

**STATE OF MISSISSIPPI  
AIR POLLUTION CONTROL  
TITLE V PERMIT**

**TO OPERATE AIR EMISSIONS EQUIPMENT**

**THIS CERTIFIES THAT**

Texas Gas Transmission, LLC  
Greenville Compressor Station  
1012 South Beauchamp Street  
Greenville, Mississippi  
Washington 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) 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:** September 29, 2023

**Effective Date:** As specified herein.

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

*Krystal Rudolph*

**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Expires:** August 31, 2028

**Permit No.:** 2800-00015

**TABLE OF CONTENTS**

SECTION 1. GENERAL CONDITIONS .....3  
SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES .....13  
SECTION 3. EMISSION LIMITATIONS & STANDARDS .....15  
SECTION 4. COMPLIANCE SCHEDULE.....28  
SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS .....29  
SECTION 6. ALTERNATIVE OPERATING SCENARIOS .....38  
SECTION 7. TITLE VI REQUIREMENTS .....39

**APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT**

## SECTION 1. GENERAL CONDITIONS

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

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

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

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

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

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

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

(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 3 or more years. Such a reopening shall be completed no later than 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 emission 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 this permit shall follow the same procedures as apply to initial permit issuance and shall only affect 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 DEQ at least 30 days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

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

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

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

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

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

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

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

- 1.8 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.

- (a) For purposes of fee assessment and collection, the permittee shall elect for actual 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. 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

simpolethose 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.

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

- (b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee.

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

- (c) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time.

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

- (d) The fee shall be due September 1 of each year. By July 1 of each year, the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due.

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

- (e) If in disagreement with the calculation or applicability of the Title V permit 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.C.)

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

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

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

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

- 1.11 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:
- (a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - (c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
  - (d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

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

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

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

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

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

- 1.14 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source.

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

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

- (a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
- (b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- (c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
- (d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act.

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

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

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

1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of 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. 6.4.C(2)., R. 6.4.B., and R. 6.2.A(1)(c).)

1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:

- (a) the changes are not modifications under any provision of Title I of the 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 (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:

- (1) a brief description of the change(s),
  - (2) the date on which the change will occur,
  - (3) any change in emissions, and
  - (4) any permit term or condition that is no longer applicable as a result of the change;
- (d) the permit shield shall not apply to any Section 502(b)(10) change.

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

- 1.19 Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in 11 Miss. Admin. Code Pt. 2, Ch. 3., "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared.

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

- 1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 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 Regulations 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 [a]ny 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 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 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 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).)

1.21 Any change in ownership or operational control must be approved by the Permit Board.

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

1.22 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission.

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

1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director 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 50 yards of an occupied dwelling.
- (c) Burning must not occur within 500 yards of commercial airport property, private airfields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator.

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

1.24 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies:

- (a) Except as otherwise specified herein, an “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
- (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.
- (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
  - (1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
  - (2) the permitted facility was at the time being properly operated;
  - (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
  - (4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

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

1.25 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 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
    - (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
  - (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
  - (3) This provision is in addition to any upset provision contained in any applicable requirement.

- (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- (b) Startups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
  - (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
  - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in 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.)

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

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

**SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES**

| Emission Point | Description   |
|----------------|---|
| AA-002         | 14,050 HP (at ISO conditions) 12,090 HP (at NEMA conditions) (89.77 MMBTU/hr) General Electric regenerative cycle natural gas-fired compressor turbine (Model Number M3122R, Reference Number TB02) |
| AA-004         | 2,600 HP Clark 2-stroke lean burn (2SLB) spark ignition (SI) natural gas-fired non-emergency reciprocating compressor engine (Model Number HBAT-10, Reference Number RC02)                          |
| AA-005         | 2,600 HP Clark 2SLB SI natural gas-fired non-emergency reciprocating compressor engine (Model Number HBAT-10, Reference Number RC03)  |
| AA-006         | 2,600 HP Clark 2SLB SI natural gas-fired non-emergency reciprocating compressor engine (Model Number HBAT-10, Reference Number RC04)  |
| AA-007         | 1,550 HP Clark 2SLB SI natural gas-fired non-emergency reciprocating compressor engine (Model Number HBAT-6, Reference Number RC05)   |
| AA-008         | 1,550 HP Clark 2SLB SI natural gas-fired non-emergency reciprocating compressor engine (Model Number HBAT-6, Reference Number RC06)   |
| AA-009         | 1,550 HP Clark 2SLB SI natural gas-fired non-emergency reciprocating compressor engine (Model Number HBAT-6, Reference Number RC07)   |
| AA-010         | 1,550 HP Clark 2SLB SI natural gas-fired non-emergency reciprocating compressor engine (Model Number HBAT-6, Reference Number RC08)   |
| AA-011         | 2,000 HP Clark 2SLB SI natural gas-fired non-emergency reciprocating compressor engine (Model Number TLA-6, Reference Number RC09)  |
| AA-012         | 2,000 HP Clark 2SLB SI natural gas-fired non-emergency reciprocating compressor engine (Model Number TLA-6, Reference Number RC010)   |
| AA-013         | 406 HP Ingersoll-Rand 4-stroke rich burn (4SRB) SI natural gas-fired non-emergency electrical power generator engine (Model Number PVG-8, Reference Number AX01)                                    |
| AA-014         | 406 HP Ingersoll-Rand 4SRB SI natural gas-fired non-emergency electrical power generator engine (Model Number PVGH-8, Reference Number AX02)  |
| AA-015         | 406 HP Ingersoll-Rand 4SRB SI natural gas-fired non-emergency electrical power generator engine (Model Number PVGH-8, Reference Number AX03)  |
| AA-016         | 455 HP Waukesha 4SRB SI natural gas-fired emergency electrical power generator engine (Model Number F2895GL, Reference Number AX05)   |
| AA-019         | 925 HP Waukesha 4SLB SI natural gas-fired emergency electrical power generator engine (Model Number VGF L36GL, Reference Number AX07)   |
| AA-020         | 14,550 BHP(at ISO conditions) and 12,936 BHP (at NEMA conditions) (112.35 MMBTU/hr) Solar simple-cycle natural gas-fired compressor turbine (Model Number T15000S, Reference Number TB03)           |
| AA-021         | 3.78 MMBTU/hr Peerless natural gas-fired boiler (Model Number 211A-19-WPI, Reference Number   |

| <b>Emission Point</b> | <b>Description</b>   |
|-----------------------|--|
|                       | BL03)  |
| AA-023                | 30 HP Ford 4SRB SI natural gas-fired emergency electrical power generator engine (Model Number LRG-4231-6005-F, Reference Number AX08)   |
| AA-024                | 276 HP Caterpillar 4SRB SI natural gas-fired non-emergency auxiliary air compressor engine equipped with a non-selective catalytic reduction (NSCR) system (Model No. G3406TA, Reference No. AX09) |

## SECTION 3. EMISSION LIMITATIONS & STANDARDS

### A. Facility-Wide Emission Limitations & Standards

3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (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.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Condition 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets.

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

3.A.3 For the entire facility, the permittee shall not cause, permit, or allow the emission of particles or any contaminants in sufficient amounts or of such duration from any process as to be injurious to humans, animals, plants, or property, or to be a public nuisance, or create a condition of air pollution.

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

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

**B. Emission Point Specific Emission Limitations & Standards**

| Emission Point(s)   | Applicable Requirement  | Condition Number(s) | Pollutant/Parameter                 | Limit/Standard  |
|---|---|---------------------|-------------------------------------|---|
| AA-002 through AA-012 and AA-020                          | 11 Miss. Admin. Code Pt. 2, R. 1.3. D(1)(b).  | 3.B.1               | PM                                  | $E=0.8808 * I^{-0.1667}$  |
| AA-013 through AA-016, AA-019, AA-021, AA-023, and AA-024 | 11 Miss. Admin. Code Pt. 2, R. 1.3. D(1)(a).  | 3.B.2               | PM                                  | 0.6 lb/MMBTU  |
| AA-021  | 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).  | 3.B.3               | SO <sub>2</sub>                     | 4.8 lb/MMBTU  |
| AA-002 and AA-020   | 40 CFR 60, Subpart GG<br><br>Standards of Performance for Stationary Gas Turbines, 40 CFR 60, Subpart GG<br><br>40 CFR 60.330, Subpart GG   | 3.B.4               | SO <sub>2</sub> and NO <sub>x</sub> | NSPS Applicability  |
|   | 40 CFR 60.333(b), Subpart GG  | 3.B.5               | Fuel Sulfur Content                 | 0.8 percent by weight   |
|   | 40 CFR 63, Subpart YYYY<br><br>National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines, 40 CFR 63, Subpart YYYY.<br><br>40 CFR 63.6085 and 40 CFR 63.6090(b)(4), Subpart YYYY | 3.B.6               | HAPs                                | MACT applicability only, not affected by the requirements of this standard. |
| AA-020  | 40 CFR 60.332(a)(2), Subpart GG<br><br>and<br><br>11 Miss. Admin. Code Pt. 2, R. 2.2.B(10) as established in the Permit to Construct issued November 21, 1999   | 3.B.7               | NO <sub>x</sub>                     | STD < 37.5 ppm at 15% O <sub>2</sub> , 17.34 lbs/hr and 73.43tons/year      |



| Emission Point(s)                                 | Applicable Requirement   | Condition Number(s) | Pollutant/Parameter                  | Limit/Standard  |
|---|--|---------------------|--------------------------------------|---|
| AA-004 through AA-016, AA-019, AA-023, and AA-024 | 40 CFR 63, Subpart ZZZZ<br><br>National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines , 40 CFR 63, Subpart ZZZZ<br><br>40 CFR 63.6580, 40 CFR 63.6585(a)-(b), 40 CFR 63.6590(a)(1)(i)-(ii), 40 CFR 63.6590(a)(2)(ii), 40 CFR 63.6590(b)(3)(i)-(ii), and 40 CFR 63.6590(c)(4), Subpart ZZZZ | 3.B.8               | HAPs                                 | MACT applicability  |
| AA-013 through AA-015                             | 40 CFR 63.6595(a)(1), and 40 CFR 63.6602, Subpart ZZZZ<br><br>and<br><br>Item 11 of Table 2c to Subpart ZZZZ   | 3.B.9               | CO or Formaldehyde                   | 10.3 ppmvd or less concentration of formaldehyde at 15% O <sub>2</sub>  |
| AA-016, AA-019 and AA-023                         | 40 CFR 63.6640(f)(1)-(3), Subpart ZZZZ   | 3.B.10              | HAPs                                 | Emergency Operational Requirements  |
| AA-016 and AA-023                                 | 40 CFR 63.6625(e)(1)-(2), Subpart ZZZZ   | 3.B.11              | HAPs                                 | Operational Requirements  |
| AA-013 through AA-016 and AA-023                  | 40 CFR 63.6605, Subpart ZZZZ   | 3.B.12              | HAPs                                 | Minimizing Emissions  |
|   | 40 CFR 63.6625(h), Subpart ZZZZ  | 3.B.13              | HAPs                                 | Operational Requirements  |
| AA-024  | 40 CFR 60, Subpart JJJJ<br><br>Standards of Performance for Stationary Spark Ignition Internal Combustion Engines, 40 CFR 60, Subpart JJJJ<br><br>40 CFR 60.4230(a)(4)(iii), Subpart JJJJ  | 3.B.14              | NO <sub>x</sub> , CO, and VOC        | NSPS Applicability  |
|   | 40 CFR 60.4233(e), 40 CFR 60.4234, Subpart JJJJ<br><br>and<br><br>Table 1, Subpart JJJJ  | 3.B.15              | NO <sub>x</sub><br><br>CO<br><br>VOC | 1.0 g/bhp-hr NO <sub>x</sub> or 82 ppmvd @ 15% O <sub>2</sub><br><br>2.0 g/bhp-hr CO or 270 ppmvd @ 15% O <sub>2</sub><br><br>0.7 g/bhp-hr VOC or 60 ppmvd @ 15% O <sub>2</sub> |
|   | 40 CFR 60.4243(g), Subpart JJJJ  | 3.B.16              | HAPs                                 | Operational Requirements  |
| AA-021  | 40 CFR 63, Subpart DDDDD<br><br>National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial,  | 3.B.17              | HAPs                                 | MACT applicability  |

| Emission Point(s) | Applicable Requirement   | Condition Number(s) | Pollutant/Parameter | Limit/Standard              |
|-------------------|--|---------------------|---------------------|-----------------------------|
|                   | Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63 Subpart DDDDD.<br><br>40 CFR 63.7485,<br>40 CFR 63.7490(a)(1) and (d),<br>40 CFR 63.7499(l), and<br>40 CFR 63.7500(a)(1), Subpart DDDDD |                     |                     |                             |
|                   | 40 CFR 63.7500(a)(3) and<br>40 CFR 63.7505(a), Subpart DDDDD   | 3.B.18              | HAPs                | General Operating Condition |

3.B.1 For Emissions Points AA-002 through AA-012 and AA-020, the permittee shall not have particulate emission from fossil fuel burning installations of greater than 10 MMBTU/hr heat input that exceeds the emission rate as determine by the relationship:

$$E = 0.8808 * I^{-0.1677}$$

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

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

3.B.2 For Emission Points AA-013 through AA-016, AA-019, AA-021, AA-023, and AA-024, 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).)

3.B.3 For Emission Point AA-021, the permittee shall not discharge sulfur oxides from any fuel burning installations in which fuel is burned primarily to produce heat of power by indirect heat transfer in excess of 4.8 lb/MMBTU (measured as sulfur dioxide) heat input.

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

3.B.4 Emission Points AA-002 and AA-020 are subject to the Standards of Performance for Stationary Gas Combustion Turbines, 40 CFR 60, Subpart GG. These combustion turbines qualify as stationary gas turbines with a heat input at peak load equal to or greater than 10.7 gigajoules (10 million Btu) per hour, based on the lower heating value of the fuel fired, which commenced construction, modification, or reconstruction after October 3, 1977.

(Ref.: 40 CFR 60.330, Subpart GG)

3.B.5 For Emission Points AA-002 and AA-020, the permittee shall not burn any fuel which

contains sulfur in excess of 0.8 percent by weight.

(Ref.: 40 CFR 60.333(b), Subpart GG)

- 3.B.6 Emission Points AA-002 and AA-020 meet the definition of existing combustion turbines as established in National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines, 40 CFR 63, Subpart YYYY. Therefore, these units and are not required to meet the requirements of this standard or the General Provisions, 40 CFR 63, Subpart A.

(Ref.: 40 CFR 63.6085 and 40 CFR 63.6090(a)(1) and (b)(4), Subpart YYYY)

- 3.B.7 For Emission Point AA-020, the permittee shall not cause to be discharged into the atmosphere any gases which contain nitrogen oxides in excess of

$$STD = 0.0150[(14.4)/Y] + F$$

NOT TO EXCEED 37.5 ppm at 15% O<sub>2</sub>, 17.34 lbs/hr and 73.43 tons/year for Emission Point AA-020.

where:

STD = allowable NO<sub>x</sub> emissions (percent by volume at 15% oxygen and on a dry basis).

Y = manufacturer's rated heat rate at manufacturer's rated peak load (kilojoules per watt hour), or actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt hour.

F = NO<sub>x</sub> emission allowance for fuel bound nitrogen as defined by the following table:

| Fuel-bound nitrogen (percent by weight) | F (NO <sub>x</sub> percent by volume) |
|---|---------------------------------------|
| $N \leq 0.015$                          | 0                                     |
| $0.015 < N < 0.1$                       | $0.04(N)$                             |
| $0.1 < N \leq 0.25$                     | $0.004 + 0.0067(N-0.1)$               |
| $N > 0.25$                              | 0.005                                 |

where:

N = the nitrogen content of the fuel, percent by weight.

(Ref.: 40 CFR 60.332(a)(2), Subpart GG and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10) as established in the Permit to Construct issued November 21, 1999)

- 3.B.8 For Emission Points AA-004 through AA-016, AA-019, AA-023, and AA-024, the permittee is subject to the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR 63, Subpart ZZZZ.

Emission Points AA-004 through AA-012 are existing non-emergency spark ignition 2 stroke lean burn (2SLB) stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions and as such are not required to meet the requirements of 40 CFR 63, Subpart ZZZZ or the General Provisions in Subpart A.

Emission Points AA-013 through AA-015 are existing non-emergency spark ignition 4 stroke rich burn (4SRB) stationary RICE with a site rating of less than 500 brake HP located at a major source of HAP emissions and as such must meet the applicable requirements of 40 CFR 63, Subpart ZZZZ.

Emission Points AA-016 and AA-023 are existing emergency spark ignition 4 stroke rich burn (4SRB) stationary RICE with a site rating of less than 500 brake HP located at a major source of HAP emissions and as such must meet the applicable operational requirements of 40 CFR 63, Subpart ZZZZ.

Emission Point AA-019 is an existing emergency spark ignition 4 stroke lean burn (4SLB) stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions. As such, the engine is not required to meet the requirements of 40 CFR 63, Subpart ZZZZ or the General Provisions in Subpart A.

Emission Point AA-024 is a new non-emergency spark ignition 4 stroke rich burn (4SRB) stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions and as such must meet the requirements of 40 CFR 63, Subpart ZZZZ, by meeting the requirements of 40 CFR 60, Subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under 40 CFR 63, Subpart ZZZZ.

(Ref.: 40 CFR 63.6580, 63.6585(a)-(b), 63.6590(a)(1)(i)-(ii), 63.6590(a)(2)(ii), 63.6590(b)(3)(i)-(ii), and 63.6590(c)(4), Subpart ZZZZ)

- 3.B.9 For Emission Points AA-013 through AA-015, the permittee shall limit the concentration of formaldehyde in each stationary RICE exhaust to 10.3 ppmvd or less at 15 percent O<sub>2</sub>.

(Ref.: 40 CFR 63.6595(a)(1), 40 CFR 63.6602, and Item 11 of Table 2c, Subpart ZZZZ)

- 3.B.10 For Emission Points AA-016, AA-019 and AA-023, the permittee shall operate each emergency stationary engine according to the requirements cited below. In order for the engines 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 engines are not operated

according to these requirements, the engine will not be considered an emergency engine under Subpart ZZZZ and shall meet all requirements for non-emergency engines.

- (a) There is no time limit on the use of the emergency engines in emergency situations.
- (b) The engines 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 the DEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of engine beyond 100 hours per calendar year.
- (c) The engines may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing.

(Ref.: 40 CFR 63.6640(f)(1)-(3), Subpart ZZZZ)

- 3.B.11 For Emission Points AA-016 and AA-023, the permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop the permittee's own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

(Ref.: 40 CFR 63.6625(e)(1)-(2), Subpart ZZZZ)

- 3.B.12 For Emission Points AA-013 through AA-016 and AA-023, the permittee shall be in compliance with the applicable emission limitations, operating limitations, and other requirements in Subpart ZZZZ at all times. At all times, the engines shall be operated and maintained, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require any further efforts to reduce emissions if levels required by Subpart ZZZZ have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to this Office 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.

(Ref.: 40 CFR 63.6605, Subpart ZZZZ)

- 3.B.13 For Emission Points AA-013 through AA-016 and AA-023, the permittee shall minimize

the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Table 2c to Subpart ZZZZ apply.

(Ref.: 40 CFR 63.6625(h), Subpart ZZZZ)

- 3.B.14 Emission Point AA-024 is subject to the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart JJJJ. Emission Point AA-024 qualifies as a stationary spark ignition internal combustion engine with a maximum engine power less than 500 HP that was manufactured on or after July 1, 2008.

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

- 3.B.15 For Emission Point AA-024, Nitrogen Oxide (NO<sub>x</sub>) emissions are limited to 1.0 grams per horsepower-hour (g/bhp-hr) or 82 ppmvd @ 15% O<sub>2</sub>. Carbon Monoxide (CO) emissions are limited to 2.0 g/bhp-hr or 270 ppmvd @ 15% O<sub>2</sub>, and Volatile Organic Compound (VOC) emissions are limited to 0.7 g/bhp-hr or 60 ppmvd @ 15% O<sub>2</sub>. The engine shall be operated and maintained such that it achieves these emission standards over the entire life of the engine.

(Ref: 40 CFR 60.4233(e), 40 CFR 60.4324, and Table 1, Subpart JJJJ)

- 3.B.16 For Emission Point AA-024, the air-to-fuel (AFR) ratio controller(s) shall be maintained and operated appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times.

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

- 3.B.17 For Emission Point AA-021, the permittee is subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63 Subpart DDDDD.

Emission Point AA-021 is an existing boiler in the “units designed to burn gas 1 fuel” subcategory as listed in 40 CFR 63.7499(l) and defined in 40 CFR 63.7575. This unit does not have any applicable emission standards and only has to comply with the work practice standards in Condition 3.D.1.

(Ref: 40 CFR 63.7485, 63.7490(a)(1) and (d), 63.7499(l), and 63.7500(a)(1), Subpart DDDDD)

- 3.B.18 For Emission Point AA-021, the permittee shall operate and maintain the boiler, including any monitoring equipment, in a manner consistent with safe and good air pollution control practices for minimizing emissions. The permittee shall also be in compliance with the applicable emission limits, work practice standards, and operating limits in Subpart

DDDDD at all times the affected unit is operating except for periods of startup and shutdown.

(Ref.: 40 CFR 63.7500(a)(3) and 63.7505(a), Subpart DDDDD)

C. Insignificant and Trivial Activity Emission Limitations & Standards

| Applicable Requirement                      | Condition Number(s) | Pollutant/Parameter | Limit/Standard |
|---|---------------------|---------------------|----------------|
| 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a). | 3.C.1               | PM                  | 0.6 lbs/MMBTU  |
| 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).    | 3.C.2               | SO <sub>2</sub>     | 4.8 lbs/MMBTU  |

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

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

3.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 million BTU heat input.

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



D. Work Practice Standards

| Emission Point(s)       | Applicable Requirement  | Condition Number(s) | Pollutant/Parameter | Limit/Standard   |
|-------------------------|---|---------------------|---------------------|--|
| AA-021                  | 40 CFR 63.7500(e),<br>40 CFR 63.7515(d),<br>40 CFR 63.7540(a)<br>(10)(i)-(vi), (12), and<br>(13), Subpart DDDDD<br><br>and<br><br>Item 1 of Table 3 of<br>Subpart DDDDD | 3.D.1               | HAPs                | Perform Tune-ups every 5-years   |
| AA-016<br>and<br>AA-023 | 40 CFR 63.6602, Subpart<br>ZZZZ<br><br>and<br><br>Item 6 and Footnote 1 of<br>Table 2c to Subpart ZZZZ  | 3.D.2               | HAPs                | Change Oil & Filters as required. Regularly<br>inspect Spark Plugs, Hoses, and Belts, replace as<br>required |
|                         | 40 CFR 63.6625(j),<br>Subpart ZZZZ<br><br>and<br><br>Footnote 2 of Table 2c to<br>Subpart ZZZZ  | 3.D.3               | HAPs                | Alternative Oil Analysis Program   |

3.D.1 For Emission Point AA-021, the permittee shall complete a tune-up on the emission point every five years beginning from the date of the initial tune-up. Each subsequent tune-up shall be completed no more than 61 months after the previous one. If the emission point is not operating on the required date of the tune-up, the tune-up shall be conducted within 30 calendar days of startup. The tune-up shall be completed in accordance with (a) through (f) below:

- (a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may delay the burner inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;
- (b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;

- (c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection;
- (d) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO<sub>x</sub> requirement to which the unit is subject;
- (e) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and
- (f) Maintain on-site and submit, if requested by DEQ, an annual report containing the following information listed in (1) through (3) of this section:
  - (1) The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler;
  - (2) A description of any corrective actions taken as a part of the tune-up of the boiler; and
  - (3) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.

(Ref.: 40 CFR 63.7500(e), 63.7515(d), 63.7540(a)(10)(i)-(vi),(12), and (13),,and Item 1 of Table 3,Subpart DDDDD)

3.D.2 For Emission Points AA-016 and AA-023, the permittee shall,

- (a) Change oil and filter every 500 hours of operation or annually, whichever comes first;
- (b) Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first; and
- (c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements on the schedule required in Table 2c of Subpart ZZZZ, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources shall report any failure to perform the work practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.

(Ref.: 40 CFR 63.6602, Subpart ZZZZ and Item 6 and Footnote 1 of Table 2c, Subpart ZZZZ)

- 3.D.3 For Emission Points AA-016 and AA-023, the permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Table 2c of Subpart ZZZZ. The oil analysis shall be performed at the same frequency specified for changing the oil in Table 2c of Subpart ZZZZ. The analysis program shall at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the permittee shall change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee shall change the oil within 2 business days or before commencing operation, whichever is later. The permittee shall keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program shall be part of the maintenance plan for the engine.

(Ref.: 40 CFR 63.6625(j), Subpart ZZZZ and Footnote 2 of Table 2c, Subpart ZZZZ)

## SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 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:
- (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), & (d).)

- 4.3 The permittee shall submit progress reports consistent with an applicable schedule of compliance and 11 Miss. Admin. Code Pt. 2, R. 6.2.C(8). semiannually, or at such other frequency as is specified in an applicable requirement or by the Permit Board. Such progress reports shall contain the following:
- (a) dates for achieving the activities, milestone(s), or compliance required in the schedule of compliance, and dates when such activities, milestone(s) or compliance were achieved; and
  - (b) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.C(8).)

## SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

### A. General Monitoring, Recordkeeping and Reporting Requirements

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

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

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

- (a) the date, place as defined in the permit, and time of sampling or measurements;
- (b) the date(s) analyses were performed;
- (c) the company or entity that performed the analyses;
- (d) the analytical techniques or methods used;
- (e) the results of such analyses; and
- (f) the operating conditions existing at the time of sampling or measurement.

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

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

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

5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 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 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 (i.e., April 30th, July

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

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

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

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

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

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

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

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

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

(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-002 and AA-020                | 40 CFR 60.334(h)(3), Subpart GG<br>and<br>11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).                            | 5.B.1            | Sulfur                        | Keep records of gas quality characteristics |
| AA-020                           | 40 CFR 60.8, Subpart A<br>and<br>40 CFR 60.335, Subpart GG<br>and<br>11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2). | 5.B.2            | NO <sub>x</sub>               | Performance Testing Requirements            |
| AA-013 through AA-016 and AA-023 | 40 CFR 63.6655(a)(1)-(5) and (e), Subpart ZZZZ  | 5.B.3            | HAPs                          | General Recordkeeping                       |
|                                  | 40 CFR 63.10(b)(1), Subpart A<br>and<br>40 CFR 63.6660, Subpart ZZZZ  | 5.B.4            | HAPs                          | General Recordkeeping                       |
| AA-016, AA-019 and AA-023        | 40 CFR 63.6655(f), Subpart ZZZZ<br>and<br>11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).                            | 5.B.5            | HAPs                          | Hours of Operation                          |
| AA-024                           | 40 CFR 60.4243(b)(2)(i), Subpart JJJJ   | 5.B.6            | NO <sub>x</sub> , CO, and VOC | General Recordkeeping                       |
| AA-021                           | 40 CFR 63.7505(a)(12), Subpart DDDDD  | 5.B.7            | HAPs                          | Continuous Compliance                       |
|                                  | 40 CFR 63.7555(a)(1)-(2),<br>40 CFR 63.7560, Subpart DDDDD<br>and<br>40 CFR 63.10(b)(2), Subpart A                  | 5.B.8            | HAPs                          | General Recordkeeping                       |

5.B.1 For Emission Points AA-002 and AA-020, the permittee shall monitor and keep records of the total sulfur content of the gaseous fuel combusted in the turbines. The permittee shall not be required to monitor the total sulfur content of the gaseous fuel combusted in the turbines if the gaseous fuel is demonstrated to meet the definition of natural gas in 40 CFR 60.331(u). The permittee shall use the following source 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 the sulfur content of the gaseous fuel does not exceed 20 grains/100 scf. 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 40 CFR 75 is required.

(Ref.: 40 CFR 60.334(h)(3), Subpart GG and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

5.B.2 For Emission Point AA-020, the permittee shall conduct performance tests biennially ( not to exceed 25 months from the previous test) on the turbine for Nitrogen Oxides (NOx). Compliance testing shall be performed while the turbine is operating at the load corresponding to the worst-case NOx concentration based on the initial performance testing. The permittee shall use EPA Reference Method 7E, Method 3 or 3A, Method 20 or an EPA approved alternative test method to determine NOx emissions.

(Ref.: 40 CFR 60.8, Subpart A, 40 CFR 60.335, Subpart GG, and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

5.B.3 For Emission Points AA-013 through AA-016 and AA-023, the permittee shall demonstrate compliance with the emission and operating limitations, and maintain the records described below:

- (a) A copy of each notification and report that was submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in 40 CFR 63.10(b)(2)(xiv);
- (b) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment;
- (c) Records of performance tests and performance evaluations as required in 40 CFR 63.10(b)(2)(viii);
- (d) Records of all required maintenance performed on the air pollution control and monitoring equipment;



- (e) Records of actions taken during periods of malfunction to minimize emissions in accordance, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
- (f) Records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan.

(Ref.: 40 CFR 63.6655(a)(1)-(5) and (e), Subpart ZZZZ)

- 5.B.4 For Emission Points AA-013 through AA-016 and AA-023, the permittee shall maintain records in a form suitable and readily available for expeditious review and shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, report, or record. Each record shall be kept readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(Ref.: 40 CFR 63.10(b)(1), Subpart A and 40 CFR 63.6660, Subpart ZZZZ)

- 5.B.5 For Emission Points AA-016, AA-019 and AA-023, the permittee shall keep records of the hours of operation of each engine that is recorded through the non-resettable hour meter. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

(Ref.: 40 CFR 63.6655(f), Subpart ZZZZ and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

- 5.B.6 For Emission Point AA-024, the permittee shall keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.

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

- 5.B.7 For Emission Point AA-021, the permittee shall demonstrate continuous compliance with the applicable work practice standards at all times the unit is operating, except for periods of startup and shutdown, by conducting tune-ups on the boiler in accordance with Condition 3.D.1.

(Ref.: 40 CFR 63.7540(a)(12), Subpart DDDDD)

- 5.B.8 For Emission Point AA-021, the permittee shall keep a copy each notification and report submitted to comply with 40 CFR 63, Subpart DDDDD, including all documentation supporting the Notification of Compliance Status or compliance reports. These records

shall be retained for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. The permittee is required to keep the records on site for a period of 2 years after the event and then they may be kept offsite for the remaining three years. All records shall be readily available for review.

(Ref.: 40 CFR 63.10(b)(2), Subpart A, and 63.7555(a)(1)-(2), 63.7560, Subpart DDDDD)

C. Specific Reporting Requirements

| Emission Point(s)            | Applicable Requirement   | Condition Number | Pollutant/Parameter Monitored | Reporting Requirement  |
|------------------------------|--|------------------|-------------------------------|--|
| AA-002 and AA-020            | 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).   | 5.C.1            | Fuel Content                  | Submit Gas Quality Section of the current valid purchase contract, tariff sheet or transportation contract |
| AA-020                       | 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).   | 5.C.2            | NO <sub>x</sub>               | Submit stack test results  |
| AA-013 through AA-015        | 40 CFR 63.6650(a)-(d), Subpart ZZZZ<br>and<br>Item 1 of Table 7 to Subpart ZZZZ  | 5.C.3            | HAPs                          | Submit semiannual compliance reports   |
| AA-016 and AA-023            | 40 CFR 63.6640(b) and (f), Subpart ZZZZ  | 5.C.4            | HAPs                          | Submit semiannual reports of deviations  |
| AA-016 and AA-019 and AA-023 | 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).   | 5.C.5            | Runtime                       | Submit reports of emergency and non-emergency runtime  |
| AA-021                       | 40 CFR 63.7550(a),(b), and (c)(5)(i)-(iii), (xiv), and (xvii), Subpart DDDDD<br>and<br>Table 9 of 40 CFR 63, Subpart DDDDD | 5.C.6            | HAPs                          | Submit 5-year compliance reports   |

5.C.1 For Emission Points AA-002 and AA-020, 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 by January 31<sup>st</sup> each year.

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

5.C.2 For Emission Point AA-020, the permittee shall submit a written report of the results of each performance test before the close of business on the 60th day following the completion of the performance test. For all required testing, the permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the DEQ. Also, the permittee shall notify the DEQ in writing at least ten (10) days prior to the intended test date(s) so that an observer may be afforded the opportunity to witness the test.

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

5.C.3 For Emission Points AA-013 through AA-015, the permittee shall submit semi-annual compliance reports in accordance with Condition 5.A.4, including the following information:

- (a) If there were no deviations from any applicable emission limitations or operating limitations, a statement shall be included that there were no deviations from the emission limitations or operating limitations during the reporting period; or
- (b) If there was a deviation from any emission limitation or operating limitation during the reporting period, then the compliance report shall contain the following information:
  - (1) Company name and address.
  - (2) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.
  - (3) Date of report and beginning and ending dates of the reporting period.
  - (4) The total operating time of the stationary RICE at which the deviation occurred during the reporting period.
  - (5) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
- (c) If there was a malfunction during the reporting period, the compliance report shall include 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. The report shall also include a description of actions taken by the permittee during a malfunction of an affected source to minimize emissions, including actions taken to correct a malfunction.

(Ref.: 40 CFR 63.6650(a)-(d), Subpart ZZZZ and Item 1 of Table 7, Subpart ZZZZ)

5.C.4 For Emission Points AA-016 and AA-023, the permittee shall report each instance in which each applicable operating limitation in Condition 3.D.2 was not met. These instances are deviations from the operating limitations in 40 CFR 60, Subpart ZZZZ. These deviations shall be reported according to the requirements in Condition 5.C.3.

(Ref.: 40 CFR 63.6640(b) and (f), Subpart ZZZZ)

5.C.5 For Emission Points AA-016, AA-019 and AA-023, the permittee shall submit in accordance with Condition 5.A.4, a report that contains the hours of operation of the

stationary RICE as recorded through the non-resettable hour meter. The report shall indicate how many hours are spent in emergency operation, including what classified the operation as emergency, and how many hours are spent in non-emergency.

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

5.C.6 For Emission Point AA-021, the permittee shall submit subsequent 5-year compliance reports that cover the applicable 5-year period from the initial compliance report and shall be postmarked or submitted no later than January 31 of the applicable year. The compliance reports shall contain the following information:

- (a) Company and Facility name and address.
- (b) Process unit information, emissions limitations, and operating parameter limitations.
- (c) Date of report and beginning and ending dates of the reporting period.
- (d) The total operating time during the reporting period.
- (e) The date of the most recent 5-year tune-up and the date of the most recent burner inspection if it was not done on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown.
- (f) A statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy and completeness of the report.

(Ref.: 40 CFR 63.7550(a),(b), and (c)(5)(i)-(iii), (xiv), and (xvii), and Table 9, Subpart DDDDD))

## SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

## SECTION 7. TITLE VI REQUIREMENTS

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

- 7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A – Production and Consumption Controls.
- 7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.
- 7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E – The Labeling of Products Using Ozone-Depleting Substances, for the following containers and products:
  - (a) All containers in which a class I or class II substance is stored or transported;
  - (b) All products containing a class I substance; and
  - (c) All products directly manufactured with a process that uses a class I substance, unless otherwise exempted by this subpart or, unless EPA determines for a particular product that there are no substitute products or manufacturing processes for such product that do not rely on the use of a class I substance, that reduce overall risk to human health and the environment, and that are currently or potentially available. If the EPA makes such a determination for a particular product, then the requirements of this subpart are effective for such product no later than January 1, 2015.
- 7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F – Recycling and Emissions Reduction:
  - (a) Servicing, maintaining, or repairing appliances containing class I, class II or non-exempt substitute refrigerants;
  - (b) Disposing of appliances, including small appliances and motor vehicle air conditioners; or
  - (c) Refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, as well

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

- 7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any acceptable alternative that is listed in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR Part 82, Subpart G – Significant New Alternatives Policy Program. The permittee shall also comply with any use conditions for the acceptable alternative substance.
- 7.6 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart H – Halon Emissions Reduction:
- (a) Any person testing, servicing, maintaining, repairing, or disposing of equipment that contains halons or using such equipment during technician training;
  - (b) Any person disposing of halons;
  - (c) Manufacturers of halon blends; or
  - (d) Organizations that employ technicians who service halon-containing equipment.



## APPENDIX A

### List of Abbreviations Used In this Permit

|                   |  |
|-------------------|--|
| 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               | Mississippi Department of Environmental Quality  |
| EPA               | United States 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  |
| MMBTUH            | 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 61, or National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR 63 |
| NMVOC             | Non-Methane Volatile Organic Compounds   |
| NO <sub>x</sub>   | Nitrogen Oxides  |
| NSPS              | New Source Performance Standards, 40 CFR 60  |
| O&M               | Operation and Maintenance  |
| PM                | Particulate Matter   |
| PM <sub>10</sub>  | Particulate Matter less than 10 µm in diameter   |
| PM <sub>2.5</sub> | Particulate Matter less than 2.5 µm in diameter  |
| ppm               | Parts per Million  |
| PSD               | Prevention of Significant Deterioration  |
| SIP               | State Implementation Plan  |
| SO <sub>2</sub>   | 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  |