# STATE OF MISSISSIPPI AIR POLLUTION CONTROL TITLE V PERMIT

## TO OPERATE AIR EMISSIONS EQUIPMENT

## THIS CERTIFIES THAT

Tellus Operating Group LLC, Raleigh CO2 Plant 1080 Raleigh Oilfield Road, County Road 77 Raleigh, Mississippi Smith County

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with Title V of the Federal Clean Air Act (42 U.S.C.A. § 7401 - 7671) and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

Permit Issued: \_\_\_\_\_

Effective Date: As specified herein.

#### MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

### AUTHORIZED SIGNATURE MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires:

Permit No.: 2500-00087

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### APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT

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#### SECTION 1. GENERAL CONDITIONS

1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(a).)

1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(b).)

1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(c).)

- 1.4 Prior to its expiration, this permit may be reopened in accordance with the provisions listed below.
  - (a) This permit shall be reopened and revised under any of the following circumstances:
    - (1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of 3 or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.
    - (2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
    - (3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.
    - (4) The Administrator or the Permit Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
  - (b) Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.

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(c) Reopenings shall not be initiated before a notice of such intent is provided to the Title V source by the DEQ at least 30 days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

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

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(e).)

1.6 This permit does not convey any property rights of any sort, or any exclusive privilege.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(d).)

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(5).)

- 1.8 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.
  - (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission.

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

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

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

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

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

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

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

(e) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition.

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

1.9 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(8).)

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)

- 1.11 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:
  - (a) enter upon the permittee's premises where a Title V source is located or emissionsrelated activity is conducted, or where records must be kept under the conditions of

this permit;

- (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

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

1.12 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere.

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

1.13 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970.

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

1.14 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(1).)

- 1.15 Nothing in this permit shall alter or affect the following:
  - (a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
  - (b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - (c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
  - (d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act.

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

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- 1.16 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.H.)
- 1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C(2)., R. 6.4.B., and R. 6.2.A(1)(c).)

- 1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:
  - (a) the changes are not modifications under any provision of Title I of the Act;
  - (b) the changes do not exceed the emissions allowable under this permit;
  - (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:
    - (1) a brief description of the change(s),
    - (2) the date on which the change will occur,
    - (3) any change in emissions, and
    - (4) any permit term or condition that is no longer applicable as a result of the change;
  - (d) the permit shield shall not apply to any Section 502(b)(10) change.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F(1).)

1.19 Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in 11 Miss. Admin. Code Pt. 2, Ch. 3., "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared.

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

1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 11 Miss. Admin. Code Pt. 2, Ch. 2., "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations

11 Miss. Admin. Code Pt. 2, Ch. 6., "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

- (a) routine maintenance, repair, and replacement;
- (b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
- (c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
- (d) use of an alternative fuel or raw material by a stationary source which:
  - the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51, Subpart I, or 40 CFR 51.166; or
  - (2) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, or 40 CFR 51.166;
- (e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or
- (f) any change in ownership of the stationary source.

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

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

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

1.22 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.B(1).)

1.23 Except as otherwise specified or limited herein, the open burning of residential,

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commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.

- (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.
- (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.
- (c) Burning must not occur within 500 yards of commercial airport property, private airfields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator.

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

- 1.24 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies:
  - (a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
  - (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.
  - (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
    - (1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
    - (2) the permitted facility was at the time being properly operated;
    - (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

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- (4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

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

- 1.25 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.
  - (a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
    - (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:
      - (i) An upset occurred and that the source can identify the cause(s) of the upset;
      - (ii) The source was at the time being properly operated;
      - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
      - (iv) That within 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
      - (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
    - (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
    - (3) This provision is in addition to any upset provision contained in any applicable requirement.

- (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- (b) Startups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
  - (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
  - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).
  - (3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

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

1.26 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation 11 Miss Admin. Code Pt. 2, R. 1.8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

(Ref.: 11 Miss Admin. Code Pt. 2, R. 1.8.)

#### Page 12 of 40 Permit No. 2500-00087 SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

| Emission Point | Facility<br>Description | Description                                                                                                                |
|----------------|-------------------------|----------------------------------------------------------------------------------------------------------------------------|
| AA-000         | E-25                    | Fugitive Emissions                                                                                                         |
| AA-001         | Tank 1                  | 78,750 gallon (1875 barrel) Crude Oil Storage Tank                                                                         |
| AA-002         | Tank 2                  | 16,800 gallon (400 barrel) Crude Oil Storage Tank                                                                          |
| AA-003         | Tank 3                  | 16,800 gallon (400 barrel) Crude Oil Storage Tank                                                                          |
| AA-004         | Tank 4                  | 16,800 gallon (400 barrel) Crude Oil Storage Tank                                                                          |
| AA-005         | Tank 5                  | 78,750 gallon (1875 barrel) Crude Oil Storage Tank                                                                         |
| AA-006         | E-6                     | 0.5 MMBTU/hr natural gas-fired Heater Treater                                                                              |
| AA-007         | E-7                     | 0.5 MMBTU/hr natural gas-fired Heater Treater                                                                              |
| AA-009         |                         | Control Flare with 0.05 MMBTU/hr natural gas-fired burner                                                                  |
| AA-010         | E-10                    | Glycol Dehydration Unit with emissions routed to flare (AA-009)                                                            |
| AA-012         | E-12                    | 1,085 HP natural gas-fired, four stroke lean burn, reciprocating internal combustion engine used as a generator (pre-1998) |
| AA-013         | E-13                    | 1,085 HP natural gas-fired, four stroke lean burn, reciprocating internal combustion engine used as a generator (pre-1998) |
| AA-014         | E-14                    | 1,085 HP natural gas-fired, four stroke lean burn, reciprocating internal combustion engine used as a generator (pre-1998) |
| AA-015         | E-15                    | 1,085 HP natural gas-fired, four stroke lean burn, reciprocating internal combustion engine used as a generator (pre-1998) |
| AA-016         | E-18                    | 16,800 gallon (400 barrel) Produced Water Storage Tank                                                                     |
| AA-017         | E-19                    | 16,800 gallon (400 barrel) Produced Water Storage Tank                                                                     |
| AA-019         | EQPT 19                 | 16,800 gallon (400 barrel) Produced Water Storage Tank                                                                     |
| AA-020         | EQPT 20                 | 16,800 gallon (400 barrel) Crude Oil Storage Tank                                                                          |
| AA-022         | E-22                    | 1,085 HP natural gas-fired, four stroke lean burn, reciprocating internal combustion engine used as a generator (pre-1998) |
| AA-023         | E-23                    | 1,085 HP natural gas-fired, four stroke lean burn, reciprocating internal combustion engine used as a generator (pre-1998) |
| AA-024         |                         | 1380 HP natural gas-fired, four stroke lean burn, reciprocating internal combustion engine used as a compressor (2015)     |
| AA-026         |                         | Truck Loading                                                                                                              |
| AA-027         |                         | 0.5 MMBTU/hr natural gas-fired Heater Treater                                                                              |
| AA-028         |                         | Flare No. 2 with 0.05 MMBTU/hr natural gas-fired burner for heater treater flash gas, plant upsets, and pipeline blowdown  |

#### SECTION 3. EMISSION LIMITATIONS & STANDARDS

#### A. <u>Facility-Wide Emission Limitations & Standards</u>

- 3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).
  - (a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.
  - (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour.

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

3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Condition 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets.

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

#### B. <u>Emission Point Specific Emission Limitations & Standards</u>

| Emission<br>Point(s)                                                                             | Applicable Requirement                                                                                      | Condition<br>Number(s) | Pollutant/<br>Parameter                     | Limit/Standard                            |
|--------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|------------------------|---------------------------------------------|-------------------------------------------|
|                                                                                                  | Construction Permit issued                                                                                  | 3.B.1                  | Fuel                                        | Combust natural gas only                  |
| Facility<br>Wide                                                                                 | October 28, 2010, and modified<br>October 28, 2014 and DATE<br>11 Miss. Admin. Code Pt. 2, R.<br>2.2.B(10). | 3.B.2                  | Natural Gas                                 | Fuel gas composition                      |
|                                                                                                  | 11 Miss. Admin. Code Pt. 2, R.<br>1.4.B(2).                                                                 | 3.B.3                  | $H_2S$                                      | One (1) grain per 100 standard cubic feet |
| AA-006<br>AA-017<br>AA-012<br>AA-013<br>AA-014<br>AA-015<br>AA-022<br>AA-023<br>AA-024<br>AA-027 | 11 Miss. Admin. Code Pt. 2, R.<br>1.3.D(1)(a).                                                              | 3.B.4                  | PM/PM <sub>10</sub><br>(filterable<br>only) | ≤ 0.6 lb/MMBTU                            |

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| Emission                                                           | Applicable Requirement                                                                                                                                                                                                                         | Condition | Pollutant/      | Limit/Standard                                                                                                                                                                                            |                                                      |
|--------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| Point(s)                                                           |                                                                                                                                                                                                                                                | Number(s) | Parameter       |                                                                                                                                                                                                           |                                                      |
|                                                                    | Construction Permit issued<br>October 28, 2010, and modified<br>October 28, 2014 and DATE                                                                                                                                                      | 3.B.5     | 3.B.5           | VOCs                                                                                                                                                                                                      | Route all gaseous emissions to the flare for control |
| AA-001<br>AA-002                                                   | 11 Miss. Admin. Code Pt. 2, R.<br>2.2.B(10).                                                                                                                                                                                                   |           |                 |                                                                                                                                                                                                           |                                                      |
| AA-003<br>AA-004<br>AA-005<br>AA-016<br>AA-017                     | 40 CFR 63, Subpart HH<br>(National Emission Standards<br>for Hazardous Air Pollutants<br>From Oil and Natural Gas<br>Production Facilities)                                                                                                    | 3.B.6     |                 | Applicability                                                                                                                                                                                             |                                                      |
| AA-019<br>AA-020                                                   | 40 CFR 63.760(b)(1) and<br>63.764(a), Subpart HH                                                                                                                                                                                               |           |                 |                                                                                                                                                                                                           |                                                      |
|                                                                    | 40 CFR 63.771(c), Subpart HH                                                                                                                                                                                                                   | 3.B.7     |                 | Closed-vent system requirements                                                                                                                                                                           |                                                      |
|                                                                    | 40 CFR 63.771(d)(1)(iii) and<br>(4), Subpart HH                                                                                                                                                                                                | 3.B.8     |                 | Control device requirements                                                                                                                                                                               |                                                      |
| AA-010                                                             | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).                                                                                                                                                                                                      | 3.B.9     |                 | Route all non-condensable gaseous emissions to the flare for control                                                                                                                                      |                                                      |
| AA-001<br>AA-002                                                   | 40 CFR 63.766(b)(1) and (c),<br>Subpart HH                                                                                                                                                                                                     | 3.B.10    | НАР             | Storage tank requirements                                                                                                                                                                                 |                                                      |
| AA-003<br>AA-004<br>AA-005<br>AA-016<br>AA-017<br>AA-019<br>AA-020 | 40 CFR 63.771(b), Subpart HH                                                                                                                                                                                                                   | 3.B.11    |                 | Cover requirements                                                                                                                                                                                        |                                                      |
| AA-009<br>AA-028                                                   | Construction Permit issued<br>October 28, 2010, and modified<br>October 28, 2014 and DATE<br>11 Miss. Admin. Code Pt. 2, R.<br>2.2.B(10).                                                                                                      | 3.B.12    |                 | Control flare operating requirements                                                                                                                                                                      |                                                      |
| AA-012<br>AA-013<br>AA-014<br>AA-015<br>AA-022<br>AA-023<br>AA-024 | <ul> <li>40 CFR 63, Subpart ZZZZ</li> <li>(National Emissions Standards<br/>for Hazardous Air Pollutants for<br/>Stationary Reciprocating<br/>Internal Combustion Engines)</li> <li>40 CFR 63.6585 and<br/>63.6600(c), Subpart ZZZZ</li> </ul> | 3.B.13    |                 | Applicability. Demonstration of<br>compliance for AA-024 by complying<br>with the requirements of 40 CFR 60,<br>Subpart JJJJ. No emission or operating<br>limitations apply to AA-012 through AA-<br>023. |                                                      |
| AA-024                                                             | <ul> <li>40 CFR 60, Subpart JJJJ</li> <li>(Standards of Performance for<br/>Stationary Spark Ignition<br/>Internal Combustion Engines)</li> <li>40 CFR 60.4230(a)(4)(i),<br/>Subpart JJJJ</li> </ul>                                           | 3.B.14    |                 | Applicability                                                                                                                                                                                             |                                                      |
|                                                                    |                                                                                                                                                                                                                                                |           | NO <sub>X</sub> | $\leq$ 1.0 g/HP-hr or 82 ppmvd at 15% O <sub>2</sub>                                                                                                                                                      |                                                      |
|                                                                    | 40 CFR 60.4233(e) and Table 1,<br>Subpart JJJJ                                                                                                                                                                                                 | 3.B.15    | СО              | $\leq 2.0$ g/HP-hr or 270 ppmvd at 15% O <sub>2</sub>                                                                                                                                                     |                                                      |
| ļ                                                                  | I                                                                                                                                                                                                                                              |           |                 |                                                                                                                                                                                                           |                                                      |

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| Emission<br>Point(s) | Applicable Requirement                    | Condition<br>Number(s) | Pollutant/<br>Parameter | Limit/Standard                                                   |
|----------------------|-------------------------------------------|------------------------|-------------------------|------------------------------------------------------------------|
|                      |                                           |                        | VOC                     | $\leq 0.7$ g/HP-hr or 60 ppmvd at 15% $\rm O_2$                  |
|                      | 40 CFR 60.4234, Subpart JJJJ              | 3.B.16                 | Exhaust<br>Emissions    | Achieve emissions standards for the life of the affected engines |
| AA-028               | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). | 3.B.17                 | Gaseous<br>Emissions    | Control emissions from upsets and blowdowns                      |

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3.B.1 For the entire facility, the permittee shall only combust natural gas in all combustion units operating at the facility.

(Ref.: Construction Permit issued October 28, 2010, and modified October 28, 2014, and DATE, and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

3.B.2 For the entire facility, the permittee shall only combust natural gas in combustion units at this facility that contains one (1) grain or less of total sulfur per 100 standard cubic feet and is composed of at least 70% methane by volume or has a gross calorific value between 950 and 1100 BTU per standard cubic foot.

(Ref.: Construction Permit issued October 28, 2010, and modified October 28, 2014, and DATE, and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

3.B.3 For the entire facility, the permittee shall not permit the emission of any gas stream which contains hydrogen sulfide (H2S) in excess of one grain per 100 standard cubic feet. Gas streams containing hydrogen sulfide in excess of one grain per 100 standard cubic feet shall be incinerated at temperatures of no less than 1600°F for a period of no less than 0.5 seconds or processed in such a manner which is equivalent to or more effective for the removal of hydrogen sulfide.

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

3.B.4 For Emission Point AA-006, AA-007, AA-012, AA-013, AA-014, AA-015, AA-022, AA-023, AA-024, and AA-027, the permittee shall not exceed the maximum permissible emission rate of ash and/or particulate matter of 0.6 pounds per million BTU per hour heat input from fossil fuel burning installations of less than 10 million BTU per hour heat input.

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

3.B.5 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-016, AA-017, AA-019, AA-020, the permittee shall route all gaseous emissions to the flare (Emission Point AA-009) for control.

(Ref.: Construction Permit issued October 28, 2010, and modified October 28, 2014, and DATE, and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

3.B.6 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-016, AA-017, AA-019, AA-020, the permittee is subject to and shall comply with the National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities (40 CFR 63, Subpart HH) and the General Provisions (40 CFR 63, Subpart A) as outlined in Table 2, Subpart HH.

(Ref.: 40 CFR 63.760(b)(1) and 63.764(a), Subpart HH)

3.B.7 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-016, AA-017, AA-019, AA-020, the permittee shall route all gases, vapors, and fumes emitted from the material in the emissions unit to a control device that meets the requirements in Condition 3.B.8. The closed-vent system shall be operated with no detectable emissions. If the closed-vent system contains one or more bypass devices that could be used to divert all or a portion of the gases, vapors, or fumes from entering the control device, the permittee shall

meet the requirements of the following paragraphs:

- (a) For each bypass device, except as provided in paragraph (b), the permittee shall either:
  - (1) At the inlet of the bypass device that could divert the stream away from the control device to the atmosphere, properly install, calibrate, maintain, and operate a flow indicator that is capable of taking periodic readings and sounding an alarm when the bypass device is open such that the stream is being, or could be, diverted away from the control device to the atmosphere; or
  - (2) Secure the bypass device valve installed at the inlet to the bypass device in the non-diverting position using a car-seal or a lock-and-key type configuration.
- (b) Low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and safety devices are not subject to the requirements of paragraph (a) of this condition.

(Ref.: 40 CFR 63.771(c), Subpart HH)

- 3.B.8 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-016, AA-017, AA-019, AA-020, the permittee shall comply with the following:
  - (a) The control device used to reduce HAP emissions in accordance with the standards of 40 CFR 63, Subpart HH, shall be a flare that is designed and operated in accordance with the requirements of 40 CFR 63.11(b), Subpart A.
  - (b) For each control device used to comply with 40 CFR 63, Subpart HH, shall be operated at all times when gases, vapors, and fumes are vented from the HAP emissions unit or units through the closed-vent system to the control device. The permittee may vent more than one unit to a control device used to comply.

(Ref.: 40 CFR 63.771(d)(1)(iii) and (4), Subpart HH)

3.B.9 For Emission Point AA-010, the permittee shall route all non-condensable gaseous emissions to the flare (Emission Point AA-009) for control.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10), as established in the Title V Operating Permit issued DATE)

- 3.B.10 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-016, AA-017, AA-019, AA-020, the permittee shall comply with the following:
  - (a) The permittee shall equip the affected storage vessel with the potential for flash emissions with a cover that is connected, through a closed-vent system that meets the conditions specified in Condition 3.B.7, to a control device the conditions specified in Condition 3.B.8. The cover shall be designed and operated in accordance with the requirements of Condition 3.B.11.
  - (b) One or more safety devices that vent directly to the atmosphere may be used on the storage vessel and air emission control equipment complying with paragraph (a).

(Ref.: 40 CFR 63.766(b)(1) and (c), Subpart HH)

3.B.11 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-016, AA-017, AA-

019, AA-020, the permittee shall comply with the following:

- (a) The cover and all openings on the cover (e.g., access hatches, sampling ports, and gauge wells, shall be designed to form a continuous barrier over the entire surface area of the liquid in the storage vessel.
- (b) Each cover opening shall be secured in a closed, sealed position (e.g., covered by a gasketed lid or cap) whenever material is in the unit on which the cover is installed except during those times when it is necessary to use an opening as follows:
  - (1) To add material to, or remove material from the unit (this includes openings necessary to equalize or balance the internal pressure of the unit following changes in the level of the material in the unit);
  - (2) To inspect or sample the material in the unit;
  - (3) To inspect, maintain, repair, or replace equipment located inside the unit; or
  - (4) To vent liquids, gases, or fumes from the unit through a closed-vent system to a control device designed and operated in accordance with the requirements of Condition 3.B.7.

(Ref.: 40 CFR 63.771(b), Subpart HH)

- 3.B.12 For Emissions Point AA-009 and AA-028, the permittee shall operate the control flare according to 40 CFR 63.11(b) and the requirements specified below:
  - (a) The control flare shall be operated at all times when emissions may be vented to it.
  - (b) The flare shall be operated and maintained according to the manufacturer's recommendations or the permittee's own maintenance plan.
  - (c) The flare shall be operated with no visible emissions as determined by EPA Method 22, except for a period not to exceed a total of five (5) minutes during any two (2) consecutive hours.
  - (d) The permittee shall maintain a flare pilot flare at all times when emissions may be vented to the flare.
  - (e) The flare shall only be used to with a combustion gas mixture whose net heating value is 300 BTU/scf or greater if the flare is air or steam-assisted. If the flare is non-assisted, the flare shall only be used with a combustion gas mixture whose net heating value is 200 BTU/scf or greater.

(Ref.: Construction Permit issued October 28, 2010, and modified October 28, 2014, and DATE and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

3.B.13 For Emission Points AA-012, AA-013, AA-014, AA-015, AA-022, AA-023, and AA-024, the permittee is subject to and shall comply with the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) and the General Provisions (40 CFR 63, Subpart A) as outlined in Table 8, Subpart ZZZZ. For Emission Point AA-024, permittee shall demonstrate compliance with this subpart by complying with the applicable requirements of the

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Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (40 CFR 60, Subpart JJJJ). For Emission Points AA-012, AA-013, AA-014, AA-015, AA-022, and AA-023, the permittee is not required to comply with the emission or operating limitations of 40 CFR 63, Subpart ZZZZ.

(Ref.: 40 CFR 63.6585 and 63.6600(c), Subpart ZZZZ)

3.B.14 For Emission Point AA-024, the permittee is subject to and shall comply with the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (40 CFR 60, Subpart JJJJ) and the applicable General Provisions (40 CFR 60, Subpart A).

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

- 3.B.15 For Emission Point AA-024, the permittee shall limit emissions in accordance with the following:
  - (a) Nitrogen oxides (NO<sub>X</sub>) to no more than 1.0 grams per horsepower-hour (g/HP-hr) or 82 parts per million by volume on a dry basis (ppmvd) at 15% O<sub>2</sub>;
  - (b) Carbon monoxide (CO) to no more than 2.0 grams per horsepower-hour (g/HP-hr) or 270 parts per million by volume on a dry basis (ppmvd) at 15% O<sub>2</sub>; and
  - (c) Volatile organic compounds (excluding formaldehyde) (VOC) to no more than 0.7 grams per horsepower-hour (g/HP-hr) or 60 parts per million by volume on a dry basis (ppmvd) at 15% O<sub>2</sub>.

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

3.B.16 For Emission Point AA-024, the permittee shall achieve the emissions standards outlined in Condition 3.B.15 for the entire life of the affected engine.

(Ref.: 40 CFR 60.4234, Subpart JJJJ)

3.B.17 For Emission Point AA-028, the permittee shall route all emissions from upsets and pipeline blowdowns to the flare for control.

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

C. Insignificant and Trivial Activity Emission Limitations & Standards

| Applicable Requirement                         | Condition<br>Number(s) | Pollutant/<br>Parameter | Limit/Standard |
|------------------------------------------------|------------------------|-------------------------|----------------|
| 11 Miss. Admin. Code Pt. 2, R.<br>1.3.D(1)(a). | 3.C.1                  | РМ                      | 0.6 lbs/MMBTU  |
| 11 Miss. Admin. Code Pt. 2, R.<br>1.4.A(1).    | 3.C.2                  | SO <sub>2</sub>         | 4.8 lbs/MMBTU  |

3.C.1 The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input 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.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the

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fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)

#### D. <u>Work Practice Standards</u>

| Emission<br>Point(s) | Applicable Requirement                                                                                                                                                            | Condition<br>Number(s) | Pollutant/<br>Parameter      | Limit/Standard                                                                   |
|----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|------------------------------|----------------------------------------------------------------------------------|
|                      | Construction Permit<br>issued October 28, 2010,<br>and modified October<br>28, 2014 and DATE                                                                                      |                        |                              |                                                                                  |
| Facility<br>Wide     | 40 CFR 63, Subpart HH<br>(National Emission<br>Standards for Hazardous<br>Air Pollutants From Oil<br>and Natural Gas<br>Production Facilities)<br>40 CFR 63.764(j),<br>Subpart HH | 3.D.1                  | Operation and<br>Maintenance | Operate all equipment as efficiently as possible and perform routine maintenance |
|                      | 40 CFR 63, Subpart<br>ZZZZ (National<br>Emissions Standards for<br>Hazardous Air Pollutants<br>for Stationary<br>Reciprocating Internal<br>Combustion Engines)                    |                        |                              |                                                                                  |
|                      | 40 CFR 63.6605(b),<br>Subpart ZZZZ                                                                                                                                                |                        |                              |                                                                                  |

3.D.1 For the entire facility, the permittee shall operate and maintain all air emissions equipment, including associated air pollution control and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Furthermore, the permittee shall perform routine maintenance on all air emissions equipment such that the equipment may be operated in an efficient manner. Determination of whether such operation and maintenance procedures are being used will be based on information available to MDEQ which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance procedures.

(Ref.: Construction Permit issued October 28, 2010, and modified October 28, 2014, and DATE, 40 CFR 63.764(j), Subpart HH, and 40 CFR 63.6605(b), Subpart ZZZZ)

#### SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:
  - (a) the identification of each term or condition of the permit that is the basis of the certification;
  - (b) the compliance status;
  - (c) whether compliance was continuous or intermittent;
  - (d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
  - (e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit.
  - (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(5)(a), (c), & (d).)

## SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

- A. <u>General Monitoring, Recordkeeping and Reporting Requirements</u>
- 5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.

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

- 5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:
  - (a) the date, place as defined in the permit, and time of sampling or measurements;
  - (b) the date(s) analyses were performed;
  - (c) the company or entity that performed the analyses;
  - (d) the analytical techniques or methods used;
  - (e) the results of such analyses; and
  - (f) the operating conditions existing at the time of sampling or measurement.

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

5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

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

5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 6.2.E.

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

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

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

5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their

equivalents approved by the DEQ and the EPA.

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

5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

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

#### B. Specific Monitoring and Recordkeeping Requirements

| Emission<br>Point(s)                                                         | Applicable Requirement                                                                                                                                                                                        | Condition<br>Number | Pollutant/Parameter<br>Monitored | Monitoring/Recordkeeping Requirement             |
|------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|----------------------------------|--------------------------------------------------|
|                                                                              | Construction Permit<br>issued October 28, 2010,<br>and modified October<br>28, 2014 and DATE<br>11 Miss. Admin. Code<br>Pt. 2, R. 2.2.B(11).                                                                  | 5.B.1               | Hours of Operation               | Recordkeeping requirement                        |
| Facility<br>Wide                                                             | 11 Miss. Admin. Code<br>Pt. 2, R. 6.3.A(3)(a).                                                                                                                                                                | 5.B.2               | Gas Quality                      |                                                  |
|                                                                              | Construction Permit<br>issued October 28, 2010,<br>and modified October<br>28, 2014 and DATE                                                                                                                  | 5.B.3               | H <sub>2</sub> S                 | Semiannual gas analysis requirement              |
|                                                                              | 11 Miss. Admin. Code<br>Pt. 2, R. 2.2.B(11).                                                                                                                                                                  |                     |                                  |                                                  |
|                                                                              | 40 CFR 63, Subpart A<br>(General Provisions)                                                                                                                                                                  |                     |                                  |                                                  |
|                                                                              | 40 CFR 63.11(b)(1) and (5), Subpart A                                                                                                                                                                         | 5.B.4               | Pilot Flame                      | Monitoring requirement and visual emissions test |
| AA-009                                                                       | 11 Miss. Admin. Code<br>Pt. 2, R. 6.3.A(3)(a).                                                                                                                                                                |                     |                                  |                                                  |
| AA-028                                                                       | Construction Permit<br>issued October 28, 2010,<br>and modified October<br>28, 2014 and DATE                                                                                                                  | 5.B.5               | Operation                        | Conformance with design                          |
|                                                                              | 11 Miss. Admin. Code<br>Pt. 2, R. 6.3.A(3)(b).                                                                                                                                                                |                     |                                  |                                                  |
| AA-001<br>AA-002<br>AA-003<br>AA-004<br>AA-005<br>AA-016<br>AA-017<br>AA-019 | 40 CFR 63, Subpart HH<br>(National Emission<br>Standards for Hazardous<br>Air Pollutants From Oil<br>and Natural Gas<br>Production Facilities)<br>40 CFR 63.764(c)(2)(ii),<br>and 63.773(d)(1),<br>Subpart HH | 5.B.6               | НАР                              | Control device monitoring requirements           |
| AA-019<br>AA-020                                                             | 40 CFR 63.773(d)(3),<br>Subpart HH                                                                                                                                                                            | 5.B.7               |                                  | Continuous recorder requirements                 |

| Emission<br>Point(s) | Applicable Requirement                                                                                                                            | Condition<br>Number | Pollutant/Parameter<br>Monitored | Monitoring/Recordkeeping Requirement                |
|----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|----------------------------------|-----------------------------------------------------|
|                      | 40 CFR 63.773(d)(6) and (7), Subpart HH                                                                                                           | 5.B.8               |                                  | Excursions                                          |
|                      | 40 CFR 63.773(c)(2)(i)<br>through (iv), Subpart HH                                                                                                | 5.B.9               |                                  | Closed-vent and cover system requirements           |
|                      | 40 CFR 63.773(c)(3) and (4), Subpart                                                                                                              | 5.B.10              |                                  | Repair requirements                                 |
|                      | 40 CFR 63.773(c)(5) and (6), Subpart HH                                                                                                           | 5.B.11              |                                  | Inspection exclusions                               |
|                      | 40 CFR 63.774(b),<br>Subpart HH                                                                                                                   | 5.B.12              |                                  | Recordkeeping                                       |
|                      | 40 CFR 63.774(a) and<br>Table 2, Subpart HH 5.B.13                                                                                                | 5.B.13              |                                  | General recordkeeping provisions                    |
|                      | 40 CFR 63.774(g),<br>Subpart HH                                                                                                                   | 5.B.14              |                                  | Malfunction records                                 |
| AA-024               | 40 CFR 60, Subpart JJJJ<br>(Standards of<br>Performance for<br>Stationary Spark Ignition<br>Internal Combustion<br>Engines)<br>40 CFR 60.4243(b), | 5.B.15              | Exhaust Emissions                | Demonstration of compliance with emission standards |
|                      | Subpart JJJJ<br>40 CFR 60.4245(a),<br>Subpart JJJJ                                                                                                | 5.B.16              |                                  | Recordkeeping requirements                          |

5.B.1 For the entire facility, the permittee shall maintain records of the hours of operation of each gas-fired engine on a monthly basis and for each consecutive 12-month period.

(Ref.: Construction Permit issued October 28, 2010, and modified October 28, 2014, and DATE, and 11 Miss. Admin. Code Pt. 2.2.B(11).)

5.B.2 For the entire facility, the permittee shall use the gas quality characteristics in a current valid purchase contract, tariff sheet, transportation contract, or own measurements to demonstrate compliance with Condition 3.B.2. The records shall be kept on-site and made available for DEQ personnel upon request.

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

- 5.B.3 For the entire facility, in order to demonstrate compliance with Conditions 3.B.3 and 3.B.12(e), the permittee shall perform the following gas analyses:
  - (a) Semiannual analyses of the gas flow to the control flare (Emission Point AA-009);
  - (b) Semiannual analyses of the gas flow to the control flare (Emission Point AA-028); and
  - (c) Annual analyses of the pipeline quality natural gas flow to the natural gas-fired sources.

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Each gas analysis shall include the following properties: hydrogen sulfide concentration, sulfur content, methane concentration (by volume), gross and net heating value, molecular weight, specific gravity, and speciated VOC components (minimally to  $C_{6}$ +). The permittee shall maintain records of these analyses in accordance with the requirements outlined in Condition 5.A.3.

(Ref.: Construction Permit issued October 28, 2010, and modified October 28, 2014, and DATE, and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 5.B.4 For Emission Points AA-009 and AA-028, the permittee shall comply with the monitoring requirements listed in (a) through (c).
  - (a) The permittee shall continuously monitor and record the presence of the flare pilot flame by use of a thermocouple or any other equivalent device to detect the presence of a flame.
  - (b) The permittee shall monitor each flare to assure that it is operated and maintained in conformance with the design.
  - (c) The permittee shall demonstrate initial compliance for each flare with the visible emissions limit in Condition 3.B.12(c). within ninety (90) days of issuance of this permit by conducting an EPA Method 22 test for a period of two (2) consecutive hours. The test shall be conducted while the facility is operating at the representative flow to the flare. The permittee shall monitor or use actual production rates to calculate the gas flow rates to the flares during the test. If a change is made at the facility, which causes the previous 2-hour visible emissions test to no longer be representative then the permittee must perform a Method 22 test within ninety (90) days of the change. If the visible emissions limit in Condition 3.B.12(c) is not met during the Method 22 test, corrective action shall be taken immediately. Immediately following completion of the corrective action(s), the permittee shall demonstrate compliance by performing an EPA Method 22 test for a period of two (2) hours.
  - (d) Subsequent to the initial testing required in Condition 5.B.4(c) above, the permittee shall perform monthly visible emissions tests for a minimum of fifteen (15) minutes using EPA Method 22 while the facility is operating with gases being flared. If visible emissions are observed for a period greater than one (1) minute, corrective action shall be taken immediately. Immediately following completion of the corrective action(s), the permittee shall demonstrate compliance by performing an EPA Method 22 test for a period of two (2) hours and shall monitor and maintain records of the flare rate during the test. The monthly visible emissions tests shall be separated by at least fifteen (15) days between each test.

(Ref.: 40 CFR 63.11(b)(1) and (5), Subpart A, and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a).)

- 5.B.5 For Emission Points AA-009 and AA-028, the permittee shall comply with the following recordkeeping requirements outlined in paragraphs (a) through (d):
  - (a) The permittee shall maintain a copy of the flare manufacturer operating and maintenance recommendations or the permittee's own flare maintenance manual and

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detailed records of all maintenance performed on the flare. These records shall be made available upon request during inspection by MDEQ personnel.

- (b) The permittee shall maintain continuous records of the thermocouple or equivalent device output demonstrating the presence of a flame in the control flare whenever the facility is in operation
- (c) The permittee shall maintain records of all EPA Method 22 tests, and details of any corrective/preventative action(s) taken.
- (d) The permittee shall maintain records of all gas analyses performed to determine the net heating value of the gas being combusted in the flare.

(Ref.: Construction Permit issued October 28, 2010, and modified October 28, 2014, and DATE and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b).)

- 5.B.6 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-016, AA-017, AA-19, and AA-020, the permittee shall install and operate a continuous parameter monitoring system (CPMS) in accordance with the requirements of Condition 5.B.7. The continuous monitoring system shall be designed and operated so that a determination can be made on whether the control device is achieving the applicable performance requirements of Condition 3.B.8. Each continuous parameter monitoring system shall meet the following specifications and requirements:
  - (a) Each continuous parameter monitoring system shall measure data values at least once every hour and record either:
    - (1) Each measured data value; or
    - (2) Each block average value for each 1-hour period or shorter periods calculated from all measured data values during each period. If values are measured more frequently than once per minute, a single value for each minute may be used to calculate the hourly (or shorter period) block average instead of all measured values.
  - (b) A site-specific monitoring plan must be prepared that addresses the monitoring system, data collection, and quality assurance and quality control elements outlined in this condition and in 40 CFR 63.8(d), Subpart A. Each CPMS must be installed, calibrated, operated, and maintained in accordance with the procedures in the approved site-specific monitoring plan. Using the process described in 40 CFR 63.8(f)(4), Subpart A, the permittee may request approval of monitoring system quality assurance and quality control procedures alternative to those specified in paragraphs (1) through (5) below in the site-specific monitoring plan.
    - (1) The performance criteria and design specifications for the monitoring system equipment, including the sample interface, detect signal analyzer, and data acquisition and calculations;
    - (2) Sampling interface (e.g., thermocouple) location such that the monitoring system will provide representative measurements;

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- (3) Equipment performance checks, system accuracy audits, or other audit procedures;
- (4) Ongoing operation and maintenance procedures in accordance with the provisions in 40 CFR 63.8(c)(1) and (3), Subpart A; and
- (5) Ongoing reporting and recordkeeping procedures in accordance with the provisions in 40 CFR 63.10(c), (e)(1), and (e)(2)(i), Subpart A.
- (c) The permittee must conduct the CPMS equipment performance checks, system accuracy audits, or other audit procedures specified in the site-specific monitoring plan at least once every 12 months.
- (d) The permittee must conduct a performance evaluation of each CPMS in accordance with the site-specific monitoring plan.

(Ref.: 40 CFR 63.764(c)((2)(ii), and 63.773(d)(1), Subpart HH)

- 5.B.7 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-016, AA-017, AA-19, and AA-020, the permittee shall install, calibrate, operate, and maintain a device equipped with a continuous recorder to measure the values of operating parameters appropriate for the control device as specified in either paragraphs (a) or (b) of this condition.
  - (a) A heat sensing monitoring device equipped with a continuous recorder that indicates the continuous ignition of the pilot flame.
  - (b) A continuous monitoring system that measures alternative operating parameters other than those specified in paragraphs (a) of this condition upon approval of MDEQ as specified in 40 CFR 63.8(f)(1) through (5), Subpart A.

(Ref.: 40 CFR 63.773(d)(3), Subpart HH)

- 5.B.8 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-016, AA-017, AA-19, and AA-020, the permittee shall comply with the following:
  - (a) An excursion for a given control device is determined to have occurred when the monitoring data or lack of monitoring data result in any one of the criteria specified in 40 CFR 63.773(d)(6)(i) through (vi). When multiple operating parameters are monitored for the same control device and during the same operating day and more than one of these operating parameters meets an excursion criterion specified in 40 CFR 63.773(d)(6)(i) through (vi), then a single excursion is determined to have occurred for the control device for that operating day.
  - (b) For each excursion, the permittee shall be deemed to have failed to have applied control in a manner that achieves the required operating parameter limits. Failure to achieve the required operating parameter limits is a violation of this standard.

(Ref.: 40 CFR 63.773(d)(6) and (7), Subpart HH)

5.B.9 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-016, AA-017, AA-19, and AA-020, the permittee shall inspect each closed-vent system according to the

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procedures below.

- (a) For each closed-vent system joints, seams, or other connections that are permanently or semi-permanently sealed (e.g., a welded join between two sections of hard piping or a bolted and gasketed ducting flange), the permittee shall:
  - Conduct an initial inspection according to the procedures specified in 40 CFR 63.772(c), to demonstrate that the closed-vent system operates with no detectable emissions. Inspection results shall be submitted with the Notification of Compliance Status Report as specified in Condition 5.C.3.
  - (2) Conduct annual visual inspections for defects that could result in air emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in piping; loose connections; or broken or missing caps or other closure devices. The permittee shall monitor a component or connection using the procedures in 40 CFR 63.772(c) to demonstrate that it operates with no detectable emissions following any time the component is repaired or replaced or the connection is unsealed. Inspection results shall be submitted in the Periodic Report as specified in Condition 5.C.4.
- (b) For closed-vent system components other than those specified in paragraph (a), the permittee shall:
  - Conduct an initial inspection according to the procedures specified in 40 CFR 63.772(c) to demonstrate that the components or connections operate with no detectable emissions. Inspection results shall be submitted with the Notification of Compliance Status Report as specified in Condition 5.C.3.
  - (2) Conduct annual inspections according to the procedures specified in 40 CFR 63.772(c) to demonstrate that the components or connections operate with no detectable emissions. Inspection results shall be submitted in the Periodic Report as specified in Condition 5.C.4.
  - (3) Conduct visual inspections for defects that could result in air emissions. Defects include but are not limited to, visible cracks, holes, or gaps in ductwork; loose connections; or broken or missing caps or other closure devices. Inspection results shall be submitted in the Periodic Report as specified in Condition 5.C.4.
- (c) For each cover, the permittee shall:
  - (1) Conduct visual inspections for defects that could result in air emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in the cover, or between the cover and the separator wall; broken, cracked, or otherwise damaged seals or gaskets on closure devices; and broken or missing hatches, access covers, caps, or other closure devices. In the case where the storage vessel is buried partially or entirely underground, inspection is required only for those portions of the cover that extend to or above the ground surface, and those connections that are on such portions of the cover (e.g., fill ports, access

hatches, gauge wells, etc.) and can be opened to the atmosphere.

- (2) The inspections specified in paragraph (1) above shall be conducted initially, following the installation of the cover. Inspection results shall be submitted with the Notification of Compliance Status Report as specified in Condition 5.C.3. Thereafter, the owner or operator shall perform the inspection at least once every calendar year, except as provided in Condition 5.B.11 of this section. Annual inspection results shall be submitted in the Periodic Report as specified in Condition 5.C.4.
- (d) For each bypass device, except as provided in paragraph (a)(2) of Condition 5.B.11, the permittee shall either:
  - (1) At the inlet to the bypass device that could divert the steam away from the control device to the atmosphere, set the flow indicator to take a reading at least once every 15 minutes; or
  - (2) If the bypass device valve installed at the inlet to the bypass device is secured in the non-diverting position using a car-seal or a lock-and-key type configuration, visually inspect the seal or closure mechanism at least once every month to verify that the valve is maintained in the non-diverting position and the vent stream is not diverted through the bypass device.

(Ref.: 40 CFR 63.773(c)(2)(i) through (iv), Subpart HH)

- 5.B.10 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-016, AA-017, AA-19, and AA-020, the permittee shall comply with the following:
  - (a) In the event that a leak or detect is detected, the permittee shall repair the leak or defect as soon as practicable, except as provided in paragraph (b).
    - (1) A first attempt at repair shall be made no later than five (5) calendar days after the leak is detected.
    - (2) Repair shall be completed no later than 15 calendar days after the leak is detected.
  - (b) Delay of repair of a closed-vent system or cover for which leaks or defects have been detected is allowed if the repair is technically infeasible without a shutdown as defined in 40 CFR 63.761, or if the permittee determines that emissions resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair. Repair of such equipment shall be complete by the end of the next shutdown.

(Ref.: 40 CFR 63.773(c)(3) and (4), Subpart HH)

- 5.B.11 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-016, AA-017, AA-19, and AA-020, the permittee shall comply with the following:
  - (a) Any parts of the closed-vent system or cover that are designated, as described in paragraphs (1) and (2) below, as unsafe to inspect are exempt from the inspection requirements of paragraphs (a), (b), and (c) of Condition 5.B.9 if:

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- (1) The permittee determines that the equipment is unsafe to inspect because inspecting personnel would be exposed to an imminent or potential danger as a consequence of complying with paragraphs (a), (b), and (c) of Condition 5.B.9; and
- (2) The permittee has a written plan that requires inspection of the equipment as frequently as practicable during safe-to-inspect times.
- (b) Any parts of the closed-vent system or cover that are designated, as described in paragraphs (1) and (2) below, as difficult to inspect are exempt from the inspection requirements of paragraphs (a), (b), and (c) of Condition 5.B.9 if:
  - (1) The permittee determines that the equipment cannot be inspected without elevating the inspecting personnel more than two (2) meters above a support surface; and
  - (2) The permittee has a written plan that requires inspection of the equipment at least once every five (5) years.

(Ref.: 40 CFR 63.773(c)(5) and (6), Subpart HH)

- 5.B.12 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-016, AA-017, AA-19, and AA-020, the permittee shall maintain the records specified in paragraphs (a) through (i) of this section:
  - (a) The permittee of an affected source subject to the provisions of this subpart shall maintain files of all information (including all reports and notifications) required by this subpart. The files shall be retained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report or period.
    - (1) All applicable records shall be maintained in such a manner that they can be readily accessed.
    - (2) The most recent 12 months of records shall be retained on site or shall be accessible from a central location by computer or other means that provides access within 2 hours after a request.
    - (3) The remaining four (4) years of records may be retained offsite.
    - (4) Records may be maintained in hard copy or computer-readable form including, but not limited to, on paper, microfilm, computer, floppy disk, magnetic tape, or microfiche.
  - (b) Records specified in 40 CFR 63.10(b)(2), Subpart A;
  - (c) Records specified in 40 CFR 63.10(c), Subpart A, for each monitoring system operated by the permittee in accordance with the requirements of Conditions 5.B.7 through 5.B.9. Notwithstanding the requirements of 40 CFR 63.10(c), Subpart A, monitoring data recorded during periods identified in paragraphs (1) through (3) below shall not be included in any average or percent leak rate computed under this subpart. Records shall be kept of the times and durations of all such periods and any other periods during process or control device operation when monitors are not

operating or failed to collect required data.

- (1) Monitoring system breakdowns, repairs, calibration checks, and zero (low-level) and high-level adjustments;
- (2) Periods of non-operation resulting in cessation of the emissions to which the monitoring applies; and
- (3) Excursions due to invalid data as defined in 40 CFR 63.773(d)(6)(iv), Subpart HH.
- (d) Each permittee using a control device to comply shall keep the following records upto-date and readily accessible:
  - The hourly records and records of pilot flame outages specified in paragraphs
     (1) through (3) below.
    - (i) Flare design (i.e., steam-assisted, air-assisted, or non-assisted);
    - (ii) All visible emission readings, heat content determinations, flowrate measurements, and exit velocity determinations made during the compliance determination required by 40 CFR 63.772(e)(2); and
    - (iii) All hourly records and other recorded periods when the pilot flame is absent.
  - (2) Hourly records of the times and durations of all periods when the vent stream is diverted from the control device or the device is not operating.
  - (3) Where a seal or closure mechanism is used to comply with 40 CFR 63 771(c)(3)(i)(B), hourly records of flow are not required. In such cases, the permittee shall record that the monthly visual inspection of the seals or closure mechanism has been done, and shall record the duration of all periods when the seal mechanism is broken, the bypass line valve position has changed, or the key for a lock-and-key type lock has been checked out, and records of any carseal that has broken.
- (e) Records identifying all parts of the cover or closed-vent system that are designated as unsafe to inspect in accordance with Condition 5.B.11, an explanation of why the equipment is unsafe to inspect, and the plan for inspecting the equipment.
- (f) Records identifying all parts of the cover or closed-vent system that are designated as difficult to inspect in accordance with Condition 5.B.11, an explanation of why the equipment is difficult to inspect, and the plan for inspecting the equipment.
- (g) For each inspection conducted in accordance with Conditions 5.B.9 through 5.B.11, during which a leak or defect is detected, a record of the information specified in paragraphs (1) through (8) below.
  - (1) The instrument identification numbers, operator name or initials, and identification of the equipment.
  - (2) The date the leak or defect was detected and the date of the first attempt to

repair the leak or defect.

- (3) Maximum instrument reading measured by the method specified in 40 CFR 63.772(c) after the leak or defect is successfully repaired or determined to be nonrepairable.
- (4) "Repair delayed" and the reason for the delay if a leak or defect is not repaired within 15 calendar days after discovery of the leak or defect.
- (5) The name, initials, or other form of identification of the permittee (or designee) whose decision it was that repair could not be effected without a shutdown.
- (6) The expected date of successful repair of the leak or defect if a leak or defect is not repaired within 15 calendar days.
- (7) Dates of shutdowns that occur while the equipment is unrepaired.
- (8) The date of successful repair of the leak or defect.
- (h) For each inspection conducted in accordance with Conditions 5.B.9 through 5.B.11 during which no leaks or defects are detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks or defects were detected.
- (i) Records of glycol dehydration unit baseline operations calculated as required under 40 CFR 63.771(e)(1), Subpart HH.

(Ref.: 40 CFR 63.774(b), Subpart HH)

5.B.13 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-016, AA-017, AA-19, and AA-020, the permittee that shall maintain the applicable records of 40 CFR 63, Subpart A, listed in Table 2 of 40 CFR 63, Subpart HH.

(Ref.: 40 CFR 63.774(a), Subpart HH)

5.B.14 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-010, AA-016, AA-017, AA-19, and AA-020, the permittee shall maintain records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control equipment and monitoring equipment. The permittee shall maintain records of actions taken during periods of malfunction to minimize emissions in accordance with Condition 3.D.1, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

(Ref.: 40 CFR 63.774(g), Subpart HH)

- 5.B.15 For Emission Point AA-024, the permittee shall demonstrate compliance with the requirements outlined in Condition 3.B.15 by complying with either paragraph (a) or (b) below:
  - (a) The permittee shall purchase an engine certified according to procedures specified in 40 CFR 60, Subpart JJJJ, for the same model year and demonstrating compliance according to one of the methods specified in 40 CFR 60.4243(a), Subpart JJJJ.
  - (b) If the permittee purchases a non-certified engine as described above, the permittee

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shall keep a maintenance plan and records of conducted maintenance and shall, 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 shall conduct an initial performance test and conduct subsequent performance testing every 8,760 hours or three years, whichever comes first, thereafter to demonstrate compliance. These performance tests shall by completed in accordance with the applicable requirements of 40 CFR 60.4244, Subpart JJJJ.

(Ref.: 40 CFR 60.4243(b)(1) and (b)(2)(ii), Subpart JJJJ)

- 5.B.16 For Emission Point AA-024, the permittee shall maintain the records specified in paragraphs (a) through (d) below:
  - (a) All notifications submitted to comply with this subpart and all documentation supporting any notification.
  - (b) Maintenance conducted on the engine.
  - (c) If the stationary SI internal combustion engine is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR 90, 1048, 1054, and 1060, as applicable.
  - (d) If the stationary SI internal combustion engine is not a certified engine or is a certified engine operating in a non-certified manner and subject to 40 CFR 60.4243(a)(2), Subpart JJJJ, documentation that the engine meets the emission standards through the compliance demonstration outlined in Condition 5. B.17.

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

| Emission<br>Point(s)                 | Applicable Requirement                                                                                                                                                      | Condition<br>Number | Reporting Requirement             |
|--------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|-----------------------------------|
| Facility Wide                        | 11 Miss. Admin. Code Pt. 2, R.<br>6.3.A(3)(c)(1).                                                                                                                           | 5.C.1               | Semiannual summary reports        |
| AA-001<br>AA-002<br>AA-003<br>AA-004 | 40 CFR 63, Subpart HH<br>(National Emission Standards<br>for Hazardous Air Pollutants<br>From Oil and Natural Gas<br>Production Facilities)<br>40 CFR 63.775(b), Subpart HH | 5.C.2               | Reporting for major sources       |
| AA-005                               | 40 CFR 63.775(d), Subpart HH                                                                                                                                                | 5.C.3               | Notification of Compliance Status |
| AA-016<br>AA-017                     | 40 CFR 63.775(e), Subpart HH                                                                                                                                                | 5.C.4               | Periodic Reports                  |
| AA-019<br>AA-020                     | 40 CFR 63.775(f), Subpart HH                                                                                                                                                | 5.C.5               | Notification of process change    |
|                                      | Construction Permit issued<br>October 28, 2010, and modified<br>October 28, 2014 and DATE                                                                                   | 5.C.6               | Bypass event                      |

#### C. <u>Specific Reporting Requirements</u>

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| Emission<br>Point(s) | Applicable Requirement                                                                                                                                      | Condition<br>Number | Reporting Requirement  |
|----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|------------------------|
| AA-024               | 40 CFR 60, Subpart JJJJ<br>(Standards of Performance for<br>Stationary Spark Ignition<br>Internal Combustion Engines)<br>40 CFR 60.4245(d), Subpart<br>JJJJ | 5.C.7               | Reporting requirements |

- 5.C.1. For the entire facility, the permittee shall submit a semiannual summary report of the required monitoring in accordance with Condition 5.A.4. 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. The report shall also include the following:
  - (a) Results of the gas analyses performed during the reporting period;
  - (b) Details of any periods where the pilot flame was not present including date, start and end times, duration, cause, corrective and preventative actions taken, and whether or not any gases were being vented to the flare;
  - (c) Copies of data sheets for all EPA Method 22 tests performed during the reporting period, including data on gas flow rate to the flare where required by Condition 5.B.4(c) & (d), and details of any accompanying corrective and preventative actions taken.
  - (d) Continuous pilot flame monitor downtime data: monitor downtime event date, start and end times, duration, cause, corrective and preventive actions taken, and total duration monitor downtime for the reporting period

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

- 5.C.2 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-016, AA-017, AA-019, and AA-020, the permittee shall submit the information listed below:
  - (a) The initial notifications required for existing affected sources under 40 CFR 63.9(b)(2), Subpart A, shall be submitted by one (1) year after an affected source becomes subject to the provisions of this subpart.
  - (b) The planned date of the performance test specified in 40 CFR 63.8(e)(2), Subpart A, at least 60 days before the test in accordance with 40 CFR 63.7(b), Subpart A. Unless requested by MDEQ, a site-specific test plan is not required by this subpart. If requested by MDEQ, the permittee must also submit the site-specific test plan required by 40 CFR 63.7(c), Subpart A, with the notification of the performance test.
  - (c) If there was a malfunction during the reporting period, the Periodic Report specified in Condition 5.C.4 of this section shall include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by the permittee during a malfunction of an affected source to minimize emissions in

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accordance with Condition 3.D.1, including actions taken to correct a malfunction.

(Ref.: 40 CFR 63.775(b), Subpart HH)

- 5.C.3 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-016, AA-017, AA-019, and AA-020, the permittee shall submit a Notification of Compliance Status Report as required under 40 CFR 63.9(h), Subpart A, within 180 days of the issuance of this permit. In addition to the information required under 40 CFR 63.9(h), the Notification of Compliance Status Report shall include the information specified below.
  - (a) The permittee shall submit performance test results including the information in paragraphs (1) through (3).
    - (1) All visible emission readings, heat content determinations, flowrate measurements, and exit velocity determinations made during the compliance determination required by 40 CFR 63.772(e).
    - (2) A statement of whether a flame was present at the pilot light over the full period of the compliance determination.
    - (3) The results of the closed-vent system initial inspections performed according to the requirements of Condition 5.B.9.
  - (b) The permittee shall submit one complete test report for each test method used for a particular source. A complete test report shall include a sampling site description, description of sampling and analysis procedures and any modifications to standard procedures, quality assurance procedures, record of operating conditions during the test, record of preparation of standards, record of calibrations, raw data sheets for field sampling, raw data sheets for field and laboratory analyses, documentation of calculations, and any other information required by the test method.
  - (c) Results of any continuous monitoring system performance evaluations shall be included in the Notification of Compliance Status Report.
  - (d) The permittee shall submit a statement as to whether the source has complied with the requirements of 40 CFR 63, Subpart HH.
  - (e) If a cover is installed to comply, the results of the initial inspection performed according to the requirements specified in Condition 5.B.9.

(Ref.: 40 CFR 63.775(d), Subpart HH)

- 5.C.4 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-016, AA-017, AA-019, and AA-020, the permittee shall prepare Periodic Reports in accordance with the paragraphs below and submit them to MDEQ in accordance with 5.A.4.
  - (a) The permittee shall submit Periodic Reports semiannually beginning 60 calendar days after the end of the applicable reporting period in accordance with 5.A.4. The first report shall be submitted no later than 240 days after the date of the Notification of Compliance Status Report is due and shall cover the six month period beginning on the date the Notification of Compliance Status report is due.

- (b) The permittee shall include the information specified as follows:
  - The information required under 40 CFR 63.10(e)(3), Subpart A. For the purposes of this subpart and the information required under 40 CFR 63.10(e)(3), excursions (as defined in Condition 5.B.8) shall be considered excess emissions.
  - (2) A description of all excursions as defined in Condition 5.B.8 of this subpart that have occurred during the six month reporting period.
    - (i) For each excursion caused when the daily average value of a monitored operating parameter is less than the minimum operating parameter limit (or, if applicable, greater than the maximum operating parameter limit), as specified in Condition 5.B.8, the report must include the daily average values of the monitored parameter, the applicable operating parameter limit, and the date and duration of the period that the excursion occurred.
    - (ii) For each excursion caused by the lack of monitoring data, as specified in Condition 5.B.8, the report must include the date and duration of the period when the monitoring data were not collected and the reason why the data were not collected.
  - (3) For each inspection conducted in accordance with Conditions 5.B.9 through 5.B.11 during which a leak or defect is detected, the records specified in paragraph (g) of Condition 5.B.12 must be included in the next Periodic Report.
  - (4) For each closed-vent system with a bypass line subject to paragraph (a)(1) of Condition 3.B.7, records required under paragraph (d)(3) of Condition 5.B.12 of all periods when the vent stream is diverted from the control device through a bypass line.
  - (5) When applicable, the information below shall be stated in the Periodic Report.
    - (i) No excursions.
    - (ii) No continuous monitoring system has been inoperative, out of control, repaired, or adjusted.
  - (6) Any change in compliance methods as specified in 40 CFR 63.772(f), Subpart HH.
  - (7) The records specified in paragraph (d)(1)(iii) of Condition 5.B.12.
  - (8) The results of any periodic test as required in Condition 5.B.6 conducted during the reporting period.
  - (9) Certification by a responsible 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.

(Ref.: 40 CFR 63.775(e), Subpart HH)

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- 5.C.5 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-016, AA-017, AA-019, and AA-020, whenever a process change is made, or a change of the information submitted in the Notification of Compliance Status Report, the permittee shall submit a report within 180 days after the process change is made. The report shall include:
  - (a) A brief description of the process change;
  - (b) A description of any modification to standard procedures or quality assurance procedures;
  - (c) Revisions of any information reported in the original Notification of Compliance Status Report; and
  - (d) Information required by the Notification of Compliance Status Report for changes involving the addition of processes or equipment.

(Ref.: 40 CFR 63.775(f), Subpart HH)

5.C.6 For Emission Point AA-010, the permittee shall report a bypass to the MDEQ orally within 24 hours and submit written notice of the bypass within seven (7) days of the event.

(Ref.: Construction Permit issued October 28, 2010, and modified October 28, 2014, and DATE)

5.C.7 For Emission Point AA-024, if the engine is subject to performance testing as specified in Condition 5.B.15(b), the permittee shall submit a copy of each performance test as conducted in 40 CFR 60.4244, Subpart JJJJ, within 60 days after the test has been completed. Performance test reports using EPA Method 18, EPA Method 320, or ASTM D6348-03 (incorporated by reference—see 40 CFR 60.17) to measure VOC require reporting of all QA/QC data. For Method 18, report results from sections 8.4 and 11.1.1.4; for Method 320, report results from sections 8.6.2, 9.0, and 13.0; and for ASTM D6348-03 reports results of all QA/QC procedures in Annexes 1-7.

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

## SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

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## SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act – Stratospheric Ozone Protection. The full text of the referenced regulations may be found on-line at <u>http://www.ecfr.gov/</u> under Title 40, or DEQ shall provide a copy upon request from the permittee.

- 7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A Production and Consumption Controls.
- 7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B Servicing of Motor Vehicle Air Conditioners.
- 7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E
   The Labeling of Products Using Ozone-Depleting Substances, for the following containers and products:
  - (a) All containers in which a class I or class II substance is stored or transported;
  - (b) All products containing a class I substance; and
  - (c) All products directly manufactured with a process that uses a class I substance, unless otherwise exempted by this subpart or, unless EPA determines for a particular product that there are no substitute products or manufacturing processes for such product that do not rely on the use of a class I substance, that reduce overall risk to human health and the environment, and that are currently or potentially available. If the EPA makes such a determination for a particular product, then the requirements of this subpart are effective for such product no later than January 1, 2015.
- 7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F Recycling and Emissions Reduction:
  - (a) Servicing, maintaining, or repairing appliances;
  - (b) Disposing of appliances, including small appliances and motor vehicle air conditioners; or
  - (c) Refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, as well as persons selling, offering for sale, and/or purchasing class I, class II, or non-exempt substitute refrigerants.
- 7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any acceptable alternative that is listed in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR Part 82, Subpart G Significant New Alternatives Policy Program. The permittee shall also comply with any use conditions for

the acceptable alternative substance.

- 7.6 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart H Halon Emissions Reduction:
  - (a) Any person testing, servicing, maintaining, repairing, or disposing of equipment that contains halons or using such equipment during technician training;
  - (b) Any person disposing of halons;
  - (c) Manufacturers of halon blends; or
  - (d) Organizations that employ technicians who service halon-containing equipment.

## **APPENDIX A**

## List of Abbreviations Used In this Permit

| 11 Miss. Admin. Code Pt. 2, Ch. 1. | Air Emission Regulations for the Prevention, Abatement, and        |
|------------------------------------|--------------------------------------------------------------------|
|                                    | Control of Air Contaminants                                        |
| 11 Miss. Admin. Code Pt. 2, Ch. 2. | Permit Regulations for the Construction and/or Operation of Air    |
|                                    | Emissions Equipment                                                |
| 11 Miss. Admin. Code Pt. 2, Ch. 3. | Regulations for the Prevention of Air Pollution Emergency Episodes |
| 11 Miss. Admin. Code Pt. 2, Ch. 4. | Ambient Air Quality Standards                                      |
| 11 Miss. Admin. Code Pt. 2, Ch. 5. | Regulations for the Prevention of Significant Deterioration of Air |
|                                    | Quality                                                            |
| 11 Miss. Admin. Code Pt. 2, Ch. 6. | Air Emissions Operating Permit Regulations for the Purposes of     |
|                                    | Title V of the Federal Clean Air Act                               |
| 11 Miss. Admin. Code Pt. 2, Ch. 7. | Acid Rain Program Permit Regulations for Purposes of Title IV of   |
| ,                                  | the Federal Clean Air Act                                          |
| BACT                               | Best Available Control Technology                                  |
| CEM                                | Continuous Emission Monitor                                        |
| CEMS                               | Continuous Emission Monitoring System                              |
| CFR                                | Code of Federal Regulations                                        |
| CO                                 | Carbon Monoxide                                                    |
| COM                                | Continuous Opacity Monitor                                         |
| COMS                               | Continuous Opacity Monitoring System                               |
| DEQ                                | Mississippi Department of Environmental Quality                    |
| EPA                                | United States Environmental Protection Agency                      |
| gr/dscf                            | Grains Per Dry Standard Cubic Foot                                 |
| HP                                 | Horsepower                                                         |
| HAP                                | Hazardous Air Pollutant                                            |
| lbs/hr                             |                                                                    |
| M or K                             | Pounds per Hour<br>Thousand                                        |
|                                    |                                                                    |
| MACT                               | Maximum Achievable Control Technology                              |
| MM                                 | Million                                                            |
| MMBTUH                             | Million British Thermal Units per Hour                             |
| NA                                 | Not Applicable                                                     |
| NAAQS                              | National Ambient Air Quality Standards                             |
| NESHAP                             | National Emissions Standards for Hazardous Air Pollutants, 40      |
|                                    | CFR 61 or National Emission Standards for Hazardous Air            |
| NUMBER                             | Pollutants for Source Categories, 40 CFR 63                        |
| NMVOC                              | Non-Methane Volatile Organic Compounds                             |
| NO <sub>x</sub>                    | Nitrogen Oxides                                                    |
| NSPS                               | New Source Performance Standards, 40 CFR 60                        |
| O&M                                | Operation and Maintenance                                          |
| PM                                 | Particulate Matter                                                 |
| $PM_{10}$                          | Particulate Matter less than 10 µm in diameter                     |
| ppm                                | Parts per Million                                                  |
| PSD                                | Prevention of Significant Deterioration, 40 CFR 52                 |
| SIP                                | State Implementation Plan                                          |
| $SO_2$                             | Sulfur Dioxide                                                     |
| TPY                                | Tons per Year                                                      |
| TRS                                | Total Reduced Sulfur                                               |
| VEE                                | Visible Emissions Evaluation                                       |
| VHAP                               | Volatile Hazardous Air Pollutant                                   |
| VOC                                | Volatile Organic Compound                                          |
|                                    |                                                                    |