STATE OF MISSISSIPPI
AND FEDERALLY ENFORCEABLE
AIR POLLUTION CONTROL

PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT AT A SYNTHETIC MINOR SOURCE

THIS CERTIFIES THAT

Tinsley Resources LLC
Mayersville Crude Oil Gathering Facility
Highway 1 South, Tank Farm Road
Mayersville, Mississippi
Issaquena 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 the Federal Clean Air Act and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), the regulations and standards adopted and promulgated thereunder, and the State Implementation Plan for operating permits for synthetic minor sources.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

Krystal Rudolph

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: July 2, 2020 **Permit No.: 1220-00007**

Effective Date: As specified herein.

Expires: June 30, 2025

Section 1.

A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only.

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

2. This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.4.D.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.4.D.)

3. Any activities not identified in the application are not authorized by this permit.

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

4. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)

5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)

6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.

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

7. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

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

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

a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and

b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission.

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

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

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

10. 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. 2.1.D(7).)

11. This permit does not authorize a modification as defined in Regulation 11 Miss. Admin. Code Pt. 2, Ch.2., "Permit Regulations for the Construction and/or Operation of Air Emission Equipment." A modification may require a Permit to Construct and a modification of this permit. 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 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, or 40 CFR 51.166; or

(2) The source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, or 40 CFR 51.166;

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 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I or 40 CFR 51.166; or

f. Any change in ownership of the stationary source.

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

B. GENERAL OPERATIONAL CONDITIONS

1. 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 the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in Regulation, 11 Miss. Admin. Code Pt. 2, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.10.)

2. Any diversion from or bypass of collection and control facilities is prohibited, except as provided for in 11 Miss. Admin. Code Pt. 2, R. 1.10., "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants."

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

3. Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits.

   (Ref.: Miss. Code Ann. 49-17-29 1.a(i and ii))

4. Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.

   a. Upsets

(1) For an upset defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., 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 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;

(v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.

(2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.

(3) This provision is in addition to any upset provision contained in any applicable requirement.

(4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.

b. Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.)

(1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.

(2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this

regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).

(3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

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

5. Compliance Testing: Regarding compliance testing:

a. The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.

b. Compliance testing will be performed at the expense of the permittee.

c. Each emission sampling and analysis report shall include but not be limited to the following:

(1) Detailed description of testing procedures;

(2) Sample calculation(s);

(3) Results; and

(4) Comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

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

C. PERMIT RENEWAL / MODIFICATION / TRANSFER / TERMINATION

1. For renewal of this permit, the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board. If the applicant submits a timely and complete application pursuant to this paragraph and the Permit Board, through no fault of the applicant, fails to act on the application on or before the expiration date of the existing permit, the applicant shall continue to operate the stationary source under the terms and conditions of the expired permit, which shall remain in effect until final action on the application is taken by the Permit Board. Permit expiration terminates the source's ability to operate unless a timely and complete renewal application has been submitted.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.8.)

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

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

3. The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

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

4. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:

   a. Persistent violation of any terms or conditions of this permit.

   b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

   c. A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

5. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board.

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

SECTION 2
EMISSION POINT DESCRIPTION

The permittee is authorized to operate air emissions equipment, as described in the following table.

Emission Point	Description
AA-001	80,000 bbl (3,354,060 gallon) Internal Floating Roof Crude Oil Storage Tank
AA-002	Marine Loading/Unloading controlled by Flare
AA-002FL	Marine Loading Flare to control VOC and HAP Emissions
AA-003	Fugitive Emissions from Loading/Unloading
AA-004	80,000 bbl (3,354,060 gallon) External Floating Roof Crude Oil Storage Tank

SECTION 3
EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limitation/Standard
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity	< 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2		
	11 Miss. Admin. Code Pt. 2, R. 1.4.B(2).	3.3	H_2S	< 1 gr/dscf
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.4	Throughput	< 306,600,000 gallons/yr of crude oil
		3.5	Control Requirements	Route all emissions to the flare (AA-002FL)
AA-002FL	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.6	SO_2	4.8 lb/MMBtu
	11 Miss. Admin. Code Pt. 2, R, 1.3.D(1)(a).	3.7	PM (filterable only)	0.6 lb/MMBtu
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.8	Fuel	Propane only
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.9	Control Efficiency	Flare Operating Requirements
AA-002 AA-002FL	40 CFR 63, Subpart Y – National Emission Standards for Hazardous Air Pollutants for Marine Tank Vessel Loading Operations 40 CFR 63.560(a) and (c)	3.10	HAP	Applicability
	40 CFR 63.562(b)(1), Subpart Y	3.11		Control Requirements
	40 CFR 63.562(b)(3), Subpart Y	3.12		Reduce HAP emissions by 98 weight-percent
	40 CFR 63.562(e), Subpart Y	3.13		Operation and Maintenance Requirements

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

(a) Startup operations may produce emissions which exceed 40% opacity for up to

fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.

(b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour.

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

3.2 For the Entire Facility, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Condition 3.1. This shall not apply to vision obscuration caused by uncombined water droplets.

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

3.3 For the Entire Facility, the permittee shall not cause or permit the emission of any gas stream which contains hydrogen sulfide in excess of one grain per 100 standard cubic feet.

Gas streams containing hydrogen sulfide in excess of one grain per 100 standard cubic feet shall be incinerated at temperatures of not less than 1600°F for a period of not less than 0.5 seconds, or processed in such manner which is equivalent to or more effective for the removal of hydrogen sulfide.

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

3.4 For the Entire Facility, the permittee shall not load/unload crude oil in excess of 306,600,000 gallons per year.

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

3.5 For Emission Point AA-002, the permittee shall route all emissions to Emission Point AA-002FL for control.

3.6 For Emission Point AA-002FL, 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 million BTU heat input.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.1.A(1).)

3.7 For Emission Point AA-002FL, the maximum permissible emission of ash and/or particulate matter shall not exceed 0.6 pounds per million BTU per hour heat input.

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

3.8 For Emission Point AA-002FL, the permittee shall only use propane for the pilot flame of the flare.

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

3.9 For Emission Point AA-002FL, the permittee shall demonstrate a control efficiency of at least 98% by operating the flare according to the requirements of 40 CFR 63.11(b), Subpart A, and the requirements specified in paragraphs (a) through (e) below:

(a) The flare shall be operated at all times when emissions may be vented to it.
(b) The flare shall be operated and maintained according to the manufacturer's recommendations.
(c) The flare shall be operated with no visible emissions as determined by EPA Method 22, except for periods not to exceed a total of five (5) minutes during any two (2) consecutive hours.
(d) The permittee shall maintain a flare pilot flame at all times when emissions may be vented to the flare.
(e) The flare shall be used with a combustion gas mixture who net heating value is 300 BTU/scf or greater if the flare is air or steam-assisted. If the flare is non-assisted, the flare shall only be used with a combustion gas mixture who net heating value is 200 BTU/scf or greater.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). 40 CFR 63.565(e), Subpart Y)

3.10 For Emission Points AA-002 and AA-002FL, the permittee is subject to and shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants for Marine Tank Vessel Loading Operations (40 CFR 63, Subpart Y) and the General Provisions (40 CFR 63, Subpart A).

For the purposes of this Subpart, Emission Point AA-002 is considered a new source with emissions less than 10 and 25 tons.

(Ref.: 40 CFR 63.560(a) and (c), Subpart Y)

3.11 For Emission Points AA-002 and AA-002FL, the permittee shall comply with the following:

(a) Equip each terminal with a vapor collection system that is designed to collect HAP vapors displaced from marine tank vessels during marine tank vessel

loading operations to prevent HAP vapors collected at one loading berth from passing through another loading berth to the atmosphere.

(b) Limit marine tank vessel loading operations to those vessels that are equipped with vapor collection equipment that is compatible with the terminal's vapor collection system.

(c) Limit marine tank vessel loading operations to those vessels that are vapor tight and those vessels that are connected to the vapor collection system.

(Ref.: 40 CFR 63.562(b)(1), Subpart Y)

3.12 For Emission Points AA-002 and AA-002FL, the permittee shall reduce HAP emissions from marine tank vessel loading operations by 98 weight-percent as determined using methods in 40 CFR 63.565(e)

(Ref.: 40 CFR 63.562(b)(3), Subpart Y)

3.13 For Emission Points AA-002 and AA-002FL, the permittee shall operate and maintain a source, including associated air pollution control equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the MDEQ which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(a) The MDEQ will determine compliance with design, equipment, work practice, or operational emission standards by evaluating the permittee's conformance with operation and maintenance requirements.

(b) The permittee shall develop a written operation and maintenance plan that describes in detail a program of corrective action for varying (i.e., exceeding baseline parameters) air pollution control equipment and monitoring equipment, based on monitoring requirements in 40 CFR 63.564, used to comply with these emissions standards. The plan shall also identify all routine or otherwise predictable continuous monitoring system (thermocouples, pressure transducers, continuous emissions monitors (CEMS), etc.) variances. The maintenance plan shall include all applicable requirements in 40 CFR 63.562(e)(2)(i) – (iv).

(c) Based on the results of the determination made under (b), the MDEQ may require that the permittee make changes to the operation and maintenance plan for that source. Revisions may be required if the plan does not contain the information in 40 CFR 63.562(e)(3)(i)-(iii).

(d) If the operation and maintenance plan fails to address or inadequately addresses a variance event at the time the plan was initially developed, the permittee shall

revise the operation and maintenance plan within 45 working days after such an event occurs. The revised plan shall include procedures for operating and maintaining the air pollution control equipment or monitoring equipment during similar variance events and a program for corrective action for such events.

(e) The permittee shall keep the written operation and maintenance plan on record to be made available for inspection, upon request, by the MDEQ for the life of the source. In addition, if the operation and maintenance plan is revised, the permittee shall keep previous (i.e., superseded) versions of the plan on record to be made available for inspection upon request by the MDEQ for a period of 5 years after each revision to the plan.

(f) To satisfy the requirements of the operation and maintenance plan, the permittee may use the source's standard operating procedures (SOP) manual, an Occupational Safety and Health Administration (OSHA) plan, or other existing plans provided the alternative plans meet the requirements of this section and are made available for inspection when requested by the MDEQ.

(g) In response to an action to enforce the standards set forth in this subpart, the permittee may assert an affirmative defense to a claim for civil penalties for exceedances of such standards that are caused by a malfunction, as defined in 40 CFR 63.2. Appropriate penalties may be assessed, however, if the respondent fails to meet its burden of proving all the requirements in the affirmative defense. The affirmative defense shall not be available for claims for injunctive relief.

(1) To establish the affirmative defense in any action to enforce such a limit, the permittee must timely meet the notification requirements of 40 CFR 63.562(e)(7)(ii), and must prove by a preponderance of evidence that the requirements in 40 CFR 63.562(e)(7)(i)(A)-(I) were followed.

(2) The permittee who is experiencing an exceedance of its emission limit(s) during a malfunction shall notify the MDEQ by telephone or facsimile (FAX) transmission as soon as possible, but no later than 2 business days after the initial occurrence of the malfunction, if it wishes to avail itself of an affirmative defense to civil penalties for that malfunction. The permittee shall also submit a written report to the MDEQ within 45 days of the initial occurrence of the exceedance of the standard to demonstrate, with all necessary supporting documentation, that it has met the requirements set forth in paragraph 40 CFR 63.562(e)(7)(i). The permittee may seek an extension of this deadline for up to 30 additional days by submitting a written request to the MDEQ before the expiration of the 45 day period. Until a request for an extension has been approved by the MDEQ, the permittee is subject to the requirement to submit such report within 45 days of the initial occurrence of the exceedance.

(Ref.: 40 CFR 63.562(e), Subpart Y)

SECTION 4
WORK PRACTICES

"THIS SECTION WAS INTENTIONALLY LEFT BLANK SINCE NO WORK PRACTICE STANDARDS APPLY TO THIS PERMIT ACTION."

SECTION 5
MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Monitoring/Recordkeeping Requirement
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain records for a minimum of 5 years.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2	VOC HAP	Maintain monthly records of the throughput
AA-002FL	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.3	Fuel Consumption	Record amount of Propane combusted during each calendar month
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.4	Fuel Analysis	Semi-annual fuel analysis
AA-002FL	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). and 40 CFR 63.565(e), Subpart Y	5.5	Flare Operations	Monitoring and Recordkeeping
		5.6	Method 22	
AA-002 AA-002FL	40 CFR 63.563(a), Subpart Y	5.7	Compliance Determination	Compliance Determination
	40 CFR 63.563(b)(5), Subpart Y	5.8		Flare Requirements
	40 CFR 63.563(c), Subpart Y	5.9		Leak Detection and Repair
	40 CFR 63.564(a)(1) and (2), Subpart Y	5.10	Monitoring Requirements	Monitoring Requirements
	40 CFR 63.565(a), Subpart Y	5.11	Test Methods and Procedures	Performance Testing
	40 CFR 63.567(f), Subpart Y	5.12	Recordkeeping	Vapor Collection System
	40 CFR 63.567(h), Subpart Y	5.13		Vapor-tightness Documentation
	40 CFR 63.567(i), Subpart Y	5.14		
	40 CFR 63.567(k), Subpart Y	5.15		Leak Detection and Repair

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

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

5.2 For the Entire Facility, the permittee shall maintain monthly records of the throughput and keep a record of the 12-month rolling total for each emission point to demonstrate compliance with Condition 3.5.

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

5.3 For Emission Point AA-002FL, the permittee shall maintain records of the amount of propane combusted during each calendar month.

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

5.4 For Emission Points AA-002 and AA-002FL, the permittee shall conduct a field gas analysis of the produced gas routed to the flare. The initial gas analysis shall be performed within ninety (90) days of permit issuance.

If a change is made at the facility, which causes the most recent gas analysis to no longer be representative, the permittee shall perform a gas analysis within ninety (90) days of the change.

Subsequent gas analyses shall be performed semiannually, not to exceed 25 months from the previous analysis. Each gas analysis shall include the following properties: hydrogen sulfide concentration, sulfur content, methane concentration (by volume), gross and net heating values, molecular weight, specific gravity, and speciated VOC components.

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

5.5 For Emission Point AA-002FL, the permittee shall comply with the following monitoring requirements outlined in paragraphs (a) through (d):

(a) The permittee shall continuously monitor and record the presence of the flare pilot flame. The permittee shall install, calibrate, maintain, and operate a heat sensing device (an ultraviolet beam sensor or thermocouple) at the pilot light to indicate the presence of a flame during the entire loading cycle.

(b) The permittee shall demonstrate initial compliance with the visible emissions limit in Condition 3.9(c) within ninety (90) days of permit issuance by conducting and EPA Method 22 test for a period of two (2) consecutive hours. The test shall be conducted during three complete loading cycles with a separate test run for each loading cycle. The observation period for detecting visible emissions shall encompass each loading cycle. The permittee shall record all visible emission readings, heat content determinations, flow rate measurements, maximum permittee velocity calculations, and exit velocity determination made during the

performance test. The permittee shall monitor and maintain records of the gas flow rate to the flare during the test.

If a change is made the facility, which causes the previous 2-hour visible emissions test to no longer be representative, then the permittee must perform a Method 22 test within ninety (90) days of the change.

If the visible emissions limit in Condition 3.9(c) is not met during the Method 22 test, corrective action shall be taken immediately. Immediately following completion of the corrective action(s), the permittee shall demonstrate compliance by performing an EPA Method 22 test for a period of two (2) hours.

(c) Subsequent to the initial testing, the permittee shall perform monthly visible emissions test for a minimum of fifteen (15) minutes using EPA Method 22 while the facility is operating with all gases being flared. If visible emissions are observed for a period greater than one (1) minute, corrective action shall be taken immediately. Immediately following completion of the corrective action(s), the permittee shall demonstrate compliance by performing an EPA Method 22 test for a period of two (2) hours and shall monitor and maintain records of the flare rate during the test. The monthly visible emissions tests shall be separated by at least fifteen (15) days between each test.

(d) The permittee must demonstrate that the flare meets the requirements of 40 CFR 63.11 of Subpart A. In addition, a performance test according to Method 22 shall be performed to determine visible emissions. The Method 22 test required by paragraph (b) of this condition will demonstrate compliance with this requirement.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). 40 CFR 63.564(f), and 40 CFR 63.565(e))

5.6 For Emission Point AA-002FL, the permittee shall comply with the following recordkeeping requirements outlined in paragraphs (a) through (d):

(a) The permittee shall maintain a copy of the flare manufacturer operating and maintenance recommendations and detailed records of all maintenance performed in the flare.

(b) The permittee shall maintain continuous records of the thermocouple or equivalent device output demonstration the presence of a flame in the control flare whenever the facility is in operation.

(c) The permittee shall maintain records of all EPA Method 22 tests, and details of any corrective/preventative action(s) taken.

(d) The permittee shall maintain records of all gas analyses performed to determine the net heating value of the gas being combusted in the flare.

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

5.7 For Emission Points AA-002 and AA-002FL, the permittee shall use the following to determine compliance with the emission limits under 40 CFR 63.562(b)(1).

(a) Each valve in the terminal's vapor collection system that would route displaced vapors to the atmosphere, either directly or indirectly, shall be secured closed during marine tank vessel loading operations either by using a car-seal or a lock-and-key type configuration, or the by-pass line from the valve shall be equipped with a flow indicator, except for those valves used for pressure/vacuum relief, analyzers, instrumentation devices, sampling, and venting for maintenance. Marine tank vessel loading operations shall not be performed with open by-pass lines.

Repairs shall be made to valves, car-seals, or closure mechanisms no later than 15 days after a change in the position of the valve or a break in the car-seal or closure mechanism is deterred or no later than prior to the next marine tank vessel loading operation, whichever is later.

(b) Marine tank vessel loading operations shall be performed only if the marine tank vessel's vapor collection equipment is compatible to the terminal's vapor collection system; marine tank vessel loading operations shall be performed only when the marine tank vessel's vapor collection equipment is connected to the terminal's vapor collection system.

(c) The permittee shall use the procedures in 40 CFR 63.563(a)(4) to ensure that the marine tank vessels are vapor tight.

(Ref.: 40 CFR 63.563(a), Subpart Y)

5.8 For Emission Points AA-002 and AA-002FL, the permittee shall establish that the flare used to comply with the emission standards in Condition 3.11 is in compliance with the design requirements for flares in 40 CFR 63.565(e). The facility shall operate with the presence of a pilot flame in the flare, as determined in 40 CFR 63.564(f).

(Ref.: 40 CFR 63.563(b)(5), Subpart Y)

5.9 For Emission Points AA-002 and AA-002FL, the permittee shall comply with the following:

(a) The permittee shall inspect and monitor all ductwork and piping and connections to vapor collection systems and control devices once each calendar year using Method21.

(b) If evidence of a potential leak is found by visual, audible, olfactory, or any other detection method, all ductwork and piping and connections to vapor collection systems and control devices shall be inspected to the extent necessary to positively identify the potential leak and any potential leaks shall be monitored with 5 days by Method 21. Each detection of a leak shall be recorded, and the leak shall be tagged until repaired.

(c) When a leak is detected, a first effort to repair the vapor collection system and control device shall be made within 15 days or prior to the next marine tank vessel loading operation, whichever is later.

(Ref.: 40 CFR 63.563(c), Subpart Y)

5.10 For Emission Points AA-002 and AA-002FL, the permittee shall comply with the monitoring requirements in 40 CFR 63.8 of Subpart A in accordance with Table 1 of 40 CFR 63.560.

All monitoring equipment shall be installed such that representative measurements of emissions or process parameters from the source are obtained. For monitoring equipment purchased from a vendor, verification of the operational status of the monitoring equipment shall include completion of the manufacturer's written specifications or recommendations for installation, operation, and calibration of the system.

(Ref.: 40 CFR 63.564(a)(1) and (2), Subpart Y)

5.11 For Emission Points AA-002 and AA-002FL, the permittee shall comply with the performance testing requirements in 40 CFR 63.7 of Subpart A in accordance with Table 1 of 40 CFR 63.560.

(Ref.: 40 CFR 63.565(a), Subpart Y)

5.12 For Emission Points AA-002 and AA-002FL, the permittee shall maintain in an accessible location on site an engineering report describing the detail the vent system, vapor collection system, used to vent each vent stream to a control device. This report shall include all valves and vent pipes that could vent the stream to the atmosphere, thereby bypassing the control device, and identify which valves are car-sealed opened and which valves are car-sealed closed.

(Ref.: 40 CFR 63.567(f), Subpart Y)

5.13 For Emission Point AA-002 and AA-002FL, the permittee shall keep the vapor-tightness documentation required under 40 CFR 63.563(a)(4) on file at the source in a permanent form available for inspection.

(Ref.: 40 CFR 63.567(h), Subpart Y)

5.14 For Emission Point AA-002 and AA-002FL, the permittee shall maintain a documentation file for each marine tank vessel loaded at that source to reflect current test results as determined by the appropriate method in 40 CFR 63.565(c)(1) and (2). Updates to this documentation file shall be made at least once per year. The permittee shall include, as a minimum, the following information in this documentation:

(a) Test title;

(b) Marine vessel owner and address;

(c) Marine vessel identification number;

(d) Loading time, according to 40 CFR 63.563(a)(4)(ii) or (iii), if appropriate;

(e) Testing location;

(f) Date of test;

(g) Tester name and signature;

(h) Test results from 40 CFR 63.565(c)(1) or (2), as appropriate;

(i) Documentation provided under 40 CFR 63.563(a)(4)(ii) and (iii)(B) showing that the repair of leaking components attributed to a failure of a vapor-tightness test is technically infeasible without dry-docking the vessel; and

(j) Documentation that a marine tank vessel failing a pressure test or leak test has been repaired.

(Ref.: 40 CFR 63.567(i), Subpart Y)

5.15 For Emission Point AAa-002 and AA-002FL, when each leak of the vapor collection system, or vapor collection system, and control device is detected and repaired as specified in 40 CFR 63.563(c) the following information required shall be maintained for 5 years:

(a) Date of inspection;

(b) Findings (location, nature, and severity of each leak);

(c) Leak determination method;

(d) Corrective action (date each leak repaired, reasons for repair interval); and

(e) Inspector name and signature.

(Ref.: 40 CFR 63.567(k), Subpart Y)

SECTION 6
REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	Report permit deviations within five (5) working days.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.2	Submit certified semi-annual monitoring report.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.3	All documents submitted to MDEQ shall be certified by a Responsible Official.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.4	Annual reporting of monthly throughput and a 12-month rolling average
		6.5	Annual reporting of propane combusted each month
		6.6	Gas Analysis, Flare Reporting
AA-002 AA-002FL	40 CFR 63.567(d), Subpart Y	6.7	Method 22 Reporting
	40 CFR 63.567(m), Subpart Y	6.8	Malfunction Reporting
	40 CFR 63.567(n)(2), Subpart Y	6.9	General Reporting

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

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

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

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

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

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

6.4 For the Entire Facility, the permittee shall submit an annual report, in accordance with Condition 6.2, of the monthly throughput records and on a 12-month rolling total.

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

6.5 For the Entire Facility, the permittee shall submit an annual report, in accordance with Condition 6.2, of the amount of propane combusted each month.

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

6.6 For Emission Point AA-002FL, the permittee shall submit an annual report, in accordance with Condition 6.2, of the following:

(a) Records of all gas analyses performed during the reporting period;

(b) Details of any periods where the pilot flame was not present, cause, corrective and preventative actions taken, and whether or not any gases were being vented to the flare;

(c) Continuous pilot flame monitor downtime data: monitor downtime event date, start and end times, duration, cause, corrective and preventative actions taken, and total duration monitor downtime for the reporting period.

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

6.7 For Emission Points AA-002 and AA-002FL, the permit shall report the opacity test results and other information required by 40 CFR 565(e) and 40 CFR 63.11 of Subpart A. Copies of data sheets for all EPA Method 22 tests performed during the reporting period, including data on gas flow rate to the flare and details of any accompanying corrective and preventative actions taken. This report shall be submitted in accordance with Condition 6.2

(Ref.: 40 CFR 63.567(d), Subpart Y and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

6.8 For Emission Points AA-002 and AA-002FL, the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded shall be stated in a semiannual report. The report must also include a description of actions taken by the permittee during a malfunction of an affected source to minimize emissions in accordance with 40 CFR 63.562(e), including actions taken to correct a malfunction. The report, to be certified by the owner or operator or other responsible official, shall be submitted semiannually and delivered or postmarked by the 30th day following the end of each calendar half.

(Ref.: 40 CFR 63.567(m), Subpart Y)

6.9 For Emission Point AA-002 and AA-002FL, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All reports shall be sent to the MDEQ. If acceptable to both the MDEQ and the permittee, these reports may be submitted on electronic media. The MDEQ retains the right to require submittal of reports subject to paragraph (n)(1) of this section in paper format.

(Ref.: 40 CFR 63.567(n)(2), Subpart Y)