

STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT

TO CONSTRUCT 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 construct air emissions equipment to comply with the emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: October 28, 2010

Permit No.: 2500-00087

Modified: October 28, 2014 and **DATE**

Draft/Proposed

SECTION 1

A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
2. Any activities not identified in the application are not authorized by this permit.
(Ref.: Miss. Code Ann. 49-17-29 1.b)
3. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for operating without a valid permit pursuant to State Law.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
4. It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(6).)
5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit, unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)
7. The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).)
8. The permit does not convey any property rights of any sort, or any exclusive privilege.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)
9. The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such

records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

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

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

11. Solids Removal: The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits.

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

12. Diversion and Bypass of Air Pollution Controls: The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed except as provided for in 11 Miss. Admin. Code Pt. 2, R. 1.10., "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants."

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

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

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

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

- a) To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and
- b) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emissions.

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

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

- a) Persistent violation of any of the terms or conditions of this permit;

- b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts;
or
- c) A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

27. Compliance Testing: Regarding compliance testing:

- a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.
- b) Compliance testing will be performed at the expense of the permittee.
- c) Each emission sampling and analysis report shall include but not be limited to the following:
 - (1) detailed description of testing procedures;
 - (2) sample calculation(s);
 - (3) results; and
 - (4) comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

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

B. GENERAL NOTIFICATION REQUIREMENTS

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

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

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

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

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

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

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

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

**SECTION 2
EMISSION POINT DESCRIPTION**

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

| Emission Point | Facility Description | Description |
|----------------|----------------------|--|
| AA-000 | E-25 | Fugitive Emissions |
| AA-001 | Tank 1 | 78,750 gallon (1875 barrel) Crude Oil Storage Tank with tank vapors vented to flare (AA-009) |
| AA-002 | Tank 2 | 16,800 gallon (400 barrel) Crude Oil Storage Tank with tank vapors vented to flare (AA-009) |
| AA-003 | Tank 3 | 16,800 gallon (400 barrel) Crude Oil Storage Tank with tank vapors vented to flare (AA-009) |
| AA-004 | Tank 4 | 16,800 gallon (400 barrel) Crude Oil Storage Tank with tank vapors vented to flare (AA-009) |
| AA-005 | Tank 5 | 78,750 gallon (1875 barrel) Crude Oil Storage Tank with tank vapors vented to flare (AA-009) |
| 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 with tank vapors vented to flare (AA-009) |
| AA-017 | E-19 | 16,800 gallon (400 barrel) Produced Water Storage Tank with tank vapors vented to flare (AA-009) |
| AA-019 | EQPT 19 | 16,800 gallon (400 barrel) Produced Water Storage Tank with tank vapors vented to flare (AA-009) |
| AA-020 | EQPT 20 | 16,800 gallon (400 barrel) Crude Oil Storage Tank with tank vapors vented to flare (AA-009) |
| 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) |

**SECTION 3
EMISSION LIMITATIONS AND STANDARDS**

| Emission Point | Applicable Requirement | Condition Number(s) | Pollutant/Parameter | Limitation/Standard |
|--|--|---------------------|--|--|
| Facility Wide | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). | 3.1 | Fuel | Combust natural gas only |
| | 11 Miss. Admin. Code Pt. 2, R. 1.4.B(2). | 3.2 | H ₂ S | One (1) grain per 100 standard cubic feet |
| | 11 Miss. Admin. Code Pt. 2, R. 1.3.A. | 3.3 | Opacity | ≤ 40% |
| | 11 Miss. Admin. Code Pt. 2, R. 1.3.B. | 3.4 | Equivalent Opacity | ≤ 40% |
| AA-001 AA-002 AA-003 | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). | 3.5 | Emissions | Route all gaseous emissions to the flare for control |
| AA-004 AA-005 AA-010 AA-016 AA-017 AA-019 AA-020 | 40 CFR 63, Subpart HH (National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities) 40 CFR 63.760(b)(1), Subpart HH | 3.6 | HAP | Applicability |
| AA-006 AA-007 AA-012 AA-013 AA-014 AA-015 AA-022 AA-023 | 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a). | 3.7 | PM/PM ₁₀ (filterable only) | ≤ 0.6 lb/MMBTU |
| AA-012 AA-013 AA-014 AA-015 AA-022 AA-023 | 40 CFR 63, Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines) 40 CFR 63.6585 and Table 8, Subpart ZZZZ | 3.8 | HAP | Applicability |

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

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

3.2 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).)

- 3.3 For the entire facility, 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) Emission resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60% 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 any one hour.
- (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.A.)
- 3.4 For the entire facility, except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Condition 3.3. This shall not apply to vision obscuration caused by uncombined water droplets.
- (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)
- 3.5 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-010, AA-016, AA-017, AA-019, and AA-020, the permittee shall route all gaseous emissions to the flare (Emission Point AA-009) for control.
- (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 3.6 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-010, AA-016, AA-017, AA-019, and 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), Subpart HH)
- 3.7 For Emission Points AA-006 AA-007, AA-012, AA-013, AA-014, AA-015, AA-022, and AA-023, 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).)
- 3.8 For Emission Points AA-012, AA-013, AA-014, AA-015, AA-022, and AA-023, 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.
- (Ref.: 40 CFR 63.6585 and Table 8, Subpart ZZZZ)

**SECTION 4
WORK PRACTICES**

| Emission Point | Applicable Requirement | Condition Number(s) | Pollutant/Parameter | Work Practice |
|----------------|--|---------------------|---------------------------|--|
| Facility Wide | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). 40 CFR 63, Subpart HH (National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities) 40 CFR 63.764(j), Subpart HH | 4.1 | Operation and Maintenance | Operate all equipment as efficiently as possible and perform routine maintenance |
| AA-009 | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). | 4.2 | | Control flare operating requirements |

4.1 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 records, and inspection of the source.

(Ref.: 40 CFR 63.764(j), Subpart HH, and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

4.2 For Emission Point AA-009, the permittee shall operate the control flare according to 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.
- (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.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

**SECTION 5
MONITORING AND RECORDKEEPING REQUIREMENTS**

| Emission Point | Applicable Requirement | Condition Number(s) | Pollutant/Parameter | Monitoring/Recordkeeping Requirement |
|-----------------------|---|----------------------------|----------------------------|--|
| Facility Wide | 11 Miss. Admin. Code Pt. 2, R. 2.9. | 5.1 | Monitoring & Recordkeeping | Maintain records for a minimum of five (5) years |
| | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 5.2 | Hours of Operation | Recordkeeping requirement |
| | | 5.3 | H ₂ S | Semiannual gas analysis requirement |
| AA-009 | 40 CFR 63, Subpart A (General Provisions) | 5.4 | Pilot Flame | Monitoring requirement |
| | 40 CFR 63.11(b)(5), Subpart A | | | |
| | 40 CFR 63.11(b)(1), Subpart A | 5.5 | Operation | Conformance with design |
| | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 5.6 | Visual Emissions | EPA Method 22 |
| 5.7 | | Maintenance | Recordkeeping requirement | |

5.1 For the entire facility, the permittee shall retain all required records, monitoring data, supporting information, and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to MDEQ as required by Applicable Rules and Regulations or this permit upon request.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.9.)

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

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

5.3 For the entire facility, in order to demonstrate compliance with Condition 3.2, the permittee shall perform semi-annual gas analyses. 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 C6+). The permittee shall maintain records of these analyses in accordance with the requirements outlined in Condition 5.1.

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

5.4 For the Emission Point AA-009, the permittee shall monitor the presence of a flare pilot flame using a thermocouple or any other equivalent device to detect the presence of a flame.

(Ref.: 40 CFR 63.11(b)(5), Subpart A)

5.5 For Emission Point AA-009, the permittee shall monitor the flare to assure that it is operated and maintained in conformance with the design.

(Ref.: 40 CFR 63.11(b)(1), Subpart A)

- 5.6 For Emission Point AA-009, the permittee shall perform quarterly visual observations for a period of two (2) hours using EPA Method 22 to demonstrate compliance with the visible emissions limitation.

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

- 5.7 For Emission Point AA-009, the permittee shall keep records of all maintenance performed on the flare in order to operate in accordance with Condition 4.2 and shall be made available upon request during inspection by MDEQ personnel.

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

**SECTION 6
REPORTING REQUIREMENTS**

| Emission Point | Applicable Requirement | Condition Number(s) | Reporting Requirement |
|--|---|---------------------|--|
| Facility Wide | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 6.1 | Report deviations within five (5) days |
| | | 6.2 | Semiannual reports |
| | | 6.3 | Semiannual summary reports |
| AA-001 AA-002 AA-003 AA-004 AA-005 AA-010 AA-016 AA-017 AA-019 AA-020 | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 6.4 | Bypass event |

- 6.1 For the entire facility, 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 preventative measures taken. Such reports shall be made within five (5) days of the time the deviation began.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 6.2 For the entire facility, the permittee shall submit reports of any required monitoring to MDEQ by January 31st and July 31st 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.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 6.3 For the entire facility, the permittee shall prepare a summary report of the required monitoring, which includes the semiannual gas analysis (required in Condition 5.3) in accordance with Condition 6.2 of this permit.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 6.4 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-010, AA-016, AA-017, AA-019, and AA-020, 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.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)