

# STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

## THIS CERTIFIES THAT

Tennessee Gas Pipeline Company LLC,  
Bellewood Compressor Station Number 602  
Bellewood Road  
Isola, Mississippi  
Humphreys County

has been granted permission to construct air emissions equipment to comply with the emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: August 6, 2026

Permit No.: 1180-00030

## **SECTION 1. GENERAL CONDITIONS**

- 1.1 This permit is for air pollution control purposes only.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
- 1.1 Any activities not identified in the application are not authorized by this permit.  
(Ref.: Miss. Code Ann. 49-17-29(1)(b))
- 1.2 The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for operating without a valid permit pursuant to State Law.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
- 1.3 It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(6).)
- 1.4 The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
- 1.5 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit, unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)
- 1.6 The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).)
- 1.7 The permit does not convey any property rights of any sort, or any exclusive privilege.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)
- 1.8 The permittee shall furnish to the Department of Environmental Quality (DEQ) within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to

determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

- 1.9 *Design and Construction Requirements:* The stationary source shall be designed and constructed so as to operate without causing a violation of an Applicable Rules and Regulations, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards, and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A(1)-(3).)

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

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

- 1.11 *Fugitive Dust Emissions from Construction Activities:* The construction of the stationary source shall be performed in such a manner so as to reduce fugitive dust emissions from construction activities to a minimum.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A(4).)

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

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

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

1.13 *Right of Entry:* The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives upon presentation of credentials:

- (a) To enter at reasonable times upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and
- (b) To have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air contaminants or waste waters, fuel, process material, or other material which affects or may affect emission of air contaminants from any source.

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

1.14 *Permit Modification or Revocation:* After notice and opportunity for a hearing, the Permit Board may modify the permit or revoke it in whole or in part for good cause shown including, but not limited to:

- (a) Persistent violation of any of the terms or conditions of this permit;
- (b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
- (c) A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

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

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

1.16 *Permit Transfer:* This permit shall not be transferred except upon approval of the Permit Board.

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

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(7).)

- 1.18 *Permit Expiration:* The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance, if construction is suspended for eighteen (18) months or more, or if construction is not completed within a reasonable time. The DEQ may extend the 18-month period upon a satisfactory showing that an extension is justified.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1)., R. 2.5.C(4)., and R. 5.2.)
- 1.19 *Certification of Construction:* A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(3).)
- 1.20 *Beginning Operation:* After certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by 11 Miss. Admin. Code Pt. 2, R. 2.13.G.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).)
- 1.21 *Application for a Permit to Operate:* The application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).)
- 1.22 *Operating Under a Permit to Construct:* Upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).)
- 1.23 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.
- (a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through

properly signed contemporaneous operating logs or other relevant evidence the following:

- (i) An upset occurred and that the source can identify the cause(s) of the upset;
    - (ii) The source was at the time being properly operated;
    - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
    - (iv) That within five (5) working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
    - (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
  - (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
  - (3) This provision is in addition to any upset provision contained in any applicable requirement.
  - (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- (b) Startups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
  - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).

- (3) Where an upset, as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., occurs during startup or shutdown, see the upset requirements above.

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

- 1.24 *General Duty:* All air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants.

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

- 1.25 *Compliance Testing:* Regarding compliance testing:

- (a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.
- (b) Compliance testing will be performed at the expense of the permittee.
- (c) Each emission sampling and analysis report shall include but not be limited to the following:
  - (1) detailed description of testing procedures;
  - (2) sample calculation(s);
  - (3) results; and
  - (4) comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

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

## SECTION 2. EMISSION POINT DESCRIPTION

The permittee is authorized to construct and operate, upon certification of construction, air emissions equipment, as described in the following table.

| Emission Point | Description                                                                                                                    |
|----------------|--------------------------------------------------------------------------------------------------------------------------------|
| AA-001         | 31,900 horsepower (hp) (23.1 Megawatt (MW)) Solar Titan Model No. T250 natural gas-fired simple cycle compressor turbine No. 1 |
| AA-002         | 31,900 HP (23.1 MW) Solar Titan Model No. T250 natural gas-fired simple cycle compressor turbine No. 2                         |
| AA-003         | 31,900 HP (23.1 MW) Solar Titan Model No. T250 natural gas-fired simple cycle compressor turbine No. 3                         |
| AA-004         | 2,682 HP Caterpillar Model G3520 spark ignition (SI) natural gas-fired emergency backup power generating engine No. 1          |
| AA-005         | 2,682 HP Caterpillar Model G3520 SI natural gas-fired emergency backup power generating engine No. 2                           |
| AA-006         | Natural gas-fired catalytic heater No. 1 (less than 10 MMBTUH)                                                                 |
| AA-007         | Natural gas-fired catalytic heater No. 2 (less than 10 MMBTUH)                                                                 |
| AA-008         | Fugitive emissions from equipment leaks                                                                                        |
| AA-009         | Natural gas blowdowns                                                                                                          |
| AA-010         | 5,000 gallon condensate storage tank (ST-1)                                                                                    |
| AA-011         | 5,000 gallon condensate storage tank (ST-2)                                                                                    |
| AB-001         | Centrifugal compressor driven by Emission Point AA-001                                                                         |
| AB-002         | Centrifugal compressor driven by Emission Point AA-002                                                                         |
| AB-003         | Centrifugal compressor driven by Emission Point AA-003                                                                         |



### 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                 | Opacity                             | ≤ 40%                                                                                                                                                                  |
| AA-001 through AA-005            | 11 Miss. Admin. Code Pt. 2, R. 1.3. D(1)(b)                                                                                                                 | 3.3                 | PM (filterable)                     | $E=0.8808 \times I^{-0.1667}$                                                                                                                                          |
| AA-006 and AA-007                | 11 Miss. Admin. Code Pt. 2, R. 1.3. D(1)(a)                                                                                                                 | 3.4                 | PM (filterable)                     | ≤ 0.6 lb/MMBTU                                                                                                                                                         |
| AA-001, AA-002, And AA-003       | 40 CFR 60, Subpart KKKKa                                                                                                                                    | 3.5                 | NO <sub>x</sub> and SO <sub>2</sub> | Applicability                                                                                                                                                          |
|                                  | Standards of Performance for Stationary Combustion Turbines 40 CFR 60.4300a, 60.4305a, and 60.4315a, Subpart KKKKa                                          |                     |                                     |                                                                                                                                                                        |
|                                  | 40 CFR 60.4330a(a)(2), Subpart KKKKa and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).                                                                          | 3.6                 | SO <sub>2</sub>                     | ≤ 0.060 lb SO <sub>2</sub> /MMBTU                                                                                                                                      |
|                                  |                                                                                                                                                             |                     | Fuel Sulfur                         | ≤ 20 grains S per 100 scf                                                                                                                                              |
| AB-001 through AB-003 and AA-008 | 40 CFR 60, Subpart OOOOb                                                                                                                                    | 3.8                 | VOC / GHG                           | Applicability                                                                                                                                                          |
|                                  | Standards of Performance for Crude Oil and Natural Gas Facilities) for which Construction, Modification, or Reconstruction Commenced After December 5, 2022 |                     |                                     |                                                                                                                                                                        |
|                                  | 40 CFR 60.5360b, 60.5365b(b) and (i), Subpart OOOOb                                                                                                         |                     |                                     |                                                                                                                                                                        |
| AB-001 through AB-003            | 40 CFR 60.5380b(a)(6)(i), Subpart OOOOb                                                                                                                     | 3.9                 | Volumetric flow rate                | ≤10 scfm per seal                                                                                                                                                      |
| AA-004 and AA-005                | 40 CFR 63, Subpart ZZZZ                                                                                                                                     | 3.10                | HAP                                 | Applicability                                                                                                                                                          |
|                                  | NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE)                                                                                      |                     |                                     |                                                                                                                                                                        |
|                                  | 40 CFR Part 63.6580, 63.6585(a) and (c), 63.6590(a)(2)(iii), and (c)(1), Subpart ZZZZ                                                                       | 3.11                | NO <sub>x</sub> , CO, and VOC       | General Applicability                                                                                                                                                  |
|                                  | 40 CFR 60, Subpart JJJJ                                                                                                                                     |                     |                                     |                                                                                                                                                                        |
|                                  | Standards of Performance for Stationary Spark Ignition Internal Combustion Engines                                                                          | 3.12                | NO <sub>x</sub> , CO, and VOC       | 2.0 g/bhp/hr NO <sub>x</sub> or 160 ppmvd @ 15% O <sub>2</sub> , 4.0 g/bhp/hr CO or 540 ppmvd @ 15% O <sub>2</sub> , 1.0 g/bhp/hr VOC or 86 ppmvd 15% O <sub>2</sub> , |
|                                  | 40 CFR 60.4230(a)(4)(iv), Subpart JJJJ                                                                                                                      |                     |                                     |                                                                                                                                                                        |
|                                  | 40 CFR 60.4233(e); 60.4234; and Table 1 to 40 CFR Part 60, Subpart JJJJ                                                                                     |                     |                                     |                                                                                                                                                                        |

|        |                                           |      |                               |                                                 |
|--------|-------------------------------------------|------|-------------------------------|-------------------------------------------------|
|        | 40 CFR 60.4237(a), Subpart JJJJ           | 3.13 | Operations                    | Operational Restriction                         |
|        | 40 CFR 60.4243(d)(1)-(3), Subpart JJJJ    | 3.14 | NO <sub>x</sub> , CO, and VOC | Operating Requirement                           |
| AA-008 | 40 CFR 60.5397b(c) and (d), Subpart OOOOb | 3.15 | VOC / GHG                     | Fugitive emissions monitoring plan requirements |

3.1 For the entire facility, 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 paragraphs (a) and (b) below.

- (a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.
- (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour.

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

3.2 For the entire facility, the permittee shall not cause, permit, or allow the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in 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 Emission Points AA-001 through AA-005, the permittee shall not have particulate emissions from fossil fuel burning installations of greater than 10 MMBTU/hr heat input that exceeds the emission rate as determined by the relationship:

$$E = 0.8808 \times I^{-0.1667}$$

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

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

3.4 For Emission Points AA-006 and AA-007, the permittee shall not have particulate emissions from installations of less than 10 million BTU per hour heat input exceed 0.6 pounds per million BTU per hour heat input.

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

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- 3.5 For Emission Points AA-001 through AA-003, the permittee is subject to and shall comply with all applicable requirements of the Standards of Performance for Stationary Combustion Turbines, 40 CFR 60, Subpart KKKKa, and the applicable General Provisions in 40 CFR 60, Subpart A.

(Ref: 40 CFR 60.4300a, 60.4305a, and 60.4315a, Subpart KKKKa)

- 3.6 For Emission Points AA-001 through AA-003, the permittee shall not burn any fuel which contains total potential sulfur emissions in excess of 0.060 lb SO<sub>2</sub> /MMBTU (20 gr/100 scf).

(Ref.: 40 CFR 60.4330a(a)(2), Subpart KKKKa and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

- 3.7 For Emission Points AA-001 through AA-003, the permittee must not discharge into the atmosphere from the turbines any gases that contain an amount of NO<sub>x</sub> that exceeds 15 ppm at 15 percent O<sub>2</sub> or 24 ng/J (0.055 lb/MMBtu) or 150 ppm at 15% O<sub>2</sub> when operating at less than 70% of peak load. During each operating hour, the permittee must meet the applicable NO<sub>x</sub> emission standard, which corresponds to a stationary combustion turbine firing natural gas for that operating hour. As an alternative to determining compliance on an operating hour basis, the permittee may elect to use the lowest NO<sub>x</sub> emission standard that is applicable, as determined using table 1 to Subpart KKKKa, for the entire required compliance period.

The permittee must meet the applicable NO<sub>x</sub> emissions standard during all times that the turbine is operating (including periods of startup, shutdown, and malfunction).

(Ref.: 40 CFR 60.4320a(a), (b)(1) and (b)(2), (d), and Items 7 and 16 of Table 1 to Subpart KKKKa)

- 3.8 For Emission Points AB-001 through AB-003 and AA-008, the permittee is subject to and shall comply with all applicable requirements of the Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced after December 6, 2022, 40 CFR 60, Subpart OOOOb and the applicable General Provisions, 40 CFR 60, Subpart A as identified in Table 5 of Subpart OOOOb.

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

- 3.9 For Emission Points AB-001 through AB-003, for the centrifugal compressors equipped with dry seals, the volumetric flow rate per seal must not exceed 10 standard cubic feet per minute (scfm) per seal. If the individual seals are manifolded to a single open-ended vent line, the volumetric flow rate must not exceed the sum of the individual seals multiplied by 10 scfm. If the volumetric flow rate, measured in accordance with Condition 5.5 exceeds 10 scfm multiplied by the number of dry seals connected to the vent, the seals connected to the measured vent must be repaired as provided in Condition 5.6.

(Ref: 40 CFR 60.5380b(a)(6)(i), Subpart OOOOb)

- 3.10 For Emission Points AA-004 and AA-005, the permittee is subject to and shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Combustion Engines, 40 CFR 63, Subpart ZZZZ.

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Emission Points AA-004 and AA-005 are considered new, spark ignition, four stroke lean burn, emergency engines, each with a site rating greater than 500 HP that are located at an area source of HAP emissions. As such, the engines must meet the requirements of Subpart ZZZZ by meeting the requirements of 40 CFR Part 60, Subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under 40 CFR Part 63 Subpart ZZZZ or the General Provisions of Subpart A.

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

- 3.11 For Emission Points AA-004 and AA-005, the permittee is subject to and shall comply with all applicable requirements of the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines, 40 CFR 60, Subpart JJJJ and the applicable General Provisions, 40 CFR 60, Subpart A as identified in Table 3 of Subpart JJJJ.

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

- 3.12 For Emission Points AA-004 and AA-005, Nitrogen Oxide (NO<sub>x</sub>) emissions are limited to 2.0 grams per horsepower-hour (g/hp-hr) or 160 ppmvd @ 15% O<sub>2</sub>, Carbon Monoxide (CO) emissions are limited to 4.0 g/hp-hr or 540 ppmvd @ 15% O<sub>2</sub>, and VOC emissions are limited to 1.0 g/hp-hr or 86 ppmvd @ 15% O<sub>2</sub>. The permittee must operate and maintain each stationary SI ICE such that it achieves these emission standards over the entire life of the engine.

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

- 3.13 For Emission Points AA-004 and AA-005, the permittee must install and operate a non-resettable hour meter on each emergency engine.

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

- 3.14 For Emission Points AA-004 and AA-005, the permittee must operate the emergency stationary engines according to the requirements in (a) through (c) below. In order for the engines to be considered emergency stationary engines, 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 engines will not be considered emergency engines under 40 CFR 60, Subpart JJJJ and must meet all requirements for non-emergency engines.

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

(b) The engine may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not

required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of each engine beyond 100 hours per calendar year.

- (c) The engine may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing.

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

3.15 For Emission Point AA-008, the permittee must develop a fugitive emissions monitoring plan. A fugitive emissions monitoring plan must be developed that covers all fugitive emissions components affected facilities within each company-defined area in accordance with (a) and (b) below.

- (a) Elements of fugitive emissions monitoring plan. Your fugitive emissions monitoring plan must include the elements specified in (1) through (8) below, at a minimum.
  - (1) Frequency for conducting surveys. Surveys must be conducted at least as frequently as required by Conditions 5.16 and 5.17.
  - (2) Technique for determining fugitive emissions (i.e., audible, visual, and olfactory (AVO) or other detection methods, Method 21 of appendix A-7 to 40 CFR 60, and/or Optical Gas Imaging (OGI) and meeting the requirements of (a)(7)(i) through (vii) below.
  - (3) Manufacturer and model number of fugitive emissions detection equipment to be used, if applicable.
  - (4) Procedures and timeframes for identifying and repairing fugitive emissions components from which fugitive emissions are detected, including timeframes for fugitive emission components that are unsafe to repair. The repair schedule must meet the requirements of Condition 5.18 at a minimum.
  - (5) Procedures and timeframes for verifying fugitive emission component repairs.
  - (6) Records that will be kept and the length of time records will be kept.
  - (7) If you are using OGI, your plan must also include the elements specified in (i) through (vii).
    - (i) Verification that your OGI equipment meets the specifications of (A) and (B) below. This verification is an initial verification, and may either be performed by the facility, by the manufacturer, or by a third party. For the purposes of complying with the fugitive emissions monitoring program with OGI, fugitive emissions are defined as any visible emissions observed using OGI.

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- (A) Your OGI equipment must be capable of imaging gases in the spectral range for the compound of highest concentration in the potential fugitive emissions.
- (B) Your OGI equipment must be capable of imaging a gas that is half methane, half propane at a concentration of 10,000 ppm at a flow rate of  $\leq 60$  g/hr from a quarter inch diameter orifice.
- (ii) Procedure for a daily verification check.
- (iii) Procedure for determining the operator's maximum viewing distance from the equipment and how the operator will ensure that this distance is maintained.
- (iv) Procedure for determining maximum wind speed during which monitoring can be performed and how the operator will ensure monitoring occurs only at wind speeds below this threshold.
- (v) Procedures for conducting surveys, including the items specified in paragraphs (A) through (C) below.
  - (A) How the operator will ensure an adequate thermal background is present in order to view potential fugitive emissions.
  - (B) How the operator will deal with adverse monitoring conditions, such as wind.
  - (C) How the operator will deal with interferences (e.g., steam).
- (vi) Training and experience needed prior to performing surveys.
- (vii) Procedures for calibration and maintenance. At a minimum, procedures must comply with those recommended by the manufacturer.
- (8) If the permittee uses Method 21 of appendix A-7 to 40 CFR 60, the plan must also include the elements specified in (i) through (iv) below. For the purposes of complying with the fugitive emissions monitoring program using Method 21 of appendix A-7 to 40 CFR 60 a fugitive emission is defined as an instrument reading of 500 ppmv or greater.
  - (i) Verification that the monitoring equipment meets the requirements specified in Section 6.0 of Method 21 of appendix A-7 to 40 CFR 60. For purposes of instrument capability, the fugitive emissions definition shall be 500 ppmv or greater methane using a Flame Ionization Detector (FID)-based instrument. If the permittee wishes to use an analyzer other than an FID-based instrument, the permittee must develop a site-specific fugitive emission definition that would

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be equivalent to 500 ppmv methane using a FID-based instrument (e.g., 10.6 eV PID with a specified isobutylene concentration as the fugitive emission definition would provide equivalent response to your compound of interest).

- (ii) Procedures for conducting surveys. At a minimum, the procedures shall ensure that the surveys comply with the relevant sections of Method 21 of appendix A-7 to 40 CFR 60,.
- (iii) Procedures for calibration. The instrument must be calibrated before use each day of its use by the procedures specified in Method 21 of appendix A-7 to 40 CFR 60. At a minimum, the permittee must also conduct precision tests at the interval specified in Method 21 of appendix A-7 to 40 CFR 60, and a calibration drift assessment at the end of each monitoring day. The calibration drift assessment must be conducted as specified in
  - (A) below. Corrective action for drift assessments is specified (B) and (C) below.
  - (A) Check the instrument using the same calibration gas that was used to calibrate the instrument before use. Follow the procedures specified in Method 21 of appendix A-7 to 40 CFR 60, Section 10.1, except do not adjust the meter readout to correspond to the calibration gas value. If multiple scales are used, record the instrument reading for each scale used. Divide the arithmetic difference of the initial and post-test calibration response by the corresponding calibration gas value for each scale and multiply by 100 to express the calibration drift as a percentage.
  - (B) If a calibration drift assessment shows a negative drift of more than 10 percent, then all equipment with instrument readings between the fugitive emission definition multiplied by (100 minus the percent of negative drift) divided by 100 and the fugitive emission definition that was monitored since the last calibration must be re-monitored.
  - (C) If any calibration drift assessment shows a positive drift of more than 10 percent from the initial calibration value, then, at the permittee's discretion, all equipment with instrument readings above the fugitive emission definition and below the fugitive emission definition multiplied by (100 plus the percent of positive drift) divided by 100 monitored since the last calibration may be re-monitored.
- (iv) Procedures for monitoring yard piping (other than buried yard piping). At a minimum, place the probe inlet at the surface of the yard piping and run the probe down the length of the piping. Connection points on the piping must be monitored following the

procedures specified in Method 21 of appendix A-7 to 40 CFR 60.

- (b) Additional elements of fugitive emissions monitoring plan. Each fugitive emissions monitoring plan must include the elements specified in (1) and (2) below, at a minimum, as applicable.
- (1) If the permittee is using OGI, the plan must include procedures to ensure that all fugitive emissions components, except buried yard piping and associated components (e.g., connectors), are monitored during each survey. Example procedures include, but are not limited to, a sitemap with an observation path, a written narrative of where the fugitive emissions components are located and how they will be monitored, or an inventory of fugitive emissions components.
  - (2) If the permittee is using Method 21 of appendix A-7 to 40 CFR 60, the plan must include a list of fugitive emissions components to be monitored and method for determining the location of fugitive emissions components to be monitored in the field (e.g., tagging, identification on a process and instrumentation diagram, etc.). The fugitive emissions monitoring plan must include the written plan developed for all of the fugitive emissions components designated as difficult-to-monitor in accordance with Condition 5.22(c), and the written plan for fugitive emissions components designated as unsafe-to-monitor in accordance with Condition 5.22(d).

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



## SECTION 4. WORK PRACTICES

| Emission Point        | Applicable Requirement            | Condition Number(s) | Work Practice                             |
|-----------------------|-----------------------------------|---------------------|-------------------------------------------|
| Facility-Wide         | 40 CFR 60.5371b(d), Subpart OOOOb | 4.1                 | Comply with super-emitter event standards |
| AA-001 through AA-003 | 40 CFR 60.4333a(a), Subpart KKKKa | 4.2                 | Good air control practices                |
| AB-001 through AB-003 | 40 CFR 60.5370b(b), Subpart OOOOb | 4.3                 | Good air control practices                |

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

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

- 4.2 For Emission Points AA-001 through AA-003, the permittee must operate and maintain the stationary combustion turbines, air pollution control equipment, and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction.

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

- 4.3 For Emission Points AB-001 through AB-003, at all times, including periods of startup, shutdown, and malfunction, the permittee shall maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the MDEQ which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. The provisions for exemption from compliance during periods of startup, shutdown and malfunctions provided in 40 CFR 60.8(c) do not apply to 40 CFR Subpart OOOOb.

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

## SECTION 5. MONITORING AND RECORDKEEPING REQUIREMENTS

| Emission Point        | Applicable Requirement                                                                                   | Condition Number(s) | Pollutant/Parameter    | Monitoring/Recordkeeping Requirement                         |
|-----------------------|----------------------------------------------------------------------------------------------------------|---------------------|------------------------|--------------------------------------------------------------|
| Facility-Wide         | 11 Miss. Admin. Code Pt. 2, R. 2.9.                                                                      | 5.1                 | Recordkeeping          | Maintain records for a minimum of 5 years.                   |
| AA-001 through AA-003 | 40 CFR 60.4372a(a) and (b) and 60.4390a(f), Subpart KKKKa                                                | 5.2                 | Fuel Sulfur Content    | Fuel monitoring                                              |
| AA-001 through AA-003 | 40 CFR 60.4333a(b)(1)-(5), 60.4333a(c)(2), 60.4340a(a)(1), and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 5.3                 | NO <sub>x</sub> and CO | Performance stack testing                                    |
| AB-001 through AB-003 | 40 CFR 60.5380b(a)(6)(i)-(ii), Subpart OOOOb                                                             | 5.4                 | GHG and VOC            | Volumetric flow rate monitoring requirements                 |
|                       | 40 CFR 60.5380b(a)(7)(iii), Subpart OOOOb                                                                | 5.5                 | GHG and VOC            | Volumetric flow rate monitoring requirements                 |
|                       | 40 CFR 60.5380b(a)(8), Subpart OOOOb                                                                     | 5.6                 | GHG and VOC            | Dry seal repair requirements                                 |
|                       | 40 CFR 60.5380b(a)(9), Subpart OOOOb                                                                     | 5.7                 | GHG and VOC            | Dry seal monitoring requirements                             |
|                       | 40 CFR 60.5386b(a), Subpart OOOOb                                                                        | 5.8                 | GHG and VOC            | Dry seal monitoring requirements                             |
|                       | 40 CFR 60.5386b(b)-(d), Subpart OOOOb                                                                    | 5.9                 | GHG and VOC            | Volumetric flow rate monitoring requirements                 |
| AB-001 through AB-003 | 40 CFR 60.5411b(b), Subpart OOOOb                                                                        | 5.10                | GHG and VOC            | Cover monitoring and recordkeeping requirements              |
|                       | 40 CFR 60.5420b(c)(4), Subpart OOOOb                                                                     | 5.11                | Records                | Recordkeeping requirements                                   |
| AA-004 and AA-005     | 40 CFR 60.4243(a)(1) and (2) and (b)(1) and 60.4245(a), Subpart JJJJ                                     | 5.12                | Records                | Recordkeeping requirements                                   |
|                       | 40 CFR 60.4245(a), Subpart JJJJ                                                                          | 5.13                | Maintenance            | Recordkeeping requirements                                   |
|                       | 40 CFR 60.4245(b), Subpart JJJJ                                                                          | 5.14                | Hours                  | Recordkeeping requirements                                   |
| AA-008                | 40 CFR 60.5397b(e), Subpart OOOOb                                                                        | 5.15                | GHG and VOC            | Fugitive emissions monitoring requirements                   |
|                       | 40 CFR 60.5397b(f), Subpart OOOOb                                                                        | 5.16                | GHG and VOC            | Fugitive emissions initial survey monitoring requirements    |
|                       | 40 CFR 60.5397b(g)(1)(v), (g)(2), and (g)(3), Subpart OOOOb                                              | 5.17                | GHG and VOC            | Fugitive emissions survey monitoring requirements            |
|                       | 40 CFR 60.5397b(h), Subpart OOOOb                                                                        | 5.18                | GHG and VOC            | Fugitive emissions survey repair requirements                |
|                       | 40 CFR 60.5410b(k), Subpart OOOOb                                                                        | 5.19                | GHG and VOC            | Fugitive emissions monitoring and recordkeeping requirements |
|                       | 40 CFR 60.5415b(l), Subpart OOOOb                                                                        | 5.20                | GHG and VOC            | Fugitive emissions continuous compliance                     |
|                       | 40 CFR 60.5420b(c)(14), Subpart OOOOb                                                                    | 5.21                | Records                | Fugitive emissions recordkeeping requirements                |

|                         |                                      |      |         |                                      |
|-------------------------|--------------------------------------|------|---------|--------------------------------------|
| AA-010<br>and<br>AA-011 | 40 CFR 60.5365b(e), Subpart<br>OOOOb | 5.22 | Records | Emissions recordkeeping requirements |
|-------------------------|--------------------------------------|------|---------|--------------------------------------|

- 5.1 The permittee shall retain all required records, monitoring data, supporting information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to 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 Emission Points AA-001 through AA-003, the permittee shall monitor and keep records of the total sulfur content of the gaseous fuel combusted in the turbines. The permittee shall maintain on site the gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the natural gas, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf (equivalent to 338 ppmv) or less.

(Ref.: 40 CFR 60.4372a(a) and (b) and 60.4390a(f), Subpart KKKKa)

- 5.3 For Emission Points AA-001 through AA-003, the permittee shall demonstrate compliance with the NO<sub>x</sub> emission limitations by performance testing each turbine within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of the facility. Continuous compliance shall be demonstrated by conducting subsequent performance tests within 12 calendar months of the date that the previous performance test was conducted.

If the NO<sub>x</sub> emission result from the most recent performance test is less than or equal to 75 percent of the NO<sub>x</sub> emissions standard for the stationary combustion turbine, the permittee may reduce the frequency of subsequent performance tests to 26 calendar months following the date the previous performance test was conducted. If the results of any subsequent performance test exceed 75 percent of the NO<sub>x</sub> emissions standard for the stationary combustion turbine, the permittee must resume 14-calendar-month performance testing.

A turbine that has not operated for the 60 calendar days prior to the due date of a performance test is not required to perform the subsequent performance test until 45 calendar days or 10 operating days, whichever is longer, after the next operating day. The MDEQ must be notified of recommencement of operation consistent with Condition 6.5.

If a turbine has operated 168 operating hours or less, either in total or using a particular fuel, since the date on which the previous performance test was conducted, the permittee may request that the otherwise required performance test be postponed until the turbine has operated more than 168 operating hours, either in total or using a particular fuel, since the date on which the previous performance test was conducted. A request for an extension under this scenario must be addressed to the air division or office director of the Region IV Office of the U.S. EPA for approval at least 30 calendar days prior to the date on which the performance test is required to be conducted. If a postponement is approved, a performance test must be conducted within 45 calendar days after the day that the turbine reaches 168

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hours of operation since the date on which the previous performance test was conducted. When the turbine has operated more than 168 operating hours since the date on which the previous performance test was conducted, the MDEQ must be notified consistent with Condition 6.5.

The permittee may request the use of a custom testing schedule by submitting a written request to the MDEQ. The minimum requirements of the custom schedule include the conditions specified below:

- (a) Emissions from the most recent performance test for each individual turbine are 75 percent or less of the applicable standard;
- (b) Each stationary combustion turbine uses the same emissions control technology;
- (c) Each stationary combustion turbine is operated in a similar manner;
- (d) Each stationary combustion turbine and its emissions control equipment are maintained according to the manufacturer's recommended maintenance procedures; and
- (e) A performance test is conducted on each affected facility at least once every 5 calendar years.

The permittee shall also conduct a one-time performance test on each turbine for carbon monoxide (CO) emissions according to the procedures of EPA Test Method 10.

The CO and NO<sub>x</sub> performance tests must be done at load conditions within plus or minus 25 percent of 100 percent of peak load. The permittee may perform testing at the highest achievable load point, if at least 75 percent of peak load cannot be achieved in practice. The permittee must conduct three separate test runs for each performance test. The minimum time per run is 20 minutes.

Reference method testing is to be conducted in accordance with test protocol detailing QA/QC to be used during testing and subject to approval by the DEQ.

(Ref: 40 CFR 60.4333a(b)(1)-(5), 60.4333a(c)(2), 60.4340a(a)(1), and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 5.4 For Emission Points AB-001 through AB-003, for each centrifugal compressor equipped with dry seals, the permittee must comply with the GHG and VOC requirements as specified in (a) and (b) below, using volumetric flow rate as a surrogate. The permittee must determine the volumetric flow rate in accordance with Condition 5.5.

- (a) The permittee must conduct the first volumetric flow rate measurement from the centrifugal compressor equipped with a dry seal on or before 8,760 hours of operation after startup.
- (b) The permittee must conduct subsequent volumetric flow rate measurements from the centrifugal compressor equipped with dry seals on or before 8,760 hours of operation after the previous measurement which demonstrates compliance with the 10 scfm volumetric flow rate per seal. If the individual seals are manifolded to a single open-ended vent line, the volumetric flow rate must not exceed the sum of the individual seals multiplied by 10 scfm.

(Ref.: 40 CFR 60.5380b(a)(6)(ii)-(iii), Subpart OOOOb)

- 5.5 For Emission Points AB-001 through AB-003, the permittee must determine the volumetric flow rate from each centrifugal compressor equipped with dry seals as specified in (a) or (b) below. If the volumetric flow rate exceeds 10 scfm multiplied by the number of dry seals connected to the vent, the dry seals connected to the measured vent must be repaired as provided in Condition 5.6.
- (a) For centrifugal compressors equipped with dry seals in operating-mode or in standby-pressurized-mode, determine volumetric flow rate at standard conditions from the centrifugal compressor equipped with dry seals using one of the methods specified in (1) through (3) below.
    - (1) The permittee may choose to use any of the methods set forth in Condition 5.8 to screen for leaks/emissions. For the purposes of this paragraph, when using any of the methods in Condition 5.8, emissions are detected whenever a leak is detected according to the method. If emissions are detected using the methods set forth in Condition 5.8, then use one of the methods specified in (2) or (3) below to determine the volumetric flow rate. If emissions are not detected using the methods in Condition 5.8, then the permittee may assume that the volumetric emissions are zero.
    - (2) Use a temporary or permanent flow meter according to methods set forth in Condition 5.9(a).
    - (3) Use a high-volume sampler according to the method set forth Condition 5.9(b).
  - (b) For conducting measurements on manifolded groups of centrifugal compressors equipped with dry seals, the permittee must determine the volumetric flow rate from the dry seal centrifugal compressors as specified in (1) or (2) below.
    - (1) Measure at a single point in the manifold downstream of all centrifugal compressors equipped with dry seals inputs and, if practical, prior to comingling with other non-compressor emission sources.
    - (2) Determine the volumetric flow rate at standard conditions from the common stack using one of the methods specified in Condition 5.5(a)(1) through (3).

(Ref.: 40 CFR 60.5380b(a)(7)(iii), Subpart OOOOb)

- 5.6 For Emission Points AB-001 through AB-003, the permittee must repair the seal within 90 calendar days after the date of the volumetric emissions measurement that exceeds the applicable required flow rate per seal. The permittee must conduct follow-up volumetric flow rate measurements from seal vents using the methods specified in Condition 5.5 within 15 days after the repair to document that the rate has been reduced to less than the applicable required flow rate per seal. If the individual seals are manifolded to a single open-ended vent line or vent, the volumetric flow rate must be reduced to less than the sum of the individual seals multiplied by the applicable required flow rate per seal specified in Condition 3.9. Delay of repair will be allowed if the conditions in (a) or (b) below are met.
- (a) If the repair of the dry seal is technically infeasible, would require a vent blowdown, a compressor station shutdown, or would be unsafe to repair during

operation of the unit, the repair must be completed during the next scheduled compressor station shutdown for maintenance, after a scheduled vent blowdown, or within (two) 2 years of the date of the volumetric emissions measurement that exceeds the applicable required flow rate per seal, whichever is earliest. A vent blowdown is the opening of one or more blowdown valves to depressurize major production and processing equipment, other than a storage vessel.

- (b) If the repair requires replacement of the compressor seal or a part thereof, but the replacement cannot be acquired and installed within the repair timelines specified under this section due to the condition specified in (1) below, the repair must be completed in accordance with (2) below and documented in accordance with Condition 5.16(b)(6)-(8).
  - (1) Seal or part thereof supplies had been sufficiently stocked but are depleted at the time of the required repair.
  - (2) The required replacement must be ordered no later than ten (10) calendar days after the centrifugal compressor seal is added to the delay of repair list due to parts unavailability. The repair must be completed as soon as practicable, but no later than 30 calendar days after receipt of the replacement seal or part, unless the repair requires a compressor station shutdown. If the repair requires a compressor station shutdown, the repair must be completed in accordance with the timeframe specified in Condition 5.6(a).

(Ref.: 40 CFR 60.5380b(a)(8), Subpart OOOOb)

- 5.7 For Emission Points AB-001 through AB-003, as an alternative to meeting the requirements for centrifugal compressors with dry seals specified in Conditions 5.4 through 5.6, the permittee is allowed to comply with the standard by meeting the requirements specified in (a) and (b) below, or (c) below.

- (a) The permittee must reduce methane and VOC emissions from the centrifugal compressor dry seal system by 95.0 percent.
- (b) If a control device is used to reduce emissions, the permittee must equip the dry seal system with a cover that meets the requirements of 40 CFR 60.5411b(b). The cover must be connected through a closed vent system that meets the requirements of 40 CFR 60.5411b(a) and (c) and the closed vent system must be routed to a control device that meets the conditions specified in 40 CFR 60.5412b.
- (c) As an alternative to routing the closed vent system to a control device, the permittee may route the closed vent system to a process. If emissions are routed to a process, the permittee must equip the dry seal system with a cover that meets the requirements of 40 CFR 60.5411b(b). The cover must be connected through a closed vent system that meets the requirements of 40 CFR 60.5411b(a) and (c).

(Ref.: 40 CFR 60.5380b(a)(9), Subpart OOOOb)

- 5.8 For Emission Points AB-001 through AB-003, the permittee must use one of the methods described in (a) and (b) below to screen for emissions or leaks from the dry seal centrifugal compressor vents when complying with Condition 5.4.

- (a) Use an OGI instrument for equipment leak detection. For the purposes of

Condition 5.8(a), any visible emissions observed by the OGI instrument from compressor dry seal vent is a leak. For dry seal centrifugal compressor affected facilities located at compressor stations, use an OGI instrument to screen for emissions from compressor dry seals in accordance with the elements of Condition 3.15(a)(7).

- (b) Use Method 21 in appendix A-7 to 40 CFR 60 according to 40 CFR 60.5403b(b)(1) and (2). An instrument reading of 500 parts per million by volume (ppmv) above background or greater is a leak.

(Ref.: 40 CFR 60.5386b(a), Subpart OOOOb)

5.9 For Emission Points AB-001 through AB-003, the permittee must comply with the following requirements:

- (a) The permittee must determine natural gas volumetric flow rate using a rate meter which meets the requirement in Method 2D in appendix A-1 of 40 CFR 60. Rate meters must be calibrated on an annual basis according to the requirements in Method 2D.
- (b) The permittee must use a high-volume sampler to measure emissions of the centrifugal compressor dry seal vent in accordance with (1) through (7) below.
  - (1) The permittee must use a high-volume sampler designed to capture the entirety of the emissions from the applicable vent and measure the entire range of methane concentrations being emitted as well as the total volumetric flow at standard conditions. The permittee must develop a standard operating procedure for this device and document these procedures in the appropriate monitoring plan. In order to get reliable results, persons using this device should be knowledgeable in its operation and the requirements in this section.
  - (2) This procedure may involve hazardous materials, operations, and equipment. This procedure may not address all of the safety problems associated with its use. It is the responsibility of the user of this procedure to establish appropriate safety and health practices and determine the applicability of regulatory limitations prior to performing this procedure.
  - (3) The high-volume sampler must include a methane gas sensor(s) which meets the requirements in (i) through (iii) below.
    - (i) The methane sensor(s) must be selective to methane with minimal interference, less than 2.5 percent for the sum of responses to other compounds in the gas matrix. Document the minimal interference through empirical testing or through data provided by the manufacturer of the sensor.
    - (ii) The methane sensor(s) must have a measurement range over the entire expected range of concentrations.

- (iii) The methane sensor(s) must be capable of taking a measurement once every second, and the data system must be capable of recording these results for each sensor at all times during operation of the sampler.
- (4) The high-volume sampler must be designed such that it is capable of sampling sufficient volume in order to capture all emissions from the applicable vent. The high-volume sampler must include a flow measurement sensor(s) which meets the requirements of (i) and (ii) below.
  - (i) The flow measurement sensor must have a measurement range over the entire expected range of flow rates sampled. If needed multiple sensors may be used to capture the entire range of expected flow rates.
  - (ii) The flow measurement sensor(s) must be capable of taking a measurement once every second, and the data system must be capable of recording these results for each sensor at all times during operation of the sampler.
- (5) The permittee must calibrate the methane sensor(s) according to the procedures in (i)(A) and (i)(B) below, and flow measurement sensors must be calibrated according to the procedures in (ii) below.
  - (i) For Methane Sensor Calibration:
    - (A) Initially and on a semi-annual basis, determine the linearity at four points through the measurement range for each methane sensor using methane gaseous calibration cylinder standards. At each point, the difference between the cylinder value and the sensor reading must be less than five (5) percent of the respective calibration gas value. If the sensor does not meet this requirement, perform corrective action on the sensor, and do not use the sampler until these criteria can be met.
    - (B) Prior to and at the end of each testing day, challenge each sensor at two points, a low point, and a mid-point, using methane gaseous calibration cylinder standards. At each point, the difference between the cylinder value and the sensor reading must be less than five (5) percent of the respective calibration gas value. If the sensor does not meet this requirement, perform corrective action on the sensor and do not use the sampler again until these criteria can be met. If the post-test calibration check fails at either point, invalidate the data from all tests performed subsequent to the last passing calibration check.
  - (ii) Flow measurement sensors must meet the requirements in Method



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2D in appendix A-1 of 40 CFR 60. Rate meters must be calibrated on an annual basis according to the requirements in Method 2D. If the flow sensor relies on ancillary temperature and pressure measurements to correct the flow rate to standard conditions, the temperature and pressure sensors must also be calibrated on an annual basis. Standard conditions are defined as 20 °C (68 °F) and 760 mm Hg (29.92 in. Hg).

- (6) The permittee must conduct sampling of the dry seal centrifugal compressor vent in accordance with the procedures in (i) through (v) below.
- (i) The instrument must be operated consistent with manufacturer recommendations; users are encouraged to develop a standard operating procedure to document the exact procedures used for sampling.
  - (ii) Identify the dry seal centrifugal compressor vent to be measured and record the signal to noise ratio (S/N) of the engine. Collect a background methane sample in ppmv for a minimum of one minute and record the result along with the date and time.
  - (iii) Approach the vent with the sample hose and adjust the sampler so that the sampler is measuring at the full flow rate. Then, adjust the flow rate to ensure the measured methane concentration is within the calibrated range of the methane sensor and minimum methane concentration is at least two (2) ppmv higher than the background concentration. Sample for a period of at least one minute and record the average flow rate in standard cubic feet per minute and the methane sample concentration in ppmv, along with the date and time. Standard conditions are defined as 20 °C (68 °F) and 760 mm Hg (29.92 in. Hg).
  - (iv) Calculate the leak rate according to the following equation:

**Equation 1 to paragraph (c)(6)(iv)**

$$Q = V \left( \frac{CH_{4S} - CH_{4B}}{1000000} \right)$$

Where:

CH<sub>4B</sub> = background methane concentration, ppmv

CH<sub>4S</sub> = methane sample concentration, ppmv

V = Average flow rate of the sampler, scfm

Q = Methane emission rate, scfm

- (v) Collect at least three separate one-minute measurements and determine the average leak rate. The relative percent difference of these three separate samples should be less than 10 percent.

- (7) If the measured natural gas flow determined as specified in paragraph

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Condition 5.9(b)(6) exceeds 70.0 percent of the manufacturer's reported maximum sampling flow rate the permittee must either use a temporary or permanent flow meter according to Condition 5.9(a) or use another method meeting the requirements in Condition 5.9(c) to determine the leak or flow rate.

- (c) As an alternative to a high-volume sampler, the permittee may use any other method that has been validated in accordance with the procedures specified in Method 301 in appendix A in 40 CFR part 63, subject to DEQ approval, as specified in 40 CFR 60.8(b).

(Ref.: 40 CFR 60.5386b(b)-(d), Subpart OOOOb)

5.10 For Emission Points AB-001 through AB-003, if complying with Condition 5.7(b) or (c), the permittee shall comply with the following centrifugal compressor cover requirements:

- (a) Each cover opening shall be secured in a closed, sealed position (e.g., covered by a gasketed lid or cap) whenever material is in the unit on which the cover is installed except during those times when it is necessary to use an opening as follows:
  - (1) To add material to, or remove material from the unit (this includes openings necessary to equalize or balance the internal pressure of the unit following changes in the level of the material in the unit);
  - (2) To inspect or sample the material in the unit;
  - (3) To inspect, maintain, repair, or replace equipment located inside the unit; or
  - (4) To vent liquids, gases, or fumes from the unit through a closed vent system designed and operated in accordance with the requirements of Condition 5.11 to a control device or to a process.
- (b) The permittee must design and operate the cover with no identifiable emissions as demonstrated by 40 CFR 60.5416b(a) and (b), except when operated as provided in (a).

(Ref.: 40 CFR 60.5411b(b), Subpart OOOOb)

5.11 For Emission Points AB-001 through AB-003, the permittee must maintain the records specified in (a) and (b) below.

- (a) For the centrifugal compressor affected facility, the permittee must maintain records of deviations in cases where the centrifugal compressor was not operated in compliance with the requirements specified in Conditions 5.4 through 5.7, including a description of each deviation, the date and time each deviation began and the duration of each deviation.
- (b) For the dry seal centrifugal compressor complying with the standard in Condition 5.4, the permittee must maintain the records specified in (1) through (8) below.
  - (1) Records of the cumulative number of hours of operation since initial startup, since May 7, 2024, or since the previous volumetric flow rate measurement, as applicable.

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- (2) A description of the method used and the results of the volumetric flow rate measurement or emissions screening, as applicable.
- (3) Records for all flow meters, composition analyzers and pressure gauges used to measure volumetric flow rates as specified in (i) through (vi) below.
  - (i) Description of standard method published by a consensus-based standards organization or industry standard practice.
  - (ii) Records of volumetric flow rate emissions calculations conducted according to Condition 5.4, as applicable.
  - (iii) Records of manufacturer's operating procedures and measurement methods.
  - (iv) Records of manufacturer's recommended procedures or an appropriate industry consensus standard method for calibration and results of calibration, recalibration, and accuracy checks.
  - (v) Records which demonstrate that measurements at the remote location(s) can, when appropriate correction factors are applied, reliably and accurately represent the actual temperature or total pressure at the flow meter under all expected ambient conditions. The permittee must include the date of the demonstration, the data from the demonstration, the mathematical correlation(s) between the remote readings and actual flow meter conditions derived from the data, and any supporting engineering calculations. If adjustments were made to the mathematical relationships, a record and description of such adjustments.
  - (vi) Record of each initial calibration or a recalibration which failed to meet the required accuracy specification and the date of the successful recalibration.
- (4) Date when performance-based volumetric flow rate is exceeded.
- (5) The date of successful repair of the compressor seal, including follow-up performance-based volumetric flow rate measurement to confirm successful repair.
- (6) Identification of each compressor seal placed on delay of repair and explanation for each delay of repair.
- (7) For each compressor seal or part needed for repair placed on delay of repair because of replacement seal or part unavailability, the permittee must document: the date the seal or part was added to the delay of repair list, the date the replacement seal or part was ordered, the anticipated seal or part delivery date (including any estimated shipment or delivery date provided by the vendor), and the actual arrival date of the seal or part.

- (8) Date of planned shutdowns that occur while there are any seals or parts that have been placed on delay of repair.

(Ref.: 40 CFR 60.5420b(c)(4), Subpart OOOOb)

5.12 For Emission Points AA-004 and AA-005, if the permittee demonstrates compliance by purchasing a certified engine, the permittee shall maintain documentation in (a) and (b) below. If the permittee demonstrates compliance with the emission standards in accordance with 40 CFR 63.4243(b)(2), the permittee shall keep documentation that the engine meets the emission standards per (c) below.

- (a) Confirms the purchase of a spark-ignition internal combustion engine certified to meet the emission standards specified in Condition 3.12 and maintain such documentation;
- (b) If the permittee operates and maintains the engine according to the manufacturer's emission-related written instructions, the permittee shall maintain records of conducted maintenance to demonstrate compliance, but no performance testing is required. The permittee shall also meet the requirements as specified in 40 CFR Part 1068, Subparts A through D (as applicable). If the permittee adjusts engine settings according to and consistent with the manufacturer's instructions, the engine will not be considered out of compliance.
- (c) If the permittee does not operate and maintain the engine according to the manufacturer's emission-related written instructions, the engine will be considered a non-certified engine. As such, the permittee shall keep a maintenance plan and records of conducted maintenance and must (to the extent practicable) maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. Additionally, the permittee must demonstrate compliance through performance testing by conducting an initial performance test within 1 year of engine startup and conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter to demonstrate compliance.

(Ref.: 40 CFR 60.4243(a)(1) and (2) and (b) and 60.4245(a), Subpart JJJJ)

5.13 For Emission Points AA-004 and AA-005, the permittee shall maintain all records of maintenance conducted on the engine, as well as documentation from the manufacturer that the engine is certified to meet the emission standards required by Condition 3.12.

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

5.14 For Emission Points AA-004 and AA-005, the permittee shall maintain records of the hours of operation recorded by the non-resettable hour meter. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

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

5.15 For Emission Point AA-008, each fugitive emissions component, except buried yard piping and associated components (e.g., connectors), shall be observed or monitored for fugitive

emissions during each monitoring survey.

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

- 5.16 For Emission Point AA-008, the permittee must conduct initial monitoring surveys according to the following requirements.
- (a) For compressor station sites, you must conduct an initial monitoring survey using OGI or Method 21 of appendix A-7 to 40 CFR 60 within 90 days of the startup of production, for each fugitive emissions components affected facility.
  - (b) For a modified or reconstructed fugitive emissions components affected facility, the initial monitoring survey must be conducted within 90 days of the startup of production for each fugitive emissions components affected facility after the modification or reconstruction.

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

- 5.17 For Emission Point AA-008, a monitoring survey of the fugitive emissions components located at the compressor station must be conducted according to the following requirements.
- (a) A monitoring survey must be conducted at least monthly using AVO, or any other detection method, after the initial survey. Any indications of fugitive emissions using these methods are considered fugitive emissions that must be repaired in accordance with Condition 3.15.
  - (b) A monitoring survey must be conducted at least quarterly using OGI or Method 21 of appendix A-7 to 40 CFR 60 after the initial survey. Consecutive quarterly monitoring surveys must be conducted at least 60 calendar days apart.
  - (c) If you are using Method 21 of appendix A-7 to 40 CFR 60, fugitive emissions components that cannot be monitored without elevating the monitoring personnel more than two (2) meters above the surface may be designated as difficult-to-monitor. Fugitive emissions components that are designated difficult-to-monitor must meet the specifications of (1) through (4) below.
    - (1) A written plan must be developed for all the fugitive emissions components designated difficult-to-monitor. This written plan must be incorporated into the fugitive emissions monitoring plan required by Condition 3.15.
    - (2) The plan must include the identification and location of each fugitive emissions component designated as difficult-to-monitor.
    - (3) The plan must include an explanation of why each fugitive emissions component designated as difficult-to-monitor is difficult-to-monitor.
    - (4) The plan must include a schedule for monitoring the difficult-to-monitor fugitive emissions components at least once per calendar year.

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- (d) If you are using Method 21 of appendix A-7 to 40 CFR 60, fugitive emissions components that cannot be monitored because monitoring personnel would be exposed to immediate danger while conducting a monitoring survey may be designated as unsafe-to-monitor. Fugitive emissions components that are designated unsafe-to-monitor must meet the specifications of (1) through (4) below.
- (1) A written plan must be developed for all the fugitive emissions components designated unsafe-to-monitor. This written plan must be incorporated into the fugitive emissions monitoring plan required by Condition 3.15.
  - (2) The plan must include the identification and location of each fugitive emissions component designated as unsafe-to-monitor.
  - (3) The plan must include an explanation of why each fugitive emissions component designated as unsafe-to-monitor is unsafe-to-monitor.
  - (4) The plan must include a schedule for monitoring the fugitive emissions components designated as unsafe-to-monitor.

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

5.18 For Emission Point AA-008, each identified source of fugitive emissions shall be repaired in accordance with the requirements below.

- (a) A first attempt at repair shall be made in accordance with (1) and (2) below.
- (1) A first attempt at repair shall be made no later than 15 calendar days after detection of fugitive emissions that were identified using AVO.
  - (2) For purposes of complying with Condition 5.17(a) and (b) using OGI or Method 21 of appendix A-7 to 40 CFR 60, a first attempt at repair shall be made no later than 30 calendar days after detection of the fugitive emissions.
- (b) Repair shall be completed as soon as practicable, but no later than 15 calendar days after the first attempt at repair as required in (a)(1) above, and 30 calendar days after the first attempt at repair as required in (a)(2) above.
- (c) Delay of repair will be allowed if the conditions in (1) or (2) below are met.
- (1) If the repair is technically infeasible, would require a vent blowdown, a compressor station shutdown, a well shutdown or well shut-in, or would be unsafe to repair during operation of the unit, the repair must be completed during the next scheduled compressor station shutdown for maintenance, scheduled well shutdown, scheduled well shut-in, after a scheduled vent blowdown, or within two (2) years of detecting the fugitive emissions, whichever is earliest. A vent blowdown is the opening of one or more blowdown valves to depressurize major production and processing equipment, other than a storage vessel.

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- (2) If the repair requires replacement of a fugitive emissions component or a part thereof, but the replacement cannot be acquired and installed within the repair timelines specified in Condition 5.18(a) and (b) due to either of the conditions specified in (i) or (ii) below, the repair must be completed in accordance with (iii) below and documented in accordance Condition 5.16(e)(9).
  - (i) Valve assembly supplies had been sufficiently stocked but are depleted at the time of the required repair.
  - (ii) A replacement fugitive emissions component or a part thereof requires custom fabrication.
  - (iii) The required replacement must be ordered no later than 10 calendar days after the first attempt at repair. The repair must be completed as soon as practicable, but no later than 30 calendar days after receipt of the replacement component, unless the repair requires a compressor station or well shutdown. If the repair requires a compressor station or well shutdown, the repair must be completed in accordance with the timeframe specified in Condition 5.18.
- (d) Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements of (1) through (5) below, to ensure that there are no fugitive emissions.
  - (1) The permittee may resurvey the fugitive emissions components to verify repair using either Method 21 of appendix A-7 to 40 CFR 60 or OGI, except as specified in Condition 5.18(e).
  - (2) For each repair that cannot be made during the monitoring survey when the fugitive emissions are initially found, a digital photograph must be taken of that component, or the component must be tagged during the monitoring survey when the fugitive emissions were initially found for identification purposes and subsequent repair. The digital photograph must include the date that the photograph was taken and must clearly identify the component by location within the site (e.g., the latitude and longitude of the component or by other descriptive landmarks visible in the picture).
  - (3) If the permittee uses Method 21 of appendix A-7 to 40 CFR 60 to resurvey the repaired fugitive emissions components the permittee is subject to the resurvey provisions specified in (i) and (ii) below.
    - (i) A fugitive emissions component is repaired when the Method 21 instrument indicates a concentration of less than 500 ppmv above background or when no soap bubbles are observed when the alternative screening procedures specified in section 8.3.3 of Method 21 of appendix A-7 to 40 CFR 60 are used.
    - (ii) The permittee must use the Method 21 monitoring requirements

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specified in the procedures for conducting surveys specified in Condition 3.15(a)(8)(ii) or the alternative screening procedures specified in section 8.3.3 of Method 21 of appendix A-7 to 40 CFR 60.

- (4) If the permittee uses OGI to resurvey the repaired fugitive emissions components, the permittee is subject to the resurvey provisions specified in (i) and (ii) below.
  - (i) A fugitive emissions component is repaired when the OGI instrument shows no indication of visible emissions.
  - (ii) The permittee must use the OGI monitoring requirements specified in Condition 3.15(a)(7).
- (e) For fugitive emissions identified using AVO detection methods, the permittee may resurvey using those same methods, Method 21 of appendix A-7 to 40 CFR 60, or OGI. If the permittee uses AVO detection methods, a fugitive emissions component is repaired when there are no indications of fugitive emissions using these methods.

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

5.19 For Emission Point AA-008, to achieve initial compliance with the GHG and VOC standards for fugitive emissions components affected facilities, the permittee must comply with (a) through (e) below.

- (a) The permittee must develop a fugitive emissions monitoring plan as required in Condition 3.15.
- (b) The permittee must conduct an initial monitoring survey as required in Conditions 5.16 and 5.17.
- (c) The permittee must repair each identified source of fugitive emissions for each affected facility as required in Condition 5.18.
- (d) The permittee must submit the initial annual report for each fugitive emissions components affected facility as required in Condition 6.9.
- (e) The permittee must maintain the records specified in Condition 5.21.

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

5.20 For Emission Point AA-008, for each fugitive emissions components affected facility, the permittee must demonstrate continuous compliance with the requirements of Conditions 3.15 and 5.15 through 5.20 according to (a) through (d) below.

- (a) Periodic monitoring surveys must be conducted as required in Conditions 5.15 and 5.17.
- (b) Each identified source of fugitive emissions must be repaired as required in



Condition 5.18.

- (c) Annual reports must be submitted for fugitive emissions components affected facilities as required in Condition 6.9.
- (d) Records must be maintained as specified in Condition 5.21.

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

5.21 For Emission Point AA-008, for each fugitive emissions components affected facility, the permittee must maintain the records below.

- (a) The date of startup or the date of modification for the fugitive emissions components affected facility at a compressor station.
- (b) The fugitive emissions monitoring plan as required in Condition 3.15.
- (c) The records of each monitoring survey as specified below.
  - (1) Date of the survey.
  - (2) Beginning and end time of the survey.
  - (3) Name of operator(s), training, and experience of the operator(s) performing the survey.
  - (4) Monitoring instrument or method used.
  - (5) Fugitive emissions component identification when Method 21 of appendix A-7 to 40 CFR 60 is used to perform the monitoring survey.
  - (6) Ambient temperature, sky conditions, and maximum wind speed at the time of the survey. For compressor stations, operating mode of each compressor (i.e., operating, standby pressurized, and not operating-depressurized modes) at the station at the time of the survey.
  - (7) Any deviations from the monitoring plan or a statement that there were no deviations from the monitoring plan.
  - (8) Records of calibrations for the instrument used during the monitoring survey.
  - (9) Documentation of each fugitive emission detected during the monitoring survey, including the information specified below.
    - (i) Location of each fugitive emission identified.
    - (ii) Type of fugitive emissions component, including designation as difficult-to-monitor or unsafe-to-monitor, if applicable.
    - (iii) If Method 21 of appendix A-7 to 40 CFR 60 is used for detection,

record the component ID and instrument reading.

- (iv) For each repair that cannot be made during the monitoring survey when the fugitive emissions are initially found, a digital photograph or video must be taken of that component or the component must be tagged for identification purposes. The digital photograph must include the date that the photograph was taken and must clearly identify the component by location within the site (e.g., the latitude and longitude of the component or by other descriptive landmarks visible in the picture). The digital photograph or identification (e.g., tag) may be removed after the repair is completed, including verification of repair with the resurvey.
- (v) The date of first attempt at repair of the fugitive emissions component(s).
- (vi) The date of successful repair of the fugitive emissions component, including the resurvey to verify repair and instrument used for the resurvey.
- (vii) Identification of each fugitive emission component placed on delay of repair and explanation for each delay of repair.
- (viii) For each fugitive emission component placed on delay of repair for reason of replacement component unavailability, the permittee must document: the date the component was added to the delay of repair list, the date the replacement fugitive component or part thereof was ordered, the anticipated component delivery date (including any estimated shipment or delivery date provided by the vendor), and the actual arrival date of the component.
- (ix) Date of planned shutdowns that occur while there are any components that have been placed on delay of repair.

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

5.22 For Emission Points AA-010 and AA-011, the permittee shall keep records of the potential for emissions calculation for the life of the storage vessel or until such time the tank battery becomes a storage vessel affected facility because the potential for emissions meets or exceeds either threshold specified below.

- (a) Potential for VOC emissions equal to or greater than 6 tons per year as determined in 40 CFR 60.5365b(e)(2).
- (b) Potential for methane emissions is equal to or greater than 20 tons per year as determined in 40 CFR 60.5365b(e)(2).

(Ref.: 40 CFR 60.5365b(e), Subpart OOOOb)

## SECTION 6. REPORTING REQUIREMENTS

| Emission Point                   | Applicable Requirement                                                          | Condition Number(s) | Reporting Requirement                                          |
|----------------------------------|---------------------------------------------------------------------------------|---------------------|----------------------------------------------------------------|
| Facility-Wide                    | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).                                       | 6.1(a)              | Report deviations within five (5) working days                 |
|                                  | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).                                       | 6.1(b)              | Annual reporting                                               |
|                                  | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).                                       | 6.1(c)              | Certification by responsible official                          |
|                                  | 11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).                                        | 6.1(d)              | Notification of beginning actual construction within 15 days   |
|                                  | 11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).                                        | 6.1(e)              | Notification when construction does not begin or is suspended  |
|                                  | 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).                                | 6.1(f)              | Certification of completion of construction prior to operation |
|                                  | 11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).                                        | 6.1(g)              | Notification of changes in construction                        |
| AA-001 through AA-003            | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)                                        | 6.2                 | Submit performance stack test protocol and notification        |
|                                  | 40 CFR 60.4375a(e), Subpart KKKKa and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 6.3                 | Submit performance stack test results                          |
|                                  | 40 CFR 60.4375a(b), Subpart KKKKa                                               | 6.4                 | Performance stack test notifications                           |
|                                  | 40 CFR 60.4375a(d), Subpart KKKKa                                               | 6.5                 | Submit notifications                                           |
|                                  | 40 CFR 60.4375a(f), Subpart KKKKa                                               | 6.6                 | Submit semiannual reports                                      |
|                                  | 40 CFR 60.4375a(g), Subpart KKKKa                                               | 6.7                 | CEDRI Notification and Reporting                               |
| AB-001 through AB-003 and AA-008 | 40 CFR 60.5420b(b), Subpart OOOOb                                               | 6.8                 | Submit annual reports                                          |
| AA-008                           | 40 CFR 60.5420b(b)(9), Subpart OOOOb                                            | 6.9                 | Submit annual reports                                          |
| Facility-Wide                    | 40 CFR 60.5420b(b)(14), Subpart OOOOb                                           | 6.10                | Submit annual reports                                          |
| AB-001 through AB-003 and AA-008 | 40 CFR 60.5420b(b)(15) and 60.5420b(d), Subpart OOOOb                           | 6.11                | Submit annual reports                                          |
| AA-004 and AA-005                | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)                                        | 6.12                | Submit annual reports                                          |

6.1 General Reporting Requirements:

- (a) The permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- (b) Beginning upon issuance of this permit and lasting until issuance or modification of the applicable operating permit, the permittee shall submit reports of any required monitoring by January 31<sup>st</sup> for the preceding calendar year. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 2.1.C. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration. For any air emissions equipment not yet constructed and/or operating the report shall so note and include an estimated date of commencement of construction and/or startup, whichever is applicable.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- (c) Any document required by this permit to be submitted to the DEQ shall contain a certification signed by a responsible official stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- (d) Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).)
- (e) The permittee must notify DEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).)
- (f) Upon the completion of construction or installation of an approved stationary source or modification, and prior to commencing operation, the applicant shall notify the Permit Board that construction or installation was performed in accordance with the approved plans and specifications on file with the Permit Board.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).)
- (g) The Permit Board shall be promptly notified in writing of any change in construction from the previously approved plans and specifications or permit. If the Permit Board determines the changes are substantial, it may require the submission of a new application to construct with “as built” plans and specifications.

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Notwithstanding any provision herein to the contrary, the acceptance of an “as built” application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law.

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

- 6.2 For Emission Points AA-001 through AA-003, the permittee shall submit a written test protocol at least thirty (30) days prior to the intended performance 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.

After the first successful submittal of an initial written test protocol, the permittee may request that the resubmittal of testing protocol be waived for subsequent testing by certifying in writing at least thirty (30) days prior to subsequent testing that all conditions for testing remain unchanged such that the original protocol can and will be followed.

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

- 6.3 For Emission Points AA-001 through AA-003, the permittee shall submit a written report of the results from all required performance tests within sixty (60) days of the date the performance testing is performed.

Within 60 days after the date of completing each performance test, the permittee must submit the results following the procedures specified in Condition 6.7. The permittee must submit the report in a file format generated using the EPA's Electronic Reporting Tool (ERT). Alternatively, the permittee may submit an electronic file consistent with the extensible markup language (XML) schema listed on the EPA's ERT website (<https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert>) accompanied by the other information required by 40 CFR 60.8(f)(2) in PDF format.

(Ref.: 40 CFR 60.4375a(e), Subpart KKKKa and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 6.4 For Emission Points AA-001 through AA-003, the permittee shall comply with the notification requirements of 40 CFR 60.8 for the initial and subsequent performance tests.

(Ref.: 40 CFR 60.4375a(b), Subpart KKKKa)

- 6.5 For Emission Points AA-001 through AA-003, if complying with 40 CFR 60.4333a(b)(4), the permittee must notify the MDEQ within 15 calendar days after the facility has operated more than 168 operating hours since the date the previous performance test was required to be conducted.

(Ref.: 40 CFR 60.4375a(d), Subpart KKKKa)

- 6.6 For Emission Points AA-001 through AA-003, the permittee must submit to the DEQ semiannual reports of the following recorded information. Beginning on January 15, 2027, or once the report template for Subpart KKKKa has been available on the Compliance and Emissions Data Reporting Interface (CEDRI) website (<https://www.epa.gov/electronic-reporting-air-emissions/cedri>) for one year, whichever date is later, submit all subsequent reports using the appropriate electronic report template on the CEDRI website for Subpart

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KKKKa and following the procedure specified in Condition 6.7. Unless the EPA or MDEQ has approved a different schedule for submission of reports, the report must be submitted by the deadline specified in this Subpart KKKKa, regardless of the method in which the report is submitted.

(Ref.: 40 CFR 60.4375a(f), Subpart KKKKa)

- 6.7 For Emission Points AA-001 through AA-003, the permittee must submit notifications and reports to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>).

(Ref.: 40 CFR 60.4375a(g), Subpart KKKKa)

- 6.8 For Emission Points AB-001 through AB-003 and AA-008, the permittee must submit annual reports containing the information specified below in accordance with Condition 6.7. The initial annual report is due no later than 90 days after the end of the initial compliance period as determined according to 40 CFR 60.5410b. Subsequent annual reports are due no later than the same date each year as the initial annual report. For more than one affected facility, the permittee may submit one report for multiple affected facilities provided the report contains all of the information required as specified in Conditions 6.4 through 6.7. Annual reports may coincide with Title V reports as long as all the required elements of the annual report are included. The permittee may arrange with the DEQ a common schedule on which reports required by 40 CFR 60, Subpart OOOOb may be submitted as long as the schedule does not extend the reporting period.

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

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

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

- 6.9 For Emission Point AA-008, for the fugitive emissions components affected facility, each annual report must contain the information specified in (a) through (d) below, as applicable.

(a) The following:

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- (1) Designation of the type of site (i.e., well site, centralized production facility, or compressor station) at which the fugitive emissions components affected facility is located.
- (2) For the fugitive emissions components affected facility at a compressor station that became an affected facility during the reporting period, the permittee must include the date of startup or the date of modification.
- (b) For each fugitive emissions monitoring survey performed during the annual reporting period, the information specified in (1) through (7) below.
  - (1) Date of the survey.
  - (2) Monitoring instrument or, if the survey was conducted by AVO methods, notation that AVO was used.
  - (3) Any deviations from the monitoring plan elements under 40 CFR 60.5397b(c)(1), (2), and (7), (c)(8)(i), or (d) or a statement that there were no deviations from these elements of the monitoring plan.
  - (4) Number and type of components for which fugitive emissions were detected.
  - (5) Number and type of fugitive emissions components that were not repaired as required in 40 CFR 60.5397b(h).
  - (6) Number and type of fugitive emission components (including designation as difficult-to-monitor or unsafe-to-monitor, if applicable) on delay of repair and explanation for each delay of repair.
  - (7) Date of planned shutdown(s) that occurred during the reporting period if there are any components that have been placed on delay of repair.
- (c) For the fugitive emissions components affected facility complying with an alternative fugitive emissions standard under 40 CFR 60.5399b, in lieu of the information specified in Conditions 6.9(a) and (b), the permittee must provide the information specified in (1) through (3) below.
  - (1) The alternative standard with which you are complying.
  - (2) The site-specific reports specified by the specific alternative fugitive emissions standard, submitted in the format in which they were submitted to the state, local, or Tribal authority. If the report is in hard copy, the permittee must scan the document and submit it as an electronic attachment to the annual report required in Condition 6.9.
  - (3) If the report specified by the specific alternative fugitive emissions standard is not site-specific, the permittee must submit the information specified in Condition 6.9(a) and (b) for each individual site complying with the alternative standard.
- (d) If the permittee complies with an alternative GHG and VOC standard under 40 CFR 60.5398b, in lieu of the information specified in Condition 6.9(a) and (b), you must provide the information specified in 40 CFR 60.5424b.

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

- 6.10 For the entire facility, if the permittee had a super-emitter event during the reporting period, the annual report must include the start date of the super-emitter event, the duration of the super-emitter event in hours, and the affected facility associated with the super-emitter event, if applicable.

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

- 6.11 For Emission Points AB-001 through AB-003 and AA-008, the permittee must submit the annual report using the appropriate electronic report template on the Compliance and Emissions Data Reporting Interface (CEDRI) website for Subpart OOOOb and following the procedure specified below. If the reporting form specific to Subpart OOOOb is not available on the CEDRI website at the time that the report is due, the permittee must submit the report to the EPA at the appropriate address listed in 40 CFR 60.4. Once the form has been available on the CEDRI website for at least 90 calendar days, the permittee must begin submitting all subsequent reports via CEDRI. The date reporting forms become available will be listed on the CEDRI website. Unless the EPA or DEQ has approved a different schedule for submission of reports, the report must be submitted by the deadline specified in Subpart OOOOb, regardless of the method in which the report is submitted.

For any applicable notifications or reports required to be submitted to the EPA via CEDRI, CEDRI can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>). The EPA will make all the information submitted through CEDRI available to the public without further notice. Do not use CEDRI to submit information you claim as CBI. Although EPA does not expect persons to assert a claim of CBI, if the permittee wishes to assert a CBI claim for some of the information in the report or notification, the permittee must submit a complete file in the format specified in this subpart, including information claimed to be CBI, to the EPA following the procedures of this section. Clearly mark the part or all of the information that you claim to be CBI. Information not marked as CBI may be authorized for public release without prior notice. Information marked as CBI will not be disclosed except in accordance with procedures set forth in 40 CFR part 2. All CBI claims must be asserted at the time of submission. Anything submitted using CEDRI cannot later be claimed CBI. Furthermore, under CAA section 114(c), emissions data is not entitled to confidential treatment, and the EPA is required to make emissions data available to the public. Thus, emissions data will not be protected as CBI and will be made publicly available. The permittee must submit the same file submitted to the CBI office with the CBI omitted to the EPA via the EPA's CDX as described earlier in this paragraph (d).

(Ref.: 40 CFR 60.5420b(b)(15) and 60.5420b(d), Subpart OOOOb)

- 6.12 For Emission Points AA-004 and AA-005, as part of the annual monitoring report required by this permit, the permittee shall submit reports showing the hours of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. Records must indicate the time of operation of the engine and the reason the engine was in operation during that time. Records must also include the emergency and non-emergency hours of operation on a 12-month rolling basis.

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