STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
TITLE V PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Columbia Gulf Transmission LLC, Holcomb Compressor Station
Old Mississippi 7
Holcomb, Mississippi
Grenada 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.:** 0960-00040

69935 PER20250001

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SECTION 2. GENERAL CONDITIONS

2.1 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).)

2.2 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).)

2.3 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).)

2.4 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.)

2.5 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).)

2.6 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).)

2.7 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).)

2.8 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.)

2.9 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).)

2.10 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.)

2.11 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).)

2.12 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).)

2.13 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).)

2.14 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).)

2.15 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).)

2.16 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.)

2.17 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).)

2.18 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).)

2.19 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.)

2.20 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).)

2.21 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).)

2.22 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).)

2.23 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.)

2.24 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.)

2.25 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 3. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-001	15,845 horsepower (hp) (135.48 MMBTU/hr) Solar Model Mars 100 natural gas-fired centrifugal compressor turbine (Ref. T01)
AA-002	15,845 hp (135.48 MMBTU/hr) Solar Model Mars 100 natural gas-fired centrifugal compressor turbine (Ref. T02)
AA-003	880 hp Waukesha Model VGF-L36GL four stroke lean burn (4SLB) spark ignition (SI) natural gas-fired emergency backup power generating engine (Ref. G1)
AA-007	Facility-wide Fugitive Emissions

SECTION 4. EMISSION LIMITATIONS & STANDARDS

A. FACILITY-WIDE EMISSION LIMITATIONS & STANDARDS

4.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.)

4.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.)

4.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(s)	Pollutant / Parameter	Limit/Standard
AA-003	11 Miss. Admin. Code Pt. 2, R. 1.3. D(1)(a).	3.B.1	PM	0.6 lbs/MMBTUH
AA-001 and AA-002	11 Miss. Admin. Code Pt. 2, R. 1.3. D(1)(b).	3.B.2	PM	$E=0.8808*I^{-0.1667}$
	NSPS for Stationary Combustion Turbines, 40 CFR 60, Subpart KKKK 40 CFR 60.4300; 60.4305; and 60.4315, Subpart KKKK	3.B.3	NO_x and SO_2	Applicability
	40 CFR 60.4330(a)(2), Subpart KKKK	3.B.4	SO_2	0.060 lb SO2 /MMBTU (20 grains S/100scf
	40 CFR 60.4320(a) and Table 1 of Subpart KKKK	3.B.5	NO_x	25 ppm at 15 % O_2 or 150 ng/J of useful output (1.2 lb/MWh) at ≥ 75% load and Temperature ≥ 0 °F
	40 CFR 60.4320(a) and Table 1 of Subpart KKKK	3.B.6	NO_x	150 ppm at 15 % O_2 or 1,100 ng/J of useful output (8.7 lb/MWh) at <50% load and Temperature < 0 °F
	40 CFR 60.4333(a), Subpart KKKK	3.B.7	NO_x and CO	Minimizing Emissions
AA-001 and AA-002	11 Miss. Admin. Code Pt.2, R. 2.2.B(10)., as established in the Permit to Construct issued May 8, 2017	3.B.8	CO	Normal Operation (≥50 % load) 7.43 lb/hr
				Low Load (< 50 %); 653.41 lb/hr
				Low Ambient Temp. (< 0 °F) 31.41 lb/hr
				Startup & Shutdown 272.70 lb/event
		3.B.9	CO	78.83 tpy (per turbine)
AA-003	NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ 40 CFR Part 63.6580; 63.6585(a) and (c); and 63.6590(c)(1), Subpart ZZZZ	3.B.10	HAPs	Applicability
	NSPS for Stationary Spark Ignition Internal Combustion Engines, 40 CFR 60, Subpart JJJJ 40 CFR 60.4230(a)(4)(iv), Subpart JJJJ	3.B.11	NO_x, CO, and VOC	Applicability

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant / Parameter	Limit/Standard
	40 CFR Part 60.4233(e), 60.4234; and Table 1 to 40 CFR Part 60, Subpart JJJJ	3.B.12	NO_x, CO, and VOC	2.0 g/bhp/hr NOx or 160 ppmvd @ 15% O_2, 4.0 g/bhp/hr CO or 540 ppmvd @ 15% O_2, 1.0 g/bhp/hr VOC or 86 ppmvd @ 15% O_2,
	40 CFR Part 60.4237(a), Subpart JJJJ	3.B.13	Operational Restriction	Operational Requirement
	40 CFR Part 60.4243(d), Subpart JJJJ	3.B.14	Operational Restriction	Emergency Operational Requirements
AA-007	40 CFR 60, Subpart OOOOa (Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015) 40 CFR 60.5360a and 60.5365a(c) and (j), Subpart OOOOa	3.B.15	GHG/VOC	Applicability
	40 CFR 60.5370a(b), Subpart OOOOa	3.B.16	GHG/VOC	Continuous Compliance
	40 CFR 60.5370a(a) and 60.5397a, Subpart OOOOa	3.B.17	GHG/VOC	Operational Requirements
	40 CFR 60.5425a and Table 3 to Subpart OOOOa	3.B.18		Applicability

4.B.1 For Emission Point AA-003, the permittee shall not have particulate emissions from fossil fuel burning installations of less than 10 MMBTU/hr heat input that exceeds 0.6 lb/MMBTU.

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

4.B.2 For Emission Points AA-001 and AA-002, the permittee shall not have particulate emissions from fossil fuel burning installations of greater than 10 MMBTU/hr heat input that exceeds the 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).)

4.B.3 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 Standard for Stationary Combustion Turbines, 40 CFR 60, Subpart KKKK, and the General Provisions in Subpart A.

(Ref.: 40 CFR 60.4300, Subpart KKKK)

4.B.4 For Emission Points AA-001 and AA-002, the permittee shall not burn any fuel which contains total potential sulfur emissions in excess of 0.060 lb SO_2 /MMBTU (20 grains S/100 scf).

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

4.B.5 For Emission Points AA-001 and AA-002, nitrogen oxides (NO_x) emissions shall not exceed 25 ppm at 15 percent O_2 or 150 ng/J of useful output (1.2 lb/MWh).

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

4.B.6 For Emission Points AA-001 and AA-002, when the turbines are operating at less than 75 percent of peak load or at temperatures less than 0 degree Fahrenheit, NO_x emissions shall not exceed 150 ppm at 15 percent O_2 or 1,100 ng/J of useful output (8.7 lb/MWh).

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

4.B.7 For Emission Points AA-001 and AA-002, the permittee must operate and maintain the stationary combustion turbine, air pollution control equipment, and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction.

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

4.B.8 For Emission Points AA-001 and AA-002, the maximum hourly rate shall not exceed the following limits:

Operating Mode	Carbon Monoxide (CO) Emissions Limit per turbine
Normal Operation (≥ 50% Load)	7.43 lb/hr
Low Load (<50% Load)	653.41 lb/hr
Low Ambient Temperature (≤0°F)	31.41 lb/hr
Startup/Shutdown	272.70 lb/event

(Ref.: 11 Miss. Admin. Code Pt.2, R. 2.2.B(10)., as established in the Permit to Construct issued May 8, 2017)

4.B.9 For Emission Points AA-001 and AA-002, the permittee shall limit CO emissions from each turbine to no more than 78.83 tons per year on a 12-month rolling total average.

(Ref.: 11 Miss. Admin. Code Pt.2, R. 2.2.B(10)., as established in the Permit to Construct issued May 8, 2017)

4.B.10 For Emission Point AA-003, 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.

Emission Point AA-003 is a new, spark ignition, four stroke lean burn (4SLB) emergency engine with a site rating greater than 500 HP that is located at an area source of HAP emissions. As such, the engine must meet the requirements of 40 CFR Part 63, Subpart ZZZZ by meeting the requirements of 40 CFR Part 60, Subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under 40 CFR Part 63, Subpart ZZZZ or the General Provisions of Subpart A.

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

4.B.11 For Emission Point AA-003, the permittee is subject to and shall comply with all applicable requirements the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart JJJJ. Emission Point AA-003 must meet the requirements of 40 CFR 60, Subpart JJJJ, because it is an emergency engine rated greater than 500 HP and was manufactured after January 1, 2009.

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

4.B.12 For Emission Point AA-003, nitrogen oxide (NOx) emissions are limited to 2.0 grams per horsepower-hour (g/bhp-hr) or 160 ppmvd @ 15% O_2, carbon monoxide (CO) emissions are limited to 4.0 g/bhp-hr or 540 ppmvd @ 15% O_2, and volatile organic compound (VOC) emissions are limited to 1.0 g/bhp-hr or 86 ppmvd @ 15% O_2. The engine must be operated and maintained such that the engine achieves these emission standards over the entire life of the engine.

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

4.B.13 For Emission Point AA-003, the permittee must install and operate a non-resettable hour meter on the emergency engine.

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

4.B.14 For Emission Point AA-003, the permittee shall 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 Subpart JJJJ and shall meet all requirements for non-emergency engines:

(a) There is no limit on the use of the engine during emergency situations.

(b) The engine may be operated for maintenance checks and readiness testing for a maximum of 100 hours per calendar year, 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 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 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.

If the emergency engine is not operated according to the requirements in (a) - (c) above, the engine will not be considered an emergency engine under this subpart and will need to meet any applicable requirements for a non-emergency engine.

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

4.B.15 For Emission Point AA-007, the permittee is subject to and shall comply with all applicable requirements of 40 CFR 60 Subpart OOOOa, Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced after September 18, 2015. The collection of fugitive emission components at a compressor station and reciprocating compressors, as defined by 40 CFR 60.5430a, are affected facilities under the Subpart.

(Ref.: 40 CFR 60.5360a and 60.5365a(c) and (j), Subpart OOOOa)

4.B.16 For Emission Point AA-007, the permittee shall at all times, including periods of startup, shutdown, and malfunction, 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 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 60, Subpart OOOOa.

(Ref. 40 CFR 60.5370a(b), Subpart OOOOa)

4.B.17 For Emission Point AA-007, the permittee shall be in compliance with the applicable standards of 40 CFR 60, Subpart OOOOa upon startup, and must reduce GHG (in the form of a limitation on emissions of methane) and VOC emissions by complying with the requirements of Conditions 3.B.18, 3.D.1, and 3.D.2. For purposes of 40 CFR 60, Subpart OOOOa, fugitive emissions are defined as: Any visible emission from a fugitive emissions component observed using optical gas imaging or an instrument reading of 500 ppm or greater using Method 21.

(Ref.: 40 CFR 60.5370a(a) and 60.5397a, Subpart OOOOa)

4.B.18 For Emission Point AA-007, the permittee must comply with the General Provisions of 40 CFR 60.1 through 40 CFR 60.19 except for 40 CFR 60.11.

(Ref.: 40 CFR 60.5425a and Table 3 to Subpart OOOOa)

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

4.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).)

4.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).)

There are no other requirements applicable to the insignificant activities listed in the source's Title V permit application.

D. WORK PRACTICE STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-007	40 CFR 60.5397a(a-g), Subpart OOOOa	3.D.1	VOC and Methane	Develop a fugitive emission monitoring plan
	40 CFR 60.5397a(h), Subpart OOOOa	3.D.2		Fugitive emission source repair or replacement requirements

4.D.1 For Emission Point AA-007, the permittee shall demonstrate compliance with Subpart OOOOa by monitoring all fugitive emission components, as defined in 40 CFR 60.5430a. For the purposes of this condition, fugitive emissions are defined as: Any visible emission from a fugitive emissions component observed using optical gas imaging or an instrument reading of 500 ppm or greater using Method 21.

The permittee shall develop an emissions monitoring plan that covers the collection of fugitive emissions components within each company-defined area. This monitoring plan shall include the information specified in paragraphs (a) through (l) below:

(a) The permittee shall conduct an initial monitoring survey for each collection of fugitive emissions components at the compressor station. A monitoring survey shall be conducted at least quarterly after the initial survey. Consecutive quarterly monitoring surveys must be conducted at least 60 days apart. Each monitoring survey shall observe each fugitive emissions component, as defined in 40 CFR 60.5430a, for fugitive emissions.

(b) The permittee shall specify the technique used in determining the presence of fugitive emissions (i.e. Method 21 from 40 CFR Part 60, Appendix A-7 or optical gas imaging).

(c) The permittee shall include the manufacturer and model number of all fugitive emission detection equipment used.

(d) The permittee shall include the procedures and timeframes for identifying and repairing fugitive emissions components from which fugitive emissions are detected. This includes timeframes for fugitive emission components that are unsafe to repair. At a minimum, the repair schedule shall meet the requirements of Condition 3.D.2.

(e) The permittee shall include procedures and timeframes for verifying fugitive emission component repairs.

(f) The permittee shall specify what records will be kept and the length of time these records will be kept.

(g) If the permittee utilizes optical gas imaging, the monitoring plan shall include the information specified in (1) through (7) below:

(1) Verification that the optical gas imaging equipment is capable of imaging gases in the spectral range for the compound of highest concentration in the potential fugitive emissions. The optical gas imaging equipment must be capable of imaging a gas that is half methane, half propane at a concentration of 10,000 parts per million (ppm) at a flow rate of ≤ 60 grams per hour (g/hr) from a quarter inch diameter orifice. This verification is an initial verification and may either be performed by the facility, by the manufacturer, or by a third party. For the purposes of complying with the fugitives emissions monitoring program with optical gas imaging, a fugitive emission is defined as any visible emissions observed using optical gas imaging.

(2) Procedures for a daily verification check.

(3) Procedures for determining the permittee's maximum viewing distance from the equipment and procedures for how the permittee will ensure that this distance is maintained.

(4) Procedures for determining maximum wind speed during which monitoring can be performed and procedures for how the permittee will ensure monitoring occurs only at wind speeds below this threshold.

(5) Procedures for conducting surveys, including how the permittee will ensure an adequate thermal background is present in order to view potential fugitive emissions, how the permittee will deal with adverse monitoring conditions, such as wind, and how the permittee will deal with interferences (e.g., steam).

(6) Specification of the training and experience needed prior to performing surveys.

(7) Procedures for calibration and maintenance. At a minimum, procedures must comply with those recommended by the manufacturer.

(h) If the permittee utilizes Method 21 from 40 CFR Part 60, Appendix A-7, the monitoring plan shall include the information specified in subparagraphs (1) and (2) below. For the purposes of complying with the fugitive emissions monitoring program using Method 21 a fugitive emission is defined as an instrument reading of 500 ppm or greater.

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

(2) Procedures for conducting surveys. At a minimum, these procedures shall ensure that the surveys comply with the relevant sections of Method 21 from 40 CFR Part 60, Appendix A-7, including Section 8.3.1.

(i) A site map.

(j) A defined observation path that ensures that all fugitive emissions components are within sight of the path. The observation path must account for interferences.

(k) If the permittee utilizes Method 21, the plan shall also include a list of fugitive emissions components to be monitored and the method for determining location of fugitive emissions components to be monitored in the field (e.g. tagging, identification on a process and instrumentation diagram, etc.).

(l) The plan shall also include the written plan developed for all of the fugitive emission components designated as difficult-to-monitor in accordance with 40 CFR 60.5397(g)(3)(i) and the written plan for fugitive emission components designated as unsafe-to-monitor in accordance with 40 CFR 60.5397(g)(3)(ii).

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

4.D.2 For Emission Point AA-007, each identified source of fugitive emissions shall be repaired or replaced in accordance with paragraphs (a) through (c) below:

(a) Each identified source of fugitive emissions shall be repaired or replaced as soon as practicable, but no later than 30 calendar days after detection of the fugitive emissions.

(b) If the repair or replacement is technically infeasible, would require a vent blowdown or a compressor station shutdown, or would be unsafe to repair during operation of the unit, the repair or replacement must be completed during the next scheduled compressor station shutdown, after a planned vent blowdown or within 2 years, whichever is earlier.

(c) Each repaired or replaced fugitive emissions component must be resurveyed as soon as practicable, but no later than 30 days after being repaired, to ensure that there are no fugitive emissions. This survey shall comply with the requirements of subparagraphs (1) through (4), as applicable:

(1) For repairs that cannot be made during the monitoring survey when the fugitive emissions are initially found, the operator may resurvey the repaired fugitive emissions components using either Method 21 or optical gas imaging within 30 days of finding such fugitive emissions.

(2) For each repair that cannot be made during the monitoring survey when the fugitive emissions are initially found, a digital photograph must be taken of that component or the component must be tagged for identification purposes. The digital photograph must include the date that the photograph was taken, must clearly identify the component by location within the site (e.g., the latitude and longitude of the component or by other descriptive landmarks visible in the picture).

(3) If the permittee utilizes Method 21 to resurvey the repaired fugitive emissions components, then the fugitive emissions component is considered repaired when the Method 21 instrument indicates a concentration of less than 500 ppm above background or when no soap bubbles are observed when the alternative screening procedures specified in Section 8.3.3 of Method 21 are used. The permittee shall utilize the Method 21 monitoring requirements specified in Condition 3.D.1(h)(2) or the alternative screening procedures specified in Section 8.3.3 of Method 21.

(4) If the permittee utilizes optical gas imaging to resurvey the repaired fugitive emissions components, then the fugitive emissions component is considered repaired when the optical gas imaging instrument shows no indication of visible emissions. The permittee shall utilize the optical gas monitoring requirements specified in Condition 3.D.1(g).

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

SECTION 5. COMPLIANCE SCHEDULE

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

5.2 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 6. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. GENERAL MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS

6.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).)

6.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).)

6.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).)

6.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))

6.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).)

6.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).)

6.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).)

6.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 and AA-002	40 CFR 60.4340, 60.4400(a) and (b), Subpart KKKK; 40 CFR 60.8, Subpart A; and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)	5.B.1	NO_x and CO	Performance stack testing requirements
	40 CFR 60.4365, Subpart KKKK	5.B.2	Fuel Sulfur Content	Fuel monitoring requirements
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.3	Operations	Monitoring and recordkeeping requirements
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.4	CO and NOx	Monitoring and recordkeeping requirements
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.5	Combustion Zone Temperature	Monitoring and recordkeeping requirements
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.6		Monitoring and recordkeeping requirements
AA-003	40 CFR Part 60.4243(b), Subpart JJJJ	5.B.7	NO_x, CO, and VOC	Operational and recordkeeping requirements and performance stack testing requirements
	40 CFR Part 60.4245(a), Subpart JJJJ	5.B.8	General Operating Condition	Recordkeeping requirements
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2) and 40 CFR 60.4245(b), Subpart KKKK	5.B.9	General Operating Condition	Recordkeeping requirements
AA-007	40 CFR 60.5410a(j), Subpart OOOOa	5.B.10	VOC	Recordkeeping requirements
	40 CFR 60.5420a(c), Subpart OOOOa	5.B.11		Continuous compliance demonstration requirements

6.B.1 For Emission Points AA-001 and AA-002, the permittee shall demonstrate compliance with the short term nitrogen oxides limits by conducting an annual performance test in accordance with 40 CFR 60.4400(a). Annually means no more than 14 months following the previous performance test. If the NOx lb/hr and ppm emission results from the performance test is less than or equal to 75% of the NO_x emission limits for the turbine, the permittee may reduce the frequency of subsequent performance test to once every 2 years (no more than 26 calendar months following the previous performance test). If the results of any subsequent performance test exceed 75% of the NO_x emission limit for the turbine, the permittee must resume annual performance tests.

The permittee shall demonstrate compliance with the short term CO limits for normal operation by conducting an annual performance test in accordance with EPA Reference

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Method 10, 40 CFR 60, Appendix A, or alternatively approved methodology. Annually means no more than 14 months following the previous performance test. If the CO emission results from the performance test is less than or equal to 75% of the CO lb/hr and ppm emission limits, the permittee may reduce the frequency of subsequent performance test to once every 2 years (no more than 26 calendar months following the previous performance test). If the results of any subsequent performance test exceed 75% of the CO emission limit for the turbine, the permittee must resume annual performance tests.

(Ref.: 40 CFR 60.4340, 60.4400(a) and (b), Subpart KKKK; 40 CFR 60.8, Subpart A; and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

6.B.2 For Emission Points AA-001 and AA-002, the permittee shall not be required to monitor the total sulfur content of the natural gas combusted in the turbines provided the permittee can demonstrate it does not exceed the potential sulfur emission limit contained in Condition 3.B.4. The permittee shall use one of the following sources of information to make the required demonstration:

(a) The gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less; or

(b) Representative fuel sampling data which show that sulfur content of the natural gas being fired does not exceed 26 ng SO_2/J (0.06 lb SO_2/MMBtu) heat input. At a minimum, the amount of fuel sampling data specified in Section 2.3.1.4 or 2.3.2.4 of Appendix D to Part 75 is required.

(Ref.: 40 CFR 60.4365, Subpart KKKK)

6.B.3 For Emission Points AA-001 and AA-002, the permittee shall maintain the following records to demonstrate compliance with the annual NO_x and CO emission limits:

(a) Monthly operating hours at Normal Operation >0 °F operating mode (NL hrs),

(b) Monthly operating hours at Low-Load (<50% load) operating mode (LL hrs),

(c) Monthly operating hours at Low-Temperature (<0 °F) operating mode (LT hrs),

(d) Monthly number and duration of startup and shutdown events (SS events).

These monthly records will be used to calculate monthly emissions (ME_x) for CO and NO_x using the following equations:

NO_x (lb/month) = (7.32 * NL hrs) + (16.10 * LL hrs) + (21.68 * LT hrs) + (3.10 * SS events)

CO (lb/month) = (7.43 * NL hrs) + (653.41 * LL hrs) + (31.41 * LT hrs) + (272.70 * SS events)

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

6.B.4 For Emission Points AA-001 and AA-002, the permittee shall monitor and record the monthly and consecutive twelve month rolling total of CO and NO_x emissions. Such records shall be kept for five years and made available upon request by DEQ personnel.

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

6.B.5 For Emission Points AA-001 and AA-002, the permittee shall utilize a thermocouple to continuously monitor the combustion zone temperature to document normal turbine operation. Each thermocouple shall be set to alarm if the combustion zone temperature exceeds the design level by >10 °F for 10 seconds and an automatic shutdown of the turbine if the combustion zone temperature exceeds design level by >20 °F for 20 seconds. Records of the continuous monitoring of combustion zone temperature shall be maintained. Additionally, the permittee shall record the date and time of any automatic turbine shutdowns due to combustion zone temperature over-temperature conditions.

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

6.B.6 For Emission Points AA-001 and AA-002, the design combustion zone temperature is set at 1,360 °F. Each unit's thermocouple shall be checked for proper calibration, annually, and calibration records maintained.

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

6.B.7 For Emission Point AA-003, the permittee must demonstrate compliance with the emission limitations described in Condition 3.B.12 for the non-certified engine according to the applicable requirements specified in 40 CFR 60.4244. The permittee must also 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 subsequent performance testing every 8,760 hours or 3 years, whichever comes first, following the initial performance test.

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

6.B.8 For Emission Point AA-003, the permittee shall keep the following records:

(a) All notifications submitted to comply with 40 CFR 60, Subpart JJJJ and all documentation supporting any notification;

(b) Records of maintenance conducted on the engine; and

(a) Documentation that the non-certified engine meets the emission standards listed in Condition 3.B.12.

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

6.B.9 For Emission Point AA-003, the permittee shall keep records of the hours of operation of the engine recorded using the non-resettable hour meter. These records must indicate 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. These records should also include any time spent operating for the purposes identified in Condition 3.B.14(a), (b), and (c), and should contain an explanation of the emergency situation and date of engine operation for this purpose.

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

6.B.10 For Emission Point AA-007, the permittee shall maintain and the keep the records specified in 40 CFR 60.7(f) and in all applicable paragraphs of 40 CFR 60.5420a(c). in a form suitable and readily available for expeditious review. These records shall be kept in hard copy or electronic form for five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(Ref: 40 CFR 60.5410a(j) 40 CFR 60.5420a(c), Subpart OOOOa)

6.B.11 For Emission Point AA-007, the permittee shall demonstrate continuous compliance with the fugitive emission standards for each collection of fugitive emissions components at the compressor station by complying with the requirements of paragraphs (a) through (d) below:

(a) The permittee shall conduct periodic monitoring surveys as required in Condition 3.D.1(a).

(b) The permittee shall repair or replace each identified source of fugitive emissions as required in Condition 3.D.2.

(c) The permittee shall maintain the records specified in Condition 5.B.10.

(d) The permittee shall submit annual reports for the collection of fugitive emissions components at the compressor station as required in Condition 5.C.7.

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

C. SPECIFIC REPORTING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Reporting Requirement
AA-001 and AA-002	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.C.1	Hours	Submit semiannual reports of operations
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.C.2	NO_x and CO	Submit semiannual reports of emissions
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.C.3	Shutdowns	Submit semiannual reports of over-temperature shutdowns
AA-001, AA-002, and AA-003	40 CFR 60.4375(b), Subpart KKKK and 40 CFR 60.4245(d), Subpart JJJJ	5.C.4	NO_x, CO, and VOC	Submit performance stack test reports
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.C.5	Fuel	Submit semiannual reports of fuel sulfur content monitoring records
AA-003	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.C.6	Hours	Submit semiannual reports of operations
AA-007	40 CFR 60.5420a(b)(1), (7) and (11), Subpart OOOOa	5.C.7	VOC	Submit annual reports

6.C.1 For Emission Points AA-001 and AA-002, the permittee shall submit semiannual reports showing the operating hours during each load condition described in Condition 5.B.3 and the number of and duration of each startup and shutdown event. The reports shall be submitted in accordance with Condition 5.A.4.

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

6.C.2 For Emission Points AA-001 and AA-002, the permittee shall submit semiannual reports showing the monthly and twelve (12) month consecutive rolling total emissions of CO and NO_x. The reports shall be submitted in accordance with Condition 5.A.4.

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

6.C.3 For Emission Points AA-001 and AA-002, the permittee shall include in the semiannual report documentation of all over-temperature shutdowns during the reporting period and the corrective action taken. These reports shall be submitted in accordance with Condition 5.A.4.

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

6.C.4 For Emission Points AA-001, AA-002, and AA-003, shall submit the following notifications, information, and reports for each required performance test:

(a) A notification of the scheduled test date(s) should be submitted ten (10) days prior to the scheduled date(s) so an observer may be afforded the opportunity to witness the test(s).

(b) A written test protocol for each required test at least thirty (30) days prior to the intended test date(s) to ensure all test methods and procedures are acceptable to the DEQ. After the first successful submittal of a written test protocol, the permittee may request that the submittal of the protocol be waived for subsequent testing by certifying in writing at least thirty (30) days prior to the subsequent testing that all conditions for testing remain unchanged such that the original protocol can and will be followed.

(c) The performance stack test reports of all required performance stack testing within sixty (60) days of the date the performance stack testing is performed

(Ref.: 40 CFR 60.4375(b), Subpart KKKK, 40 CFR 60.4245(d), Subpart JJJJ, and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).))

6.C.5 For Emission Points AA-001, AA-002, and AA-003, the permittee shall submit a copy of the Gas Quality Section of the current valid purchase contract, tariff sheet or transportation contract for natural gas combusted in the turbines and emergency generator in accordance with Condition 5.A.4.

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

6.C.6 For Emission Point AA-003, the permittee shall submit semiannual reports in accordance with Condition 5.A.4 showing the records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. This report must contain at a minimum the records required by Condition 5.B.9.

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

6.C.7 For Emission Point AA-007, the permittee shall submit annual reports containing the information specified in 40 CFR 60.5420a(b)(1), (b)(7), and (b)(11). Subsequent annual reports are due no later than same date each year as the initial annual report. If the permittee owns or operates more than one affected facility, the permittee may submit one report for multiple affected facilities provided the report contains all of the information required as specified in 40 CFR 60.5420a(b)(1) through (b)(8), as applicable, except as provided in 40 CFR 60.5420a(b)(13).

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

(Ref.: 40 CFR 60.5420a(b)(1), (7) and (11), Subpart OOOOa)

SECTION 7. ALTERNATIVE OPERATING SCENARIOS

7.1 None permitted.

SECTION 8. 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 **http://www.ecfr.gov/** under Title 40, or DEQ shall provide a copy upon request from the permittee.

8.1 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.

8.2 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.

8.3 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.

8.4 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.

8.5 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.

8.6 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

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
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/H	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards for Hazardous Air Pollutants, 40 CFR 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 less than 10 µm in diameter
$PM_{2.5}$	Particulate Matter less than 2.5 µm in diameter
ppm	Parts per Million
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
VHAP	Volatile Hazardous Air Pollutant
VOHAP	Volatile Organic Hazardous Air Pollutant
VOC	Volatile Organic Compound

APPENDIX B

LIST OF REGULATIONS REFERENCED IN PERMIT

The full text of the regulations referenced in this permit may be found on-line at http://www.deq.state.us.us and http://ecfr.gpoaccess.gov, or the Mississippi Department of Environmental Quality (MDEQ) will provide a copy upon request. A list of regulations referenced in this permit is shown below:

11 Miss. Admin. Code Pt. 2, Ch. 1, Mississippi Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants (Amended December 14, 2011)

11 Miss. Admin. Code Pt. 2, Ch. 6, Mississippi Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Air Emissions Operating Permit Regulations for the Purpose of Title V of the Federal Clean Air Act (Amended December 14, 2011)

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

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

40 CFR Part 60, Subpart A – General Provisions

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

40 CFR Part 60, Subpart KKKK – Standards of Performance for Stationary Combustion Turbines

40 CFR 60, Subpart OOOOa – Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015