STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
TITLE V PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Monroe Gas Storage Company LLC, Monroe Gas Storage Facility
60103 Phillips School House Road
Amory, Mississippi
Monroe County

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

Permit Issued: _____

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

_____

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires:[Date not to exceed 5 years from issuance] **Permit No.:** 1840-00083

TABLE OF CONTENTS

SECTION 1. GENERAL CONDITIONS

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

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

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

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

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

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

1.4 Prior to its expiration, this permit may be reopened in accordance with the following provisions:.

(a) This permit shall be reopened and revised under any of the following circumstances:

(1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of three (3) or more years. Such a reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.

(2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

(3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

(4) The Administrator or the Permit Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(b) Proceedings to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.

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

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

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

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

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

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

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

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

1.8 The permittee shall pay to the DEQ an annual fee based on a fee schedule established by the Mississippi Commission on Environmental Quality (i.e., the "Commission"). The fee schedule shall be set each year by order of the Commission in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.

(a) A portion of the fee shall be based on the permittee's annual quantity of emissions. The permittee shall elect for "actual emissions" or "allowable emissions" to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions.

(i) "Actual emissions" shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process

equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission.

(ii) "Allowable emissions" are those emissions limited by this permit as well as those emissions not expressly limited by this permit but otherwise allowed by this permit, as represented in the Title V application.

(iii) Not withstanding paragraphs (i) and (ii), a minimum annual fee shall be assessed in accordance with the fee schedule established by the Commission when calculating this portion of the fee.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.B(1).)

(b) A portion of the fee shall be based on the complexity of this permit, as determined by the number of air regulations applicable to the permittee on the date of the fee calculation in accordance with the fee schedule established by the Commission. Only air regulations required to be addressed by this permit may be included in the annual fee schedule.

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

(c) By July 1 of each year, the permittee shall submit a completed annual fee reporting form to the DEQ accompanied by all necessary calculations and supporting information to verify actual emissions. If the annual fee reporting form is not filled out completely and accurately or certified in accordance with Regulation 11 Miss. Admin. Code Pt. 2, R. 6.2.E., "allowable emissions" or other information necessary to determine the appropriate annual fee shall be used in the fee calculation.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.B(3)(c).)

(d) If the Commission determines that there is not sufficient information available to the permittee to accurately complete and submit the annual fee reporting form by July 1, but such information becomes available and is submitted to the DEQ after July 1, the fee calculation and assessment may be altered according to the annual fee schedule. No fee actually paid to the DEQ shall be refunded due to a change in the fee calculation.

If a fee is recalculated such that the amount assessed for an annual period is reduced and the permittee has already paid all or a portion of the fee, the revised fee

assessment may not be reduced to an amount less than what the permittee has already paid regardless of the results of the recalculation.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.B(3)(d).)

(e) The fee shall be due September 1 of each year. However, the permittee may elect a quarterly payment method of four (4) equal payments with the payments due September 1, December 1, March 1 and June 1. The permittee shall notify the DEQ that the quarterly payment method will be used by September 1.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.E(1).)

(f) If at any time within the year the Commission determines that the information submitted by the permittee is insufficient or incorrect, the DEQ will notify the permittee of the deficiencies and the adjusted fee schedule. Past due fees as a result of the adjusted fee assessment will be due at the time of the next scheduled quarterly payment.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.E(1)(b).)

(g) If an annual fee is not paid within thirty (30) days after the due date, a penalty of ten (10) percent of the amount due shall at once accrue and be added thereto. If the fee is not paid in full (including any interest and penalty within sixty (60) days of the due date), the Permit Board may revoke the permit upon proper notice and hearing as required by law.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.E(1)(a).)

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

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

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

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

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

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

1.11 The permittee shall allow the DEQ (or an authorized representative), upon the presentation of credentials and other documents as may be required by law, to perform the following:

(a) Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy (at reasonable times) any records that must be kept under the conditions of this permit;

(c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

(d) As authorized by the Federal Act, sample or monitor (at reasonable times) substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

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

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

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

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

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

1.14 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance upon satisfying one of the following conditions:

(a) Such applicable requirements are included and are specifically identified in the permit; or

(b) The Permit Board, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the permittee and the permit includes such determination (or a concise summary thereof).

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

1.15 Nothing in this permit shall alter or affect the following:

(a) The provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;

(b) The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

(c) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.

(d) The ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act.

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

1.16 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required to register such a plan pursuant to Section 112(r) of the Federal Act.

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

1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one that is submitted at least six (6) months prior to the date of permit expiration.

If the permittee submits a timely and complete application for permit issuance (including for renewal), the failure to have a Title V permit is not a violation of the applicable regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application.

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

1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (Ref.: Section 502(b)(10) of the Federal Act) if the following criteria are met:

(a) The changes are not modifications under any provision of Title I of the Federal Act;

(b) The changes do not exceed the emissions allowable under this permit;

(c) The permittee provides the Administrator and the Department with written notification in advance of the proposed changes [i.e., at least seven (7) days or such

other time frame as provided in other regulations for emergencies] and the notification includes the following information:

(1) A brief description of the change(s),

(2) The date on which the change will occur,

(3) Any change in emissions, and

(4) Any permit term or condition that is no longer applicable as a result of the change;

(d) The permit shield shall not apply to any Section 502(b)(10) change.

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

1.19 Should the Executive Director of the Mississippi Department of Environmental Quality declare an "Air Pollution Emergency Episode", the permittee will be required to operate in accordance with either the permittee's prepared "Emission Control Action Program(s)" or, in the absence of a prepared Emission Control Action Program, the appropriate requirements and "Emission Reduction Objectives" specified in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 3. – "Regulations for the Prevention of Air Pollution Emergency Episodes" – for the level of emergency declared and the permittee's source of air contamination.

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

1.20 Except as otherwise provided herein, a modification of the permittee's facility may require a Permit to Construct in accordance with the provisions specified in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 2. – "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment" – and may require modification of this permit in accordance with Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6. – "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act."

"Modification" is defined as any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

(a) Routine maintenance, repair, and replacement;

(b) Use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the "Federal Energy Supply and Environmental Coordination Act of 1974" (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the "Federal Power Act";

(c) Use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;

(d) Use of an alternative fuel or raw material by a stationary source which:

(1) The source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to Regulation 11 Miss. Admin. Code Pt. 2, Ch. 2. and/or Ch. 5.; or

(2) The source is approved to use under any permit issued under Regulation 11 Miss. Admin. Code Pt. 2, Ch. 2. and/or Ch. 5.;;

(e) An increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to Regulation 11 Miss. Admin. Code Pt. 2, Ch. 2. or Ch. 5.; or

(f) Any change in ownership of the stationary source.

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

1.21 An administrative permit amendment may be made by the Permit Board authorizing changes in ownership or operational control consistent with the following procedure:

(a) The Permit Board shall take action within sixty (60) days after receipt of a completed request for a permit transfer, unless a public hearing is scheduled. The Permit Board may incorporate such changes without providing notice to the public or affected State(s) provided that it designates any such permit revision as having been made pursuant to this paragraph.

(b) A permit transfer shall be approved upon satisfaction of the following:

(1) The applicant for transfer approval can demonstrate to the Permit Board it has the financial resources, operational expertise, and environmental compliance history over the last five (5) years to insure compliance with the terms and conditions of the permit to be transferred, except where this conflicts with State Law, and

(2) The Permit Board determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the DEQ.

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

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

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

1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance.

Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or an Emergency Air Pollution Episode Alert imposed by the Executive Director of DEQ; and must meet the following buffer zones:

(a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.

(b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within fifty (50) yards of an occupied dwelling.

(c) Burning must not occur within 500 yards of commercial airport property, private airfields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator.

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

1.24 Except as otherwise specified herein, the permittee shall be subject to the following 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 non-compliance, and the corrective actions taken and;

(v) That as soon as practicable but no later than twenty-four (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) Start-ups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)

(1) Start-ups and shutdowns are part of normal source operation. Emission limitations apply during start-ups and shutdowns unless source specific emission limitations or work practice standards for start-ups 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 Regulation 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for start-ups and shutdowns. Source specific emission limitations or work practice standards established for start-ups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).

(3) Where an upset as defined in Rule 1.2 occurs during start-up or shutdown, see the "Upset" requirements above.

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

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

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

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point[1]	Facility ID	Description
AA-001	COMP01	4,735 HP natural gas-fired internal combustion compressor engine with emissions controlled by an oxidation catalyst (Four-stroke, lean burn [4SLB] engine manufactured July 30, 2007)
AA-002	COMP02	4,735 HP natural gas-fired internal combustion compressor engine with emissions controlled by an oxidation catalyst (4SLB manufactured December 4, 2007)
AA-003	COMP03	4,735 HP natural gas-fired internal combustion compressor engine with emissions controlled by an oxidation catalyst (4SLB manufactured November 20, 2007)
AA-004	EG01	1,818 HP natural gas-fired emergency generator (4SLB manufactured April 7, 2007)
AA-006	TEG1 and TEG2	450 MMSCFD triethylene glycol dehydrator flash tank and still vent controlled by a thermal oxidizer (AA-007)
AA-007	TOx	Thermal Oxidizer controlling exhaust from the dehydration unit (AA-006)
AA-008	--	Maintenance emissions from compressor blowdowns
AA-009	COMP04	1,148 HP natural gas-fired internal combustion compressor engine with emissions controlled by an oxidation catalyst (4SLB manufactured in 2007)
AA-010	COMP05	1,148 HP natural gas-fired internal combustion compressor engine with emissions controlled by an oxidation catalyst (4SLB manufactured in 2009)
AA-011	--	Fugitive emissions from piping and equipment leaks

[1] Emission Points AA-005 and AT-001 are considered insignificant activities and no longer specifically addressed in the TVOP.

SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. FACILITY-WIDE EMISSION LIMITATIONS & STANDARDS

3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial, or waste disposal process, which exceeds forty (40) percent opacity subject to the exceptions provided in (a) and (b):

(a) Start-up operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per start-up in any one hour and not to exceed three (3) start-ups 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 sixty (60) percent opacity and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour.

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

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

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

3.A.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.)

B. EMISSION POINT SPECIFIC EMISSION LIMITATIONS & STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-001 AA-002 AA-003 AA-004 AA-009 AA-010	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.B.1	PM (filterable only)	$E = 0.8808*I^{-0.1667}$
	40 CFR 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants: Reciprocating Internal Combustion Engines (RICE) 40 CFR 63.6580, 63.6585(a) and (c), and 63.6590(c)(1), Subpart ZZZZ	3.B.2	HAP	Applicability
AA-001 AA-002 AA-003 AA-009 AA-010	40 CFR Part 60, Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines 40 CFR 60.4230(a)(4)(i) and (ii), 60.4246, and Table 3 to Subpart JJJJ	3.B.3	NO_x, CO, VOC	Applicability
	40 CFR 60.4233(e), 60.4234, and Table 1, Subpart JJJJ	3.B.4	NO_x	2.0 g/hp-hr (82 ppmvd @ 15% O_2)
			CO	4.0 g/hp-hr (270 ppmvd @ 15% O_2)
			VOC	1.0 g/hp-hr (60 ppmvd @ 15% O_2)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permit issued DATE (PSD Avoidance Limit and MACT Avoidance Limit)	3.B.5	CO	≥ 93% reduction using an oxidation catalyst
AA-001 AA-002 AA-003	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permit issued DATE (PSD Avoidance Limit)	3.B.6	NO_x	0.7 g/hp-hr
AA-009 AA-010	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permit issued DATE		NO_x	1.0 g/hp-hr
AA-004	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permit issued DATE	3.B.7	Hours of operation	Non-emergency operating requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-006	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Permit to Construct issued May 19, 2008	3.B.8	Operation	Route emissions to thermal oxidizer at all times
AA-007	11 Miss. Admin. Code Pt. 2, R.2.2.B(10). , as established in the Permit to Construct issued May 19, 2008, and modified in the Title V Operating Permit issued DATE	3.B.9	Minimum Temperature	Maintain a minimum operating temperature of 1,300º F (3-hour average)
AA-008	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permit issued DATE	3.B.10	Blowdowns	No more than 50 compressor blowdowns per calendar year venting a total of 1.5 MMscf of natural gas per year
AA-011	40 CFR Part 60, Subpart OOOOb – Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification or Reconstruction Commenced After December 6, 2022 40 CFR 60.5360b, 60.5365b(i)(3)(i), 60.5425b, and Table 5, Subpart OOOOb	3.B.11	VOC, Methane (GHG)	Applicability

3.B.1 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-009, and AA-010, the maximum permissible emission of ash and/or particulate matter shall not exceed an emission rate as determined by the relationship

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

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

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

3.B.2 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-009, and AA-010, the permittee is subject to and shall comply with the applicable requirements of the *National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE)*, 40 CFR Part 63, Subpart ZZZZ, and the appliable *General Provisions* of 40 CFR Part 63, Subpart A.

All of the emission points are considered new spark ignition (SI) engines located at an area source and must meet the requirements of Subpart ZZZZ by meeting the requirements of 40 CFR Part 60, Subpart JJJJ. These engines have no further requirements under Subpart ZZZZ pursuant to 40 CFR 63.6590(c)(1).

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

3.B.3 Emission Points AA-001, AA-002, AA-003, AA-009, and AA-010, are subject to and shall comply with all applicable requirements of the *Standards of Performance for Stationary Spark (SI) Ignition Internal Combustion Engines (ICE),* 40 CFR Part 60, Subpart JJJJ, and the applicable *General Provisions* of 40 CFR 60, Subpart A, as required in Table 3 to Subpart JJJJ. [Note: Emission Point AA-004 is an emergency SI ICE manufactured prior to January 1, 2009; therefore, it is not subject to Subpart JJJJ.]

(Ref.: 40 CFR 60.4230(a)(4)(i), (ii), and (iv), 60.4236(c), 60.4246, and Table 3 to Subpart JJJJ)

3.B.4 For Emission Points AA-001, AA-002, AA-003, AA-009, and AA-010, the permittee shall operate and maintain each engine such that it meets the following standards over the entire life of the engine.

(a) $NO_x \leq 2.0$ g/hp-hr (160 ppmvd @ 15% O_2)

(b) $CO \leq 4.0$ g/hp-hr (540 ppmvd @ 15% O_2)

(c) $VOC \leq 1.0$ g/hp-hr (86 ppmvd @ 15% O_2)[1]

[1] When calculating emissions of volatile organic compounds (VOC), emissions of formaldehyde should not be included.

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

3.B.5 For Emission Points AA-001, AA-002, AA-003, AA-009, and AA-010, the permittee shall install, operate, and maintain an oxidation catalyst for control of CO, VOC, and formaldehyde. The oxidation catalyst shall achieve a 93 percent reduction of CO, at a minimum.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permit issued DATE [PSD Avoidance Limit for CO for Emission Points AA-001, AA-002, and AA-003 and MACT Avoidance Limit for All])

3.B.6 For Emission Points AA-001, AA-002, and AA-003, the permittee shall limit emissions of NO_x to no more than 0.7 g/hp-hr, as determined on a 3-hour basis.

For Emission Points AA-009 and AA-010, the permittee shall limit emissions of NO_x to no more than 1.0 g/hp-hr, as determined on a 3-hour basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permit issued DATE [PSD Avoidance Limit for Emission Points AA-001, AA-002, and AA-003])

3.B.7 For Emission Point AA-004, the permittee must operate the emergency stationary ICE according to the following requirements. In order for the engine to be considered an emergency stationary ICE, 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 permittee does not operate the engine according to the requirements in paragraphs (a) through (c) of this condition, the engine will not be considered an emergency engine, as defined in 40 CFR Part 60.4248 of Subpart JJJJ and 40 CFR 63.6675 of Subpart ZZZZ, and must meet all requirements for non-emergency engines, as applicable.

(a) There is no time limit on the use of emergency stationary ICE in emergency situations.

(b) The permittee may operate the emergency stationary ICE for a maximum of 100 hours per calendar year for non-emergency use. Any operation for non-emergency situations as allowed by paragraph (c) counts as part of the 100 hours per calendar year allowed by this paragraph (b). The emergency stationary ICE 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 DEQ 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 emergency RICE beyond 100 hours per calendar year.

(c) The emergency stationary ICE 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 provided in paragraph (b). 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 arrangement with another entity.

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

3.B.8 For Emission Point AA-006, the permittee shall only operate the glycol dehydration unit with emissions controlled by the thermal oxidizer (Emission Point AA-007).

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Permit to Construct issued May 19, 2008)

3.B.9 For Emission Point AA-007, the permittee shall maintain a minimum operating temperature of 1,300 F in the combustion chamber, as determined on a rolling 3-hour average

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Permit to Construct issued May 19, 2008, and modified in the Title V Operating Permit issued DATE)

3.B.10 For Emission Point AA-008, the permittee shall limit compressor blowdowns to no more than 50 blowdown events per calendar year emitting no more than 1.5 million standard cubic feet of natural gas per calendar year (MMscf/yr).

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

3.B.11 For Emission Point AA-011, 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 Part 60, Subpart OOOOb, and the applicable *General Provisions* of 40 CFR 60, Subpart A, as required in Table 5 to Subpart OOOOb. The affected facility includes the fugitive emissions components (i.e., Emission Point AA-011).

(Ref.: 40 CFR 60.5360b, 60.5365b(i)(3)(i), 60.5425b, and Table 5 to Subpart OOOOb)

C. INSIGNIFICANT AND TRIVIAL ACTIVITY EMISSION LIMITATIONS & STANDARDS

Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.C.1	PM	0.6 lb/MMBTU
11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.C.2	SO_2	4.8 lb/MMBTU

3.C.1 The maximum permissible emission of ash and/or particulate matter (PM) from fossil fuel burning installations of less than ten (10) million BTU (MMBTU) per hour heat input shall not exceed 0.6 pounds per MMBTU per hour heat input.

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

3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per MMBTU heat input.

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

D. WORK PRACTICE STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
Facility-Wide	40 CFR 60.5371b(d), Subpart OOOOb	3.D.1	Methane (GHG)	Super-emitter event investigation
AA-001 AA-002 AA-003 AA-009 AA-010	40 CFR 60.4243(b)(2)(ii), Subpart JJJJ	3.D.2	NO_x, CO, VOC	Maintain and operate the engines according to the maintenance plan.
AA-011	40 CFR 60.5370b(b), Subpart OOOOb	3.D.3	VOC, Methane (GHG)	Good air pollution control practices

3.D.1 After January 22, 2027, the permittee must initiate a super-emitter event investigation according to 40 CFR 60.5371b(d) within five (5) calendar days of receiving notification from the EPA of the super-emitter event. A super-emitter event is defined as any emissions event that is located at or near the compressor station and that is detected using remote detection methods and has quantified emission rate of 100 kg/hr of methane or greater.

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

3.D.2 For Emission Points AA-001, AA-002, AA-003, AA-009, and AA-010, the permittee must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engines in a manner consistent with good air pollution control practice for minimizing emissions.

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

3.D.3 For Emission Point AA-011, at all times, including periods of startup, shutdown, and malfunction, the permittee shall maintain and operate the affected units 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 DEQ 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 40 CFR Part 60, Subpart OOOOb.

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

SECTION 4. COMPLIANCE SCHEDULE

4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.

4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with terms and conditions contained in this permit (including emission limitations, standards, or work practices) by January 31 of each year for the preceding calendar year. If the permit was reissued or modified during the course of the preceding calendar year, the compliance certification shall address each version of the permit. Each compliance certification shall include the following information:

(a) The identification of each term or condition of the permit that is the basis of the certification;

(b) The compliance status;

(c) Whether compliance was continuous or intermittent;

(d) The method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;

(e) Such other facts as may be specified as pertinent in specific conditions elsewhere in this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(5)(a), (c), and (d).)

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. GENERAL MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS

5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.

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

5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring the following information:

(a) The date, place as defined in the permit, and time of sampling or measurements;

(b) The date(s) analyses were performed;

(c) The company or entity that performed the analyses;

(d) The analytical techniques or methods used;

(e) The results of such analyses; and

(f) The operating conditions existing at the time of sampling or measurement.

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

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

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

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

For applicable periodic reporting requirements in 40 CFR Parts 60, 61, and 63, the permittee shall comply with the deadlines in this condition for reporting conducted on a semiannual basis. Additionally, any required quarterly reports shall be submitted by the end of the month following each calendar quarter period (i.e., April 30, July 31, October

31, and January 31), and any required annual reports shall be submitted by January 31 following each calendar year.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)
(Ref.: 40 CFR 60.19(c), 61.10(g), and 63.10(a)(5))

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

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

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

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

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

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

5.A.8 Unless otherwise specified in Section 4 of this permit, the monitoring, testing, recordkeeping, and reporting requirements specified in Section 5 herein supersede the requirements of any preceding permit to construct and/or operate upon permit issuance.

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

B. SPECIFIC MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Monitoring / Recordkeeping Requirement
AA-001 AA-002 AA-003 AA-009 AA-010	40 CFR 60.4243(b)(2)(ii) and 60.4244, Subpart JJJJ and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.1	NO_x, CO, VOC	Initial and subsequent performance testing
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.2	Inlet temperature	Continuously monitor the inlet temperature to the oxidation catalyst and maintain the temperature between 450°F – 1350°F
	40 CFR 60.4245(a)(1)-(4), Subpart JJJJ and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b).	5.B.3	NO_x, CO, VOC	General recordkeeping requirements
AA-004	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.4	Hours of operation	Install non-resettable hour meter and record hours of operation
AA-007	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.5	Temperature	Continuously monitor the combustion chamber temperature
AA-008	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.6	Compressor blowdowns	Record date, duration, and amount of natural gas vented during each blowdown
AA-011	40 CFR 60.5397b(b), (c), and (d), Subpart OOOOb	5.B.7	VOC, GHG (methane)	Develop a fugitive emissions monitoring plan
	40 CFR 60.5397b(e), Subpart OOOOb	5.B.8		Fugitive emissions components and exceptions
	40 CFR 60.5397b(f) and (g)(1)(v), Subpart OOOOb	5.B.9		Initial and subsequent fugitive emissions monitoring survey frequency
	40 CFR 60.5397b(h), Subpart OOOOb	5.B.10		Fugitive emissions repair requirements
	40 CFR 60.5397b(k) and 60.5420b(c)(14)(i), (iv), and (v), Subpart OOOOb	5.B.11		General recordkeeping requirements
	40 CFR 60.5397b(i) and 60.5410b(k), Subpart OOOOb	5.B.12		Initial compliance demonstration
	40 CFR 60.5397b(j) and 60.5415b(l), Subpart OOOOb	5.B.13		Continuous compliance demonstration

5.B.1 For Emission Points AA-009 and AA-010, the permittee must conduct an initial performance test within 180 days of startup of the units to demonstrate compliance with the emission standards in Conditions 3.B.4 and 3.B.6. For Emission Points AA-001, AA-002, AA-003, AA-009, and AA-010, the permittee must conduct subsequent performance testing every 8,760 hours of operation or three (3) years, whichever comes first, to demonstrate compliance with the emission standards in Conditions 3.B.4 and 3.B.6, as applicable. Performance tests shall be conducted according to the test methods and

procedures in 40 CFR 60.4244 and the applicable Performance Test provisions of 40 CFR 60.8.

During the performance testing for CO, the permittee shall also demonstrate compliance with the minimum oxidation catalyst removal efficiency for CO in Conditions 3.B.5 by determining the CO concentration at the inlet to and exhaust from the oxidation catalyst.

(Ref.: 40 CFR 60.4243(b)(2)(ii) and 60.4244, Subpart JJJJ and 11 Miss. Admin. Code Pt. 2, 6.3.A(3)(a)(2).)

5.B.2 For Emission Points AA-001, AA-002, AA-003, AA-009, and AA-010, the permittee must install, operate, and maintain a monitor for continuously measuring the temperature in the inlet to each oxidation catalyst according to the paragraphs (a) through (d) of this condition.

(a) The permittee shall maintain the inlet temperature between 450 degrees Fahrenheit (^{o}F) and 1,350 ^{o}F, as determined on a three-hour rolling average.

(b) The temperature monitor shall be maintained according to written manufacturer's instructions or a site-specific monitoring plan.

(c) The monitor must collect data at least once every 15 minutes and record the hourly average and 3-hour rolling average each hour.

(d) The temperature sensor must have a minimum tolerance of 5 ^{o}F or 1 percent of the measurement range, whichever is larger.

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

5.B.3 For Emission Points AA-001, AA-002, AA-003, AA-009, and AA-010, the permittee shall keep records of the following information:

(a) All notifications submitted to comply with Subpart JJJJ and all documentation supporting any notification.

(b) Maintenance conducted on the engine.

(c) Performance testing documentation demonstrating that the engines meet the emission standards in Conditions 3.B.4, 3.B.5, and 3.B.6.

(Ref.: 40 CFR 60.4245(a)(1)-(4), Subpart JJJJ and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b).)

5.B.4 For Emission Point AA-004, the permittee shall install and maintain a non-resettable hour meter on the engine. The permittee shall keep records of the operation of the engine that is recorded through the hour meter. The permittee shall document how many hours are spent in emergency operation, including what classified the operation as an emergency, and how many hours are spent in non-emergency operation.

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

5.B.5 For Emission Point AA-007, to demonstrate compliance with Condition 3.B.9, the permittee must install, operate, and maintain a monitor for continuously measuring the temperature in the combustion chamber of the thermal oxidizer according to the paragraphs (a) through (c) of this condition.

(a) The monitor must collect data at least once every 15 minutes and record the hourly average and 3-hour rolling average each hour.

(b) The temperature monitor shall be maintained according to the manufacturer's written instructions or a site-specific monitoring plan.

(c) The temperature sensor must have a minimum tolerance of 5 ^{o}F or 1 percent of the measurement range, whichever is larger.

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

5.B.6 For Emission Point AA-008, the permittee shall monitor and record date, start time, duration, and amount of natural gas vented during each compressor blowdown. At the end of each calendar year, the permittee shall total the number compressor blowdowns and total amount of natural gas vented to demonstrate compliance with Condition 3.B.10.

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

5.B.7 For Emission Point AA-011, the permittee must develop a fugitive emissions monitoring plan containing the following elements and that covers all fugitive emissions components affected facilities within each company-defined area.

(a) Frequency for conducting surveys. Surveys must be conducted at least as frequently as required by Condition 5.B.9.

(b) Technique for determining fugitive emissions (i.e., AVO or other detection methods, Method 21 of appendix A-7 to 40 CFR Part 60, and/or OGI meeting the requirements of paragraph (g) of this condition).

(c) Manufacturer and model number of fugitive emissions detection equipment to be used, if applicable.

(d) 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. The repair schedule must meet the requirements of Condition 5.B.10 at a minimum.

(e) Procedures and timeframes for verifying fugitive emission component repairs.

(f) Records that will be kept and the length of time records will be kept.

(g) If the permittee uses OGI, the plan must also include the elements specified in 40 CFR 60.5397b(c)(7)(i) through (vii). The plan must also 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.

(h) If the permittee uses Method 21 of appendix A-7 to 40 CFR Part 60, the plan must also include the elements specified in 40 CFR 60.5397b(c)(8)(i) through (iv). For the purposes of complying with the fugitive emissions monitoring program using Method 21 of appendix A-7 to 40 CFR Part 60, a fugitive emission is defined as an instrument reading of 500 ppmv or greater.

The plan must also 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.). The 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 40 CFR 60.5397b(g)(2), and the written plan for fugitive emissions components designated as unsafe-to-monitor in accordance with 40 CFR 60.5397b(g)(3).

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

5.B.8 For Emission Point AA-011, 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.B.9 For Emission Point AA-011, the permittee must conduct an initial monitoring survey using OGI or Method 21 of appendix A-7 to 40 CFR Part 60 within 90 days of startup of AA-009 or AA-010 (whichever is sooner). Subsequent monitoring surveys must be conducted at the frequencies in paragraphs (a) and (b) of this condition.

(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.B.10.

(b) A monitoring survey must be conducted at least quarterly using OGI or Method 21 of appendix A-7 to 40 CFR Part 60 after the initial survey. Consecutive quarterly monitoring surveys must be conducted at least 60 calendar days apart.

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

5.B.10 For Emission Point AA-011, the permittee shall repair each identified source of fugitive emissions in accordance with the following paragraphs:

(a) A first attempt at repair shall be made in accordance with paragraphs (a)(1) and (a)(2) of this condition.

(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) If the permittee is complying by using OGI or Method 21 of appendix A-7 to 40 CFR Part 60, 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 paragraph (a)(1) of this condition, and 30 calendar days after the first attempt at repair as required in paragraph (a)(2) of this condition.

(c) Delay of repair will be allowed if the conditions in 40 CFR 60.5397b(h)(3)(i) or (ii) are met.

(d) Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements of 40 CFR 60.5397b(h)(4)(i) through (v), to ensure that there are no fugitive emissions.

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

5.B.11 For Emission Point AA-011, the permittee shall maintain the records identified in paragraphs (a) through (c) of this condition.

(a) The date of startup of AA-009 and AA-010.

(b) The fugitive emissions monitoring plan as required in Condition 5.B.7.

(c) The records of each monitoring survey as specified in paragraphs (c)(1) through (c)(9) of this condition.

(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 40 CFR part 60 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 in paragraphs (c)(9)(i) through (c)(9)(ix) of this condition.

(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 40 CFR part 60 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 60.5397b(k) and 60.5420b(c)(14)(i), (iv), and (v), Subpart OOOOb)

5.B.12 For Emission Point AA-011, to achieve initial compliance with the GHG and VOC standards for fugitive emissions components, the permittee must comply with paragraphs (a) through (e) of this condition.

(a) The permittee must develop a fugitive emissions monitoring plan as required in Condition 5.B.7.

(b) The permittee must conduct an initial monitoring survey as required in Conditions 5.B.8 and 5.B.9.

(c) The permittee must repair each identified source of fugitive emissions for each affected facility as required in Condition 5.B.10.

(d) The permittee must submit the initial annual report for each fugitive emissions components affected facility as required in Condition 5.C.7.

(e) The permittee must maintain the records specified in Condition 5.B.11.

(Ref.: 40 CFR 60.5397b(i) and 60.5410b(k), Subpart OOOOb)

5.B.13 For Emission Point AA-011, the permittee must demonstrate continuous compliance with the requirements of Conditions 5.B.7 through 5.B.11 according to paragraphs (a) through (d) of this condition.

(a) Periodic monitoring surveys must be conducted as required in Conditions 5.B.8 and 5.B.9.

(b) Each identified source of fugitive emissions must be repaired as required in Condition 5.B.10.

(c) Annual reports must be submitted for fugitive emissions components affected facilities as required in Condition 5.C.7.

(d) Records must be maintained as specified in Condition 5.B.11.

(Ref.: 40 CFR 60.5397b(j) and 60.5415b(l), Subpart OOOOb)

C. SPECIFIC REPORTING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Reporting Requirement
AA-001 AA-002 AA-003 AA-009 AA-010	40 CFR 60.4245(d), Subpart JJJJ and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.1	NO_x, CO, VOC	Performance test reporting
AA-004	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.2	Hours of operation	Annual report summarizing hours of operation in emergency and non-emergency use
AA-007	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.3	Temperature	Report date, time, and duration of any deviations and the corrective action taken
AA-008	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.4	Blowdown events	Report the date, start time, duration, and amount of natural gas vented during each blowdown and the calendar year total
AA-009 AA-010 AA-011	11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (2).	5.C.5	Notification	Notification of completion of construction
AA-009 AA-010	40 CFR 60.4245(c), Subpart JJJJ and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.6	Notification	Initial notification
AA-011	40 CFR 60.5397b(k), 60.5420b(b)(1), and 60.5420b(b)(9), Subpart OOOOb	5.C.7	VOC, Methane (GHG)	Equipment leak-specific information for annual reports

5.C.1 For Emission Points AA-001, AA-002, AA-003, AA-009, and AA-010, the permittee must submit a copy of each performance test conducted pursuant to Condition 5.B.1 within 60 days after the test has been completed. Performance test reports using EPA Method 18, EPA Method 320, or ASTM D6348-03 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 shall submit the notification to EPA electronically via the Electronic Reporting Tool (ERT) as listed on the EPA's ERT website (https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert) according to 40 CFR 60.4245(f). The permittee shall also submit a copy of the test reports directly to the DEQ.

(Ref.: 40 CFR 60.4245(d), Subpart JJJJ and 11 Miss. Admin. Code Pt. 2, 6.3.A(3)(c)(1).)

5.C.2 For Emission Point AA-004, the permittee shall submit an annual report summarizing the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must 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. These records shall be submitted with the semiannual report due January 31st for the prior calendar year, in accordance with Condition 5.A.4.

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

5.C.3 For Emission Point AA-007, in addition to reporting required by Condition 5.A.5, the permittee shall provide the date, time, and duration of all three-hour average temperatures below the minimum allowed temperature of 1,300 °F. The permittee shall also provide a summary of any corrective action taken to restore the temperature to the minimum allowed. These records shall be submitted in the semiannual reports required according to Condition 5.A.4.

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

5.C.4 For Emission Point AA-008, the permittee shall provide the date, start time, duration, and amount of natural gas vented during each compressor blowdown. The permittee shall also provide the total number of blowdowns and amount of natural gas vented for the entire calendar year. These records shall be submitted with the semiannual report due January 31st for the prior calendar year, in accordance with Condition 5.A.4.

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

5.C.5 Prior to startup of Emission Points AA-009, AA-010, and AA-011, the permittee shall notify the DEQ of the completion of construction in accordance with the approved application using the Certification of Construction Form available at https://www.mdeq.ms.gov/applications-forms/. The DEQ shall be promptly notified in writing of any change in construction from the previously approved application.

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

5.C.6 For Emission Points AA-009 and AA-010, the permittee must submit an initial notification as required in 40 CFR 60.7(a)(1). The notification must include the information in paragraphs (a) through (e). The permittee shall submit the notification to EPA electronically 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/) according to 40 CFR 60.4245(g). The permittee shall also submit a copy of the notification directly to DEQ.

(a) Name and address of the permittee;

(b) The address of the affected source;

(c) Engine information including make, model, engine family, serial number, model year, maximum engine power, and engine displacement;

(d) Emission control equipment; and

(e) Fuel used.

(Ref.: 40 CFR 60.4245(c), Subpart JJJJ and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)

5.C.7 For Emission Point AA-011, upon startup of AA-009 or AA-010 (whichever is sooner), the permittee must submit an initial annual report no later than 90 days after the end of the initial compliance period. Subsequent annual reports shall be submitted with the semiannual report due January 31st, in accordance with Condition 5.A.4.

(a) The company name, facility site name associated with the affected facility, and address of the affected facility.

(b) An identification of each affected facility being included in the annual report.

(c) Beginning and ending dates of the reporting period.

(d) A certification by a certifying official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. If a report is submitted via CEDRI, the certifier's electronic signature during the submission process replaces the requirement in this permit condition.

(e) Designation of the type of site (i.e., well site, centralized production facility, or compressor station) at which the fugitive emissions components affected facility is located.

(f) For each fugitive emissions monitoring survey performed during the annual reporting period, the information specified in paragraphs (f)(1) through (7) of this condition.

(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 Condition 5.B.7 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 by Condition 5.B..

(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.

(Ref: 40 CFR 60.5397b(k), 60.5420b(b)(1), and 60.5420b(b)(9), Subpart OOOOb)

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

SECTION 7. TITLE VI REQUIREMENTS

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

7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A – Production and Consumption Controls.

7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.

7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E – The Labeling of Products Using Ozone-Depleting Substances, for the following containers and products:

(a) All containers in which a class I or class II substance is stored or transported;

(b) All products containing a class I substance; and

(c) All products directly manufactured with a process that uses a class I substance, unless otherwise exempted by this subpart or, unless EPA determines for a particular product that there are no substitute products or manufacturing processes for such product that do not rely on the use of a class I substance, that reduce overall risk to human health and the environment, and that are currently or potentially available. If the EPA makes such a determination for a particular product, then the requirements of this subpart are effective for such product no later than January 1, 2015.

7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F – Recycling and Emissions Reduction:

(a) Servicing, maintaining, or repairing appliances containing class I, class II or non-exempt substitute refrigerants;

(b) Disposing of appliances, including small appliances and motor vehicle air conditioners; or

(c) Refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, as

well as persons selling, offering for sale, and/or purchasing class I, class II, or non-exempt substitute refrigerants.

7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any acceptable alternative that is listed in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR Part 82, Subpart G – Significant New Alternatives Policy Program. The permittee shall also comply with any use conditions for the acceptable alternative substance.

7.6 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart H – Halon Emissions Reduction:

(a) Any person testing, servicing, maintaining, repairing, or disposing of equipment that contains halons or using such equipment during technician training;

(b) Any person disposing of halons;

(c) Manufacturers of halon blends; or

(d) Organizations that employ technicians who service halon-containing equipment.

APPENDIX A

List of Abbreviations Used In this Permit

4SLB	Four-stroke, lean-burn
BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Department of Environmental Quality
EPA	Environmental Protection Agency
GHG	Greenhouse gas
g/hp-hr	Gram per horsepower-hour
gr/dscf	Grains per dry standard cubic foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lb/hr	Pounds per hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBtu/hr	Million British thermal units per hour
MMscf/d	Million standard cubic feet per day
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards for Hazardous Air Pollutants, 40 CFR Part 61; or National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR Part 63
NMVOC	Non-Methane Volatile Organic Compounds
NO_X	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR Part 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM_{10}	Particulate Matter of 10 µm and less in diameter
$PM_{2.5}$	Particulate Matter of 2.5 µm and less in diameter
ppmvd	Parts per million by volume, dry basis
PSD	Prevention of Significant Deterioration
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction
tpy	Tons per year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VOC	Volatile Organic Compound

LIST OF REGULATIONS REFERENCED IN THIS PERMIT

The full text of the regulations referenced in this permit may be found on-line at https://www.mdeq.ms.gov/regulations/ and https://www.ecfr.gov/. A list of regulations referenced in this permit is shown below:

11 Miss. Admin. Code, Part 2, Ch. 1. – Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants (Amended May 24, 2018)

11 Miss. Admin. Code, Part 2, Ch. 2. – Permit Regulations for the Construction and/or Operation of Air Emissions Equipment (Amended February 22, 2024)

11 Miss. Admin. Code, Part 2, Ch. 6. – Air Emission Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act (Amended June 27, 2024)

40 CFR Part 82 – Title VI of the Clean Air Act (Stratospheric Ozone Protection)

40 CFR Part 60, Subpart A – General Provisions

40 CFR Part 60, Subpart JJJJ – Performance Standards for Stationary Spark Ignition Internal Combustion Engines

40 CFR Part 60, Subpart OOOOb - Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification or Reconstruction Commenced After December 6, 2022

40 CFR Part 63, Subpart A – General Provisions

40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines