

# **STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT**

**TO CONSTRUCT AIR EMISSIONS EQUIPMENT**

## **THIS CERTIFIES THAT**

**BBT Mississippi LLC, Baxterville Compressor Station  
1017 Clear Creek Church Road  
Columbia, Mississippi  
Marion 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**

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**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Issued:** \_\_\_\_\_

**Permit No.: 1440-00049**

## SECTION 1. GENERAL CONDITIONS

- 1.1 This permit is for air pollution control purposes only.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
- 1.1 Any activities not identified in the application are not authorized by this permit.  
(Ref.: Miss. Code Ann. 49-17-29(1)(b))
- 1.2 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).)
- 1.3 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).)
- 1.4 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).)
- 1.5 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).)
- 1.6 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).)
- 1.7 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).)
- 1.8 The permittee shall furnish to the Department of Environmental Quality (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).)

- 1.9 *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(1)-(3).)

- 1.10 The necessary facilities shall be constructed to prevent any wastes or other products or substances to be placed in a location where they are likely to cause pollution of the air or waters of the State without the proper environmental permits.

(Ref.: Miss. Code Ann. 49-17-29(1) and (2))

- 1.11 *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).)

- 1.12 *General Nuisances:* The permittee shall not cause, permit, or allow the emission of particles or any contaminants in sufficient amounts or of such duration from any process as to be injurious to humans, animals, plants, or property, or to be a public nuisance, or create a condition of air pollution.

- (a) The permittee shall not cause or permit the handling, transporting, or storage of any material in a manner which allows or may allow unnecessary amounts of particulate matter to become airborne.
- (b) When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than that from which it originated or to violate any other provision of 11 Miss. Admin. Code Pt. 2, Ch. 1, the Commission may order such corrected in a way that all air and gases or air and gasborne material leaving the building or equipment are controlled or removed prior to discharge to the open air.

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

1.13 *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 at reasonable times 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) 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 contaminants or waste waters, fuel, process material, or other material which affects or may affect emission of air contaminants from any source.

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

1.14 *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.)

1.15 *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)

1.16 *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.)

1.17 *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).)

- 1.18 *Permit Expiration:* The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance, if construction is suspended for eighteen (18) months or more, or if construction is not completed within a reasonable time. The DEQ may extend the 18-month period upon a satisfactory showing that an extension is justified.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1)., R. 2.5.C(4)., and R. 5.2.)
- 1.19 *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).)
- 1.20 *Beginning Operation:* 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).)
- 1.21 *Application for a Permit to Operate:* 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).)
- 1.22 *Operating Under a Permit to Construct:* 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).)
- 1.23 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 five (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 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 11 Miss. Admin. Code Pt. 2, R. 1.2., occurs during startup or shutdown, see the upset requirements above.

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

- 1.24 *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).)

- 1.25 *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).)

## 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.

<b>Emission Point</b>	<b>Description</b>
AA-001	1,380-Horsepower (HP) 2022 Caterpillar Model 3516J natural gas-fired, four-stroke, lean burn (4SLB) compressor engine with emissions controlled by an oxidation catalyst. [Facility ID No. C-1]
AA-002	122-HP 2025 Generac natural gas-fired emergency generator engine for 80-kiloWatt (kW) Model SG080 Genset. [Facility ID No. G-1]
AA-003	8,820-gallon (50-barrel) Condensate Storage Tank for Maintenance Purposes [Facility ID No. Tk-1]
AA-004	8,820-gallon (50-barrel) Oil Storage Tank for Maintenance Purposes [Facility ID No. Tk-2]
AA-005	Fugitive emissions from equipment leaks
AA-006	Compressor driven by Emission Point AA-001 [Facility ID No. CPR-1]
AA-007	Startup, Shutdown, Maintenance Emissions [Facility ID No. SSM-1]
AA-008	Liquids Truck Loading [Facility ID No. LOAD-1]

### 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.B.	3.1	Opacity	≤ 40%
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.2	Opacity	≤ 40%
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 1.3.C.	3.3	PM	General Nuisances
AA-001 and AA-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.4	Operating Restriction	Combust only natural gas
AA-001 and AA-002	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.5	PM (filterable)	0.6 lb/MMBtu heat input
AA-001 and AA-002	40 CFR 63, Subpart ZZZZ  (National Emission Standards for Hazardous Air Pollutants from Stationary Reciprocating Internal Combustion Engines)  40 CFR 63.6580, 63.6585(a) and (c), and 63.6590(a)(2)(iii) and (c)(1), Subpart ZZZZ	3.6	HAP	Applicability
AA-001 and AA-002	40 CFR 60, Subpart JJJJ  (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines)  40 CFR 60.4230(a)(4)(i) and (iv), Subpart JJJJ	3.7	NO <sub>x</sub> , CO, and VOC	Applicability
AA-001	40 CFR 60.4233(e), 60.4234, 63.4236, and Table 1 to Subpart JJJJ	3.8	NO <sub>x</sub>	1.0 g/hp-hr or ≤ 82 ppmvd at 15% O <sub>2</sub>
			CO	2.0 g/hp-hr or ≤ 270 ppmvd at 15% O <sub>2</sub>
			VOC	0.7 g/hp-hr or ≤ 60 ppmvd at 15% O <sub>2</sub>

AA-001	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.9	CO	Install, operate, and maintain an oxidation catalyst
AA-002	40 CFR 60.4233(e), 60.4234, 63.4236, and Table 1 to Subpart JJJJ	3.10	NO <sub>x</sub>	10 g/hp-hr
			CO	387 g/hp-hr
AA-002	40 CFR Part 60.4237(c), Subpart JJJJ	3.11	Hour Meter	Operational Requirement
AA-002	40 CFR Part 60.4243(d)(1)-(3), Subpart JJJJ	3.12	Operations	Operational Requirement
AA-005 and AA-006	40 CFR Part 60, Subpart OOOOb  (Standards of Performance for Crude Oil and Natural Gas Facilities)  40 CFR 60.5360b, 60.5365b(c) and (i), Subpart OOOOb	3.13	VOC / GHG	Applicability
AA-006	40 CFR 60.5370b(a)(1)(i) and 60.5385b(a), and 60.5415b(g)(1) and (4), Subpart OOOOb	3.14	VOC / GHG	Cylinder volumetric flow rate and rod packing replacements

3.1 For the entire facility, the permittee shall not cause, permit, or allow 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 11 Miss. Admin. Code Pt. 2, R. 1.3.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.)

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

- (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.)

- 3.3 The permittee shall not cause, permit, or allow the emission of particles or any contaminants in sufficient amounts or of such duration from any process as to be injurious to humans, animals, plants, or property, or to be a public nuisance, or create a condition of air pollution. (a) The permittee shall not cause or permit the handling, transporting, or storage of any material in a manner which allows or may allow unnecessary amounts of particulate matter to become airborne. (b) When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than that from which it originated or to violate any other provision of Regulation 11 Miss. Admin. Code Pt. 2, Ch. 1, the Commission may order such corrected in a way that all air and gases or air and gas-borne material leaving the building or equipment are controlled or removed prior to discharge to the open air.

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

- 3.4 For Emission Points AA-001 and AA-002, the facility shall combust only natural gas.

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

- 3.5 For Emission Points AA-001 and AA-002, the maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations less than 10 MMBtu/hr 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).)

- 3.6 For Emission Points AA-001 and AA-002, the permittee is subject to and shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE) (40 CFR 63, Subpart ZZZZ) and the applicable General Provisions (40 CFR 63, Subpart A). Because Emission Points AA-001 and AA-002 are new stationary RICE located at an area source, the permittee shall meet the requirements of 40 CFR 63, Subpart ZZZZ by meeting the requirements of 40 CFR 60, Subpart JJJJ. No further requirements of Subpart ZZZZ apply.

(Ref.: 40 CFR 63.6580, 63.6585(a) and (c), and 63.6590(a)(2)(iii) and (c)(1), Subpart ZZZZ)

- 3.7 For Emission Points AA-001 and AA-002, the permittee is subject to and shall comply with all applicable requirements of the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (SI ICE) (40 CFR 60, Subpart JJJJ) and the applicable General Provisions (40 CFR 60, Subpart A) noted in Table 3 to Subpart JJJJ.

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

- 3.8 For Emission Point AA-001, the permittee must comply with the following emission standards and operate and maintain the SI ICE over the entire life of the engine. The permittee may not install stationary SI ICE that do not meet the emissions standards below:

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**Draft/Proposed**

- (a)  $\text{NO}_x \leq 1.0 \text{ g/hp-hr (82 ppmvd @ 15 \% O}_2\text{)}$
- (b)  $\text{CO} \leq 2.0 \text{ g/hp-hr (270 ppmvd @ 15 \% O}_2\text{)}$
- (c)  $\text{VOC} \leq 0.7 \text{ g/hp-hr (60 ppmvd @ 15 \% O}_2\text{)}^1$

<sup>1</sup> When calculating emissions of VOC, emissions of formaldehyde should not be included.

(Ref.: 40 CFR 60.4233(e), 60.4234, and Table 1 to Subpart JJJJ)

- 3.9 For Emission Point AA-001, the permittee shall install, operate, and maintain an oxidation catalyst according to the manufacturer's written instructions or site-specific written instructions for the engine. The permittee shall operate the control device at all times when operating. Should the control device become non-operational then the engine shall be shut down immediately, but not as to cause damage to equipment or property, or cause further environmental problems. The engine shall not startup until such time that the control device becomes operational.

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

- 3.10 For Emission Point AA-002, the permittee must comply with the following emission standards and operate and maintain the SI ICE over the entire life of the engine. The permittee may not install stationary SI ICE that do not meet the emissions standards below:

- (a)  $\text{NO}_x \leq 10 \text{ g/hp-hr}^1$
- (b)  $\text{CO} \leq 387 \text{ g/hp-hr}$

<sup>1</sup> The emission standards applicable to emergency engines between 25 HP and 130 HP are in terms of NOX + HC.

(Ref.: 40 CFR 60.4233(e), 60.4234, 63.4236, and Table 1 to Subpart JJJJ)

- 3.11 For Emission Point AA-002, the permittee must install and operate a non-resettable hour meter on the emergency engine.

(Ref: 40 CFR Part 60.4237(c), Subpart JJJJ)

- 3.12 For Emission Point AA-002, the permittee must operate the emergency stationary engine according to the requirements cited below. In order for the engine to be considered an emergency stationary engine, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described below, is prohibited. If the engine is not operated according to these requirements, the engine will not be considered an emergency engine under 40 CFR Part 60, Subpart JJJJ and must meet all requirements for non-emergency engines.

- (a) There is no time limit on the use of the emergency stationary 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.

(Ref.: 40 CFR Part 60.4243(d)(1)-(3), Subpart JJJJ)

- 3.13 For Emission Points AA-005 and AA-006, the permittee is subject to and shall comply with all applicable requirements of the Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced after December 6, 2022 (40 CFR 60, Subpart OOOOb).

(Ref.: 40 CFR 60.5360b and 60.5365b(c) and (i), Subpart OOOOb)

- 3.14 For Emission Point AA-006, the volumetric flow rate of each cylinder, measured in accordance with Condition 5.6, must not exceed 2 scfm per individual cylinder. If the individual cylinders are manifolded to a single open-ended vent line, the volumetric flow rate must not exceed the sum of the individual cylinders multiplied by 2 scfm. Measurements of the volumetric flow rate must be conducted in accordance with the schedule specified in Condition 3.14(a) and (b) and determine the volumetric flow rate per cylinder in accordance with Condition 5.6. If the volumetric flow rate, measured in accordance with Condition 5.6, for a cylinder exceeds 2 scfm per cylinder (or a combined volumetric flow rate greater than the number of compression cylinders multiplied by 2 scfm), the rod packing or packings must be repaired or replaced as provided in Condition 3.14(c).

- (a) The first volumetric flow rate measurements from the reciprocating compressor rod packing vent must be conducted on or before 8,760 hours of operation after startup.
- (b) Subsequent volumetric flow rate measurements from the reciprocating compressor rod packing vent must be conducted on or before 8,760 hours of operation after the previous measurement which demonstrates compliance with the applicable volumetric flow rate of 2 scfm per cylinder (or a combined volumetric flow rate greater than the number of compression cylinders multiplied

by 2 scfm), or on or before 8,760 hours of operation after last rod packing replacement, whichever date is later.

- (c) The rod packing must be repaired or replaced within 90 calendar days after the date of the volumetric emissions measurement that exceeded 2 scfm per cylinder. Follow-up volumetric flow rate measurements must be conducted from compressor vents using the methods specified in Condition 5.6 within 15 days after the repair (or rod packing replacement) to document that the rate has been reduced to less than 2 scfm per cylinder. Delay of repair will be allowed if the conditions in Condition 3.14(c)(1) or (2) are met.
  - (1) If the repair (or rod packing replacement) is technically infeasible, would require a vent blowdown, a compressor station shutdown, or would be unsafe to repair during operation of the unit, the repair (or rod packing replacement) must be completed during the next scheduled compressor station shutdown for maintenance, after a scheduled vent blowdown, or within 2 years of the date of the volumetric emissions measurement that exceeds the applicable required flow rate per cylinder, whichever is earliest. A vent blowdown is the opening of one or more blowdown valves to depressurize major production and processing equipment, other than a storage vessel.
  - (2) If the repair requires replacement of the rod packing or a part, but the replacement cannot be acquired and installed within the repair timelines specified in Condition 5.6 due to the condition specified in Condition 3.14(c)(1), the repair must be completed in accordance with Condition 3.14(c)(2) and documented in accordance with Condition 5.7(h)-(j).
    - (i) Rod packing or part supplies had been sufficiently stocked but are depleted at the time of the required repair.
    - (ii) The required rod packing or part replacement must be ordered no later than 10 calendar days after the reciprocating compressor is added to the delay of repair list due to parts unavailability. The repair must be completed as soon as practicable, but no later than 30 calendar days after receipt of the replacement rod packing or part, unless the repair requires a compressor station shutdown. If the repair requires a compressor station shutdown, the repair must be completed in accordance with the timeframe specified in Condition 3.14(c)(1).

(Ref.: 40 CFR 60.5370b(a)(1)(i), 60.5383b(a) and 60.5415b(g)(1) and (4), Subpart OOOOb)

#### SECTION 4. WORK PRACTICES

Emission Point	Applicable Requirement	Condition Number(s)	Work Practice
Facility-Wide	40 CFR 60.5371b(d), Subpart OOOOb	4.1	Comply with super-emitter event standards
AA-006	40 CFR 60.5370b(b), Subpart OOOOb	4.2	Good air control practices

- 4.1 For the entire facility, the permittee must initiate a super-emitter event investigation according to 40 CFR 60.5371b within five (5) calendar days of receiving notification from EPA of the super-emitter event.

(Ref.: 40 CFR 60.5371b(d), Subpart OOOOb)

- 4.2 For Emission Point AA-006, at all times, including periods of startup, shutdown, and malfunction, the permittee shall maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the MDEQ which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. The provisions for exemption from compliance during periods of startup, shutdown and malfunctions provided for in 40 CFR 60.8(c) do not apply to this subpart.

(Ref.: 40 CFR 60.5370b(b), Subpart OOOOb)

## SECTION 5. MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain records for a minimum of 5 years.
AA-001	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2	Oxidation Catalyst	Inspect oxidation catalyst once every six (6) months
AA-001	40 CFR 60.4243(b)(2)(ii) and 60.4244, Subpart JJJJ; 40 CFR 60.8(a), Subpart A; and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.3	NO <sub>x</sub> , CO, and VOC	Initial and subsequent performance testing and routine maintenance
AA-001	40 CFR 60.4243(g), Subpart JJJJ	5.4	Air-to-Fuel Ratio	Maintain air-to-fuel ratio controllers
AA-001	40 CFR 60.4245(a)(1), (2), and (4), Subpart JJJJ	5.5	Records	Maintain records of notifications, maintenance, and performance testing
AA-006	40 CFR 60.5385b(b) and (c), Subpart OOOOb	5.6	GHG and VOC	Monitoring and recordkeeping requirements
AA-006	40 CFR 60.5420b(c)(5), Subpart OOOOb	5.7	GHG and VOC	Recordkeeping requirements
AA-005	40 CFR 60.5397b(c) and (d), Subpart OOOOb	5.8	GHG and VOC	Monitoring and recordkeeping requirements
AA-005	40 CFR 60.5397b(e), Subpart OOOOb	5.9	GHG and VOC	Monitoring and recordkeeping requirements
AA-005	40 CFR 60.5397b(f), Subpart OOOOb	5.10	GHG and VOC	Monitoring and recordkeeping requirements
AA-005	40 CFR 60.5397b(g)(1)(v), (g)(2), and (g)(3), Subpart OOOOb	5.11	GHG and VOC	Monitoring and recordkeeping requirements
AA-005	40 CFR 60.5397b(h), Subpart OOOOb	5.12	GHG and VOC	Monitoring and recordkeeping requirements
AA-005	40 CFR 60.5410b(k), Subpart OOOOb	5.13	GHG and VOC	Monitoring and recordkeeping requirements
AA-005	40 CFR 60.5415b(l), Subpart OOOOb	5.14	GHG and VOC	Continuous Compliance
AA-005	40 CFR 60.5420b(c)(14), Subpart OOOOb	5.15	GHG and VOC	Recordkeeping requirements

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AA-002	40 CFR 60.4243(b), 60.4244, and 60.4245(a), Subpart JJJJ	5.16	NOx and CO	Monitoring and recordkeeping requirements
AA-002	40 CFR 60.4245(b), Subpart JJJJ	5.17	Hours	Monitoring and recordkeeping requirements

- 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, but is not limited to, 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 DEQ 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-001, the permittee shall inspect the oxidation catalyst once every six (6) months to ensure proper operation and maintenance. If a catalyst malfunction is detected, the compressor engine shall be taken offline until such a time that repairs can be made.

All inspections, and any maintenance activities made on the oxidation catalyst, shall be kept in log form. This log shall include the date the inspection was conducted, any problems detected, any corrective action taken to fix the problem and the name of the person responsible for conducting the inspection.

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

- 5.3 For Emission Point AA-001, the permittee must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, the permittee must conduct an initial performance test and conduct subsequent performance testing every 8,760 hours or three (3) years, whichever comes first, to demonstrate compliance. The initial performance test must be conducted within 60 days after achieving the maximum production rate at which the engine will be operated, but not later than 180 days after initial startup. The test methods and procedures specified in 40 CFR 60.4244 shall be used to conduct the performance tests.

(Ref.: 40 CFR 60.4243(b)(2)(ii) and 60.4244, Subpart JJJJ; 40 CFR 60.8(a), Subpart A; and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 5.4 For Emission Point AA-001, the permittee shall operate an air-to-fuel ratio (AFR) controller with the operation of the three-way catalysts/non-selective catalytic reduction. The AFR controller must be maintained and operated appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times.

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

- 5.5 For Emission Point AA-001, the permittee must keep records of the information in (a) through (c) below.

- (a) All notifications submitted to comply with Subpart JJJJ and all documentation supporting any notification.
- (b) Maintenance conducted on the engine.
- (c) Documentation that the engine meets the emission standards in Condition 3.8.  
(Ref.: 40 CFR 60.4245(a)(1), (2), and (4), Subpart JJJJ)

5.6 For Emission Point AA-006, the volumetric flow rate per cylinder shall be determined according to the following:

- (a) The volumetric flow rate per cylinder must be determined from the reciprocating compressor as specified in Condition 5.6(a)(1) or (2).
  - (1) For reciprocating compressor rod packing equipped with an open-ended vent line on compressors in operating or standby pressurized mode, determine the volumetric flow rate of the rod packing using one of the methods specified in Condition 5.6(a)(1)(i) through (iii).
    - (i) Determine the volumetric flow rate at standard conditions from the open-ended vent line using a high-volume sampler according to methods set forth in Condition 5.6(b).
    - (ii) Determine the volumetric flow rate at standard conditions from the open-ended vent line using a temporary or permanent meter, according to methods set forth in Condition 5.6(a).
    - (iii) Any of the methods set forth in 40 CFR 60.5386b(a) to screen for leaks and emissions. For the purposes of this condition, emissions are detected whenever a leak is detected according to any of the methods in 40 CFR 60.5386b(a). If emissions are detected using the methods set forth in 40 CFR 60.5386b(a), then the permittee must use one of the methods specified in Condition 5.6(a)(1)(i) and (ii) to determine the volumetric flow rate per cylinder. If emissions are not detected using the methods in 40 CFR 60.5386b(a), then the permittee may assume that the volumetric flow rate is zero.
  - (2) For reciprocating compressor rod packing not equipped with an open-ended vent line on compressors in operating or standby pressurized mode, you must determine the volumetric flow rate of the rod packing using the methods specified in Condition 5.6(a)(2)(i) and (ii).
    - (i) The permittee must use the methods described in 40 CFR 60.5386b(a) to conduct leak detection of emissions from the rod packing case into an open distance piece, or, for compressors with a closed distance piece, you must conduct annual leak detection of emissions from the rod packing vent, distance piece vent, compressor crank case breather cap, or other vent emitting gas from the rod packing.

- (ii) The permittee must measure emissions found in Condition 5.6(a)(2)(i) using a meter or high-volume sampler according to methods set forth in 40 CFR 60.5386b(b) or (c).
- (b) For conducting measurements on manifolded groups of reciprocating compressor affected facilities, you must determine the volumetric flow rate from reciprocating compressor rod packing vent as specified in Condition 5.6(b)(1) and (2).
  - (1) Measure at a single point in the manifold downstream of all compressor vent inputs and, if practical, prior to comingling with other non-compressor emission sources.
  - (2) Determine the volumetric flow rate per cylinder at standard conditions from the common stack using one of the methods specified in Condition 5.6(b)(2)(i) through (iv).
    - (i) A temporary or permanent flow meter according to the methods set forth in 40 CFR 60.5386b(b).
    - (ii) A high-volume sampler according to methods set forth 40 CFR 60.5386b(c).
    - (iii) An alternative method, as set forth in 40 CFR 60.5386b(d).
    - (iv) Any of the methods set forth in 40 CFR 60.5386b(a) to screen for emissions. For the purposes of this condition, emissions are detected whenever a leak is detected when using any of the methods in 40 CFR 60.5386b(a). If emissions are detected using the methods set forth in 40 CFR 60.5386b(a), then the permittee must use one of the methods specified in Condition 5.6(b)(2)(i) through (iii) to determine the volumetric flow rate per cylinder. If emissions are not detected using the methods in 40 CFR 60.5386b(a), then the permittee may assume that the volumetric flow rate is zero.

(Ref.: 40 CFR 60.5385b(b) and (c), Subpart OOOOb)

5.7 For Emission Point AA-006, the permittee must maintain the records in Condition 5.8(a)-(j) and 40 CFR 60.5420b(c)(8) through (13), as applicable. If the permittee complies with an alternative GHG and VOC standard under 40 CFR 60.5398b, in lieu of the information specified in 40 CFR 60.5420b(c)(8), the permittee must provide the information specified in 40 CFR 60.5424b for complying with alternative GHG and VOC standards.

- (a) For each reciprocating compressor affected facility, you must maintain records of deviations in cases where the reciprocating compressor was not operated in compliance with the requirements specified in Condition 5.6, including a description of each deviation, the date and time each deviation began and the duration of each deviation in hours.
- (b) Records of the date of installation of a rod packing emissions collection system and closed vent system as specified in 40 CFR 60.5385b(d).

- (c) Records of the cumulative number of hours of operation since initial startup, since May 7, 2024, or since the previous volumetric flow rate measurement, as applicable. Alternatively, a record that emissions from the rod packing are being routed to a process through a closed vent system.
- (d) A description of the method used and the results of the volumetric flow rate measurement or emissions screening, as applicable.
- (e) Records for all flow meters, composition analyzers and pressure gauges used to measure volumetric flow rates as specified in Condition 5.7(e)(1) through (6).
  - (1) Description of standard method published by a consensus-based standards organization or industry standard practice.
  - (2) Records of volumetric flow rate calculations conducted according to Condition 5.6, as applicable.
  - (3) Records of manufacturer operating procedures and measurement methods.
  - (4) Records of manufacturer's recommended procedures or an appropriate industry consensus standard method for calibration and results of calibration, recalibration, and accuracy checks.
  - (5) Records which demonstrate that measurements at the remote location(s) can, when appropriate correction factors are applied, reliably and accurately represent the actual temperature or total pressure at the flow meter under all expected ambient conditions. You must include the date of the demonstration, the data from the demonstration, the mathematical correlation(s) between the remote readings and actual flow meter conditions derived from the data, and any supporting engineering calculations. If adjustments were made to the mathematical relationships, a record and description of such adjustments.
  - (6) Record of each initial calibration or a recalibration which failed to meet the required accuracy specification and the date of the successful recalibration.
- (f) Date when performance-based volumetric flow rate is exceeded.
- (g) The date of successful replacement or repair of reciprocating compressor rod packing, including follow-up performance-based volumetric flow rate measurement to confirm successful repair.
- (h) Identification of each reciprocating compressor placed on delay of repair because of rod packing or part unavailability and explanation for each delay of repair.
- (i) For each reciprocating compressor that is placed on delay of repair because of replacement rod packing or part unavailability, the operator must document: the

date the rod packing or part was added to the delay of repair list, the date the replacement rod packing or part was ordered, the anticipated rod packing or part delivery date (including any estimated shipment or delivery date provided by the vendor), and the actual arrival date of the rod packing or part.

- (j) Date of planned shutdowns that occur while there are any reciprocating compressors that have been placed on delay of repair due to the unavailability of rod packing or parts to conduct repairs.

(Ref.: 40 CFR 60.5420b(c)(5), Subpart OOOOb)

5.8 For Emission Point AA-005, the permittee must develop a fugitive emissions monitoring plan. A fugitive emissions monitoring plan must be developed that covers all fugitive emissions components affected facilities within each company-defined area in accordance with (a) and (b) below.

- (a) Elements of fugitive emissions monitoring plan. Your fugitive emissions monitoring plan must include the elements specified in Condition 5.8(a)(1) through (8), at a minimum.
  - (1) Frequency for conducting surveys. Surveys must be conducted at least as frequently as required by Conditions 5.10 and 5.11.
  - (2) Technique for determining fugitive emissions (i.e., AVO or other detection methods, Method 21 of appendix A-7 to Subpart OOOOb, and/or OGI and meeting the requirements of Condition 5.8(a)(7)(i) through (vii).
  - (3) Manufacturer and model number of fugitive emissions detection equipment to be used, if applicable.
  - (4) Procedures and timeframes for identifying and repairing fugitive emissions components from which fugitive emissions are detected, including timeframes for fugitive emission components that are unsafe to repair. Your repair schedule must meet the requirements of Condition 5.12 at a minimum.
  - (5) Procedures and timeframes for verifying fugitive emission component repairs.
  - (6) Records that will be kept and the length of time records will be kept.
  - (7) If you are using OGI, your plan must also include the elements specified in Condition 5.8(a)(7)(i) through (vii).
    - (i) Verification that your OGI equipment meets the specifications of paragraphs Condition 5.8(a)(7)(i)(A) and (B). This verification is an initial verification, and may either be performed by the facility,

by the manufacturer, or by a third party. For the purposes of complying with the fugitive emissions monitoring program with OGI, fugitive emissions are defined as any visible emissions observed using OGI.

- (A) Your OGI equipment must be capable of imaging gases in the spectral range for the compound of highest concentration in the potential fugitive emissions.
  - (B) Your OGI equipment must be capable of imaging a gas that is half methane, half propane at a concentration of 10,000 ppm at a flow rate of  $\leq 60$  g/hr from a quarter inch diameter orifice.
- (ii) Procedure for a daily verification check.
  - (iii) Procedure for determining the operator's maximum viewing distance from the equipment and how the operator will ensure that this distance is maintained.
  - (iv) Procedure for determining maximum wind speed during which monitoring can be performed and how the operator will ensure monitoring occurs only at wind speeds below this threshold.
  - (v) Procedures for conducting surveys, including the items specified in paragraphs Condition 5.8(a)(7)(v)(A) through (C).
    - (A) How the operator will ensure an adequate thermal background is present in order to view potential fugitive emissions.
    - (B) How the operator will deal with adverse monitoring conditions, such as wind.
    - (C) How the operator will deal with interferences (e.g., steam).
  - (vi) Training and experience needed prior to performing surveys.
  - (vii) Procedures for calibration and maintenance. At a minimum, procedures must comply with those recommended by the manufacturer.
- (8) If you are using Method 21 of appendix A-7 to Subpart OOOOb, your plan must also include the elements specified in Condition 5.8(a)(8)(i) through (iv). For the purposes of complying with the fugitive emissions monitoring program using Method 21 of appendix A-7 to Subpart OOOOb a fugitive emission is defined as an instrument reading of 500 ppmv or greater.

- (i) Verification that your monitoring equipment meets the requirements specified in Section 6.0 of Method 21 of appendix A-7 to Subpart OOOOb. For purposes of instrument capability, the fugitive emissions definition shall be 500 ppmv or greater methane using a FID-based instrument. If you wish to use an analyzer other than an FID-based instrument, you must develop a site-specific fugitive emission definition that would be equivalent to 500 ppmv 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).
- (ii) Procedures for conducting surveys. At a minimum, the procedures shall ensure that the surveys comply with the relevant sections of Method 21 of appendix A-7 to Subpart OOOOb, including Section 8.3.1.
- (iii) Procedures for calibration. The instrument must be calibrated before use each day of its use by the procedures specified in Method 21 of appendix A-7 to Subpart OOOOb. At a minimum, you must also conduct precision tests at the interval specified in Method 21 of appendix A-7 to Subpart OOOOb, Section 8.1.2, and a calibration drift assessment at the end of each monitoring day. The calibration drift assessment must be conducted as specified in Condition 5.8(a)(8)(iii)(A). Corrective action for drift assessments is specified in 5.8(a)(8)(iii)(B) and (C).
  - (A) Check the instrument using the same calibration gas that was used to calibrate the instrument before use. Follow the procedures specified in Method 21 of appendix A-7 to Subpart OOOOb, Section 10.1, except do not adjust the meter readout to correspond to the calibration gas value. If multiple scales are used, record the instrument reading for each scale used. Divide the arithmetic difference of the initial and post-test calibration response by the corresponding calibration gas value for each scale and multiply by 100 to express the calibration drift as a percentage.
  - (B) If a calibration drift assessment shows a negative drift of more than 10 percent, then all equipment with instrument readings between the fugitive emission definition multiplied by (100 minus the percent of negative drift) divided by 100 and the fugitive emission definition that was monitored since the last calibration must be re-monitored.

- (C) If any calibration drift assessment shows a positive drift of more than 10 percent from the initial calibration value, then, at the owner/operator's discretion, all equipment with instrument readings above the fugitive emission definition and below the fugitive emission definition multiplied by (100 plus the percent of positive drift) divided by 100 monitored since the last calibration may be re-monitored.
  - (iv) Procedures for monitoring yard piping (other than buried yard piping). At a minimum, place the probe inlet at the surface of the yard piping and run the probe down the length of the piping. Connection points on the piping must be monitored following the procedures specified in Method 21 of appendix A-7 to Subpart OOOOb.
- (b) Additional elements of fugitive emissions monitoring plan. Each fugitive emissions monitoring plan must include the elements specified in 5.8(b)(1) and (2), at a minimum, as applicable.
  - (1) If you are using OGI, your plan must include procedures to ensure that all fugitive emissions components, except buried yard piping and associated components (e.g., connectors), are monitored during each survey. Example procedures include, but are not limited to, a sitemap with an observation path, a written narrative of where the fugitive emissions components are located and how they will be monitored, or an inventory of fugitive emissions components.
  - (2) If you are using Method 21 of appendix A-7 to Subpart OOOOb, your plan must include a list of fugitive emissions components to be monitored and method for determining the location of fugitive emissions components to be monitored in the field (e.g., tagging, identification on a process and instrumentation diagram, etc.). Your fugitive emissions monitoring plan must include the written plan developed for all of the fugitive emissions components designated as difficult-to-monitor in accordance with Condition 5.11(c), and the written plan for fugitive emissions components designated as unsafe-to-monitor in accordance with Condition 5.11(d).

(Ref.: 40 CFR 60.5397b(c) and (d), Subpart OOOOb)

- 5.9 For Emission Point AA-005, each fugitive emissions component, except buried yard piping and associated components (e.g., connectors), shall be observed or monitored for fugitive emissions during each monitoring survey.

(Ref.: 40 CFR 60.5397b(e), Subpart OOOOb)

- 5.10 For Emission Point AA-005, the permittee must conduct initial monitoring surveys according to the following requirements.

- (a) For compressor station sites, you must conduct an initial monitoring survey using OGI or Method 21 of appendix A-7 to Subpart OOOOb within 90 days of the startup of production, for each fugitive emissions components affected facility.
- (b) For a modified or reconstructed fugitive emissions components affected facility, the initial monitoring survey must be conducted within 90 days of the startup of production for each fugitive emissions components affected facility after the modification or reconstruction.

(Ref.: 40 CFR 60.5397b(f), Subpart OOOOb)

5.11 For Emission Point AA-005, a monitoring survey of the fugitive emissions components affected facility located at the compressor station must be conducted according to the following requirements.

- (a) A monitoring survey must be conducted at least monthly using AVO, or any other detection method, after the initial survey. Any indications of fugitive emissions using these methods are considered fugitive emissions that must be repaired in accordance with Condition 5.12.
- (b) A monitoring survey must be conducted at least quarterly using OGI or Method 21 of appendix A-7 to Subpart OOOOb after the initial survey. Consecutive quarterly monitoring surveys must be conducted at least 60 calendar days apart.
- (c) If you are using Method 21 of appendix A-7 to Subpart OOOOb, fugitive emissions components that cannot be monitored without elevating the monitoring personnel more than 2 meters above the surface may be designated as difficult-to-monitor. Fugitive emissions components that are designated difficult-to-monitor must meet the specifications of Condition 5.11(c)(1) through (4).
  - (1) A written plan must be developed for all the fugitive emissions components designated difficult-to-monitor. This written plan must be incorporated into the fugitive emissions monitoring plan required by Condition 5.8.
  - (2) The plan must include the identification and location of each fugitive emissions component designated as difficult-to-monitor.
  - (3) The plan must include an explanation of why each fugitive emissions component designated as difficult-to-monitor is difficult-to-monitor.
  - (4) The plan must include a schedule for monitoring the difficult-to-monitor fugitive emissions components at least once per calendar year.
- (d) If you are using Method 21 of appendix A-7 to Subpart OOOOb, fugitive emissions components that cannot be monitored because monitoring personnel would be exposed to immediate danger while conducting a monitoring survey may be designated as unsafe-to-monitor. Fugitive emissions components that are

designated unsafe-to-monitor must meet the specifications of Condition 5.11(d)(1) through (4).

- (1) A written plan must be developed for all the fugitive emissions components designated unsafe-to-monitor. This written plan must be incorporated into the fugitive emissions monitoring plan required by Condition 5.8.
- (2) The plan must include the identification and location of each fugitive emissions component designated as unsafe-to-monitor.
- (3) The plan must include an explanation of why each fugitive emissions component designated as unsafe-to-monitor is unsafe-to-monitor.
- (4) The plan must include a schedule for monitoring the fugitive emissions components designated as unsafe-to-monitor.

(Ref.: 40 CFR 60.5397b(g)(1)(v), (g)(2), and (g)(3), Subpart OOOOb)

5.12 For Emission Point AA-005, each identified source of fugitive emissions shall be repaired in accordance with the requirements below.

- (a) A first attempt at repair shall be made in accordance with (1) and (2) below.
  - (1) A first attempt at repair shall be made no later than 15 calendar days after detection of fugitive emissions that were identified using AVO.
  - (2) For purposes of complying with Condition 5.11(a) and (b) using OGI or Method 21 of appendix A-7 to Subpart OOOOb, a first attempt at repair shall be made no later than 30 calendar days after detection of the fugitive emissions.
- (b) Repair shall be completed as soon as practicable, but no later than 15 calendar days after the first attempt at repair as required in (a)(1) above, and 30 calendar days after the first attempt at repair as required in (a)(2) above.
- (c) Delay of repair will be allowed if the conditions in (1) or (2) below are met.
  - (1) If the repair is technically infeasible, would require a vent blowdown, a compressor station shutdown, a well shutdown or well shut-in, or would be unsafe to repair during operation of the unit, the repair must be completed during the next scheduled compressor station shutdown for maintenance, scheduled well shutdown, scheduled well shut-in, after a scheduled vent blowdown, or within 2 years of detecting the fugitive emissions, whichever is earliest. A vent blowdown is the opening of one or more blowdown valves to depressurize major production and processing equipment, other than a storage vessel.

- (2) If the repair requires replacement of a fugitive emissions component or a part thereof, but the replacement cannot be acquired and installed within the repair timelines specified in Condition 5.12 (a) and (b) due to either of the conditions specified in (i) or (ii) below, the repair must be completed in accordance with (iii) below and documented in accordance Condition 5.15(e)(9).
  - (i) Valve assembly supplies had been sufficiently stocked but are depleted at the time of the required repair.
  - (ii) A replacement fugitive emissions component or a part thereof requires custom fabrication.
  - (iii) The required replacement must be ordered no later than 10 calendar days after the first attempt at repair. The repair must be completed as soon as practicable, but no later than 30 calendar days after receipt of the replacement component, unless the repair requires a compressor station or well shutdown. If the repair requires a compressor station or well shutdown, the repair must be completed in accordance with the timeframe specified in Condition 5.12(c)(1).
- (d) Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements of Condition 5.12(d)(1) through (5), to ensure that there are no fugitive emissions.
  - (1) The operator may resurvey the fugitive emissions components to verify repair using either Method 21 of appendix A-7 to Subpart OOOOb or OGI, except as specified in Condition 5.12(d)(5).
  - (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 during the monitoring survey when the fugitive emissions were initially found for identification purposes and subsequent repair. The digital photograph must include the date that the photograph was taken and 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) Operators that use Method 21 of appendix A-7 to Subpart OOOOb to resurvey the repaired fugitive emissions components are subject to the resurvey provisions specified in (i) and (ii) below.
    - (i) A fugitive emissions component is repaired when the Method 21 instrument indicates a concentration of less than 500 ppmv above background or when no soap bubbles are observed when the alternative screening procedures specified in section 8.3.3 of Method 21 of appendix A-7 to Subpart OOOOb are used.

- (ii) Operators must use the Method 21 monitoring requirements specified in the procedures for conducting surveys specified in 40 CFR 60.5397b(c)(8)(ii) or the alternative screening procedures specified in section 8.3.3 of Method 21 of appendix A-7 to Subpart OOOOb.
- (4) Operators that use OGI to resurvey the repaired fugitive emissions components are subject to the resurvey provisions specified in (i) and (ii) below.
  - (i) A fugitive emissions component is repaired when the OGI instrument shows no indication of visible emissions.
  - (ii) Operators must use the OGI monitoring requirements specified in 40 CFR 60.5397b(c)(7).
- (e) For fugitive emissions identified using AVO detection methods, the operator may resurvey using those same methods, Method 21 of appendix A-7 to Subpart OOOOb, or OGI. For operators that use AVO detection methods, a fugitive emissions component is repaired when there are no indications of fugitive emissions using these methods.

(Ref.: 40 CFR 60.5397b(h), Subpart OOOOb)

5.13 For Emission Point AA-005, to achieve initial compliance with the GHG and VOC standards for fugitive emissions components affected facilities, the permittee must comply with (a) through (e) below.

- (a) The permittee must develop a fugitive emissions monitoring plan as required in Condition 5.8.
- (b) The permittee must conduct an initial monitoring survey as required in Conditions 5.9 and 5.10.
- (c) The permittee must repair each identified source of fugitive emissions for each affected facility as required in Condition 5.12.
- (d) The permittee must submit the initial annual report for each fugitive emissions components affected facility as required in Condition 6.4.
- (e) The permittee must maintain the records specified in Condition 5.15.

(Ref.: 40 CFR 60.5410b(k), Subpart OOOOb)

5.14 For Emission Point AA-005, for each fugitive emissions components affected facility, the permittee must demonstrate continuous compliance with the requirements of Conditions 5.8 through 5.14 according to (a) through (d) below.

- (a) Periodic monitoring surveys must be conducted as required in Conditions 5.9 and 5.11.
- (b) Each identified source of fugitive emissions must be repaired as required in Condition 5.12.
- (c) Annual reports must be submitted for fugitive emissions components affected facilities as required in Condition 6.4.
- (d) Records must be maintained as specified in Condition 5.15.

(Ref.: 40 CFR 60.5415b(l), Subpart OOOOb)

5.15 For Emission Point AA-005, for each fugitive emissions components affected facility, the permittee must maintain the records below.

- (a) The date of the startup of production or the date of the first day of production after modification for the fugitive emissions components affected facility at a well site and the date of startup or the date of modification for the fugitive emissions components affected facility at a compressor station.
- (b) For the fugitive emissions components affected facility at a well site, you must maintain records specifying what type of well site it is (i.e., single wellhead only well site, small wellsite, multi-wellhead only well site, or a well site with major production and processing equipment.)
- (c) For the fugitive emissions components affected facility at a well site where you complete the removal of all major production and processing equipment such that the well site contains only one or more wellheads, record the date the well site completes the removal of all major production and processing equipment from the well site, and, if the well site is still producing, record the well ID or separate tank battery ID receiving the production from the well site. If major production and processing equipment is subsequently added back to the well site, record the date that the first piece of major production and processing equipment is added back to the well site.
- (d) The fugitive emissions monitoring plan as required in Condition 5.8.
- (e) The records of each monitoring survey as specified below.
  - (1) Date of the survey.
  - (2) Beginning and end time of the survey.
  - (3) Name of operator(s), training, and experience of the operator(s) performing the survey.
  - (4) Monitoring instrument or method used.

- (5) Fugitive emissions component identification when Method 21 of appendix A-7 to Subpart OOOOb is used to perform the monitoring survey.
- (6) Ambient temperature, sky conditions, and maximum wind speed at the time of the survey. For compressor stations, operating mode of each compressor (i.e., operating, standby pressurized, and not operating-depressurized modes) at the station at the time of the survey.
- (7) Any deviations from the monitoring plan or a statement that there were no deviations from the monitoring plan.
- (8) Records of calibrations for the instrument used during the monitoring survey.
- (9) Documentation of each fugitive emission detected during the monitoring survey, including the information specified below.
  - (i) Location of each fugitive emission identified.
  - (ii) Type of fugitive emissions component, including designation as difficult-to-monitor or unsafe-to-monitor, if applicable.
  - (iii) If Method 21 of appendix A-7 to Subpart OOOOb is used for detection, record the component ID and instrument reading.
  - (iv) For each repair that cannot be made during the monitoring survey when the fugitive emissions are initially found, a digital photograph or video 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 and 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). The digital photograph or identification (e.g., tag) may be removed after the repair is completed, including verification of repair with the resurvey.
  - (v) The date of first attempt at repair of the fugitive emissions component(s).
  - (vi) The date of successful repair of the fugitive emissions component, including the resurvey to verify repair and instrument used for the resurvey.
  - (vii) Identification of each fugitive emission component placed on delay of repair and explanation for each delay of repair.

- (viii) For each fugitive emission component placed on delay of repair for reason of replacement component unavailability, the operator must document: the date the component was added to the delay of repair list, the date the replacement fugitive component or part thereof was ordered, the anticipated component delivery date (including any estimated shipment or delivery date provided by the vendor), and the actual arrival date of the component.
- (ix) Date of planned shutdowns that occur while there are any components that have been placed on delay of repair.

(Ref.: 40 CFR 60.5420b(c)(14), Subpart OOOOb)

5.16 For Emission Point AA-002, the permittee shall maintain documentation that details the following information:

- (a) All notifications submitted to comply with 40 CFR 60, Subpart JJJJ, and all documentation supporting any notification.
- (b) Maintenance conducted on the engine.
- (c) Documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in Condition 3.10 and in 40 CFR parts 1048, 1054, and 1060, as applicable.
- (d) If the permittee operates and maintains an engine according to the manufacturer's emission-related written instructions, the permittee shall maintain records of conducted maintenance to demonstrate compliance, but no performance testing is required. The permittee shall also meet the requirements as specified in 40 CFR Part 1068, Subparts A through D (as they apply). If the permittee adjusts engine settings according to and consistent with the manufacturer's instructions, the engine will not be considered out of compliance.
- (e) If the permittee does not operate and maintain an engine according to the manufacturer's emission-related written instructions, the engine will be considered a non-certified engine. As such, the permittee shall keep a maintenance plan and records of conducted maintenance and must (to the extent practicable) maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. Additionally, the permittee must demonstrate compliance through performance testing (contingent on the rated horsepower) by conducting an initial performance test within one (1) year of engine start-up:

(Ref.: 40 CFR 60.4243(b), 60.4244, and 60.4245(a), Subpart JJJJ)

5.17 For Emission Point AA-002, the permittee shall keep records of the hours of operation of the engine that are recorded through the non-resettable hour meter. 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(a)	Report deviations within five (5) working days
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1(b)	Annual reporting
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1(c)	Certification by responsible official
	11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).	6.1(d)	Notification of beginning actual construction within 15 days
	11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).	6.1(e)	Notification when construction does not begin or is suspended
	11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).	6.1(f)	Certification of completion of construction prior to operation
	11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).	6.1(g)	Notification of changes in construction
AA-001	11 Miss. Admin. Code Pt. 2, R. 2.B(11).	6.2	Submit performance stack test notifications and protocols
AA-001	40 CFR 60.4245(d) and (g) through (j), Subpart JJJJ and 11 Miss. Admin. Code Pt. 2, R. 2.B(11).	6.3	Submit performance stack test results
AA-005	40 CFR 60.5420b(b)(1) and (9), Subpart OOOOb	6.4	Submit annual reports
AA-006	40 CFR 60.5415b(g)(5) and 60.5420b(b)(1), Subpart OOOOb	6.5	Submit annual reports
AA-006	40 CFR 60.5415b(g)(5) and 60.5420b(b)(6), Subpart OOOOb	6.6	Submit annual reports

### 6.1 General Reporting Requirements:

- (a) 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).)

- (b) Beginning upon issuance of this permit and lasting until issuance or modification of the applicable operating permit, the permittee shall submit reports of any required monitoring by January 31<sup>st</sup> for the preceding calendar year. 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. 2.1.C. 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. For any air emissions equipment not yet constructed and/or operating the report shall so note and include an estimated date of commencement of construction and/or startup, whichever is applicable.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- (c) Any document required by this permit to be submitted to the DEQ 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).)
- (d) 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).)
- (e) 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).)
- (f) 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).)
- (g) 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).)

6.2 For Emission Point AA-001, the permittee shall submit a test protocol at least thirty (30) days prior to the scheduled test date to ensure that all test methods and procedures are

acceptable to the MDEQ. After the initial submittal of a written test protocol in conjunction with the initial compliance test(s), the permittee may request that the resubmittal of testing protocol be waived for subsequent testing by certifying in writing at least 30 days prior to subsequent testing that all conditions for testing remain unchanged such that the original protocol can and will be followed.

The MDEQ must be notified at least ten (10) days prior to the scheduled test date so that an observer may be scheduled to witness the test(s).

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

- 6.3 For Emission Point AA-001, the permittee must submit a copy of each performance test as required by Condition 5.5 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 Part 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 report results of all QA/QC procedures in Annexes 1-7.

The permittee must submit reports required by Condition 5.3 and 40 CFR 60.4244 to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>). The permittee shall refer to 40 CFR 60.4245(g) through (j) for further information related to electronic submittal via CEDRI. In addition to submittal via CEDRI, the permittee shall continue to submit all required reports directly to MDEQ.

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

- 6.4 For Emission Point AA-005, the permittee must submit annual reports for each fugitive emissions components affected facility as required below.

(a) The general information specified in (1) through (4) below is required for all reports.

- (1) The company name, facility site name associated with the affected facility, and address of the affected facility. If an address is not available for the site, include a description of the site location and provide the latitude and longitude coordinates of the site in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983.
- (2) An identification of each affected facility being included in the annual report.
- (3) Beginning and ending dates of the reporting period.

- (4) A certification by a certifying official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. If your report is submitted via CEDRI, the certifier's electronic signature during the submission process replaces the requirement in this condition.
- (b) Designation of the type of site (i.e., compressor station) at which the fugitive emissions components affected facility is located.
- (c) For each fugitive emissions monitoring survey performed during the annual reporting period, the information specified in (1) through (7) below.
  - (1) Date of the survey.
  - (2) Monitoring instrument or, if the survey was conducted by AVO methods, notation that AVO was used.
  - (3) Any deviations from the monitoring plan elements under 40 CFR 60.5397b(c)(1), (2), and (7), (c)(8)(i), or (d) or a statement that there were no deviations from these elements of the monitoring plan.
  - (4) Number and type of components for which fugitive emissions were detected.
  - (5) Number and type of fugitive emissions components that were not repaired as required in Condition 5.12.
  - (6) Number and type of fugitive emission components (including designation as difficult-to-monitor or unsafe-to-monitor, if applicable) on delay of repair and explanation for each delay of repair.
  - (7) Date of planned shutdown(s) that occurred during the reporting period if there are any components that have been placed on delay of repair.
- (d) For the fugitive emissions components affected facility complying with an alternative fugitive emissions standard under 40 CFR 60.5399b, in lieu of the information specified in Conditions 6.2(b) and (c), the permittee must provide the information specified in (1) through (3) below.
  - (1) The alternative standard with which you are complying.
  - (2) The site-specific reports specified by the specific alternative fugitive emissions standard, submitted in the format in which they were submitted to the state, local, or Tribal authority. If the report is in hard copy, the permittee must scan the document and submit it as an electronic attachment to the annual report required in 40 CFR 60.5420b(b).

- (3) If the report specified by the specific alternative fugitive emissions standard is not site-specific, the permittee must submit the information specified in Conditions 6.2(b) and (c) for each individual site complying with the alternative standard.
- (e) If you comply with an alternative GHG and VOC standard under 40 CFR 60.5398b, in lieu of the information specified in Conditions 6.2(b) and (c), the permittee must provide the information specified in 40 CFR 60.5424b.

(Ref.: 40 CFR 60.5420b(b)(1) and (9), Subpart OOOOb)

6.5 For Emission Point AA-006, the permittee shall submit annual reports containing the information specified below. The initial annual report is due no later than 90 days after the end of the initial compliance period as determined according to Condition 5.13. Subsequent annual reports are due no later than the same date each year as the initial annual report. If you own or operate more than one affected facility, you may submit one report for multiple affected facilities provided the report contains all of the information required as specified below.

- (a) The general information specified in (1) through (4) below is required for all reports.
  - (1) The company name, facility site name associated with the affected facility, and address of the affected facility. If an address is not available for the site, include a description of the site location and provide the latitude and longitude coordinates of the site in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983.
  - (2) An identification of each affected facility being included in the annual report.
  - (3) Beginning and ending dates of the reporting period.
  - (4) A certification by a certifying official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. If your report is submitted via CEDRI, the certifier's electronic signature during the submission process replaces the requirement in this condition.

(Ref.: 40 CFR 60.5415b(g)(5) and 60.5420b(b)(1), Subpart OOOOb)

6.6 For each reciprocating compressor affected facility, the information specified in (a) through (g) below, as applicable.

- (a) The cumulative number of hours of operation since initial startup, since the previous volumetric flow rate measurement, or since the previous reciprocating

compressor rod packing replacement, as applicable, which have elapsed prior to conducting your volumetric flow rate measurement or emissions screening. Alternatively, a statement that emissions from the rod packing are being routed to a process or control device through a closed vent system.

- (b) If applicable, for each deviation that occurred during the reporting period and recorded as specified in Condition 5.7(a), the date and time the deviation began, duration of the deviation in hours and a description of the deviation. If no deviations occurred during the reporting period, you must include a statement that no deviations occurred during the reporting period.
- (c) A description of the method used and the results of the volumetric flow rate measurement or emissions screening, as applicable.
- (d) If complying with the alternative GHG and VOC compliance standards of 40 CFR 60.5385b(d)(1) or (2), the information below:
  - (1) Dates of each inspection required under 40 CFR 60.5416b(a) and (b).
  - (2) Each defect or emissions identified during each inspection and the date of repair or the date of anticipated repair if the repair is delayed.
  - (3) Date and time of each bypass alarm or each instance the key is checked out if you are subject to the bypass requirements of 40 CFR 60.5416b(a)(4).
  - (4) The permittee must submit the certification signed by the qualified professional engineer or in-house engineer according to 40 CFR 60.5411b(c) for each closed vent system routing to a control device or process in the reporting year in which the certification is signed.
  - (5) If complying by routing emissions to a control device, as required in § 40 CFR 60.5385b(d)(2), the information in 40 CFR 60.5420b(b)(11)(v).
- (e) Number and type of rod packing replacements/repairs on delay of repair and explanation for each delay of repair.
- (f) Date of planned shutdown(s) that occurred during the reporting period if there are any rod packing replacements/repairs that have been placed on delay of repair.
- (g) If you comply with an alternative GHG and VOC standard under 40 CFR 60.5398b, in lieu of the information specified in Conditions 6.2(b) and (c), the permittee must provide the information specified in § 60.5424b.

(Ref.: 40 CFR 60.5415b(g)(5) and 60.5420b(b)(6), Subpart OOOOb)