

STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

ANR Pipeline Company, Sardis Compressor Station
2099 Holly Grove Road
Highway 315 West
Sardis, Mississippi
Panola County

*34°25'25" N
90°07'32" W*

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

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: _____

Permit No.: 2100-00028

Draft/Proposed – 8/10/2020

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 within thirty (30) days of startup.

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

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

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

**SECTION 2
EMISSION POINT DESCRIPTION**

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

Emission Point	Description
AA-00	Equipment Leaks - Fugitive Emissions
AB-01	Venting – Natural Gas Blowdown
AA-016	Solar Mars Natural Gas Fired Turbine 1 – 15,607 hp
AA-017	Solar Mars Natural Gas Fired Turbine 2 – 15,607 hp
AA-018	Waukesha VGF-L36GL Emergency Generator – 880 hp
AA-019	Fuel Gas Heater – 1.2 MMBtu/hr
AA-020	30 Space Heaters – 0.0725 MMBtu/hr, each
AA-021	Pipeline Fluids Tank – 2,000 Gallons (T-13)
AA-022	Wastewater Tank – 1,200 Gallons (T-14)

**SECTION 3
EMISSION LIMITATIONS AND STANDARDS**

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity	Opacity shall not exceed 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2		Equivalent Opacity
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.3	Fuel Requirement	Shall combust only natural gas
AA-00	40 CFR 60 Subpart OOOOa Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced After September 18, 2015. 40 CFR 60.5365a(j)(2), Subpart OOOOa	3.4	VOC	Applicability
	40 CFR 60.5397a(a), Subpart OOOOa	3.5		Operational Requirement
	40 CFR 60.5397a(c)(7), Subpart OOOOa	3.6		
	40 CFR 60.5397a(c)(8), Subpart OOOOa	3.7		
	40 CFR 60.5397a(h), Subpart OOOOa	3.8		
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b)	3.9		PM (Filterable only)
AA-016 AA-017	40 CFR 60 Subpart KKKK Standards of Performance for Stationary Combustion Turbines 40 CFR 60.4305(a), Subpart KKKK	3.10	NO _x SO ₂	Applicability
	40 CFR 60.4320(a), Subpart KKKK	3.11	NO _x	Emission Standards
	40 CFR 60.4330(a)(2), Subpart KKKK	3.12	SO ₂	

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
AA-016 AA-017	40 CFR 60.4333(a), Subpart KKKK	3.13	NO _x SO ₂	Minimize emissions
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.14	NO _x CO VOC	200 Startup / shut down cycles per year per turbine; 200 low-load operation hours per year per turbine; and 50 low-temperature operation hours per year per turbine
AA-018	40 CFR 63 Subpart ZZZZ National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines 40 CFR 63.6590(c)(1), Subpart ZZZZ	3.15	VOC HAP	Applicability
	40 CFR 60 Subpart JJJJ Standards of Performance for Stationary Spark Ignition Internal Combustion Engines 40 CFR 60.4230(a)(4)(iv), Subpart JJJJ	3.16	VOC CO NO _x	Applicability
	40 CFR 60.4233(e), Subpart JJJJ	3.17		Emissions Standards
	40 CFR 60.4243(d), Subpart JJJJ	3.18		Emergency engine operation requirements
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.19		Install non-resettable hour meter
	AA-018 AA-019 AA-020	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.20	PM (Filterable only)
AA-019 AA-020	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.21	SO ₂	4.8 lb/MMBtu

3.1. 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. Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.

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

3.2. 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 3.1. This shall not apply to vision obscuration caused by uncombined water droplets.

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

3.3. For the entire facility, the permittee shall only combust pipeline-quality natural gas in all combustion units operating at the facility.

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

3.4. For Emission Point AA-00, the facility is subject to and shall comply with all applicable conditions of Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015, 40 CFR 60, Subpart OOOOa. Emission Point AA-00 is the collection of fugitive emissions components from equipment leaks at a compressor station.

(Ref.: 40 CFR 60.5365a(j)(2), Subpart OOOOa.)

3.5. For Emission Point AA-00, the permittee shall demonstrate compliance with Subpart OOOOa by monitoring all fugitive emission components, as defined in 40 CFR Part 60.5430a. For the purposes of this condition along with Conditions 3.6, 3.7, and 3.8, fugitive emissions are defined as: Any visible emission from a fugitive emissions component observed using optical gas imaging or an instrument reading of 500 parts per million (ppm) or greater using EPA Method 21 – Volatile Organic Compound Leaks. The permittee shall develop an emissions monitoring plan that covers the collection of fugitive emissions components within each company-defined area. This monitoring plan shall include the information and elements specified in paragraphs (a) through (j) below:

(a) Frequency for conducting surveys.

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

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

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

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

- (d) Procedures and timeframes for identifying and repairing fugitive emissions components from which fugitive emissions are detected. This includes timeframes for fugitive emission components that are unsafe to repair. At a minimum, the repair schedule shall meet the requirements of Condition 3.8.
- (e) Procedures and timeframes for verifying fugitive emission component repairs.
- (f) Records that will be kept and the length of time these records will be kept.
- (g) A representative site map shall be kept on-site at all times.
- (h) A defined observation path that ensures all fugitive emissions components are within sight of the path. The observation path must account for interferences.
- (i) If the permittee utilizes EPA Method 21, the plan shall also include a list of fugitive emissions components to be monitored and the method for determining location of fugitive emissions components to be monitored in the field (e.g. tagging, identification on a process and instrumentation diagram, etc.).
- (j) The plan shall also include the written plan developed for all of the fugitive emission components designated as difficult-to-monitor in accordance with 40 CFR Part 60.5397(g)(3)(i) and the written plan for fugitive emission components designated as unsafe-to-monitor in accordance with 40 CFR Part 60.5397(g)(3)(ii) and (g)(4).

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

3.6. For Emission Point AA-00 if the permittee utilizes optical gas imaging, the monitoring plan required in Condition 3.5 shall include the information specified in subparagraphs (a) through (g) below:

- (a) Verification that the optical gas imaging equipment is capable of imaging gases in the spectral range for the compound of highest concentration in the potential fugitive emissions. The optical gas imaging equipment must be capable of imaging a gas that is half methane, half propane at a concentration of 10,000 ppm at a flow rate of ≤ 60 grams per hour (g/hr) from a quarter inch diameter orifice. This verification is an initial verification and may either be performed by the permittee, by the manufacturer, or by a third party. For the purposes of complying with the fugitive emissions monitoring program with optical gas imaging, a fugitive emission is defined as any visible emissions observed using optical gas imaging.
- (b) Procedures for a daily verification check.
- (c) Procedures for determining the permittee's maximum viewing distance from the equipment and procedures for how the permittee will ensure that this distance is maintained.
- (d) Procedures for determining maximum wind speed during which monitoring can be performed and procedures for how the permittee will ensure monitoring occurs only at wind speeds below this threshold.

- (e) Procedures for conducting surveys, including how the permittee will ensure an adequate thermal background is present in order to view potential fugitive emissions, how the permittee will deal with adverse monitoring conditions, such as wind, and how the permittee will deal with interferences (e.g., steam).
- (f) Specifications of the training and experience needed prior to performing surveys.
- (g) Procedures for calibration and maintenance. At a minimum, procedures must comply with those recommended by the manufacturer.

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

3.7. For Emission Point AA-00, if the permittee utilizes EPA Method 21 from 40 CFR Part 60, Appendix A-7, the monitoring plan required in Condition 3.5 shall include the information specified in paragraphs (a) and (b) below:

- (a) Verification that all monitoring equipment meets the requirements specified in Section 6.0 of EPA Method 21 from 40 CFR Part 60, Appendix A-7. For purposes of instrument capability, the fugitive emissions definition shall be 500 ppm or greater methane using a FID-based instrument. If the permittee uses an analyzer other than a FID-based instrument, the permittee shall develop a site-specific fugitive emission definition that would be equivalent to 500 ppm methane using a FID-based instrument (e.g., 10.6 eV PID with a specified isobutylene concentration as the fugitive emission definition would provide equivalent response to your compound of interest).
- (b) Procedures for conducting surveys. At a minimum, these procedures shall ensure that the surveys comply with the relevant sections of EPA Method 21 from 40 CFR Part 60, Appendix A-7, including Section 8.3.1.

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

3.8. For Emission Point AA-00, each identified source of fugitive emissions shall be repaired or replaced in accordance with paragraphs (a) through (c) below:

- (a) Each identified source of fugitive emissions shall be repaired or replaced as soon as practicable, but no later than 30 calendar days after detection of the fugitive emissions.
- (b) If the repair or replacement is technically infeasible, would require a well shutdown or well shut-in, or would be unsafe to repair during operation of the unit, the repair or replacement must be completed during the next well shutdown, well shut-in, after an unscheduled, planned or emergency vent blowdown or within 2 years, whichever is earlier.
- (c) Each repaired or replaced fugitive emissions component must be resurveyed as soon as practicable, but no later than 30 days after being repaired, to ensure that there are no fugitive emissions. This survey shall comply with the requirements of subparagraphs (1) through (4), as applicable:

- (1) For repairs that cannot be made during the monitoring survey when the fugitive emissions are initially found, the operator may resurvey the repaired fugitive emissions components using either Method 21 or optical gas imaging within 30 days of finding such fugitive emissions.
- (2) For each repair that cannot be made during the monitoring survey when the fugitive emissions are initially found, a digital photograph must be taken of that component or the component must be tagged for identification purposes. The digital photograph must include the date that the photograph was taken, must clearly identify the component by location within the site (e.g., the latitude and longitude of the component or by other descriptive landmarks visible in the picture).
- (3) If the permittee utilizes Method 21 to resurvey the repaired fugitive emissions components, then the fugitive emissions component is considered repaired when the Method 21 instrument indicates a concentration of less than 500 ppm above background or when no soap bubbles are observed when the alternative screening procedures specified in Section 8.3.3 of Method 21 are used. The permittee shall utilize the Method 21 monitoring requirements specified in Condition 3.10(h)(ii) or the alternative screening procedures specified in Section 8.3.3 of Method 21.
- (4) If the permittee utilizes optical gas imaging to resurvey the repaired fugitive emissions components, then the fugitive emissions component is considered repaired when the optical gas imaging instrument shows no indication of visible emissions. The permittee shall utilize the optical gas monitoring requirements specified in Condition 3.6(g).

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

- 3.9. For Emission Points AA-016 and AA-017, the maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of equal to or greater than 10 MMBTU per hour per heat input shall not exceed an emission rate as determined by the relationship:

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

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

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

- 3.10. For Emission Points AA-016 and AA-017, the facility is subject to and shall comply with all applicable conditions of Standards of Performance for Stationary Combustion Turbines 40 CFR 60, Subpart KKKK.

(Ref.: 40 CFR 60.4300 and 60.4305(a), Subpart KKKK)

3.11. For Emission Points AA-016 and AA-017, the permittee shall meet the following NO_x emissions standard: 25 ppm at 15% O₂ or 150 ng/J of useful output (1.2lb/MWh).

(Ref.: 40 CFR 60.4320(a), Item 3 of Table 1, Subpart KKKK)

3.12. For Emission Points AA-016 and AA-017, the permittee shall not burn any fuel which contains total potential sulfur emissions in excess of 26 ng SO₂/J (0.060 lb SO₂/MMBtu) heat input.

(Ref.: 40 CFR 60.4330(a)(2), Subpart KKKK)

3.13. For Emission Points AA-016 and AA-017, the permittee shall operation and maintain the stationary combustion turbines, air pollution control equipment, and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction.

(Ref.: 40 CFR 60.4333(a), Subpart KKKK)

3.14. For Emission Points AA-016 and AA-017, the permittee shall not exceed the hours per year per turbine of the following turbine operating modes:

- (a) 200 startup events per turbine per year;
- (b) 200 shutdown events per turbine per year;
- (c) 200 low-load operation hours per turbine per year; and
- (d) 50 low-temperature operation hours per turbine per year.

For the purposes of this condition, “startup” and “shutdown” events are defined as periods when the turbines are brought up to or down from operational capacity respectively, with a maximum of 20 minutes per startup/shutdown event (i.e. 10 minutes per event). “Low-load operation” is defined as operation at or below 50% of maximum turbine load capacity and “low-temperature operation” is defined as operation when ambient temperatures are below 0°F.

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

3.15. For Emission Point AA-018, the permittee is subject to 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE). Emission Points AA-018 is a new RICE located at an area source of HAPs. Therefore, compliance with 40 CFR Part 63, Subpart ZZZZ shall be achieved by meeting all applicable requirements of 40 CFR Part 60, Subpart JJJJ. No further requirements apply for such engines under NESHAP Subpart ZZZZ.

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

3.16. For Emission Point AA-018, the permittee is subject to and shall comply with all applicable conditions of Standards of Performance for Stationary Spark Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart JJJJ. This emission point is classified as a new, emergency, 880 hp, Spark Ignition (SI), stationary, 4-stroke lean burn (4SLB), Reciprocating Internal Combustion Engine (RICE) located at an area source of Hazardous Air Pollutants (HAPs).

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

3.17. For Emission Point AA-018, the permittee shall comply with the emissions standards below over the entire life of the engine.

Pollutant	Emissions Standard (g/bhp-hr)	Emissions Standard (ppmvd at 15% O ₂)
NO _x	2.0	160
CO	4.0	540
VOC	1.0	86

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

3.18. For Emission Point AA-018, the permittee shall operate the emergency, stationary ICE according to the requirements in (a) through (c) below:

- (a) There is no time limit on the use of the engine in emergency situations.
- (b) The engine may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of each engine beyond 100 hours per calendar year.
- (c) The engine may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in (b). Except as provided in 40 CFR 60.4243(d)(3)(i), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial agreement with another entity.

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

- 3.19. For Emission Point AA-018, the permittee shall install a non-resettable hour meter.

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

- 3.20. For Emission Points, AA-018, AA-019, and AA-020, 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).)

- 3.21. For Emission Points AA-019 and AA-020, the permittee shall not discharge sulfur oxides from any fuel burning installation in which fuel is burned primarily to produce heat or power by indirect heat transfer in excess of 4.8 pounds per MMBtu heat input (measured as sulfur dioxide).

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

**SECTION 4
WORK PRACTICES**

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

- 4.1. For the entire facility, in order to minimize the emissions of air pollutants, the permittee shall operate all air emissions equipment as efficiently as possible. Furthermore, the permittee shall perform routine maintenance on all air emissions equipment such that the equipment may be operated in an efficient manner.

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

**SECTION 5
MONITORING AND RECORDKEEPING REQUIREMENTS**

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain records for a minimum of 5 years.
AA-00	40 CFR 60.5410a(j), Subpart OOOOa	5.2	VOC	Initial Compliance
	40 CFR 60.5415a(h), Subpart OOOOa	5.3		Continuous Compliance
	40 CFR 60.5420a(c), Subpart OOOOa	5.4		Recordkeeping Requirement
AA-016 AA-017	40 CFR 60.4340(a), Subpart KKKK	5.5	NOx	Continuous Compliance
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.6		Recordkeeping
			5.7	Sulfur
AA-018	40 CFR 60.4245(a), Subpart JJJJ	5.8	VOC NOx CO	Recordkeeping
	40 CFR 60.4243(a) & (b), Subpart JJJJ	5.9		Continuous Compliance
	40 CFR 60.4245(b), Subpart JJJJ	5.10		Record hours of operation

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

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

5.2. For Emission Point AA-00, to achieve initial compliance with the fugitive emission standards for each collection of fugitive emissions components at a compressor station, the permittee shall comply with paragraphs (a) through (e) of this section:

- (a) A fugitive emission plan as required in Condition 3.5.
- (b) An initial monitoring survey as required in Condition 3.5(a).
- (c) Maintaining of all records specified in Condition 5.4.

- (d) Repair of each identified source of fugitive emissions for each affected facility as required in Condition 3.8.
- (e) Submittal of initial annual report for each collection of fugitive emissions components at a well site as required in Condition 6.5.

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

5.3. For Emission Point AA-00, the permittee shall demonstrate continuous compliance with the fugitive emission standards for each collection of fugitive emissions components at a well site by complying with the requirements of paragraphs (a) through (d) below:

- (a) The permittee shall conduct periodic monitoring surveys as required in Condition 3.5(a).
- (b) The permittee shall repair or replace each identified source of fugitive emissions as required in Condition 3.8.
- (c) The permittee shall maintain the records specified in Condition 5.4.
- (d) The permittee shall submit annual reports for the collection of fugitive emissions components at a well site as required in Condition 6.5.

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

5.4. For Emission Point AA-00, the permittee shall maintain the records specified in 40 CFR 60.7(f) and in all applicable paragraphs of 40 CFR 60.5420a(c). All records required by Subpart OOOOa shall be maintained either onsite or at the nearest local field office for at least 5 years. Any records required to be maintained by Subpart OOOOa that are submitted electronically via the EPA's CDX may be maintained in electronic format.

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

5.5. For Emission Points AA-016 and AA-017, the permittee shall perform annual (no more than 14 months from the previous test) performance tests in accordance with 40 CFR 60.4400 to demonstrate continuous compliance. If the NO_x emission result from the performance test is less than or equal to 75 percent of the NO_x emission limit for the turbine, the permittee may reduce the frequency of subsequent performance tests to once every 2 years (no more than 26 calendar months following the previous performance test). If the results of any subsequent performance test exceed 75 percent of the NO_x emission limit for the turbine, the permittee must resume annual performance tests.

(Ref.: 40 CFR 60.4340(a), Subpart KKKK)

5.6. For Emission Points AA-016 and AA-017, the permittee shall monitor and maintain records of the following as required by Condition 3.14.

- (a) The number of startups on a rolling 12-month basis.
 - (b) The number of shutdowns on a rolling 12-month basis
 - (c) The number of hours spent in low-load operation on a rolling 12-month basis
 - (d) The number of hours spent in low-temperature operation on a rolling 12-month basis
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 5.7. For Emission Points AA-016 and AA-017, the permittee shall maintain on site the natural gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the natural gas, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf (338 ppmv) or less and is either composed of at least 70% methane by volume or has a gross calorific value between 950 and 1,100 Btu/scf. The permittee shall make a copy of the current, valid tariff sheet available upon request by DEQ personnel and maintain this data in accordance with Condition 5.1
(Ref: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11) and 40 CFR 60.4360 and 60.4365(a), Subpart KKKK)
- 5.8. For Emission Point AA-018, the permittee shall keep records of the information in paragraphs (a) through (c):
- (a) All notifications submitted to comply with 40 CFR Subpart JJJJ and all documentation supporting any notification.
 - (b) Maintenance conducted on the engine.
 - (c) Documentation that the engine meets the emission standards required by Condition 3.17.
(Ref.: 40 CFR 60.4245(a), Subpart JJJJ)
- 5.9. For Emission Point AA-018, the permittee shall purchase a non-certified engine and demonstrate compliance with the emission standards in Condition 3.17 by conducting an initial performance test in accordance with 40 CFR 60.4244 within one (1) year of engine startup. Subsequent performance test shall be conducted every 8760 hours or 3 years, whichever comes first. In addition, the permittee 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.
(Ref.: 40 CFR 60.4243 (a) and (b), Subpart ZZZZ)
- 5.10. For Emission Point AA-018, the permittee shall keep records of the hours of operation of the engine through the non-resettable hour meter required by Condition 3.19. The

permittee shall document how many hours are spent for emergency operation; including what classified the operation as emergency and how many hours are spent for non-emergency operation.

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

SECTION 6 REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	Report permit deviations within five (5) working days.
		6.2	Submit semi-annual synthetic minor monitoring report
		6.3	All documents submitted to MDEQ shall be certified by a Responsible Official.
		6.4	Submit notifications of scheduled tests
AA-00	40 CFR 60.5420a, Subpart OOOOa	6.5	Submit annual reports
AA-016 AA-017	40 CFR 60.4375(b), Subpart KKKK	6.6	Submit annual performance tests
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.7	Submit records
		6.8	Submit gas quality certification
AA-018	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.9	Submit hours of emergency operation
	40 CFR 60.4245(d), Subpart JJJJ	6.10	Submit performance tests

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

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

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

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

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

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

- 6.4. The permittee shall submit the following notifications, information, and reports for each required performance test unless otherwise specified elsewhere:
- (a) A notification of the scheduled test date(s) should be submitted ten (10) days prior to the scheduled date(s) so an observer may be afforded the opportunity to witness the test(s).
 - (b) A written test protocol for each required test at least thirty (30) days prior to the intended test date(s) to ensure all test methods and procedures are acceptable to the DEQ. After the first successful submittal of a written test protocol, the permittee may request that the submittal of the protocol be waived for subsequent testing by certifying in writing at least thirty (30) days prior to the subsequent testing that all conditions for testing remain unchanged such that the original protocol can and will be followed.

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

- 6.5. For Emission Point AA-00, the permittee shall submit annual reports containing the information specified in 40 CFR 60.5420a(b)(1), (b)(4), (b)(5), (b)(7), and (b)(11). The initial annual report is due no later than 90 days after the end of the initial compliance period, which is no later than 1 year after startup. Subsequent annual reports are due no later than the same date each year as the initial annual report. If the permittee owns or operates more than one affected facility, the permittee may submit one report for multiple affected facilities provided the report contains all of the information required as specified in 40 CFR Part 60.5420a(b)(1) through (b)(8), as applicable, except as provided in 40 CFR Part 60.5420a(b)(13).

The permittee must submit reports to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX (<https://cdx.epa.gov/>.) The permittee must use the appropriate electronic report in CEDRI for this subpart or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the CEDRI Web site (<https://www3.epa.gov/ttn/chief/cedri/>). If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, you must submit the report to the Administrator at the appropriate address listed in 40 CFR Part 60.4. Once the form has been available in CEDRI for at least 90 calendar days, the permittee must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in 40 CFR Part 60 Subpart OOOOa regardless of the method in which the reports are submitted.

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

- 6.6. For Emission Points AA-016 and AA-017, the permittee shall submit the results of the annual performance test required by Condition 5.5. These results shall be submitted

before the close of business on the 60th day following the completion of the performance test.

(Ref.: 40 CFR 60.4375(b), Subpart KKKK)

- 6.7. For Emission Points AA-016 and AA-017, the permittee shall submit the records required by Condition 5.6. This report shall be submitted in accordance with Condition 6.2.

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

- 6.8. For emission Points AA-016 and AA-017, the permittee shall submit a copy of the Gas Quality Section of the current valid purchase contract, tariff sheet or transportation contract for natural gas combusted in the turbine in accordance with Condition 6.2.

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

- 6.9. For Emission Point AA-018, permittee shall report in accordance with Condition 6.2, how many hours are spent for emergency operation; including what classified the operation as emergency and how many hours are spent for non-emergency operation.

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

- 6.10. For Emission Point AA-018, if the permittee is required to conduct a performance test by Condition 5.9 then the permittee shall submit the results of that performance test within 60 days of the test being completed.

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