximum permissible emissions of ash and/or particulate matter shall not exceed an emission rate as determined by the relationship

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

where E is the emission rate in pounds per million BTU per hour heat input and I is the heat input in millions of BTU per hour.

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

- 3.7 For Emission Points AA-001, AA-002, AA-003, AA-004, and AA-017, the permittee shall not operate the combustion engine unless the emissions are vented to the oxidation catalyst.

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

- 3.8 For Emission Points AA-001, AA-002, AA-003, AA-004, and AA-017, the permittee is subject to and shall comply with all applicable requirements of the Standards of Performance for Stationary Spark Ignition (SI) Internal Combustion Engines (ICE) (40 CFR 60, Subpart JJJJ) and the General Provisions (40 CFR 60, Subpart A).

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

- 3.9 For Emission Points AA-001, AA-002, AA-003, AA-004 and AA-017, the permittee must comply with the following emission standards:

$$\begin{aligned} \text{NO}_x &\leq 1.0 \text{ g/Hp-hr or } 82 \text{ ppmvd @ } 15\% \text{ O}_2 \\ \text{CO} &\leq 2.0 \text{ g/Hp-hr or } 270 \text{ ppmvd @ } 15\% \text{ O}_2 \\ \text{VOC} &\leq 0.7 \text{ g/Hp-hr or } 60 \text{ ppmvd @ } 15\% \text{ O}_2. \end{aligned}$$

(Ref. 40 CFR 60.4233(e) and Table 1 to Subpart JJJJ)

- 3.10 For Emission Points AA-001, AA-002, AA-003, AA-004 and AA-017, the permittee is subject to and shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) and the General Provisions (40 CFR 63, Subpart A). The permittee shall meet the requirements of 40 CFR 63, Subpart ZZZZ by meeting the

requirements of 40 CFR 60, Subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under this part.

(Ref.: 40 CFR 63.6590(c), Subpart ZZZZ)

- 3.11 For Emission Points AA-001, AA-002, AA-003, AA-004, and AA-017, the permittee is subject to and shall comply with all applicable provisions of Standards of Performance for Crude Oil and Natural Gas Facilities which Construction, Modification, or Reconstruction began after September 18, 2015 (40 CFR 60, Subpart OOOOa) and the General Provisions (40 CFR 60, Subpart A).

(Ref.: 40 CFR 60.5365a(c), Subpart OOOOa)

- 3.12 For Emission Points AA-001, AA-002, AA-003, AA-004, and AA-017, the permittee shall reduce GHG (in the form of a limitation on emissions of methane) and VOC emissions by complying with the standards in paragraphs (a) through (d) for each reciprocating compressor affected facility.
- (a) Replace the reciprocating compressor rod packing according to either paragraph (1) or (2).
    - (1) On or before the compressor has operated for 26,000 hours. The number of hours of operation must be continuously monitored beginning upon initial startup of your reciprocating compressor affected facility, or the date of the most recent reciprocating compressor rod packing replacement, whichever is later.
    - (2) 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.
  - (b) Demonstrate initial compliance with standards that apply to reciprocating compressor affected facilities as required by 40 CFR 60.5410a(c).
  - (c) Demonstrate continuous compliance with standards that apply to reciprocating compressor affected facilities as required by 40 CFR 60.5415a(c).
  - (d) Perform the reporting as required by 40 CFR 60.5420a(b)(1) and (4) and the recordkeeping as required by 40 CFR 60.5420a(c)(3), (6) through (9), and (17), as applicable.

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

**SECTION 4  
WORK PRACTICES**

***THIS SECTION WAS INTENTIONALLY LEFT BLANK SINCE NO WORK PRACTICE  
STANDARDS APPLY TO THIS PERMIT ACTION.***

**SECTION 5  
MONITORING AND RECORDKEEPING REQUIREMENTS**

<b>Emission Point</b>	<b>Applicable Requirement</b>	<b>Condition Number(s)</b>	<b>Pollutant/Parameter</b>	<b>Monitoring/Recordkeeping Requirement</b>
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	CO	Demonstrate Compliance
		5.3	HAP	Demonstrate Compliance
AA-001 AA-002 AA-003 AA-004 AA-005 AA-006 AA-007 AA-008 AA-009 AA-010 AA-011 AA-012 AA-013 AA-017	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.4	Recordkeeping	Record hours of operation
AA-018		5.5		Record Amount of Gas Processed
AA-001 AA-002 AA-003 AA-004 AA-017	40 CFR 60.4234, Subpart JJJJ	5.6	Compliance	Comply Over Life of the Engine
	40 CFR 60.4243(b)(2)(ii), Subpart JJJJ	5.7		Non-Certified Engine Requirements
	40 CFR 60.4245(a), Subpart JJJJ	5.8	Recordkeeping	Records of Maintenance Performed on Engine
AA-001 AA-002 AA-003 AA-004 AA-017	40 CFR 60.5410a(c)(1) and (4), Subpart OOOOa	5.9	Compliance	Demonstrate Initial Compliance
	40 CFR 60.5415a(c), Subpart OOOOa	5.10		Demonstrate Continuous Compliance
	40 CFR 60.5420a(c)(3), (6) through (9), and (17), Subpart OOOOa	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 For the Entire Facility, the permittee shall demonstrate compliance with the CO tons per year limitations by calculating each month, the monthly emissions and the 12-month rolling average using the applicable short term limitation in Condition 3.8 for emission points AA-001, AA-002, AA-003, AA-004, and AA-017. The permittee shall use the acceptable emission factors for AA-005 through AA-013, and the hours of operation of each emission unit.

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

- 5.3 For the Entire Facility, the permittee shall demonstrate compliance with the Individual HAP and combined HAP tons per year limitations by calculating each month, the monthly emissions and the 12-month rolling average using the appropriate emission factor and the hours of operation for Emission Points AA-001 through AA-013, and AA-017. The permittee shall use the appropriate engineering methodology for Emission Points AA-014 through AA-016. For AA-018, the permittee will monitor the amount of gas processed each month and any other parameters needed to calculate the monthly emissions using Glycalc or an approved alternate methodology.

(Ref. 11 Miss. Admin. Code Pt. 2 R2.2(B)(11.)

- 5.4 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-007, AA-008, AA-009, AA-010, AA-011, AA-012, AA-013, and AA-017, the permittee shall record the monthly and rolling 12-month total hours of operation for each emission unit.

(Ref. 11 Miss. Admin. Code Pt. 2 R2.2(B)(11.)

- 5.5 For Emission Point AA-018, the permittee shall record the amount of gas processed.

(Ref. 11 Miss. Admin. Code Pt. 2 R2.2(B)(11.)

- 5.6 For Emission Points AA-001, AA-002, AA-003, AA-004, and AA-017, the permittee shall operate and maintain stationary the SI ICE that achieve the emission standards as required in Condition 3.9 over the entire life of the engine.

(Ref.: 40 CFR 60.4234, Subpart JJJJ)

- 5.7 For Emission Points AA-001, AA-002, AA-003, AA-004, and AA-017, the permittee shall demonstrate compliance by purchasing a non-certified engine and demonstrating compliance with the emission standards specified in Condition 3.9 and according to the requirements specified in 40 CFR 60.4244, as applicable.

The permittee must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.

In addition, the permittee must conduct subsequent performance testing, in accordance with 40 CFR 63.4244, every 8,760 hours or 3 years, whichever comes first.

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

5.8 For Emission Points AA-001, AA-002, AA-003, AA-004, and AA-017, the permittee shall keep records of the following information:

- (a) All notifications submitted to comply with this subpart and all documentation supporting any notification.
- (b) Maintenance conducted on the engine.
- (c) Documentation that the engine meets the emission standards.

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

5.9 For Emission Points AA-001, AA-002, AA-003, AA-004, and AA-017, to achieve initial compliance with the standard in Condition 3.11, the permittee shall comply with the following:

- (a) During the initial compliance period, the permittee shall continuously monitor the number of hours of operation or track the number of months since the last rod packing replacement.
- (b) Maintain records as specified in 40 CFR 60.5420a(c)(3).

(Ref.: 40 CFR 63.5385a(b) and 60.5410a(c)(1) and (4), Subpart OOOOa)

5.10 For Emission Points AA-001, AA-002, AA-003, AA-004, and AA-017, the permittee shall demonstrate continuous compliance by complying with the following:

- (a) Continuously monitor the number of hours of operation or track the number of months since the date of the most recent reciprocating compressor rod packing replacement.
- (b) Replace the reciprocating compressor rod packing on or before the total hours of operation reaches 26,000 hours or the number of months since the most recent rod packing replacement reaches 36 months.

(Ref.: 40 CFR 60.5385a(c) and 60.5415a(c)(1), (3), and (4), Subpart OOOOa)

5.11 For Emission Points AA-001, AA-002, AA-003, AA-004, and AA-017, the permittee shall maintain the following records for each reciprocating compressor and closed vent system:



- (a) Records of the cumulative number of hours of operation or number of months since initial startup or the previous replacement of the reciprocating compressor rod packing, whichever is later.
- (b) Records of the date and time of each reciprocating compressor rod packing replacement.
- (c) Records of deviations in cases where the reciprocating compressor was not operated in compliance with the requirements specified in 40 CFR 60.5385a.

All required records must be maintained either on-site or at the nearest local field office for at least five (5) years. Any required records which are submitted electronically via EPA's CDX may be maintained in electronic format.

(Ref.: 40 CFR 60.5385(d) and 60.5420a(c), 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	Submit certified annual monitoring report.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.3	All documents submitted to MDEQ shall be certified by a Responsible Official.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.4	Annual Report of CO and HAP emissions
AA-018	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.5	Annual Report of Amount of Gas Processed
AA-001 AA-002 AA-003 AA-004 AA-017	40 CFR 60.5420a(b)(1), (4), and (7), and 40 CFR 60.5420a(c)(3)(iii), Subpart OOOOa	6.6	Reporting Requirements
AA-016	40 CFR 60.5410a(c)(3), 60.5415a(c)(2), and 60.5420a(b), Subpart OOOOa	6.7	
AA-001 AA-002 AA-003 AA-004 AA-017	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). and 40 CFR 60.4245(d), Subpart JJJJ	6.8	Stack Testing Reporting

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 permittee shall submit an annual report in accordance with Condition 6.2 summarizing the monthly and 12-month rolling total CO, Individual HAP, and Combined HAPs for the facility.

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

- 6.5 For Emission Point AA-018, the permittee shall submit in accordance with Condition 6.2, the amount of gas processed.

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

(Ref.: 40 CFR 60.5385a (d), 60.5420a(b)(1) and (4), and (c)(3)(iii), Subpart OOOOa)

- 6.6 For Emission Points AA-001, AA-002, AA-003, AA-004, and AA-017, the permittee shall submit the records of each monitoring survey in accordance with Condition 6.7 containing the following information:

- (a) The company name, facility site name, and address of the affected facility.
- (b) An identification of each affected facility being included in the annual report.
- (c) Beginning and ending dates of the reporting period.
- (d) A certification by a certifying official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (e) For each reciprocating compressor affected facility, the information specified below:
  - (i) The cumulative number of hours of operation or the number of months since initial startup or since the previous reciprocating compressor rod packing replacement, 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.

- (ii) Records of deviations in cases where the reciprocating compressor was not operated in compliance with the requirements specified in 40 CFR 60.5385a.

(Ref.: 40 CFR 60.5420a(b)(1) and (4), Subpart OOOOa)

- 6.7 The initial annual reports required by Condition 6.6 are due no later than 90 days after the end of the initial compliance period as determined according to Condition 5.9. Subsequent annual reports are due in accordance with the annual reports required in Condition 6.2. The permittee may submit one report for multiple affected facilities provided the report contains all of the information required as specified in 40 CFR 60.5420a(b)(1) and (4), as applicable.

The permittee must submit reports to the EPA via the CEDRI (CEDRI can be accessed through the EPA's CDX at <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, the permittee must submit the report to the Administrator at the appropriate address listed in 40 CFR 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 40 CFR 60, Subpart OOOOa, regardless of the method in which the reports are submitted.

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

- 6.8 For Emission Points AA-001, AA-002, AA-003, AA-004, and AA-017, the permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the DEQ. Also, the permittee shall notify the DEQ in writing at least ten (10) days prior to the intended test date(s) so that an observer may be afforded the opportunity to witness the test.

The permittee shall submit a test report of the results of the stack test within sixty (60) days of the test date.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B)(11). and 40 CFR 60.4245(d), Subpart JJJJ)