Final Determination

of Approval for

Chevron USA Inc, Chevron Products Company, Pascagoula Refinery

"Pascagoula Aggregates PSD Project"

Facility No. 1280-00058

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SECTION 1: FINAL DETERMINATION

I. General Information

Chevron USA Inc., Chevron Products Company ("Chevron") owns and operates an existing petroleum refinery ("Pascagoula Refinery") at 250 Industrial Road in the John C. Stennis – Bayou Casotte Industrial Park, east of Pascagoula, Mississippi. The approximate Universal Transverse Mercator (UTM) coordinates for the Pascagoula Refinery are 356.79 km East and 3,357.41 km North in UTM Zone 16 (88º29'37" West and 30º20'37" North). Chevron currently operates 20 major refining process units, approximately 200 storage vessels, and four marine terminals on approximately 1,000 of 3,000 acres owned by Chevron. The Pascagoula Refinery can currently process 361,000 barrels per operating day of crude oil, which yields about 5.5 million gallons of motor gasoline per day, in addition to jet and diesel fuel, aviation gasoline, liquefied petroleum gas, petroleum coke, ammonia, sulfur, and benzene. The primary SIC Code is 2911 (Petroleum Refining), with secondary SIC Codes of 2819 (Industrial Inorganic Chemicals), 2865 (Cyclic Organic Crudes and Intermediates), and 5171 (Petroleum Terminals).

A. Project Description

Chevron is proposing to increase the daily crude throughput from 361,000 barrels per operating day to 394,000 barrels per operating day through upgrades and improvements to equipment, such as heat exchangers, pumps, and piping, which will debottleneck operations at the Crude I Unit (Plant 11), Crude II Unit (Plant 61), Hydrofiner (Plant 22), and Residuum Desulfurization Unit Module A (Plant 81A). These improvements will also allow the Pascagoula Refinery to process lighter crude slates. With the exception of new piping, the changes proposed to accommodate the increased throughput do not include new emission units or the modification of existing emission units. However, a number of units may experience increased utilization due to the increased crude processing capacity. Because an increase in crude throughput can impact numerous downstream processes, the project is referred to as the "Pascagoula Aggregates PSD Project." The following list summarizes the Plants, or process units, and related emission points that may be affected by this project.

- ***Plant 11 – Crude I Unit:*** Plant 11 will be debottlenecked and upgraded to accommodate a higher crude throughput. This will result in additional fugitive emissions from new piping components and potentially require increased firing from the Atmospheric Column Furnace (F-1101) and Vacuum Column Furnace (F-1102), which vent through two common stacks under Emission Point AE-013.

- ***Plants 15 and 115 – Rheniformer I and Naphtha Hydrotreater:*** The throughput at Rheniformer I is expected to increase due to debottlenecking of the Crude I and Crude II Units. Therefore, the heaters (F-1501/1502/1503), which vent through a common stack (Emission Point AG-043), are expected to see an increase in the actual firing rate.

- ***Plant 18 – Distillate Treating I:*** Treating of distillate products is expected to increase; however, there are no emission units at this plant, only fugitive sources of emissions which will not increase.

- ***Plant 20 – Light Ends Recovery I:*** There may be an increase in the throughput at Plant 20, which treats lighter ends for sale or use elsewhere in the refinery. However, Plant 20 has no emission units, only fugitive emissions associated with equipment leaks and wastewater. Emissions from equipment leaks will not increase, and impacts to wastewater are accounted for at Plant 32.

- ***Plant 21 – Boiler Plant Utilities:*** To accommodate an increase in crude throughput, steam production may increase. Since the boilers are identical, Chevron used boiler F-2101 (Emission Point AL-104) to determine potential emissions increases associated with increased steam demand.

- ***Plant 22 – Hydrofiner:*** The Hydrofiner removes sulfur from hydrocarbon feed. Since the feed rate to the Hydrofiner could increase as a result of the project, the feed heater F-2201 (Emission Point AM-111) may fire at a higher rate.

- ***Plant 27 – H_2S Recovery and Sulfur Recovery Units II and III:*** The increase in crude throughput may increase the amount of hydrogen sulfide (H_2S) removed and recovered from various sour gas streams at the refinery. Therefore, throughput to the sulfur recovery units may increase, resulting in an increase in emissions from the Shell Claus Offgas Treatment (SCOT) unit and thermal oxidizer used to control H_2S emissions from Sulfur Recovery Units II and III (Emission Points AO-004 and AO-005). An increase in the sour water produced may also increase emissions from the sour water tanks T-197, T-198, and T-2795 (Emission Points CC-197, AO-198, AO-095, respectively).

- ***Plant 32 – Effluent Treatment System:*** The increased throughput of crude and subsequent downstream products may result in an increase in the amount of wastewater generated and subsequently treated at the Effluent Treatment System. Therefore, emissions associated with increased wastewater were evaluated at the Equalization Tanks, T-32110, T-32120, and T-32130 (Emission Points AQ-110, AQ-120, and AQ-130).

- ***Plant 33 – Coke Conveyor and Storage:*** The increase in crude throughput may result in an increase of coke produced. Therefore, the amount of stored coke at the Coker Unit and subsequent handling and transfer of the coke to the storage areas near the wharf may increase, impacting fugitive emissions related to coke handling, transfer, and storage.

- ***Plant 34 – Storage and Blending:*** The increase in crude throughput impacts numerous storage tanks used to store crude oil, purchased supplemental gas oil and naphtha, and intermediate and final products, such as gasoline, diesel, and base oils. Therefore, numerous tanks were evaluated for increases in volatile organic compounds (VOC) emitted as a result of increased throughput at the tanks.

- ***Plant 37 – Acid and Marketing Area:*** The increase in crude throughput impacts numerous storage tanks used to hold crude oil, purchased supplemental gas oil and

naphtha, and intermediate and final products, such as gasoline, diesel, and base oils. Therefore, numerous tanks were evaluated for increases in VOC emitted as a result of increased throughput at the tanks, including the gasoline and diesel storage tanks at the Marketing Area.

- ***Plant 40 – Light Ends Recovery II:*** As with Plant 20, there may be an increase in the throughput at this plant, which treats lighter ends for sale or use elsewhere in the refinery. However, Plant 40 has no emission units, only fugitive emissions associated with equipment leaks and wastewater. Emissions from equipment leaks will not increase, and impacts to wastewater are accounted for at Plant 32.

- ***Plant 45 – Shipping:*** The increase in crude throughput is expected to increase the production of gasoline, jet fuel, diesel, and base oils. Therefore, Chevron evaluated the highest emitting loading operation to account for the potential increase in production, followed by the next highest emitter. As a result, when products are loaded at more than one location, incremental production is assumed to be loaded at the Marketing Terminal via truck followed by the wharf facilities.

- ***Plant 59 – Sour Gas Treating:*** Treatment of sour gas is expected to increase; however, there are no emission units at this plant, only fugitive sources of emissions which will not increase as a result of the project.

- ***Plant 61 – Crude II Unit:*** Plant 61 will be debottlenecked and upgraded to accommodate a lighter crude and increased production of jet fuel. These changes will result in fugitive emissions from new piping components and potentially require increased firing from the two process heaters (F-6101 and F-6102), which vent through a common stack under Emission Point BE-211.

- ***Plant 64 – Hydrogen II:*** Hydrogen is used various process units at the refinery. The increase in crude throughput and subsequent increase in downstream refining may result in an increase to hydrogen demand at the refinery. Therefore, the furnace (F-6410, Emission Point BH-231) and natural gas-fired turbine (KGT-6410, Emission Point BH-232) may see an increase in utilization to produce more hydrogen.

- ***Plant 68 – Treaters II:*** Similar to Plant 18, treating of distillate products is expected to increase; however, there are no emission units at this plant, only fugitive sources of emissions which will not increase.

- ***Plant 81A – Residuum Desulfurization Unit Module A (Lube Hydrocracker):*** The Lube Hydrocracker processes vacuum gas oil (VGO) prior to feeding the VGO to Plant 82. The project is expected to increase VGO production which will subsequently be processed in Plant 81A followed by Plant 82. Therefore, the increase in utilization of the furnaces is accounted for at one of the three identical furnaces, F-8110 (Emission Point BP-511).

- ***Plant 82 – Base Oil:*** Production of base oil is expected to increase as a result of the project. Therefore, all four furnaces (Emission Points CK-003, CK-004, CK-005, and CK-006) associated with the Isodewaxing and Hydrofinishing processes will be affected by a potential increase in throughput at Plant 82.

- ***Plant 83 – Delayed Coker Unit:*** The three cokers drive off vapors to produce petroleum coke for sale. The project may result in increased throughput at the cokers and a subsequent increase in petroleum coke production. Therefore, all three coker furnaces (Emission Points BQ-521, BQ-522, and BQ-523) are considered affected sources with an anticipated increase in firing rate.

- ***Plants 90, 91, and 92 – Sulfur Recovery Units IV, V, and VI:*** The increase in crude throughput may increase the amount of H_2S removed and recovered from various sour gas streams at the refinery. Similar to Sulfur Recovery Units II and III, the throughput to Sulfur Recovery Units IV, V, and VI may increase. All three units vent through Stretford Scrubbers (Emission Points BW-014, BX-020, and BY-025) for control of H_2S. Therefore, these sulfur recovery units and associated sulfur storage tanks are considered affected by the project.

- ***Plant 94 – Amine Regeneration:*** Diethanolamine (DEA) is used to absorb H_2S from sour gases at several areas in the refinery. The regeneration unit processes H_2S-rich DEA to produce lean DEA that is recycled for reuse in the refinery. Increased use and subsequent DEA regeneration may be expected as a result of this project; however, the emission sources associated with Plant 94 are fugitive in nature or do not emit regulated pollutants.

- ***Plant 95 – Wastewater Treater:*** The Wastewater Treater strips H_2S and ammonia from sour water. The H_2S is sent to the sulfur recovery units, and the ammonia is liquefied and stored for sale. The increased throughput at the Wastewater Treater may result in an increase in emission associated with H_2S storage.

- ***Plant 5171 – Pascagoula Marketing Terminal:*** The increase in crude throughput is expected to increase the production of gasoline, jet fuel, diesel, and base oils. Therefore, Chevron evaluated the highest emitting loading operation to account for the potential increase in production, followed by the next highest emitter. When products are loaded at more than one location, incremental production is assumed to be loaded at the Marketing Terminal via truck followed by the wharf facilities. Chevron proposes to load a maximum of 375,000,000 gallons/year of gasoline, 195,000,000 gallons/year of diesel, and 30,000,000 gallons of Jet A fuel at the Marketing Terminal on an annual basis.

Because there are no new emission units proposed, the actual-to-projected-actual applicability test in 40 CFR 52.21(a)(2)(iv)(C) for projects that only involve existing emissions units applies. Project emissions were calculated using actual emissions from a consecutive 24-month baseline period within the past ten years, which varied by pollutant, and projected actual emissions were calculated for the five-year period following

completion of the project. For purposes of determining projected actual emissions, as a conservative measure, Chevron used the potential to emit for particulate matter (PM), PM less than 10 microns in diameter (PM_{10}), PM less than 2.5 microns in diameter ($PM_{2.5}$), nitrogen oxides (NO_x), volatile organic compounds (VOC), and greenhouse gases (GHGs), as allowed in 40 CFR 52.21(b)(41)(ii)(D). The following table presents the project-related emissions changes and net emissions changes for those pollutants where a netting analysis was required. For purposes of the netting analysis, the contemporaneous period is October 2020, five years from the anticipated start of project construction, through the third quarter of 2027, the projected startup of the project.

Table 1. PSD Applicability

Pollutant	Project-Related Emissions (TPY)	Significant Emission Rate (TPY)	Netting Analysis Required? (Yes/No)	Contemporaneous Emissions (TPY)	Total Net Emissions (TPY)	PSD Review Required? (Yes/No)
PM (filterable)	40.82	25	Yes	20.83	61.65	Yes
PM_{10} (filterable + condensable)	50.44	15[1]	Yes	20.37	70.81	Yes
$PM_{2.5}$ (filterable + condensable)	52.77	10	Yes	19.91	72.68	Yes
NO_X[1,2]	660.05	40	Yes	177.67	837.72	Yes
SO_2[1]	30.69	40	No	--	--	No
VOC[2]	124.41	40	Yes	238.81	363.22	Yes
CO	57.85	100	No	--	--	No
H_2SO_4	2.97	7	No	--	--	No
H_2S	0.97	10	No	--	--	No
TRS	3.25	10	No	--	--	No
GHG (as CO_2e)[3]	656,971	75,000	Yes	452,898	1,109,869	Yes

[1] NO_x and SO_2 are precursors for $PM_{2.5}$. Therefore, if NO_x or SO_2 exceed 40 TPY, the project is considered major for $PM_{2.5}$.
[2] Both NO_x and VOC are considered precursors for ozone with a significant emission rate of 40 TPY each.
[3] Greenhouse gases (GHGs) are subject to regulation if the net emissions increase of one or more regulated NSR pollutants equals or exceeds the respective significant emission rate ***and*** the net emissions increase of GHGs is 75,000 tpy or more (determined as CO_2 equivalents).

B. Proposed Permit Limits

In order to stay below the annual significant impact level (SIL) for $PM_{2.5}$, which is further discussed in the "Source Impact Analysis" of Section III, Chevron proposes to reduce annual (ton/year) limits on $PM_{2.5}$ from seven furnaces (F-1501/1502/1503, F-8210, F-8220, F-8250, and F-8280) and three boilers (F-2101, F-2102, and F-2103). Since emissions of all PM from the furnaces and boilers should be less than 2.5 microns in diameter, the PM and PM_{10} emissions are assumed equivalent to $PM_{2.5}$ for purposes of establishing permit limits. Additionally, to meet the 1-hour and annual NO_x NAAQS, Chevron proposes to

reduce the lb/hr limit on five furnaces (F-8300A, F-8300B, F-8300C, F-2201, and F-8110) and the ton/year limit on two furnaces (F-2201 and F-8110).

Since the Air Quality Analysis was performed for comparison to both the short-term and annual standards for $PM_{2.5}$ and NO_x, the proposed permit includes both the lb/hr and ton/year limits for all emission sources noted above since these limits were relied upon in the analysis. (See Conditions 3.4 and 3.5 of the proposed permit.) To demonstrate compliance with these limits, the permit requires initial stack testing and biennial stack testing, consistent with the requirements of the Title V Operating Permit. Limits and other emissions standards established to reflect the emission rates used in the Air Quality Analysis have a regulatory reference of "11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(k)" and are noted as "PSD Air Quality Limits" in the proposed permit.

II. Best Available Control Technology (BACT) Analysis

The "Pascagoula Aggregates PSD Project" results in significant net emissions increases of PM, PM_{10}, $PM_{2.5}$, NO_x, VOC, and GHG. Under 40 CFR 52.21(j), a BACT review is required for those new or modified emission units emitting any regulated NSR pollutant for which there is a significant net emissions increase. A modified emissions unit is one undergoing a physical change or change in the method of operation. With this project, the only modified emission units are equipment leaks associated with new and modified piping (i.e., valves, connectors, etc.) in Plants 11, 22, and 61, which emit VOC. Emissions increases from all other emissions sources are a result of debottlenecking or an increase in utilization.

VOC BACT Analysis for Equipment Leaks in Plants 11, 22, and 61

VOC emissions result from leaks at valves, connectors, pumps, sampling connections, and other equipment that move gases or liquids containing VOCs through the refinery. The proposed project includes installation and overhaul or replacement of various piping components, potentially including pumps but no compressors, in Plants 11, 22, and 61. In some cases, it may be technically feasible to install "leakless" technology; however, Chevron evaluated the economic feasibility of installing "leakless" bellows seal valves. Installation of bellows seal valves would reduce VOC emissions by 3.77 tons per year at a cost of approximately $18,470 per ton, which is considered uneconomical.

Upon evaluating numerous BACT determinations from the prior 10 years in EPA's RACT/BACT/LAER Clearinghouse, all determinations required a Leak Detection and Repair (LDAR) program generally consistent with applicable State and/or Federal standards. The piping modifications in these plants will be subject to 40 CFR Part 60, Subpart GGGa (Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries for Which Construction, Reconstruction, or Modification Commenced after November 7, 2006). Subpart GGGa requires monthly monitoring of components in VOC service and leak definitions of 500 ppm for valves/connectors and 2,000 ppm for pumps, all in light liquid service. Subpart GGGa requirements are similar to TCEQ's 28VHP LDAR program used in ozone attainment areas. Therefore, MDEQ deemed BACT for

new/modified equipment leak components in Plants 11, 22, and 61 to be compliance with the provision of 40 CFR 60, Subpart GGGa.

III. Source Impact Analysis

The owner or operator of a proposed source or modification is required to demonstrate that allowable emission increases from the proposed source or modification, in conjunction with all other applicable emissions increases or reductions (including secondary emissions), will not cause or contribute to air pollution in violation of: 1) any National Ambient Air Quality Standard (NAAQS) in any air quality control region or 2) any applicable maximum allowable increase over the baseline concentration, or increment, in any area.

This demonstration is often accomplished by conducting air dispersion modeling. The modeled concentrations used to determine compliance with any NAAQS or PSD increment depend on: 1) the type of standard (i.e., deterministic or statistical), 2) the available length of record of meteorological data, and 3) the averaging time of the standard being analyzed. When the analysis is based on 5 years of National Weather Service meteorological data, the following estimates are used:

- For deterministically based standards (e.g., SO_2), the highest, second-highest short-term estimate and the highest annual estimate; and

- For statistically based standards (e.g., PM_{10}), the highest, sixth-highest estimate and highest 5-year average estimate.

A. Existing Air Quality

Any application for a permit under the Prevention of Significant Deterioration program is required to contain an analysis of ambient air quality in the area that the major stationary source or major modification would affect for each of the following pollutants: a) for the source, each pollutant that it would have the potential to emit in a significant amount and b) for the modification, each pollutant for which it would result in a significant net emissions increase.

The existing ambient air quality is defined by the natural and human-generated sources of air pollution. The area surrounding the Jackson County facility is considered in attainment for all regulated pollutants. The pollutants that result in a significant net emissions increase as a result of the proposed project and under consideration in this analysis are NOx, PM, PM_{10}, $PM_{2.5}$, and VOCs. VOCs and NOx combine in the atmosphere to form ozone (O_3) and, therefore, are called precursor emissions. Any significant emissions increase from an emission unit or net emissions increase at a major stationary source that is significant for VOC or NOx, which are precursor pollutants for ozone shall be considered significant for ozone. Under current guidance if one precursor for a pollutant exceeds the threshold, then all precursors for that pollutant must be taken into consideration and used in calculations.

MDEQ operates an ambient air quality network throughout the state of Mississippi and reports their findings in the *Mississippi Department of Environmental Quality Air Quality Data Summary*. This report details the monitored levels of all criteria pollutants, including ozone, $PM_{2.5}$, PM_{10}, and NOx, at various sites across the state and compares these levels to the National Ambient Air Quality Standards (NAAQS) to confirm the state's attainment status. For detailed information and data trends on all pollutants relevant to this project, the most recent report can be reviewed here: https://www.mdeq.ms.gov/wp-content/uploads/2025/03/2024-Air-Quality-Data-Summary-1.pdf.

B. Modeling Procedures

All estimates of ambient concentrations are to be based upon applicable air quality models, databases and other requirements specified in EPA's *Guideline on Air Quality Models* in Appendix W of 40 CFR Part 51.

The EPA Memorandums, *Guidance on the Development of Modeled Emission Rates for Precursors (MERPs) as a Tier I Demonstration Tool for Ozone and $PM_{2.5}$ under the PSD Permitting Program*, dated April 30, 2019, and *Guidance for Ozone and Fine Particulate Matter Permit Modeling* dated July 29, 2022 reflect EPA's recommendation for how agencies conduct air quality modeling and related technical analyses to satisfy compliance demonstration requirements for ozone and $PM_{2.5}$ under the PSD Permitting Program. In accordance with the above-mentioned Guidance and the *Revisions to the Guideline on Air Quality Models* (40 CFR Part 51, Appendix), EPA recommends that an applicant use a "two-tiered" demonstration approach to address single-source impacts on ozone and secondary $PM_{2.5}$. The first tier involves the use of existing technical information to evaluate the relationships between precursor emissions and a source's impacts. The second tier involves the application of more sophisticated case-specific chemical transport models (CTMs) (e.g., photochemical grid models).

Using the Tier I Demonstration approach for PSD compliance, the emissions of the individual precursor pollutants are not added together to determine if there is an exceedance, but looked at individually. If an exceedance occurs for one individual precursor, the precursor pollutants are compared to the hypothetical source's modeled emission rate and impacts (MERPs). The EPA provides access to its MERPs values on its MERPs VIEW Qlik website (https://www.epa.gov/scram/merps-view-qlik). If there is an exceedance of an individual precursor, then upon calculating the potential impacts, all precursors of either ozone or $PM_{2.5}$ are taken into consideration when calculated.

1. Ozone

Should the Tier I Demonstration find the critical air quality threshold, or significant impact level (SIL), would not be exceeded when considering the impact of the ozone precursor emissions of VOC and NOx, the proposed project will not cause ozone concentrations exceeding the ozone SIL. No further analysis or modeling will be required.

Chevron Products Company (Chevron) proposed project has an anticipated increase of 1.363 ppb. These results were obtained by calculating the worst-case scenario. Since 1.363 ppb is not below the SIL threshold of 1.0ppb, additional modeling or analysis is required.

2. Model Versions

Models and Model Versions used are listed:

- AERMOD (Version 24142)
- AERMAP (Version 24142)
- AERMET (Version 24142)
- Building Profile Input Program software (BPIP-PRIME, Version 04274)
- PRIME (Plume Rise Model Enhancement)

3. Ambient Air

The receptor grid includes an extended modeling perimeter along the southern boundary to encompass Refinery property west of the outfall canal. The Refinery area west of Route 611 is fenced on the south, east and north sides. The west side along the wharf is monitored to ensure non-commercial vessels do not approach Chevron shipping berths. The Refinery area east of Route 611 is fenced on the north, east and west sides north of the dyke wall just south of the coke conveyor. The east ambient air boundary now extends south along the outfall canal from the hurricane dyke to the Gulf of Mexico. The south ambient boundary follows the shoreline west to the property line. The west ambient air boundary follows the property line north up to the hurricane dike. Signage, additional perimeter patrols, and security cameras were installed to maintain security in this area to preclude public access consistent with EPA's December 2019 *Revised Policy on Exclusions from Ambient Air*.

4. Receptor Grid Spacing

The receptor grid spacing to adequately resolve the Significant Impact Area (SIA) for the Class II area assessment is as follows:

- Fence line: 50 m
- Fence line to 1-km: 100 m
- 1-km to 5-km: 500 m
- 5-km to 18-km from the fence line (20 km from the center of the Refinery): 1,000m for PM_{10} and $PM_{2.5}$
- 5-km to 40-km from the fence line: 1,000 m for NOx.

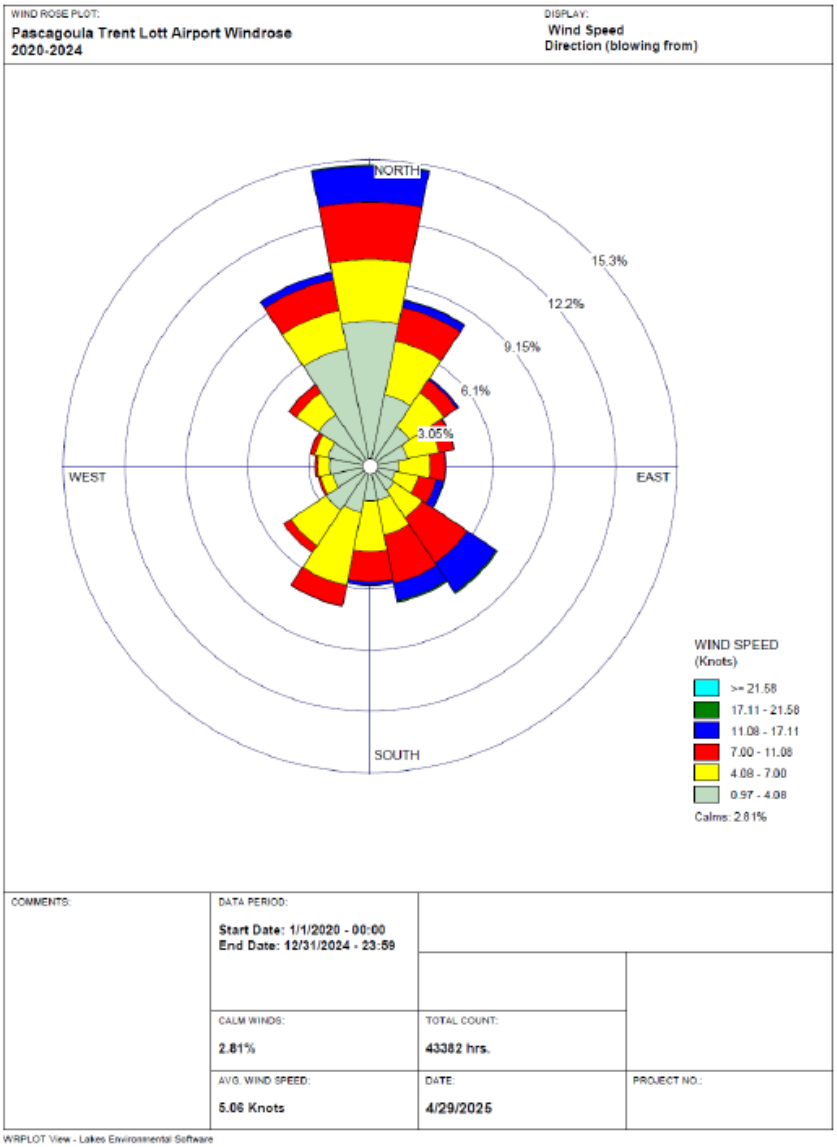
Additional receptors with 250-m spacing were added to the northwest of the Refinery to further characterize modeled concentrations in residential areas near the refinery.

Depending upon the receptor grid spacing at the locations of the peak modeled concentrations, AECOM made additional model runs if necessary using 100-m grid spacing to confirm the peak modeled concentration. The lateral extent of this receptor grid was sufficient to capture the maximum modeled impacts.

5. Meteorological Data

The five most recent years of pre-processed meteorological data for the Pascagoula Trent Lott Airport was downloaded from MDEQ's website. Pascagoula Trent Lott Airport (14 km from the Refinery) surface data and Slidell, Louisiana upper air data were processed by MDEQ for the years 2020 through 2024 using AERMET (Version 24142). The Pascagoula meteorological data are representative of the winds at the Refinery with stronger north-south flow representing the sea breeze.

Figure 6-1 Wind Rose for Pascagoula Trent Lott Airport



6. Stack Parameters

	A	B	C	D	E	F	G	H	I
1		Ht (ft)	Temp (F)	Vs (ft/s)	Dia (ft)	Ht (m)	Temp (K)	Vs (m/s)	Dia (m)
2	F_1101	160.00	495.00	40.49	10.20	48.768	530.372	12.341	3.110
3	F_1102	149.00	695.00	34.89	8.70	45.415	641.483	10.634	2.652
4	F_1201	148.00	726.00	25.73	7.96	45.110	658.706	7.843	2.426
5	OLDF1304	135.00	740.00	22.40	7.62	41.148	666.483	6.828	2.324
6	F_1305	135.00	750.00	30.00	7.62	41.148	672.039	9.144	2.324
7	F_1306	134.00	720.00	16.00	6.21	40.843	655.370	4.877	1.892
8	F_1503	152.20	400.00	41.90	10.42	46.391	477.594	12.771	3.176
9	F_1531	110.00	599.00	26.00	4.50	33.528	588.150	7.925	1.372
10	F_1532	100.00	910.00	23.65	4.50	30.480	760.928	7.209	1.372
11	F_1603	177.00	550.00	160.99	6.50	53.950	560.928	49.070	1.980
12	F_2101	80.00	330.01	80.00	5.45	24.384	438.710	24.384	1.661
13	F_2201	110.00	885.00	27.63	4.75	33.528	747.039	8.422	1.448
14	F_2490	213.25	505.00	37.40	10.50	65.000	535.928	11.398	3.200
15	F_2410	138.00	595.00	28.40	3.17	42.062	585.928	8.656	0.965
16	F_2765	200.00	900.00	90.00	3.25	60.960	755.372	27.432	0.991
17	F_2745	200.00	900.00	90.00	3.25	60.960	755.372	27.432	0.991
18	F_5337A	154.00	501.00	21.60	5.00	46.939	533.706	6.584	1.524
19	F_5337B	154.00	382.00	17.60	5.00	46.939	467.594	5.364	1.524
20	F_5337C	182.00	545.00	28.96	7.50	55.474	558.150	8.826	2.286
21	F_6102	162.00	320.00	42.00	12.25	49.378	433.150	12.802	3.734
22	F_6210	110.00	1150.00	44.40	4.50	33.528	894.261	13.533	1.372
23	F_6230	142.32	1275.00	77.36	3.58	43.380	963.706	23.579	1.092
24	F_6250	180.00	650.00	27.50	10.50	54.864	616.483	8.382	3.200
25	F_6260	196.00	595.00	18.49	7.25	59.741	585.928	5.635	2.210
26	F_6410A	101.00	550.00	105.00	6.00	30.785	560.928	32.004	1.829
27	F_6410B	101.00	550.00	105.00	6.00	30.785	560.928	32.004	1.829
28	F_6410C	101.00	550.00	105.00	6.00	30.785	560.928	32.004	1.829
29	KGT_6410	100.00	900.00	58.77	6.68	30.480	755.370	17.913	2.035
30	F_6531	100.00	770.00	28.60	4.50	30.480	683.150	8.717	1.372
31	F_6532	100.00	970.00	22.23	4.46	30.480	794.261	6.777	1.359
32	F_6701	130.00	380.00	8.40	6.25	39.624	466.483	2.560	1.905
33	F_8007	196.00	720.00	52.80	5.50	59.740	655.372	16.093	1.676
34	F_8400	222.97	425.00	35.80	8.50	67.960	491.483	10.912	2.590
35	F_8110	150.00	440.00	45.00	3.50	45.720	499.817	13.716	1.067
36	F_8120	150.00	440.00	45.00	3.50	45.720	499.817	13.716	1.067
37	F_8130	150.00	505.00	45.00	3.50	45.720	535.928	13.716	1.067
38	F_8210	184.20	480.00	67.20	2.65	56.144	522.039	20.483	0.807
39	F_8220	199.00	550.00	41.30	4.10	60.655	560.928	12.588	1.250
40	F_8250	129.40	515.00	45.40	2.98	39.441	541.483	13.838	0.908
41	F_8280	143.80	545.00	41.10	3.92	43.830	558.150	12.527	1.195
42	F_8610	150.00	670.00	45.80	2.75	45.720	627.594	13.960	0.838
43	F_8300A	246.16	460.00	21.50	10.17	75.030	510.928	6.553	3.100
44	F_8300B	246.16	440.00	21.50	10.17	75.030	499.817	6.553	3.100
45	F_8300C	246.16	470.00	21.50	10.17	75.030	516.483	6.553	3.100
46	F_8560	200.00	355.00	37.90	4.50	60.960	452.594	11.552	1.372
47	F_8620A	120.01	450.00	127.99	6.25	36.580	505.372	39.010	1.905
48	F_8620B	120.01	450.00	133.01	6.25	36.580	505.372	40.540	1.905
49	F_8620C	120.01	450.00	127.99	6.25	36.580	505.372	39.010	1.905
50	KGT_8650	94.00	960.01	28.38	10.22	28.651	788.710	8.650	3.114

51	**Barge and Ship Berths								
52	BARGE1	22.00	939.99	85.40	0.49	6.706	777.590	26.030	0.148
53	BARGE2	22.00	939.99	85.40	0.49	6.706	777.590	26.030	0.148
54	BARGE2B	22.00	939.99	85.40	0.49	6.706	777.590	26.030	0.148
55	BARGE3	22.00	939.99	85.40	0.49	6.706	777.590	26.030	0.148
56	BARGE3B	22.00	939.99	85.40	0.49	6.706	777.590	26.030	0.148
57	BARGE_4	22.00	939.99	85.40	0.49	6.706	777.590	26.030	0.148
58	BARGE4B	22.00	939.99	85.40	0.49	6.706	777.590	26.030	0.148
59	BARGE_5	22.00	939.99	85.40	0.49	6.706	777.590	26.030	0.148
60	BARGE_6	22.00	939.99	85.40	0.49	6.706	777.590	26.030	0.148
61	BARGE7A	22.00	939.99	85.40	0.49	6.706	777.590	26.030	0.148
62	SHIPBOIL	100.00	500.00	24.00	1.86	30.480	533.150	7.315	0.567
63	SHPBLR7A	100.00	500.00	24.00	1.86	30.480	533.150	7.315	0.567
64	SHIP_8	100.00	500.00	24.00	1.86	30.480	533.150	7.315	0.567
65	SHPBL9	100.00	500.00	24.00	1.86	30.480	533.150	7.315	0.567
66	BARGE9	22.00	939.99	85.40	0.49	6.706	777.590	26.030	0.148
67	** Flares and Other Sources								
68	F_1601	177.50	800.00	28.93	7.50	54.102	699.817	8.819	2.286
69	F_2102	80.00	330.01	80.00	5.45	24.384	438.710	24.384	1.661
70	F_2103	80.00	330.01	80.00	5.45	24.384	438.710	24.384	1.661
71	F_34300	89.00	780.00	41.07	2.00	27.127	688.706	12.518	0.610
72	F_34401	48.67	1600.00	23.40	2.00	14.834	1144.261	7.132	0.610
73	F_8510	150.00	445.00	34.20	3.50	45.720	502.594	10.424	1.067
74	F_791040	342.00	480.00	45.00	11.10	104.242	522.039	13.716	3.383
75	F_9080	95.00	815.00	8.20	6.72	28.956	708.150	2.499	2.048
76	F_9180	95.00	815.00	8.20	6.72	28.956	708.150	2.499	2.048
77	F_9280	95.00	815.00	8.20	6.72	28.956	708.150	2.499	2.048
78	F_3802	213.25	1831.73	65.62	32.91	65.000	1273.000	20.000	10.030
79	F_3801	213.25	1831.73	65.62	36.91	65.000	1273.000	20.000	11.250
80	F_3804	213.25	1831.73	65.62	8.04	65.000	1273.000	20.000	2.450
81	F_3803	213.25	1831.73	65.62	78.77	65.000	1273.000	20.000	24.010
82	F_3805	213.25	1831.73	65.62	73.72	65.000	1273.000	20.000	22.470
83	F_3806	213.25	1831.73	65.62	14.30	65.000	1273.000	20.000	4.360
84	F_3807	225.00	1831.73	65.62	37.47	68.580	1273.000	20.000	11.420
85	F_1602	177.49	519.53	20.41	6.50	54.100	544.000	6.220	1.980
86	R_1501	50.00	245.00	22.18	1.33	15.240	391.483	6.760	0.405
87	R_7990	338.00	398.93	39.37	0.83	103.022	477.000	12.000	0.254
88	**Emergency Equipment and Small Engines								
89	P_32203B	17.70	800.33	56.99	0.50	5.395	700.000	17.370	0.152
90	P_32203A	17.70	800.33	56.99	0.50	5.395	700.000	17.370	0.152
91	P_32204A	17.70	800.33	56.99	0.50	5.395	700.000	17.370	0.152
92	P_32204B	17.70	800.33	56.99	0.50	5.395	700.000	17.370	0.152
93	P_32201A	19.40	800.33	56.99	0.50	5.913	700.000	17.370	0.152
94	P_32201B	19.40	800.33	56.99	0.50	5.913	700.000	17.370	0.152
95	P_32202A	19.40	800.33	56.99	0.50	5.913	700.000	17.370	0.152
96	P_32202B	19.40	800.33	56.99	0.50	5.913	700.000	17.370	0.152
97	P_5353	12.00	800.33	56.99	0.49	3.658	700.000	17.370	0.150
98	P_34766	14.00	800.33	56.99	0.49	4.267	700.000	17.370	0.150
99	AC100	4.00	800.33	56.99	0.50	1.220	700.000	17.370	0.152
100	AC101	6.56	800.33	56.99	0.50	2.000	700.000	17.370	0.152
101	AC102	6.56	800.33	56.99	0.50	2.000	700.000	17.370	0.152
102	AC103	6.56	800.33	56.99	0.50	2.000	700.000	17.370	0.152
103	AC104	4.00	800.33	56.99	0.50	1.220	700.000	17.370	0.152
104	AQ080	4.00	800.33	56.99	0.50	1.220	700.000	17.370	0.152
105	AQ081	4.00	800.33	56.99	0.50	1.220	700.000	17.370	0.152
106	AS020	6.56	800.33	56.99	0.50	2.000	700.000	17.370	0.152
107	AZ024	4.00	800.33	56.99	0.50	1.220	700.000	17.370	0.152
108	AZ025	4.00	800.33	56.99	0.50	1.220	700.000	17.370	0.152
109	AZ027	4.00	800.33	56.99	0.50	1.220	700.000	17.370	0.152
110	AQ082	7.00	808.00	268.23	0.25	2.134	704.260	81.756	0.076

C. Air Quality Monitoring Requirements

The ambient air quality analysis is required to contain continuous air quality monitoring data. This data is gathered for purposes of determining whether emissions of any pollutant would cause or contribute to a violation of the standard or any maximum allowable increase. The facility must establish existing air quality in the area and air monitoring is required for each criteria pollutant that is proposed to be emitted at or above the de minimis. This requirement can be satisfied by either: 1) establishing a site-specific ambient monitoring network, or 2) using existing ambient monitoring data. If either the predicted modeled impact from an emission increase or the existing ambient concentration is less than the monitoring de minimis concentration, MDEQ has the discretionary authority to exempt an applicant from preconstruction ambient monitoring.

No de minimis air quality level is provided for ozone. However, any net emissions increase of 100 tpy or more of VOC or NOx (the precursors for ozone formation) make the proposed PSD project required to perform an ambient impact analysis, including the gathering of ambient air quality data. The proposed project has a proposed emissions increase of 124.41 tpy VOC and 660.05 tpy NOx. Since the proposed project NOx emissions exceed 100 tpy, Chevron must establish existing air quality in the facility project area. To meet this requirement, Chevron proposes to use an existing air quality monitor as opposed to establishing their own site-specific ambient monitoring network.

Table 6-3 Significant Monitoring Concentrations

Pollutant	Averaging Time		
	Annual (µg/m³)	24-hour (µg/m³)	8-hour (µg/m³)
NO_2[1]	14	-	-
Ozone	-	-	VOC emission increase > 100 TPY
PM_{10}	-	10	-
[1] A significant monitoring concentration has not been established for one-hour NO_2.			

1. Monitor Selection and Justification

Pascagoula, Mississippi Monitor - NO_2, Ozone, $PM_{2.5}$

Concentrations of $PM_{2.5}$, NO_2 and ozone are recorded at the Pascagoula monitor which is located in a parking lot near the Singing River Hospital and Pascagoula Exceptional School approximately 6 km northwest of the Refinery. The area surrounding the monitor is commercial and influenced by traffic emissions from Highway 90. The three-kilometer area surrounding the monitor is classified as 62 percent urban due to proximity to commercial buildings, medium density housing and Highway 90; whereas the three-kilometer area surrounding the Refinery is classified as 27 percent urban. The Refinery itself and other nearby industrial facilities are classified as urban; however, the proximity to the coastal wetlands and waterbodies heavily influences the land use classification of the surrounding area. The terrain surrounding the monitor is flat, similar to the terrain around the Refinery. Since the monitor is located within 10 km of

the Refinery, sources that impact the monitor would also impact the background air quality near the Refinery. As such, background concentrations from the Pascagoula monitor are likely very representative of air quality in the vicinity of the Refinery.

Chalmette Vista, Louisiana Monitor- PM_{10}

PM_{10} is no longer monitored at the Pascagoula monitor. The closest PM_{10} monitor to the Refinery is located in Chalmette Vista, Louisiana. The Chalmette Vista monitor is in an industrial area bordered by residences, and the surrounding terrain is flat. The surrounding area within three kilometers is classified as 71 percent urban. The monitor is located within 5 km of two refineries and a sugar manufacturing facility, with similar proximity to the coastline as the Refinery. As such, background concentrations from the Chalmette Vista monitor are likely very representative of air quality in the vicinity of the Refinery.

D. PSD Preliminary Analysis Modeling Impacts

In the preliminary analysis, only the significant increase in potential emissions of a pollutant from a proposed new source, or the significant net emission increase of a pollutant from a proposed modification is modeled. A full impact analysis for a particular pollutant is not required when emissions of that pollutant from a proposed source or modification would not increase ambient concentrations by more than prescribed significant ambient impact levels.

In accordance with the *Revisions to the Guideline on Air Quality Models* (40 CFR Part 51, Appendix W), EPA recommends that an applicant use a "two-tiered" demonstration approach to address single-source impacts on ozone and secondary $PM_{2.5}$. The first tier involves the use of existing technical information to evaluate the relationships between precursor emissions and a source's impacts. The second tier involves the application of more sophisticated case-specific chemical transport models (CTMs) (e.g., photochemical grid models). The April 30, 2019, Memorandum, *Guidance on the Development of Modeled Emission Rates for Precursors (MERPs) as a Tier 1 Demonstration Tool for Ozone and $PM_{2.5}$ under the PSD Permitting Program*, reflected EPA's recommendations on how to conduct an air quality modeling and related technical analyses to satisfy compliance demonstration requirements for Ozone and Secondary $PM_{2.5}$ for permit related assessment under the PSD Program.

For ozone, the modeled air quality impact of an increase in precursor emissions from the hypothetical source is expressed in units of ppb or ppm. Consistent with the modeled emissions rates that are input to the air quality model to predict a change in pollutant concentration, MERPs are expressed as an annual emissions rate in tons per year (tpy).

1. Ozone Modeling and Hypothetical Source

To calculate the Project's ozone concentration due to the precursors, NO_2 and VOC. The two cases presented by EPA include:

- Case 1: If the NOx and VOC emission increases < 40 TPY; then an ozone compliance modeling demonstration IS NOT required.
- Case 2: If the NOx and/or VOC emission increases > 40 TPY; then an ozone compliance modeling demonstration IS required.

Ozone modeling for Chevron Pascagoula falls under Case 2 and a qualitative / quantitative analysis to address ozone was required. In this case, the Project's ozone concentration can be extrapolated based on the modeled ozone concentration and a ratio of the Project emissions over the modeled emissions. This would provide a very conservative estimate of the Project-specific modeled ozone concentrations. The modeling results found in Appendix A of EPA's MERP Guidance that provides estimated ozone concentrations for hypothetical sources was used as a Tier 1 approach to estimate the Project's ozone concentration

In order to determine the Project's ozone concentration, the closest hypothetical sites modeled by EPA with modeled ozone concentrations found in Appendix A of EPA's MERP Guidance are located in Orleans County, LA, Smith County, MS, and Bay County, FL. As discussed above, both the Bay County, FL and Orleans County, LA are considered for this analysis. Since the Refinery is an elevated source, the EPA results for the "H" source was utilized.

Tier 1 Demonstration for Ozone (NAAQS)

Table 6-6 MERPs-Estimated Ozone Concentration Attributable to Project Emissions

Pollutant	Avg. Period	Hypothetical Source	NOx				VOC				Project Ozone Modeled Concentration (ppb)
			EPA Precursor Emissions (TPY)	EPA Modeled Conc. (ppb)	Project Precursor Emissions (TPY)[1]	Project Modeled Conc. (ppb)	EPA Precursor Emissions (TPY)	EPA Modeled Conc. (ppb)	Project Precursor Emissions (TPY)	Project Modeled Conc. (ppb)	
Ozone	8-hour	Bay Co., FL	1000	3.799	349.4[1]	1.327	500	0.144	124.4	0.036	1.363
		Orleans Co., LA	500	1.332	349.4[1]	0.930	1000	0.382	124.4	0.048	0.978

[1]Short-term (lb/hr) emission increases converted to tons per year (TPY).

VOC MERP Calculation:

$$1.00ppb\left(\frac{Selected\ Hyopthetical\ MERP)}{MaxConc}\right)$$

$$1.00ppb\left(\frac{500\ tpy}{0.1438038349\ ug/m\text{^}3}\right)$$

$$= 3{,}476.96\ tpy$$

NOx MERP Calculation:

$$1.00ppb\left(\frac{Selected\ Hyopthetical\ MERP)}{MaxConc}\right)$$

$$1.00ppb\left(\frac{1000\ tpy}{3.798822403\ ug/m\text{^}3}\right)$$

$$= 263.24\ tpy$$

$$\left[\left(\frac{NOx\ Increase\ (tpy)}{NOx\ MERP\ (tpy)}\right)+\left(\frac{VOC\ Increase\ (tpy)}{VOC\ MERP\ (tpy)}\right)\right] < 1$$

The recommended ozone SIL of 1 ppb was chosen to represent the critical air quality threshold. The SIL represents a de-minimis impact level such that if the maximum concentration of ozone due to a single source is less than the SIL, it can be concluded that the source has an insignificant contribution to ozone formation. The hypothetical source's modeled emission rate and impacts along with the ozone SIL were used to calculate the MERPs values below:

$$Modeled\ Air\ Quality\ Impact = (Critical\ Air\ Quality\ Threshold)\left(\frac{Project\ Emissions}{MERP}\right)$$

$$Modeled\ Air\ Quality\ Impact = (1ppb\ ozone)\left[\left(\frac{124.4\ TPY\ VOC}{3476.96\ TPY\ VOC}\right)+\left(\frac{349.4\ TPY\ NOx}{263.24\ TPY\ NOx}\right)\right]$$

$$Modeled\ Air\ Quality\ Impact = 1.363\ ppb\ ozone$$

Since the modeled Air Quality Impact is not below the Ozone SIL of 1 ppb, further analysis is required.

2. $PM_{2.5}$ Modeling and MERPS Hypothetical Sources

In July 2022, EPA released their *Final Guidance for Ozone and Fine Particulate Matter Permit Modeling* and provided updates to the guidance in April 2024 to reflect changes to the $PM_{2.5}$ SILs. The guidance from EPA recommends a tiered approach for determining which sources would be important to consider when assessing secondary $PM_{2.5}$ concentrations.

The two cases presented by EPA include:

- Case 1: If the $PM_{2.5}$ emission increases < 10 tons per year (TPY) and NOx and SO_2 emission increases < 40 TPY; then a $PM_{2.5}$ compliance modeling demonstration IS NOT required.

- Case 2: If the $PM_{2.5}$ emission increases > 10 TPY and/or NOx or SO_2 emission increases > 40 TPY; then a $PM_{2.5}$ compliance modeling demonstration IS required and secondary $PM_{2.5}$ MUST BE accounted for from the Project sources.

Secondary $PM_{2.5}$ modeling for Chevron Pascagoula falls under Case 2 and a qualitative / quantitative analysis to address secondary $PM_{2.5}$ is required.

The Final Guidance provides recommendations on air quality modeling and related technical analyses to satisfy compliance demonstration requirements for $PM_{2.5}$ for permit-related assessments under the PSD program; *Guidance on the Development of Modeled Emission Rates for Precursors (MERPs) as a Tier 1 Demonstration Tool for Ozone and $PM_{2.5}$ under the PSD Permitting Program* (April 30, 2019). The guidance and the accompanying online tool provide a Tier 1 demonstration tool for $PM_{2.5}$. The MERPs are screening thresholds for precursor emissions, where SO_2 and NOx screening values are provided for $PM_{2.5}$, for Projects that are expected to result in an insignificant increase in ambient $PM_{2.5}$ relative to PSD Increment and the NAAQS; i.e., an impact less than the 24-hour $PM_{2.5}$ SIL of 1.2 $\mu g/m^3$ or annual $PM_{2.5}$ SIL of 0.13 $\mu g/m^3$. The MERP values were derived based on modeling conducted by EPA for locations across the U.S. For this Project, since PSD review requirements are not triggered with respect to SO_2, 39 tons/year was conservatively used for the MERP calculation with the NOx Project emission rate.

In order to determine the Project's secondary $PM_{2.5}$ concentration, the closest hypothetical sites modeled by EPA with modeled $PM_{2.5}$ concentrations found in Appendix A of EPA's MERP Guidance are located in Orleans County, LA, Smith County, MS, and Bay County, FL. The Smith County, MS site is in a rural area located inland from the Project site and does not represent the coastal and more industrial environment near Pascagoula. The Orleans County, LA and Bay County, FL sites are more representative of the Project location as they are both located on the Gulf Coast within a similar climate regime, exhibiting a warm and humid climate. For Bay County, FL and Orleans County, LA, climate summaries from the National Weather Service (NWS) / National Oceanic and Atmospheric Administration (NOAA) Online Weather products indicate very similar 30 year climate normals when compared to Jackson County, MS (location of the Refinery) though it is noted that the Bay County, FL site is classified under a different climate zone than the Orleans, LA site in US EPA's MERPs database. A comparison of 30-year (1992-2022) average, maximum, and minimum temperatures and precipitation for the Refinery, Bay County, FL and Orleans County, LA hypothetical sources is provided.

In addition, there are no significant terrain features that would differentiate the climate regimes between the Refinery and either of these hypothetical sources. The base elevation of the Refinery is 2 meters, the Bay County, FL hypothetical site has a base elevation of 24 meters, and the Orleans County, LA hypothetical site has a base elevation of 1 meter.

The county level emissions (10,312 tons/year combined for NOx, SO_2 and $PM_{2.5}$) and population density (198 persons per square mile) of Bay County, FL are (in combination) more representative of the Jackson County, MS county level emissions (13,759 tons/year) and population density (231 persons per square mile) where the Refinery is located compared to Orleans County. The Orleans County, LA emissions

(9,194 tons/year) are lower; however, the population density (2,265 persons per square mile) is significantly higher.

Table 6-4 30-Year Climate Normals for Hypothetical Sources and Project Site (1992 – 2022)

Station/ Source	Parameter	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec	Ann
Bay Co. Florida	Average Max. Temperature (°F)	63.1	65.8	70.7	76.2	83.5	88.9	90.9	90.6	88.5	80.9	72.1	65.6	78.10
	Average Min. Temperature (°F)	45.3	47.9	53.6	60.1	68	74.1	76.2	75.8	72.4	63.2	53	47.5	61.40
	Average Total Precipitation (in.)	4.52	4.96	4.7	4.55	3.22	4.7	5.77	6.08	5.18	2.82	4.13	4.72	55.35
Orleans Co. Louisiana	Average Max. Temperature (°F)	62	65.9	71.8	77.9	84.9	89.7	91.1	91.2	88	80.5	71	64.3	78.20
	Average Min. Temperature (°F)	40.7	44.4	50	56.1	63.8	70.9	73.1	72.9	68.5	57.4	46.7	42.8	57.30
	Average Total Precipitation (in.)	5.57	4.14	4.94	5.21	5.46	6.11	7.25	6.96	4.14	3.72	3.89	4.49	61.88
Refinery	Average Max. Temperature (°F)	61.3	64.8	70.4	76.5	83.6	88.7	90.4	90.7	87.8	79.9	70	63.5	77.30
	Average Min. Temperature (°F)	42.4	46.2	51.8	58.4	66.4	73.2	74.9	74.6	70.6	60.1	49.2	44.6	59.40
	Average Total Precipitation (in.)	5.36	4.53	5.07	4.91	5.18	6.86	8.16	7.52	5.66	3.99	3.84	4.8	65.88

Source: NOAA Online Weather Data, https://weather.gov

Tier 1 Demonstration for $PM_{2.5}$ Secondary Impact Assessment

Following is an evaluation of the secondary impact assessment

Table 6-5 MERPs-Estimated Secondary $PM_{2.5}$ Concentration Attributable to Project Emissions

Pollutant	Avg. Period	Hypothetical Source	NOx				SO_2				Project Secondary $PM_{2.5}$ Modeled Concentration (µg/m³)
			EPA Precursor Emissions (TPY)	EPA Modeled Conc. (µg/m³)	Project Precursor Emissions (TPY)	Project Modeled Conc. (µg/m³)	EPA Precursor Emissions (TPY)	EPA Modeled Conc. (µg/m³)	Project Precursor Emissions (TPY)	Project Modeled Conc. (µg/m³)	
$PM_{2.5}$	24-hour	Bay Co., FL	1000	0.142	349.4[1]	0.0495	1000	0.717	30.7	0.0220	0.0715
	Annual		1000	0.010	660.1[2]	0.0066	1000	0.032	30.7	0.0010	0.0076
	24-hour	Orleans Co., LA	500	0.118	349.4[1]	0.0924	500	0.279	30.7	0.0171	0.0996
	Annual		500	0.002	660.1[2]	0.0032	500	0.009	30.7	0.0005	0.0037

[1]Short-term (lb/hr) emission increases converted to tons per year (TPY).
[2]Annual emission increases.

$PM_{2.5}$ 24-Hour

SO_2 MERP Calculation:

$$1.2\ \frac{\mu g}{m^3}\left(\frac{Selected\ Hyopthetical\ MERP}{MaxConc}\right)$$

$$1.2\ \frac{\mu g}{m^3}\left(\frac{500\ tpy}{0.2793936431\ \frac{\mu g}{m^3}}\right)$$

$$= 2{,}147.51\ tpy$$

NOx MERP Calculation:

$$1.2\ \frac{\mu g}{m^3}\left(\frac{Selected\ Hyopthetical\ MERP)}{MaxConc}\right)$$

$$1.2\ \frac{\mu g}{m^3}\left(\frac{500\ tpy}{0.1179460585\ \frac{\mu g}{m^3}}\right)$$

$$= 5{,}087.07\ tpy$$

$$\text{Modeled Air Quality Impact} = (\text{Critical Air Quality Threshold})\left(\frac{\text{Project Emissions}}{\text{MERP}}\right)$$

$$Modeled\ PM_{2.5}\ 24\ \text{Hr Air Quality Impact} = \left(1.2\frac{\mu g}{m^3}\right)\left[\left(\frac{30.7\ \text{TPY}\ SO_2}{2{,}147.51\ \text{TPY}\ SO_2}\right) + \left(\frac{349.4\ \text{TPY}\ NO_x}{5{,}087.07\ \text{TPY}\ NO_x}\right)\right]$$

$$\text{Modeled } PM_{2.5}\text{ 24 Hour Air Quality Impact} = 0.0996\frac{\mu g}{m^3}$$

$PM_{2.5}$ Annual

SO_2 MERP Calculation:

$$0.13\ \frac{\mu g}{m^3}\left(\frac{Selected\ Hyopthetical\ MERP)}{MaxConc}\right)$$

$$0.13\ \frac{\mu g}{m^3}\left(\frac{1000\ tpy}{0.0324019045\ \frac{\mu g}{m^3}}\right)$$

$$= 4{,}012.11\ tpy$$

NOx MERP Calculation:

$$0.13\ ug/m\text{^}3\ \left(\frac{Selected\ Hyopthetical\ MERP)}{MaxConc}\right)$$

$$0.13\ \frac{\mu g}{m^3}\left(\frac{1000\ tpy}{0.0100344885\ \frac{\mu g}{m^3}}\right)$$

$$= 12{,}955.32\ tpy$$

$$\text{Modeled Air Quality Impact} = (\text{Critical Air Quality Threshold})\left(\frac{\text{Project Emissions}}{\text{MERP}}\right)$$

$$\textit{Modeled } PM_{2.5} \text{ Annual Air Quality Impact} = \left(0.13\frac{\mu g}{m^3}\right)\left[\left(\frac{30.7 \text{ TPY } SO_2}{4{,}012.11 \text{ TPY } SO_2}\right) + \left(\frac{660.1 \text{ TPY } NO_x}{12{,}955.32 \text{ TPY } NO_x}\right)\right]$$

$$\text{Modeled } PM_{2.5} \text{ Annual Hour Air Quality Impact} = 0.007619\frac{\mu g}{m^3}$$

3. NO_2 Modeling

Based on current guidance, NO_2 impacts can be determined by using a 3-tiered NOx to NO_2 conversion rate system, where:

- Tier 1 assumes 100 percent NOx to NO_2 conversion;
- Tier 2 utilizes the Ambient Ratio Method 2 (ARM2); and
- Tier 3 allows the use of refined techniques such as the Ozone Limiting Method (OLM), Plume Volume Molar Ratio Method Version 2 (PVMRM2), and the Generic Reaction Set Method (GRSM). All three are default options in AERMOD.

For this Project, initial modeled concentrations were assessed using the EPA default Tier 2 methodology for estimating NO_2 concentrations from total NO_X emissions under ARM2.

For both averaging periods, NO_2 modeling for the SIL analysis was conducted using the Tier 2 ARM2 methodology with default values for minimum (0.5) and maximum NO_2/NOx ratio (0.9). For 1-hour NO_2, the 5-year average of the maximum modeled 1-hour NO_2 concentrations exceeded the SIL at 2,712 receptors and created an SIA of 9.8 km. The receptors that exceed the SIL were used in the cumulative analysis for demonstrating compliance with the NAAQS.

For annual NO_2, the highest annual concentration predicted in each of the five years modeled exceeded the SIL at 92 receptor locations for the "VGO through barge" scenario and 61 receptors for the "VGO through ship" scenario, resulting in an SIA of 2.83 and 2.80 km, respectively. These receptors were used in the cumulative analysis for demonstrating compliance with the PSD increment and NAAQS.

4. PM_{10} Modeling

The maximum 24-hour PM_{10} concentration over the five-year meteorological period is below the SIL of 5 µg/m³. The maximum modeled concentration is located in an area of 50-meter spacing along the fenceline; therefore, no additional modeling is required.

Pollutant	Averaging Period	AERMOD Model Concentration (µg/m³)						SIL (µg/m³)	Exceeds SIL?
		2020	2021	2022	2023	2024	Max.		
PM_{10}	24-hour	3.19	2.74	2.52	2.56	2.82	3.19	5.0	No

5. $PM_{2.5}$ NAAQS Assessment

$PM_{2.5}$ 24-Hour

$$5\ Year\ Average\ of\ 1st\ High + Secondary\ Impact =$$

$$= 0.84 \frac{\mu g}{m^3}$$

This value is below the SIL of 1.2 $\frac{\mu g}{m^3}$. Therefore, no further analysis is required.

$PM_{2.5}$ Annual

$$5\ Year\ Average\ of\ 1st\ High\ + Secondary\ Impact =$$

$$= 0.054 \frac{\mu g}{m^3}$$

This value is below the SIL of 0.13 $\frac{\mu g}{m^3}$. Therefore, no further analysis is required.

6. Increment Consumption

PSD increment consumption limits currently exist for NO_2, SO_2, PM_{10}, and $PM_{2.5}$. Compliance with the PSD increment consumption limits must be demonstrated for sources with PSD significant emissions. A preliminary impact determination is conducted to determine if the predicted off-property concentrations associated with the proposed significant emissions increases are greater than the EPA's SILs. No further modeling is required to demonstrate compliance if the maximum predicted concentration is below the SIL. If the maximum predicted concentration is equal to or greater than the SIL, all on site sources must be included in a full impact modeling analysis. Contributions from off-site sources that may impact the AOI are accounted for using ambient air monitoring data or by direct inclusion in the full impact modeling analysis. The AOI is defined as all locations with predicted concentrations that are equal to or greater than the established SILs.

$PM_{2.5}$ Increment Assessment

$PM_{2.5}$ 24-Hour

$$1st\ High\ (of\ 5\ Years)\ + Secondary\ Impact =$$

$$= 0.98\ \frac{\mu g}{m^3}$$

This value is below the SIL of 1.2 $\frac{\mu g}{m^3}$. Therefore, further analysis is not required.

$PM_{2.5}$ Annual

$$1st\ High\ (of\ 5\ Years)\ + Secondary\ Impact =$$

$$= 0.060\ \frac{\mu g}{m^3}$$

This value is below the SIL of 0.13 $\frac{\mu g}{m^3}$. Therefore, no further analysis is required.

E. PSD Full Impact Analysis Modeling Impacts

A full impact analysis is required for any pollutant for which the proposed source's estimated ambient pollutant concentrations exceed prescribed significant ambient impact levels. This analysis expands the preliminary analysis in that it considers emissions from: the proposed source; existing sources; residential, commercial, and industrial growth that accompanies the new activity and the new source or modification. For SO_2, PM_{10}, $PM_{2.5}$ and NO_2, the full impact analysis consists of separate analyses for the NAAQS and PSD increments.

Table 6-2 Monitored Background Concentrations (2022 – 2024)

Pollutant	Averaging Period(1)	2022 (µg/m³)	2023 (µg/m³)	2024 (µg/m³)	SIL (µg/m³)	NAAQS (µg/m³)
NO_2(2)	1-hour	Three-Year Average of the 98th Percentile: 52.2			7.5	188
	Annual	5.8	7.0	6.8	1	100
Ozone(2)	8-hour	Three-Year Average of the 98th Percentile: 66 ppb			1 ppb	70 ppb
PM_{10}(3)	24-Hour	43	49	54	5	150
$PM_{2.5}$(2)	24-Hour	Three-Year Average of the 98th Percentile: 16.6			1.2	35
	Annual	Three-Year Average: 8.0			0.13	9

(1) Short-term values not to be exceeded more than once per year.
(2) Monitor located in Pascagoula, MS.
(3) Monitor located in Chalmette, LA.
Sources: EPA AirData Website, MDEQ Air Monitoring Data Annual Report

1. Minor Source Baseline

Minor Source Baseline Date (MiSBD) means the earliest date after the trigger date on which a new major stationary source or a major modification to an existing source subject to PSD submits a complete application. The minor source baseline date is pollutant and geographically specific. The trigger date for $PM_{2.5}$ is October 20, 2011. Chevron will establish the minor source baseline date in Jackson County for $PM_{2.5}$.

2. NAAQS

The NAAQS are maximum concentration "ceilings" measured in terms of the total concentration of a pollutant in the atmosphere. For a new or modified source, compliance with any NAAQS is based upon the total estimated air quality, which is the sum of the ambient estimates resulting from existing sources of air pollution and the modeled ambient impact caused by the applicant's proposed emissions increase and associated growth. The applicant is required, at a minimum, to explicitly model all nearby sources as part of the NAAQS analysis. The modeling guideline defines a "nearby" source as any point source expected to cause a significant concentration gradient in the vicinity of the proposed new source or modification. For PSD purposes, "vicinity" is defined as the impact area. The location of such nearby sources could be anywhere within the impact area or an annular area extending 50 kilometers beyond the impact area.

3. Ozone NAAQS Cumulative Analysis Impact

$$NAAQS\ Value > Modeled\ Air\ Quality\ Impact + Monitered\ Design\ Value$$

$$70ppb > 1.363\ ppb + 66\ ppb$$

$$70ppb > 67.363\ ppb$$

The air quality level is less than the NAAQS, therefore no NAAQS violation is found, and the facility does not cause or contribute to a violation.

4. 1-Hour NO_2 NAAQS Cumulative Analysis Impact

OLM and PVMRM in AERMOD account for ambient conversion of NO to NO_2 in the presence of ozone based on the basic chemical mechanism of ozone titration, the interaction of NO with ambient ozone to form NO_2 and O_2. OLM and PVMRM both assume that ambient ozone (as measured at a representative ambient monitor) is present and available to oxidize NO to NO_2 without consideration of competing reactions. For both methods, the degree to which NO is converted to NO_2 depends on the relative concentration of the modeled NO with respect to ambient ozone. The main distinction between PVMRM and OLM is the approach taken to estimate the ambient concentrations of NO from emission sources for which the ozone titration mechanism is applied. OLM applies the mechanism to the hourly modeled ground-level concentration of NO at each receptor and PVMRM applies the mechanism to the

average NO concentrations in an elevated plume. The applicability of OLM versus PVMRM depends on the nature and number of modeled sources that contribute to local NO_2.

Because it more realistically represents single, non-overlapping plumes, PVMRM is generally applicable when modeling isolated elevated point sources. When concentrations from numerous sources overlap, OLM is more appropriate as it accounts for the combined NO_x concentration from multiple sources. The GRSM NO_2 screening option addresses photolytic conversion of NO_2 to NO and to address the time-of-travel necessary for NO_X plumes to convert the NO portion of the plume to NO_2 via titration and entrainment of ambient ozone. PVMRM and OLM do not address or provide for treatment of these mechanisms and have been shown to over-predict for some source characterizations and model configurations at Project source ambient air boundaries and within the first 1 to 3 kilometers.

Due to the numerous Project and background sources that would be considered in this analysis, the OLM Tier 3 option was applied for the cumulative modeling analyses. The modeling applied OLM with the OLMGROUP ALL option as recommended by EPA for multiple stack applications. For simplicity, NO_2 NAAQS and PSD Increment were modeled using the same inventory of permitted emission rates for all sources with the exception of Berths 1 through 6 and 8 at the Wharf, which existed prior to the MiSBD in 1992. This is conservative for PSD Increment as several Refinery and nearby sources have reduced NO_2 emissions or ceased operations since the MiSBD and likely resulted in increment expansion.

NO_2 background concentrations for the years 2022 through 2024 were developed and added to the modeled impacts to obtain estimates of total ambient air quality concentrations for comparison against the 1-hour and annual NO_2 NAAQS. The background monitor located in Pascagoula includes contributions from modeled sources; thus, summing these background values with the modeled impacts would add an element of conservatism to the impact analysis. Use of seasonal and hour-of-day varying background concentrations consistent with EPA guidance in their March 1, 2011 clarification memo was implemented for the 1-hour NO_2 NAAQS modeling.

Table 6-9 Season-Hour-of-Day NO_2 Background Concentrations Used in AERMOD (µg/m³)

Season / Hour	00:00	01:00	02:00	03:00	04:00	05:00	06:00	07:00
Winter	34.09	29.77	27.07	23.56	28.20	27.76	31.02	29.64
Spring	27.45	19.68	18.36	20.87	31.02	32.46	32.77	22.06
Summer	17.99	16.98	16.79	16.23	16.61	15.85	15.23	10.59
Fall	29.39	28.07	25.25	22.94	24.88	26.26	25.76	24.57
Season / Hour	**08:00**	**09:00**	**10:00**	**11:00**	**12:00**	**13:00**	**14:00**	**15:00**
Winter	20.18	15.42	11.78	13.85	12.78	14.16	14.16	14.10
Spring	13.60	10.84	11.15	10.84	11.22	11.59	10.97	11.34
Summer	13.03	9.46	14.04	8.27	7.71	9.09	10.53	8.46
Fall	14.98	10.47	10.09	8.02	7.77	10.21	10.84	10.59
Season / Hour	**16:00**	**17:00**	**18:00**	**19:00**	**20:00**	**21:00**	**22:00**	**23:00**
Winter	19.36	32.21	39.61	43.55	42.93	43.87	42.17	38.23
Spring	11.09	13.97	17.36	25.07	32.65	31.21	27.26	26.88
Summer	8.21	11.09	12.47	16.48	17.86	16.04	16.73	16.61
Fall	14.04	23.06	32.02	44.49	44.24	40.86	38.98	33.97

For the 1-hour NO_2 NAAQS analysis, the high-eighth-high 1-hour modeled concentration averaged over the five years was added to the season hour-of-day monitored background concentrations. For the annual NO_2 NAAQS analysis, the highest annual modeled concentration was added to the monitored background concentrations.

Table 6-10 NO_2 NAAQS Cumulative Modeling Results

Pollutant	Averaging Period	AERMOD Model Concentration (µg/m³)						Background Conc. (µg/m³)	Total Conc. (µg/m³)	NAAQS (µg/m³)
		2020	2021	2022	2023	2024	Max.			
NO_2	1-hour	171.4						N/A(1)	171.4	188(2)
	Annual	21.6	20.9	22.9	22.3	21.6	22.9	7.0	29.9	100

(1) Includes seasonal hourly background concentration.
(2) High-8th-High Average over 5-years

$$NAAQS\ Value > Modeled\ Air\ Quality\ Impact + Monitered\ Design\ Value$$

$$188\,\frac{\mu g}{m^3} > 171.4\,\frac{\mu g}{m^3}$$

The air quality level is less than the NAAQS; therefore, no NAAQS violation is found, and the facility does not cause or contribute to a violation.

5. PSD Class II Increment

A PSD increment is the maximum allowable increase in concentration that is allowed to occur above a baseline concentration for a pollutant. The baseline concentration is

defined for each pollutant and, in general, is the ambient concentration existing at the time that the first complete PSD permit application affecting the area is submitted. Emissions increases that consume a portion of the applicable increment are, in general, all those not accounted for in the baseline concentration and specifically include:

- Actual emissions increases occurring after the major source baseline date, which are associated with physical changes or changes in the method of operation at a major stationary source; and

- Actual emissions increase at any stationary source, area source, or mobile source occurring after the minor source baseline date.

For annual NO_2, the modeled concentration will be summarized to determine compliance with the PSD increments.

1-Hour NO_2 Increment Impact

The annual PSD Increment and NAAQS NO_2 concentrations are less than their respective thresholds and the peak concentrations are in areas of 100-meter spaced receptors; therefore, additional refinement of the results is not required.

Table 6-11 NO_2 PSD Increment Modeling Results

Pollutant	Averaging Period	AERMOD Model Concentration (µg/m³)						PSD Increment (µg/m³)
		2020	2021	2022	2023	2024	Max.	
NO_2	Annual	19.0	18.3	20.0	19.8	19.1	20.0	25

F. Vegetation and Soils Impact

VOCs are regulated as precursors to tropospheric ozone. Elevated ground-level ozone concentrations can damage plant life and crop production. VOCs interfere with the ability of plants to produce and store food, making them more susceptible to disease, insects, or other pollutants and harsh weather. Ozone is formed by the interaction of NOx, VOCs, and sunlight in the atmosphere.

PSD regulations require an analysis of air quality impacts on sensitive vegetation types, with significant commercial or recreational value, sensitive types of soil, and ecological effects such as damage to aquatic and terrestrial ecosystems. The predicted impacts attributable to the proposed Project are compared with the screening levels presented in *A Screening Procedure for the Impacts of Air Pollution Sources on Plants, Soils, and Animals* (EPA, 1980) and the secondary NAAQS as summarized in Table 7-1. The results show that the impacts are well below the screening thresholds.

Table 7-1 Screening Concentrations for Soils and Vegetation

Pollutant	Averaging Period	Modeled Concentration (µg/m³)	Ambient Background Concentration (µg/m³)	Total Concentration (µg/m³)	Screening Concentration (µg/m³)
NO_2	4-Hours	8.25	71.44[1]	79.69	3,760
	1-Month	0.95	60.16[2]	61.11	564
	Annual	2.26	7.00[1]	9.26	94
PM_{10}	24-hour	3.19	54.00[2]	57.19	150[5]
$PM_{2.5}$	24-hour	0.86	16.60[3]	17.46	35[5]
	Annual	0.05	8.0[4]	8.05	15[6]

(1) Background concentration is the highest concentration (2022-2024) (EPA Air Data Website)
(2) Background concentration is the high-second-high concentration (2022-2024) (EPA Air Data Website)
(3) Background concentration is the three-year average of the 98th percentile concentration (2022-2024) (EPA Air Data Website)
(4) Background concentration is the three-year average annual concentration (2022-2024) (EPA Air Data Website)
(5) Primary and Secondary NAAQS
(6) Secondary NAAQS

The Refinery is located near the Gulf Coast in an ecological region known as the East Gulf Coastal Plain (ECGP) which is characterized by sandy, silt, clay derived soils, wetlands, rivers and streams. The EGCP supports diverse plant and animal species within its terrestrial and aquatic systems. The EGCP areas close to the refinery on the south and east sides are undisturbed by refinery activity. The area is not supportive of typical agricultural crops, and no farming occurs near the Refinery.

According to the U.S. Fish and Wildlife Service, there are 117 threatened and endangered species in Mississippi (99 animal and 18 plant species). Three of the plant species are known to grow in Jackson County – false rosemary (Conradina canescens), Louisiana quillwort (Isoetes louisianesis Thieret), and chaffseed (Schwalbea americana L.). All three species are listed as endangered. None of these have been observed to occur in the vicinity of the Refinery.

Most of the designated vegetation screening levels are equivalent to or less stringent than the NAAQS and/or PSD increments; therefore, satisfaction of NAAQS and PSD increments assures compliance with sensitive vegetation screening levels.

G. Associated Growth Impact

A growth analysis examines the potential emissions from secondary sources associated with the proposed Project. Chevron anticipates that the majority of the construction labor force will come from the local area. Any additional personnel requirements for operations will also likely be filled from within the local labor force. As a result, no significant increase in population in the area will occur as a result of construction or operation of the Project. Local commercial establishments may see a temporary increase in business during the construction period. However, operation of the Project is not expected to significantly affect industrial and commercial development in the Pascagoula area.

The above discussion indicates that there will be no significant change in employment, population, housing, or commercial development associated with the proposed Project.

Therefore, there will not be any significant increase in growth-related emissions associated with construction and operation of the proposed Project.

H. Class I Impact and Visibility

The Federal Land Managers' Air Quality Related Values Work Group (FLAG), Phase I Report – Revised (2010), provides recommendations, specific procedures, and interpretation of results for assessing visibility impacts of new or modified sources on Class I Area resources. Section 3.2., *Initial Screening Criteria (New)*, presents a screening tool, Q/D, (where Q is the total SO_2, NO_x, PM_{10}, and H_2SO_4 annual emissions divided by D, the distance from the Class I Area) to screen out from Air Quality Related Values (AQRV) review for those sources with relatively small amounts of emissions located a large distance from a Class I Area. If this value is less than or equal to 10, the source will be considered to have negligible impacts with respect to Class I AQRV. The Federal Land Manager (FLM) (and the Federal official with direct responsibility for management of the Federal Class I parks as wilderness areas) will not request any further Class I AQRV impact analysis. As a minimum, the permitting authority should notify the FLM of all sources that exceed the Q/D criteria.

PSD Class I areas are areas of special national or regional value from a natural, scenic, recreational, or historical perspective. The PSD program provides special protection for such areas. According to 40 CFR 52.21(p), sources located within 300 km of a Class I area may be required to demonstrate that a proposed Project will not cause or contribute to an exceedance of the PSD Class I increments or adversely affect certain AQRVs (including visibility and acid deposition). There is one Class I area located within 300 km of the Project site. The closest Class I area is Breton National Wildlife Refuge (NWR) located approximately 50 km from the Refinery. At this distance and beyond, a non-steady-state modeling approach which considers spatial and time variations in meteorological conditions, such as CALPUFF, is appropriate for AQRVs.

Receptors from the National Park Service database of Class I receptors were used for this modeling analysis for Breton NWR.

(found at: https://irma.nps.gov/DataStore/Reference/Profile/2249830)

$$Q/D = \frac{(SO_2 + NO_x + PM_{10} + H_2SO_4)}{Distance\ from\ Class\ I\ Area}$$

Table 7-4 Q/D Screening Calculation

Averaging Period	NO_x (TPY)	PM_{10} (TPY)	SO_2 (TPY)(2)	H_2SO_4 (TPY)(2)	Distance (km)	Total Q/D
24-hour	349.4(1)	66.3(1)	30.7	3	50	9.0
Annual	660.1	50.4	30.7	3	50	14.9

(1) Emissions are TPY Equivalent
(2) Non-PSD pollutant. Annual emissions used for both short-term and annual Q/D calculations.

Per discussion with Tim Allen of the United States Fish and Wildlife Service (USFWS), the Project screens out for additional AQRV review based on the distance to the Class I area and the Q/D estimates.

Secondary $PM_{2.5}$ formation was included for Project sources. Breton NWR is between 50 and 60 km from the Refinery. The MERP calculation distances are 40 and 60 km. The calculation of secondary $PM_{2.5}$ formation evaluated the 40 km distance from both the Orleans County, LA and Bay County, FL MERP sites. These secondary $PM_{2.5}$ concentrations were added to the AERMOD model output. The modeled concentrations at all receptors within the Class I area were compared to the SILs. Total $PM_{2.5}$ was compared to the $PM_{2.5}$ SILs.

As all modeled impacts are below the applicable SILs for NO_2, PM_{10}, and $PM_{2.5}$, the Project is assumed to have an insignificant impact for these pollutants, and no further modeling is required.

Table 7-5 Class I MERP Secondary $PM_{2.5}$ Concentration Calculation

Pollutant	Avg. Period	Hypothetical Source	NOx				SO_2				Project Secondary $PM_{2.5}$ Modeled Concentration (µg/m³)
			EPA Precursor Emissions (TPY)	EPA Modeled Conc. (µg/m³)	Project Precursor Emissions (TPY)	Project Modeled Conc. (µg/m³)	EPA Precursor Emissions (TPY)	EPA Modeled Conc. (µg/m³)	Project Precursor Emissions (TPY)	Project Modeled Conc. (µg/m³)	
$PM_{2.5}$	24-hour	Bay Co., FL	1000	0.1348	349.4[1]	0.0471	1000	0.6586	30.7	0.0202	0.0673
	Annual		1000	0.0047	660.1[2]	0.0031	1000	0.0193	30.7	0.0006	0.0037
	24-hour	Orleans Co., LA	500	0.0552	349.4[1]	0.0386	500	0.1682	30.7	0.0103	0.0489
	Annual		500	0.0016	660.1[2]	0.0021	500	0.0058	30.7	0.0004	0.0024

[1]Short-term (lb/hr) emission increases converted to tons per year (TPY).
[2]Annual emission increases.

Table 7-6 PSD Increment Class I AERMOD Modeling Results

Pollutant	Averaging Period	AERMOD Model Concentration (µg/m³)						SIL (µg/m³)
		2020	2021	2022	2023	2024	Max.	
PM_{10}	24-hour	High-1st-High = 0.06						0.3
$PM_{2.5}$(2)	24-hour	High-1st-High Averaged Over 5 Years = 0.111						0.27
$PM_{2.5}$(4)	24-hour	High-1st-High Averaged Over 5 Years = 0.129						0.27
VGO via Barge								
NO_2(1)	Annual	0.03	0.03	0.02	0.03	0.03	0.03	0.1
PM_{10}	Annual	0.002	0.002	0.002	0.002	0.002	0.002	0.2
$PM_{2.5}$(3)	Annual	0.005	0.004	0.004	0.005	0.005	0.005	0.03
$PM_{2.5}$(5)	Annual	0.006	0.006	0.006	0.006	0.006	0.006	0.03
VGO via Ship								
NO_2(1)	Annual	0.03	0.03	0.02	0.03	0.03	0.03	0.1
PM_{10}	Annual	0.002	0.002	0.002	0.002	0.002	0.002	0.2
$PM_{2.5}$(3)	Annual	0.005	0.004	0.004	0.005	0.005	0.005	0.03
$PM_{2.5}$(5)	Annual	0.006	0.006	0.006	0.006	0.006	0.006	0.03

(1) Conversion of NO_x to NO_2 using Tier 2 (ARM2) method.
(2) Includes secondary PM concentration of 0.0489 µg/m³ (Orleans Co., LA).
(3) Includes secondary PM concentration of 0.0024 µg/m³ (Orleans Co., LA).
(4) Includes secondary PM concentration of 0.0673 µg/m³ (Bay Co., FL).
(5) Includes secondary PM concentration of 0.0037 µg/m³ (Bay Co., FL).

I. Class II Impact and Visibility

The Class II Visibility Analysis evaluates the impact the proposed project will have on local visibility conditions. This analysis is based upon impacts within the significant impact area of the proposed project and is separate from the Class I visibility analysis. Components contributing to visibility impairment include sulfates, NOx, PM, organic carbon, soot (elemental carbon), and crustal material.

The Class II Visibility Analysis evaluates the impact of the proposed project on local visibility conditions. Based on discussions with MDEQ and consistent with other PSD projects in EPA Region IV, Chevron conducted a visibility analysis for the Shepard State Park (SSP), located approximately 13.5 km northwest of the Refinery in Gautier, MS.

It should be noted that although VISCREEN is designed primarily for assessing plume visual impacts in Class I areas it can also be applied in PSD Class II areas.

The visible plume analysis was conducted with the most current version of EPA's screening model VISCREEN to determine if the project's emissions increases have the potential to cause visibility impairment. VISCREEN was applied with the guidance provided in EPA's *Workbook for Plume Visual Impact Screening and Analysis* ("Workbook"). As such, the VISCREEN model was applied to estimate two visual impact parameters, plume perceptibility (ΔE) and plume contrast (Cp) against a sky background. Given that there are no elevated scenic vistas with terrain as background for this area, visual impacts on terrain should not be a critical value in determining plume perceptibility. Screening-level guidance indicates that values above 2.0 for ΔE and +/- 0.05 for Cp are considered perceptible. The Workbook offers two levels of analysis. Level 1 screening analysis, which is the most simplified and conservative approach, employs default meteorological data with no site-specific conditions.

Table 7-2 VISCREEN Level 1 Modeling Parameters

Parameter	SSP
Background Ozone (ppm)	0.04
Background Visual Range (km)	20
Source-Observer Distance (km)	13.5
Min. Source-Class I Distance (km)	13.5
Max. Source-Class I Distance (km)	15.5
Wind Speed (m/s)	1.00
Stability Class	F
Plume-Source Observer Angle (degrees)	11.25
Particulates (lb/hr)	15.13
NOx (as NO_2) (lb/hr)	79.76

Initially, the Level 1 analysis was conducted and indicated ΔE values were above the screening thresholds. The SSP website does not include star gazing as an activity/attraction in the park; therefore, nighttime hours were excluded from the analysis. Based on Table 3-1, *Key to Stability Categories*, in the *Workbook of Atmospheric Dispersion Estimates*, the most conservative stability category during daytime hours is Stability Category D. For conservatism, the analysis used Stability Category E, 1 m/s to include dawn and dusk hours. All other inputs remained the same as the Level 1 analysis.

Table 7-3 VISCREEN Results Inside Shepard State Park

Background	Theta[1]	Azimuth	Distance	Alpha	ΔE		Contrast (Cp)	
					Criteria	Plume	Criteria	Plume
SKY	10	119	15.5	49	2.00	1.147	0.05	0.000
SKY	140	119	15.5	49	2.00	0.369	0.05	-0.005[2]
TERRAIN	10	84	13.5	84	2.00	0.466	0.05	0.005
TERRAIN	140	84	13.5	84	2.00	0.110	0.05	0.003

(1) VISCREEN results are provided for the two VISCREEN default worst-case theta angles. The two theta angles represent the sun being in front of the observer (theta = 10 degrees) and behind the observer (theta = 140 degrees).

(2) A negative C_p means the plume has a darker contrast than the background sky.

The VISCREEN results are below the criteria threshold for both ΔE and Cp values; therefore, no negative impacts are expected.

IV. Other Requirements

A. Tank Reconstruction

The permit addresses reconstruction of one external floating roof tank, Emission Point AS-501 (T-501), which stores gasoline. Because the tank reconstruction will result in improvements to tank seals and fittings, there will be a decrease in VOC emissions from this tank. However, the tank is included in the permit because reconstruction will trigger applicability to a new federal regulation, 40 CFR Part 60, Subpart Kc – *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After October 4, 2023*. Subpart Kc contains design specifications and inspection requirements for external floating roof tanks, which are included in the proposed PSD permit.

B. Equipment Leak Modifications

The modifications to piping in Plants 11, 22, and 61 will be considered a "modification" under 40 CFR 60.14. Therefore, these plants will become subject 40 CFR Part 60, Subpart GGGa – *Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries for Which Construction, Reconstruction, or Modification Commenced after November 7, 2006*. Equipment leaks in Plant 11 are already subject to Subpart GGGa; however, Plants 22 and 61 will become subject to Subpart GGGa upon completion of the piping modifications. The proposed PSD permit only regulatory references to Subpart GGGa, since the Title V Operating Permit already contains the detailed requirements of Subpart GGGa.

C. Coke Dust Management

In order to stay below the SILs for $PM_{2.5}$, Chevron proposes to further minimize emissions of fugitive dust from petroleum coke handling and storage. Fugitive emissions result from the coke pit material-handling systems that moves coke from the coke pit in the Coker Unit to storage areas near the wharf, where it is stored in piles before being transferred to ships at the wharf. Coke is transferred from the pit to the coke storage area at the wharf via a two-mile long enclosed conveyor. If the conveyor is down for maintenance, covered trucks may be used to transport the coke to the wharf. Chevron uses various management practices to minimize dust from these operations, including covered conveyors, dust suppressants, and watering. The proposed PSD permit requires Chevron develop and implement a dust management plan for the coke handling and storage to ensure the management practices are implemented effectively and monitoring is practicably enforceable.

D. Marketing Terminal Product Throughput

Chevron proposes to increase the permitted gasoline throughput and decrease the permitted diesel throughput at the marketing terminal where product is transported off-site by truck (rather than pipeline, rail, or barge/ship). The changes to permitted loading at the marketing terminal reflect anticipated increases in gasoline loading. There will be no modifications at the marketing terminal that would trigger applicability of any additional federal or state requirements not already addressed in the Title V Operating Permit.

E. "Reasonable Possibility" Monitoring and Recordkeeping

40 CFR 52.21(r)(6) requires applicants that use projected actual emissions to determine the emissions increase from the project maintain records of actual emissions upon resuming regular operations following the completion of the project if the projected actual increase is at least 50 percent of the significant emissions increase. With the "Pascagoula Aggregates PSD Project," Chevron only used projected actual emissions for SO_2 and H_2SO_4 from some affected furnaces and process heaters. As noted in Table 1, only project-related emissions of SO_2 exceed 50 percent of the significant emission rate.

Therefore, the permit includes requirements from 40 CFR 52.21(r)(6)(iii) and (v) to monitor and record annual emissions of SO_2 from those emission units affected by the project for five years following certification of construction for the project. If such actual annual emissions exceed the baseline actual emissions provided in the "Pascagoula Aggregates PSD Project" Application by 40 tons per year or more, the permittee must submit a report to MDEQ.

V. Recommendation

The impact of the emission of air contaminants from the proposed modifications has been evaluated and the staff believes that, with proper constraints and limitations, this project will operate within all State and Federal air pollution control laws and standards and will

protect public health and welfare. Therefore, the staff of the Board has decided, based on available information, to recommend to the Board that the permit be modified to reflect the requested changes.

SECTION 2: COPY OF CONSTRUCTION PERMIT

STATE OF MISSISSIPPI
AIR POLLUTION CONTROL PERMIT

AND PREVENTION OF SIGNIFICANT DETERIORATION (PSD) AUTHORITY

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Chevron USA Inc, Chevron Products Company, Pascagoula Refinery
250 Industrial Road
Pascagoula,
Jackson County, Mississippi

"Pascagoula Aggregates PSD Project"

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 and under authority granted by the Environmental Protection Agency under 40 CFR 52.01 and 52.21.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

Jarrew Whitlock

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: March 12, 2026 **Permit No.: 1280-00058**

2299 PER20250001

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.)

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

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

1.3 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).)

1.4 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).)

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

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

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

1.7 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).)

1.8 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).)

1.9 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).)

1.10 *Design and Construction Requirements:* The stationary source shall be designed and constructed so as to operate without causing a violation of any 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).)

1.11 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))

1.12 *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).)

1.13 *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.)

1.14 *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)

1.15 *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, the following:

(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.)

1.16 *Public Record and Confidential Information:* Except for information determined to be confidential under the Mississippi Air and Water Pollution Control Law, all information obtained 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)

1.17 *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.)

1.18 *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).)

1.19 *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.)

1.20 *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).)

1.21 *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).)

1.22 *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).)

1.23 *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).)

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

(a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)

(1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through

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

(i) An upset occurred and that the source can identify the cause(s) of the upset;

(i) The source was at the time being properly operated;

(ii) 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;

(iii) 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;

(iv) 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.)

1.25 *General Duty:* All air emission equipment shall be operated as efficiently as possible to minimize emissions of air contaminants.

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

1.26 *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/or modify and operate, upon certification of construction, air emissions equipment, as described in the following table.

Emission Point	Description
AE-000	**Plant 11 Crude I**
AE-001	Plant 11 Equipment Leaks
AG-000	**Plant 15 Rheniformer I/Naphtha Hydrotreater (NHT) I**
AG-043 (F-1501, F-1502, F-1503)	Three (3) refinery fuel gas-fired[1] Rheniformer I Process Furnaces with a total combined rated capacity (fired duty) of 493 MMBtu/hr that vent through a common stack (formerly AA-043)
AL-000	**Plant 21 Boiler Plant (Includes N_2 Plant)**
AL-104 (F-2101)	Refinery fuel gas[1] and natural gas-fired Boiler with a rated capacity (fired duty) of 265 MMBtu/hr and is equipped with Ultra-Low NO_x burners
AL-105 (F-2102)	Refinery fuel gas[1] and natural gas-fired Boiler with a rated capacity (fired duty) of 265 MMBtu/hr and is equipped with Ultra-Low NO_x burners
AL-106 (F-2103)	Refinery fuel gas[1] and natural gas-fired Boiler with a rated capacity (fired duty) of 265 MMBtu/hr and is equipped with Ultra-Low NO_x burners
AM-000	**Plant 22 Hydrofiner**
AM-001	Plant 22 Equipment Leaks
AM-111 (F-2201)	Refinery fuel gas-fired[1] Process Heater with a rated capacity (fired duty) of 48 MMBtu/hr (formerly AA-111)
AR-000	**Plant 33 Coke Conveyor & Storage**
AR-002	Coke Handling and Storage (formerly AA-621)
AR-003	Coke Trucking
AS-000	**Plant 34 Blending**
AS-501 (T-501)	5,063,700-gallon External Floating Roof Gasoline Tank (formerly part of AA-611)

Emission Point	Description
BE-000	**Plant 61 Crude II**
BE-001	Plant 61 Equipment Leaks
BP-000	**Plant 81 Residuum Desulfurization (RDS)**
BP-511 (F-8110)	Refinery fuel gas-fired[1] Residuum Desulfurization Feed Furnace No. 1 with a rated capacity (fired duty) of 65 MMBtu/hr (formerly AA-511)
CK-000	**Plant 82 Isodewaxing/Hydrofinishing (IDW/HDF)**
CK-003 (F-8210)	Refinery fuel gas-fired[1] Fractionator Feed Furnace with a rated capacity (fired duty) of 51.63 MMBtu/hr and equipped with Ultra-Low NO_x burners
CK-004 (F-8220)	Refinery fuel gas-fired[1] Feed Preparation Unit (FPU) Feed Furnace with a rated capacity (fired duty) of 86.0 MMBtu/hr and equipped with Ultra-Low NO_x burners
CK-005 (F-8250)	Refinery fuel gas-fired[1] IDW/HDF (R-8250) Reactor Feed Furnace with a rated capacity (fired duty) of 44.0 MMBtu/hr and equipped with Ultra-Low NO_x burners
CK-006 (F-8280)	Refinery fuel gas-fired[1] IDW/HDF (C-8280) Vacuum Feed Furnace with a rated capacity (fired duty) of 70.13 MMBtu/hr and equipped with Ultra-Low NO_x burners
BQ-000	**Plant 83 Coker**
BQ-521 (F-8300A)	Refinery fuel gas-fired[1] Coker Furnace No. 1 with a rated capacity (fired duty) of 203.5 MMBtu/hr (formerly AA-521)
BQ-522 (F-8300B)	Refinery fuel gas-fired[1] Coker Furnace No. 2 with a rated capacity (fired duty) of 203.5 MMBtu/hr (formerly AA-522)
BQ-523 (F-8300C)	Refinery fuel gas-fired[1] Coker Furnace No. 3 with a rated capacity (fired duty) of 203.5 MMBtu/hr (formerly AA-523)
CG-000	**Plant 5171 Pascagoula Marketing Terminal (PMT)**
CG-002	Three (3) Tank Truck Loading Racks with additive injection systems controlled by one (1) vapor recovery unit (formerly AN-000-RACK and AN-000-VRU)

[1] Refinery fuel gas means process off-gases, natural gas, or a mixture as supplied to the combustion devices. Refinery fuel gas, as burned, consists of process off-gases that are routed to a fuel mixer where they are supplemented with natural gas to maintain proper feed to the refinery fuel gas combustion devices. In addition, refinery fuel gas monitoring occurs after fuel blending in order to be representative of the fuel as burned.

SECTION 3. EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limitation/Standard
AE-001 AM-001 BE-001	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j) (PSD BACT Limit)	3.1	VOC	Comply with 40 CFR Part 60, Subpart GGGa
	40 CFR 60, Subpart GGGa Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries for Which Construction, Reconstruction, or Modification Commenced after November 7, 2006 40 CFR 60.590a and 60.592a(a), Subpart GGGa	3.2		Applicability Comply with equipment leak requirements by complying with 40 CFR 60, Subpart VVa requirements
	40 CFR 63, Subpart CC NESHAP from Petroleum Refineries 40 CFR 63.640(p)(2), Subpart CC	3.3	HAP	Applicability Comply with the 40 CFR 63, Subpart CC requirements by complying with the requirements of 40 CFR 60, Subpart GGGa
AG-043	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(k) (PSD Air Quality Limit)	3.4	$PM/PM_{10}/PM_{2.5}$ (filterable + condensable)	≤ 4.43 lb/hr (3-hour rolling average) not to exceed 14.43 TPY
AL-104 AL-105 AL-106				≤ 2.37 lb/hr (3-hour rolling average) not to exceed 7.34 TPY (Limits apply to each emission point.)
CK-003				≤ 0.48 lb/hr (3-hour rolling average) not to exceed 1.22 TPY
CK-004				≤ 0.81 lb/hr (3-hour rolling average) not to exceed 2.50 TPY
CK-005				≤ 0.41 lb/hr (3-hour rolling average) not to exceed 1.03 TPY
CK-006				≤ 0.66 lb/hr (3-hour rolling average) not to exceed 1.91 TPY
AM-111	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(k) (PSD Air Quality Limit)	3.5	NO_x	≤ 8.40 lb/hr (3-hour rolling average) not to exceed 29.43 TPY
BP-511				≤ 9.00 lb/hr (3-hour rolling average) not to exceed 31.32 TPY
BQ-521 BQ-522				≤ 24.93 lb/hr (3-hour rolling average) not to exceed 87.40 TPY (Limits apply to each emission point.)

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limitation/Standard
BQ-523	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(k) (PSD Air Quality Limit)	3.5	NO_x	≤ 27.92 lb/hr (3-hour rolling average) not to exceed 87.40 TPY
AR-002	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(k) (PSD Air Quality Limit)	3.6	Visible Emissions	No visible emissions
		3.7	Coke moisture content	≥ 8.0% (12-month rolling average)
AR-003	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(k) (PSD Air Quality Limit)	3.8	Operating requirements ($PM/PM_{10}/PM_{2.5}$)	Truck coke for no more than 30 days per calendar year and water coke truck haul routes daily when coke is transported by truck
AS-501	40 CFR 60, Subpart Kc Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After October 4, 2023 40 CFR 60.110c(a) and (c), Subpart Kc	3.9	VOC	Applicability
	40 CFR 60.112c(a)(1) and 60.112c(c)(1) and (2), Subpart Kc	3.10		External floating roof design specifications
	40 CFR 60.112c(a)(4) and 60.112c(e), Subpart Kc	3.11		Degassing requirements
	40 CFR 63, Subpart CC NESHAP from Petroleum Refineries 40 CFR 63.640(a) and (c)(2) and 63.660, Subpart CC (Group 1 Storage Vessel) 40 CFR 60.110c(i), Subpart Kc	3.12	HAP	Applicability - Comply with 40 CFR 63, Subpart CC by complying with 40 CFR 60, Subpart Kc
CG-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.13	Product throughput requirements	Gasoline ≤ 375,000,000 gallons/year (includes aviation fuel) Diesel ≤ 195,000,000 gallons/year Jet fuel ≤ 30,000,000 gallons/year

3.1 For Emission Points AE-001, AM-001, and BE-001 (Equipment Leaks), compliance with 40 CFR 60, Subpart GGGa has been deemed the Best Available Control Technology for piping modifications in Plants 11, 22, and 61.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5 and 40 CFR 52.21(j) [PSD BACT Limit])

3.2 For Emission Points AE-001, AM-001, and BE-001 (Equipment Leaks), upon certification of construction for piping modifications in Plants 11, 22, and 61, respectively, the entire plant shall be subject to the applicable requirements of 40 CFR 60, Subpart GGGa (*Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries for Which Construction, Reconstruction, or Modification Commenced after November 7, 2006*) and the applicable General Provisions in 40 CFR 60, Subpart A, if not already subject. The permittee shall comply with the requirements of 40 CFR 60, Subpart GGGa by complying with the applicable requirements from 40 CFR 60.482-1a to 60.482-10a of Subpart VVa.

(Ref.: 40 CFR 60.590a and 60.592a(a), Subpart GGGa)

3.3 For Emission Points AE-001, AM-001, and BE-001 (Equipment Leaks), equipment leaks that are subject to the provisions of both 40 CFR 63, Subpart CC and 40 CFR 60, Subpart GGGa are required to comply only with the provisions specified in Subpart GGGa.

(Ref.: 40 CFR 63.640(p)(2), Subpart CC)

3.4 For Emission Points AG-043, AL-104, AL-105, AL-106, AM-111, CK-003, CK-004, CK-005, and CK-006, upon permit issuance, the following PM, PM_{10}, and $PM_{2.5}$ (filterable and condensable) emission limits shall supersede any prior permitted PM, PM_{10}, and $PM_{2.5}$ limits for the given emission point:

Emission Point	$PM/PM_{10}/PM_{2.5}$ Limits (filterable + condensable)	
	lb/hr (3-hour rolling average)	TPY (12-month rolling total)
AG-043	4.43	14.43
AL-104	2.37	7.34
AL-105	2.37	7.34
AL-106	2.37	7.34
CK-003	0.48	1.22
CK-004	0.81	2.50
CK-005	0.41	1.03
CK-006	0.66	1.91

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5 and 40 CFR 52.21(k) [PSD Air Quality Limit])

3.5 For Emission Points AM-111, BP-511, BQ-521, BQ-522, and BQ-523, upon permit issuance, the following NO_x emission limits shall supersede any prior permitted NO_x limits for the given emission point:

Emission Point	NO_x Limits	
	lb/hr (3-hour rolling average)	TPY (12-month rolling total)
AM-111	8.40	29.43
BP-511	9.00	31.32
BQ-521	24.93	87.40
BQ-522	24.93	87.40
BQ-523	27.92	87.40

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5 and 40 CFR 52.21(k) [PSD Air Quality Limit])

3.6 For Emission Point AR-002, upon permit issuance, the permittee shall not discharge visible emissions from coke handling and storage. To ensure there is no discharge of visible emissions from coke handling and storage, the permittee shall use one or more of the following best management practices: total or partial enclosures, chemical dust suppression, and/or watering.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5 and 40 CFR 52.21(k) [PSD Air Quality Limit])

3.7 For Emission Point AR-002, upon permit issuance, the permittee shall maintain the moisture content of the coke at 8.0% or greater, as determined on a consecutive 12-month rolling average basis by monitoring the moisture content of the coke at loadout.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5 and 40 CFR 52.21(k) [PSD Air Quality Limit])

3.8 For Emission Point AR-003, upon permit issuance, the permittee shall truck coke for no more than 30 days in each calendar year and shall water the coke truck haul roads daily when coke is being transported by truck.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5 and 40 CFR 52.21(k) [PSD Air Quality Limit])

3.9 For Emission Point AS-501, upon reconstruction of the tank, the permittee shall comply with all applicable requirements of 40 CFR 60, Subpart Kc (*Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After October 4, 2023)* and the applicable General Provisions of 40 CFR 60, Subpart A.

(Ref.: 40 CFR 60.110c(a) and 60.110c(c), Subpart Kc)

3.10 For Emission Point AS-501, upon reconstruction of the tank, the permittee shall install and operate an external floating roof. The external floating roof must be equipped and operated as specified in paragraphs (a) through (d) below:

(a) The roof must be floating on the liquid at all times (i.e., off the roof supports) except during initial fill until the roof is lifted off roof supports and when the storage vessel is completely emptied or subsequently emptied and refilled. The process of filling,

emptying, or refilling when the roof is resting on the roof supports must be continuous and must be accomplished as rapidly as possible.

(b) The external floating roof must be equipped with a primary and secondary rim seal system as specified in 40 CFR 60.112c(b)(2), except that if a mechanical shoe primary seal is used, it must be installed so that one end of the shoe extends into the stored VOL and the other end extends a minimum vertical distance of 24 inches (61 centimeters) above the stored organic liquid surface. The external floating roof also must have welded deck seams, and it must have deck fitting controls as specified in paragraphs (b)(1) through (b)(9), as applicable. References to an internal floating roof in 40 CFR 60.112c(b)(2) means an external floating roof for the purposes of this paragraph.

(1) Each opening in an external floating roof except for vacuum breaker/automatic bleeder vents and the rim vents is to provide a projection below the liquid surface.

(2) Vacuum breaker/automatic bleeder vents must be equipped with a gasket and are to be closed at all times, with no visible gaps, when the roof is floating. Vacuum breaker/automatic bleeder vents must be set to open only when the roof is being floated off or is being landed on the roof supports.

(3) Rim vents must be equipped with a gasket and must be closed at all times with no visible gaps when the roof is floating. Rim vents must be set to open only when the external floating roof is not floating or when the pressure beneath the rim seal system exceeds the manufacturer's recommended setting.

(4) Each penetration of the external floating roof for the purpose of sampling must be a gauge hatch/sample well. The gauge hatch/sample well must have a gasketed cover, which must be closed at all times, with no visible gaps, except when the hatch or well must be opened for access.

(5) Each access hatch and gauge float well must be equipped with a cover that is gasketed and that is bolted or otherwise mechanically secured. The cover must be closed and must be bolted or otherwise mechanically secured at all times, with no visible gaps, except when the hatch or well must be opened for access.

(6) If the external floating roof does not have a liquid-mounted primary seal, all guidepoles must be unslotted and must be equipped as specified in 40 CFR 60.112c(b)(12).

(7) If the external floating roof has a liquid-mounted primary seal, equip each guidepole as specified in paragraphs (b)(7)(i) and (ii).

(i) Each slotted guidepole must be equipped as specified in 40 CFR 60.112c(b)(10)(ii) or (iv).

(ii) Each unslotted guidepole must be equipped as specified in 40 CFR 60.112c(b)(12).

(8) Each emergency roof drain is to be provided with a slotted membrane fabric cover that covers at least 90 percent of the area of the opening.

(9) Except for leg sleeves, each opening in the external floating roof not subject to controls specified in paragraphs (b)(1) through (b)(8) must be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap), except when the device must be opened for access. The cover or lid must be equipped with a gasket.

(Ref.: 40 CFR 60.112c(a) and 60.112c(c)(1) and (2), Subpart Kc)

3.11 For Emission Point AS-501, the permittee shall meet the following requirements during emptying and degassing of the storage vessel until the vapor space concentration in the storage vessel is less than 10 percent of the lower explosive limit (LEL) or, for nonflammable liquids, 5,000 ppmv as methane. The permittee must determine the LEL or methane concentration using process instrumentation or a portable measurement device and follow procedures for calibration and maintenance according to manufacturer's specifications. The permittee must check instrument calibration and check the instrumental offset response each day the instrument is used and prior to discontinuing controlled degassing to confirm the accuracy of the instrument's readings.

(a) Remove liquids from the storage vessel as much as practicable. Chemicals or a diluent such as a distillate fuel may be introduced into the storage vessel for the purpose of reducing vapor concentration before or during active degassing.

(b) Comply with one of the following:

(1) Reduce total VOC emissions by venting emissions through a closed vent system to a flare or enclosed combustion device for which the permittee elects to comply with the flare provisions and meet the requirements specified in 40 CFR 30.112c(d)(5).

(2) Reduce total VOC emissions by 98 weight percent by venting emissions through a closed vent system to any combination of non-flare control devices.

(3) Reduce total VOC emissions by routing emissions to a fuel gas system or process and meet the requirements specified in 40 CFR 60.112c(d)(6).

(c) For floating roof storage vessels, the storage vessel may be opened to set up equipment (e.g., making connections to a temporary control device) for the shutdown operations but must not be actively degassed during this time period.

(Ref.: 40 CFR 60.112c(a)(4) and 60.112c(e), Subpart Kc)

3.12 For Emission Point AS-501, the permittee shall comply with all applicable requirements of 40 CFR 63, Subpart CC (*NESHAP from Petroleum Refineries)* and the applicable General Provisions of 40 CFR 63, Subpart A. Emission Point AS-501 is a Group 1 storage vessel currently complying with the requirements of 40 CFR 63, Subpart WW. Upon certification of reconstruction of Emission Point AS-501, compliance with 40 CFR 60, Subpart Kc, including all floating roof requirements, recordkeeping, and reporting requirements will constitute compliance with the applicable provisions in 40 CFR 63, Subpart WW.

(Ref.: 40 CFR 63.640(a) and (c)(2) and 63.660, Subpart CC and 40 CFR 60.110c(i), Subpart Kc)

3.13 For Emission Point CG-002, upon permit issuance, the permittee shall limit the annual throughput of fuel at the marketing terminal to the following (each based on a rolling 365-day period):

(a) Gasoline ≤ 375,000,000 gallons/year (includes aviation fuel);

(b) Diesel ≤ 195,000,000 gallons/year; and

(c) Jet fuel ≤ 30,000,000 gallons/year.

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

SECTION 4. WORK PRACTICES

There are no work practice standards addressed in this permit.

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.
AE-001 AM-001 BE-001	40 CFR 60.592a(d) and (e), Subpart GGGa	5.2	Testing and recordkeeping	Comply with the provision in 40 CFR 60, Subpart VVa
AG-043 AL-104 AL-105 AL-106 CK-003 CK-004 CK-005 CK-006	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.3	$PM/PM_{10}/PM_{2.5}$ (filterable + condensable)	Biennial stack test – EPA Reference Method 1-5, 201 or 201A, and 202 (40 CFR 60, Appendix A)
		5.4		Calculate emissions on a 24-hour rolling average and 12-month rolling total basis
AM-111 BP-511 BQ-521 BQ-522 BQ-523	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.5	NO_x	Biennial stack test – EPA Reference Method 7 (40 CFR 60, Appendix A)
		5.6		Calculate emissions on a 3-hour rolling average and 12-month rolling total basis
AR-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.7	Visible emissions	Conduct daily visible emissions observations
		5.8	Moisture content	Monitor moisture content of each coke shipment
AR-002 AR-003	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.9	Coke Handling Dust management plan	Develop and implement a site-specific dust management plan for coke handling
AR-003	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.10	Coke trucking records	Coke trucking records
AS-501	40 CFR 60.113c(b), Subpart Kc	5.11	VOC	External floating roof inspection requirements
	40 CFR 60.113c(d)(1), Subpart Kc	5.12		Initial maximum true vapor pressure determination
	40 CFR 60.115c(a)-(e), Subpart Kc	5.13		Recordkeeping requirements
CG-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.14	Throughput	Record daily amount of gasoline, diesel, and jet fuel loaded at the marketing terminal
Facility-Wide	11 Miss. Admin. Code Pt. 2, Ch. 5 and 40 CFR 52.21(r)(6)(iii)	5.15	SO_2	"Reasonable possibility" monitoring for actual emissions of SO_2
	11 Miss. Admin. Code Pt. 2, Ch. 5 and 40 CFR 52.21(r)(6)(iii)	5.16		Produce records upon request from the DEQ or general public

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 DEQ 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 AE-001, AM-001, and BE-001, the permittee shall comply with the applicable test methods and procedures of 40 CFR 60.485a, except as provided in 40 CFR 60.593a, and the recordkeeping requirements to 60.486a of Subpart VVa.

(Ref.: 40 CFR 60.592a(d) and (e), Subpart GGGa)

5.3 For Emission Points AG-043, AL-104, AL-105, AL-106, CK-003, CK-004, CK-005, and CK-006, within 180 days of permit issuance, the permittee shall conduct an initial stack test to demonstrate compliance with the PM, PM_{10}, and $PM_{2.5}$ emission limits in Section 3 using EPA Reference Methods 1-5, 201 or 201A, and 202 (40 CFR 60, Subpart A), or alternative EPA-approved methods. Stack testing shall be done with the emission unit(s) operating at or near maximum capacity, as operating conditions allow. Testing for multiple emission units with a common stack(s) shall be done such that it is representative of the way in which the units are limited. Subsequent stack testing shall be conducted within 25 months of the previous test.

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

5.4 For Emission Points AG-043, AL-104, AL-105, AL-106, CK-003, CK-004, CK-005, and CK-006, the permittee shall calculate and record the lb/hr average emissions of $PM/PM_{10}/PM_{2.5}$ on a consecutive 24-hour rolling basis. The calculations shall be based on the results of the most recent stack test or direct monitoring. Each month the permittee shall also record the annual emissions of $PM/PM_{10}/PM_{2.5}$ in ton/year on a 12-month rolling total basis.

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

5.5 For Emission Points AM-111, BP-511, BQ-521, BQ-522, and BQ-523, within 180 days of permit issuance, the permittee shall conduct an initial stack test to demonstrate compliance with the NO_x emission limits in Section 3 using EPA Reference Method 7 (40 CFR 60, Subpart A), or an alternative EPA-approved method. Stack testing shall be done with the emission unit(s) operating at or near maximum capacity, as operating conditions allow. Testing for multiple emission units with a common stack(s) shall be done such that it is representative of the way in which the units are limited. Subsequent stack testing shall be conducted within 25 months of the previous test.

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

5.6 For Emission Points AM-111, BP-511, BQ-521, BQ-522, and BQ-523, the permittee shall calculate and record the lb/hr average emissions of NO_x on a consecutive 3-hour rolling basis. The calculations shall be based on the results of the most recent stack test or direct monitoring. Each month the permittee shall also record the annual emissions of NO_x in ton/year on a 12-month rolling total basis.

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

5.7 For Emission Point AR-002, the permittee shall conduct visible emissions observations in accordance with EPA Reference Method 22, 40 CFR 60, Appendix A. The visible emissions observations shall be performed on a daily basis. Observations shall be recorded for at least three 6-minute periods each day. If any visible emissions are observed, the permittee shall report the visible emissions as a potential deviation in the semiannual report, and the permittee shall initiate, within one (1) hour, corrective actions to eliminate the visible emissions. The permittee shall record the results of all visible emissions observations.

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

5.8 For Emission Point AR-002, the permittee shall sample and record the moisture content of each shipment of coke. To demonstrate compliance with the minimum 8.0% annual moisture content limit, the permittee shall calculate the monthly average moisture content using all samples taken during the given month and calculate a 12-month rolling average moisture content. The permittee shall record the date and results of each sampling event and the calculated monthly average and 12-month rolling average.

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

5.9 For Emission Points AR-002 and AR-003, within 180 days of permit issuance, the permittee shall develop and implement a site-specific dust management plan for fugitive emissions from coke handling, storage, and trucking. The plan shall address the best management practices used to minimize particulate matter emissions and shall address the monitoring and recordkeeping in place to ensure the best management practices are effective. The plan shall be re-evaluated at least annually (not to exceed 13 months from the previous evaluation) and revised, as needed, to address any corrective actions required to ensure no visible emissions are observed from coke handling and storage. The plan and any records required by the plan shall be made readily available for review upon request by DEQ personnel.

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

5.10 For Emission Point AR-003, the permittee shall record the number of days during the calendar year that coke was hauled by truck rather than conveyor.

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

5.11 For Emission Point AS-501, upon reconstruction of the tank, the permittee must inspect the external floating roof according to the specifications in paragraphs (a) through (g).

(a) Determine the gap areas and maximum gap widths, between the primary seal and the wall of the storage vessel and between the secondary seal and the wall of the storage vessel according to the frequency provided in paragraphs (a)(1) and (a)(2). The permittee must visually inspect all roof fittings to ensure that covers are closed and gasketed with no visible gaps and that there are no tears in sleeves, wipers, or similar controls used for a given fitting during each measurement of gaps as required under this paragraph.

(1) Measurements of gaps between the storage vessel wall and the primary seal (seal gaps) must be performed during the hydrostatic testing of the storage vessel or within 60 days of the initial fill with VOL and at least once every 60 calendar months thereafter.

(2) Measurements of gaps between the storage vessel wall and the secondary seal must be performed within 60 days of the initial fill with VOL and at least once every 12 calendar months thereafter.

(3) If the permittee ceases to store VOL for a period of 12 calendar months or more, subsequent introduction of VOL into the storage vessel must be considered an initial fill for the purposes of paragraphs (a)(1) and (a)(2).

(b) Determine gap widths and areas in the primary and secondary seals individually by the following procedures:

(1) Measure seal gaps, if any, at one or more floating roof levels when the roof is floating off the roof supports.

(2) Measure seal gaps around the entire circumference of the storage vessel in each place where a 0.125-inch (0.32-centimeter (cm)) diameter uniform probe passes freely (without forcing or binding against seal) between the seal and the wall of the storage vessel and measure the circumferential distance of each such location.

(3) The total surface area of each gap described in paragraph (b)(2) must be determined by using probes of various widths to measure accurately the actual distance from the storage vessel wall to the seal and multiplying each such width by its respective circumferential distance.

(c) Add the gap surface area of each gap location for the primary seal and the secondary seal individually and divide the sum for each seal by the nominal diameter of the storage vessel and compare each ratio to the respective standards in paragraph (d).

(d) Except as provided in paragraph (e), make necessary repairs or empty the storage vessel within 45 days of identification in any inspection failure as specified in paragraphs (d)(1) through (d)(3).

(1) For primary seals, any deviation of the requirements in paragraphs (d)(1)(i) through (d)(1)(iv) of this section is an inspection failure.

(i) The accumulated area of gaps between the storage vessel wall and the mechanical shoe or liquid-mounted primary seal must not exceed 10 square inches (in^2) per foot of storage vessel diameter (212 square centimeters (cm^2) per meter of storage vessel diameter).

(ii) The maximum width of any portion of any gap must not exceed 1.5 inches (3.81 cm).

(iii) If a mechanical shoe seal is used, one end of the mechanical shoe is to extend into the stored liquid, and the other end is to extend a minimum vertical distance of 2 feet (61 cm) above the stored liquid surface.

(iv) There are to be no holes, tears, or other openings in the shoe, seal fabric, or seal envelope.

(2) For secondary seals, any deviation of the requirements in paragraphs (d)(2)(i) through (d)(2)(iv) is an inspection failure.

(i) The secondary seal is to be installed above the primary seal so that it completely covers the space between the roof edge and the storage vessel wall except for allowed gaps as provided in paragraphs (d)(2)(ii) and (iii) of this section.

(ii) The accumulated area of gaps between the storage vessel wall and the secondary seal must not exceed 1 in^2 per foot (21.2 cm^2 per meter) of storage vessel diameter.

(iii) The maximum width of any portion of any gap must not exceed 0.5 inches (1.27 cm).

(iv) There are to be no holes, tears, or other openings in the seal or seal fabric.

(3) For roof fittings (e.g., vacuum breaker/automatic bleeder vents and rim vents, gauge hatch/sample wells, access hatches, guidepoles, ladders, and emergency roof drains), any deviation of the requirements in paragraphs (d)(3)(i) through (d)(3)(iv) is an inspection failure.

(i) Each opening in an external floating roof except for vacuum breaker/automatic bleeder vents and the rim vents provides a projection below the liquid surface.

(ii) Vacuum breaker/automatic bleeder vents and rim vents are equipped with a gasket and are closed with no visible gaps when the roof is floating.

(iii) The gauge hatch/sample well, access hatch, and gauge float must have a gasketed cover and closed with no visible gaps.

(iv) There are to be no tears or visible defects of sleeves, wipers, or fabric covers used to control emissions from a roof fitting.

(e) If a failure that is detected as specified in paragraph (d) cannot be repaired within 45 days and if the storage vessel cannot be emptied within 45 days, the permittee may request a 30-day extension from the DEQ. Such extension request must include a demonstration of unavailability of alternate storage capacity and a specification of a schedule that will assure that the control equipment will be repaired or the storage vessel will be emptied as soon as possible.

(f) Visually inspect the external floating roof, primary seal, secondary seal, and fittings each time the vessel is emptied and degassed. If the external floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, the secondary seal has holes, tears, or other openings in the seal or the seal fabric, covers have visible openings or missing or torn gaskets, or there are tears or other visible defects in flexible covers, sleeves, wipers, or other fitting controls, the permittee must repair the items as necessary so that none of the conditions specified in this paragraph exist before filling or refilling the storage vessel with VOL.

(g) The permittee must equip each affected storage vessel that has an external floating roof with an alarm system that provides a visual or audible signal that alerts the operator when the external floating roof is approaching the landed height and that provides a separate visual or audible signal to alert the operator when the roof has landed. The roof is considered landed when the floating roof first rests on supports or when the vacuum breaker/automatic bleeder vent begins to open, whichever is first (for example, when using a leg-actuated vent that triggers the vent prior to resting on the roof supports).

(Ref.: 40 CFR 60.113c(b), Subpart Kc)

5.12 For Emission Point AS-501, upon reconstruction of the tank, the permittee shall determine the maximum true vapor pressure of the stored VOL calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service. Prior to the initial filling of the storage vessel or to the refilling of the storage vessel with a new VOL, the highest maximum true vapor pressure for the range of anticipated liquids to be stored, including mixtures for which the permittee can define the range of concentrations for constituents in the mixture or with a known maximum Reid vapor pressure, must be determined using any one of the methods described in paragraphs (a) through (d).

(a) As obtained from standard reference texts.

(b) ASTM D6377-20 (incorporated by reference; see 40 CFR 60.17). Perform the method using a vapor-to-liquid ratio of 4:1, which is expressed in the method as VPCR.

(c) ASTM D6378-22 (incorporated by reference; see 40 CFR 60.17). Perform the method using a vapor-to-liquid ratio of 4:1.

(d) As measured by an appropriate method as approved by the U.S. EPA.

(Ref.: 40 CFR 60.113c(d)(1), Subpart Kc)

5.13 For Emission Point AS-501, upon reconstruction of the tank, the permittee must keep copies of the following records and all reports required 40 CFR 60, Subpart Kc for at least five (5) years.

(a) The permittee must keep readily accessible records for the life of the source showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.

(b) Except as provided in 40 CFR 60.115c(c)(1) and (2), the permittee must maintain a record of the VOL currently stored, including a description of the VOL stored, the date when the VOL was first stored in the storage vessel, and the maximum true vapor pressure of that VOL.

(c) For external floating roof tanks, the permittee must keep a record of each inspection and gap measurement performed as required by Condition 5.9. The record must contain:

(1) Identification of the storage vessel on which the inspection was performed;

(2) The date the storage vessel was inspected;

(3) The type of inspection (inspection with gap measurements as specified in Condition 5.9(a) through (d); visual inspection as specified in Condition 5.9(g));

(4) The observed condition of each component of the control equipment (seals, internal floating roof, and fittings); and

(5) For each inspection with gap measurements as specified in Condition 5.9(a) through (d):

(i) The raw data obtained in the measurement; and

(ii) The calculations described in Condition 5.9(b) and (c).

(d) For the degassing requirements of Condition 3.11, the permittee must maintain records necessary to demonstrate compliance with the requirements in Condition 3.11 including, if appropriate, records of existing standard site procedures used to empty and degas (deinventory) equipment for safety purposes.

(Ref.: 40 CFR 60.115c(a)-(e), Subpart Kc)

5.14 For Emission Point CG-002, the permittee shall record the daily amount of gasoline, diesel, and jet fuel loaded at the marketing terminal in gallons per day and shall calculate the total amount of each fuel loaded in gallons per year for each consecutive 365-day rolling period.

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

5.15 For the emission units affected by the "Pascagoula PSD Aggregates Project," the permittee shall monitor the emissions of SO_2 from each affected emission unit identified in the application and calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after certification of construction for the "Pascagoula PSD Aggregates Project."

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5 and 40 CFR 52.21(r)(6)(iii))

5.16 The permittee shall make the information required to be documented in Condition 5.15, including the most recent version of the "Pascagoula PSD Aggregates Project" Application, available for review upon request for inspection by the DEQ or the general public, pursuant to the requirements contained in 40 CFR 70.4(b)(3)(viii).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5 and 40 CFR 52.21(r)(7))

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)	Semiannual 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
AE-001 AM-001 BE-001	40 CFR 60.592a(e), Subpart GGGa	6.2	Comply with the reporting provisions in 40 CFR 60, Subpart VVa
AG-043 AL-104 AL-105 AL-106 CK-003 CK-004 CK-005 CK-006 AM-111 BP-511 BQ-521 BQ-522 BQ-523	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.3	Stack test notification and reporting requirements
AR-002 AR-003	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.4	Submit initial dust management plan
AS-501	40 CFR 60.116c(a)(1)-(5), Subpart Kc	6.5	Initial notification
	40 CFR 60.116c(b), Subpart Kc and 11 Miss. Admin. Code R. 2.2.B(11).	6.6	30-day advance notification of filling, refilling, and gas measurements
	40 CFR 60.116c(c)(1), (2), (5), (6), (7), and (8) and 60.116c(d), Subpart Kc and 11 Miss. Admin. Code R. 2.2.B(11).	6.7	Semiannual reporting requirements

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
CG-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.8	Report the amount of each type of fuel loaded for each 365-day rolling period
Facility-Wide	11 Miss. Admin. Code Pt. 2, Ch. 5 and 40 CFR 52.21(r)(6)(v)	6.9	Submit a report if actual annual emissions of SO_2 exceed the baseline actual emissions by a significant amount

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 September 30 for the preceding six-month period of January 1 through June 30 and by March 31 for the preceding six-month period of July 1 through December 31. 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. 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 AE-001, AM-001, and BE-001, the permittee shall comply with the applicable reporting requirements of 40 CFR 60.487a, Subpart VVa.

(Ref.: 40 CFR 60.592a(e), Subpart GGGa)

6.3 For Emission Points AG-043, AL-104, AL-105, AL-106, CK-003, CK-004, CK-005, CK-006, AM-111, BP-511, BQ-521, BQ-522, and BQ-523, the permittee shall comply with the following stack test notification and reporting requirements:

(a) A written test protocol shall be submitted at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the DEQ.

(b) 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.

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

(d) The permittee may petition the DEQ for a waiver from additional stack testing for each pollutant where the compliance demonstration results in an emission rate less than 50 percent of the short-term limit. Upon approval, the waiver shall remain in effect for the remainder of the permit term or five (5) years, whichever is shorter.

(e) A stack test report containing the results of the tests shall be submitted within 60 days of completion of the required test.

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

6.4 For Emission Point AR-002 and AR-003, within 180 days of permit issuance, the permittee shall submit the dust management plan for coke handling, storage, and trucking to the DEQ. The DEQ reserves the right to review and request revisions to the plan at any time to address deviations from the emission limitations and standards in Section 3 and to ensure the dust management practices are practicably enforceable.

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

6.5 For Emission Point AS-501, the permittee must submit initial notifications to the DEQ within 60 days after becoming an affected storage vessel. The initial notification shall be submitted to the U.S. EPA via the Compliance and Emissions Data Reporting Interface (CEDRI) website (https://www.epa.gov/electronic-reporting-air-emissions/cedri), if the report template has been available for at least one (1) year, and to DEQ by hard copy or other means specified by DEQ. The initial notification shall include the following:

(a) The following general facility information:

(1) Facility name;

(2) Facility physical address, including city, county, State, and zip code;

(3) Latitude and longitude of facility's physical location. Coordinates must be in decimal degrees with at least five decimal places; and

(4) The following information for the facility contact person:

(i) Name;

(ii) Mailing address, including city, county, State, and zip code;

(iii) Telephone number; and

(iv) Email address.

(b) Identification of the storage vessel(s) subject to this subpart.

(c) Capacity (in gallons) of each storage vessel.

(d) Maximum true vapor pressure of the liquid stored (in psia) in each storage vessel.

(e) Indication of the standards for which the storage vessel complies (i.e., 40 CFR 60.112c(c)).

(Ref.: 40 CFR 60.116c(a)(1)-(5), Subpart Kc)

6.6 For Emission Point AS-501, upon reconstruction of each tank, the permittee shall submit notifications for filling and refilling the storage vessel and for conducting gap

measurements as specified in paragraphs (a) and (b). In addition to submitting notification via CEDRI, the permittee shall also submit any required notification directly to the DEQ by hard copy or other means specified by DEQ.

(a) The permittee must notify the DEQ at least 30 days prior to inspection of each storage vessel for which an inspection is required by Condition 5.7 to afford the DEQ the opportunity to have an observer present. Submit the notification using CEDRI as specified in 40 CFR 60.116c(f). If the inspection is not planned and the permittee could not have known about the inspection 30 days in advance of refilling the storage vessel, the permittee must notify the DEQ at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation using CEDRI demonstrating why the inspection was unplanned.

(b) The permittee must notify the DEQ 30 days in advance of any gap measurements required by Condition 5.7 to afford the DEQ the opportunity to have an observer present. Submit the notification using CEDRI as specified in 40 CFR 60.116c(f). If the inspection required by Condition 5.2 is not planned and the permittee could not have known about the inspection 30 days in advance of the gap measurement, the permittee must notify the DEQ at least seven (7) days prior to the conducting the gap measurement. Notification must be made by telephone immediately followed by written documentation using CEDRI demonstrating why the gap measurement was unplanned.

(Ref.: 40 CFR 60.116c(b), Subpart Kc and 11 Miss. Admin. Code R. 2.2.B(11).)

6.7 For Emission Point AS-501, the permittee must submit to the DEQ semiannual reports with the applicable information in paragraphs (a) through (h). The first semiannual report shall cover the period starting on the date the tank is first filled and ending June 30 or December 31, whichever date is earlier. Subsequent semiannual reports shall be consistent with the requirements of Condition 5.A.4 of the Title V Operating Permit. For this subpart, the semiannual reports supersede the excess emissions and monitoring systems performance report and/or summary report form required under 40 CFR 60.7.

Once the report template for Subpart Kc has been available on the CEDRI website (https://www.epa.gov/electronic-reporting-air-emissions/cedri) for one year, the permittee must submit all subsequent reports using the appropriate electronic report template on the CEDRI website and following the procedure specified in 40 CFR 60.116c(f), in addition to submitting the report directly to the DEQ by hard copy or other means specified by DEQ.

(a) Report the following general facility information:

(1) Facility name;

(2) Facility physical address, including city, county, and State;

(3) Latitude and longitude of facility's physical location. Coordinates must be in decimal degrees with at least five decimal places;

(4) The following information for the facility contact person:

(i) Name;

(ii) Mailing address;

(iii) Telephone number; and

(iv) Email address.

(5) Date of report and beginning and ending dates of the reporting period; and

(6) Statement by a responsible official, with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. If your report is submitted via CEDRI, the certifier's electronic signature during the submission process replaces the requirement in this paragraph (c)(1)(vi).

(b) For storage vessels complying with the provisions of Condition 3.9:

(1) Identification of the storage vessel and an indication of whether the permittee complies with 40 CFR 60.112c(b) or (c).

(2) An indication whether the storage vessel was inspected during the reporting period, and if so, the date and type of each inspection conducted during the reporting period (EFR gap measurements according or visual EFR inspection according).

(c) For each inspection required under Condition 5.9(a), report the following information:

(1) Identification of the storage vessel and the date of the inspection;

(2) The accumulated area of gaps between the storage vessel wall and the primary seal (in square inches per foot of storage vessel diameter);

(3) The maximum width of any portion of any gap in the primary seal (in inches);

(4) The accumulated area of gaps between the storage vessel wall and the secondary seal (in square inches per foot of storage vessel diameter);

(5) The maximum width of any portion of any gap in the secondary seal (in inches); and

(6) An indication whether there was an inspection failure. If there was an inspection failure, also include the following information in the report:

(i) An indication of the type of deviation(s) (indicating all that apply from Condition 5.9(d)); and

(ii) The date the storage vessel was emptied or the repairs made and date of repair.

(d) For each inspection required by Condition 5.9(f) that finds defects as listed in Condition 5.9(f), report:

(1) Identification of the storage vessel and date of inspection;

(2) The reason it did not meet the specifications of Condition 3.10 or Condition 5.9(f);

(3) A description of each repair made; and

(4) Date of repair.

(e) For each landing of the external floating roof that triggers an alarm required by Condition 5.9(g), report:

(1) Identification of the storage vessel;

(2) Date the roof was landed; and

(3) Indication of whether the roof landed because the storage vessel was being emptied.

(f) For each degassing event, the start date and time, duration in hours, and an estimate of the mass quantity in pounds of VOL released for times when emissions are diverted from the control device through a bypass line when the storage vessel is being degassed.

(Ref.: 40 CFR 60.116c(c)(1), (2), (5), (6), (7), and (8) and 60.116c(d), Subpart Kc and 11 Miss. Admin. Code R. 2.2.B(11).)

6.8 For Emission Point CG-002, the permittee shall submit the total amount of each type of fuel loaded for each consecutive 365-day rolling period in the semiannual reports required by Condition 5.A.4 of the Title V Operating Permit.

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

6.9 For the emission units affected by the "Pascagoula PSD Aggregates Project," the permittee shall submit a report to the DEQ if the annual emissions of SO_2, in tons per year, from affected emission units in the "Pascagoula PSD Aggregates Project" exceed the baseline actual emissions, as documented in the most recent version of the "Pascagoula PSD Aggregates Project" Application, by a significant amount (i.e., 40 tons per year), and if such emissions differ from the preconstruction projection as documented in the most recent

version of the "Pascagoula PSD Aggregates Project" Application. Such report shall be submitted to the DEQ within 60 days after the end of such year. The report shall contain the following:

(a) The name, address and telephone number of the major stationary source;

(b) The annual emissions as calculated pursuant to Condition 5.16; and

(c) Any other information that the permittee wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5 and 40 CFR 52.21(r)(6)(v))

SECTION 3: PUBLIC NOTICE AND PROOF OF PUBLICATION

Notice of Public Hearing
Mississippi Environmental Quality Permit Board
P. O. Box 2261 | Jackson, MS 39225
515 East Amite St. | Jackson, MS 39201
Telephone No. (601) 961-5171

Public Notice Start Date: **December 17, 2025** MDEQ Contact: Jeffrey Bland
Public Notice End Date and Date of Public Hearing: **January 22, 2026**

Chevron USA Inc, Chevron Products Company, Pascagoula Refinery, located at 250 Industrial Road, in Pascagoula, MS, (228) 938-4600, has applied to the Mississippi Department of Environmental Quality (MDEQ) for the issuance of a Prevention of Significant Deterioration (PSD) Permit to Construct Air Emissions Equipment, Permit Ref. No. 1280-00058. **The Permit Board will hold a public hearing on this matter at 6:00 p.m. on Thursday, January 22, 2026, at the Pascagoula Senior Center located at 1912 Live Oak Avenue, Pascagoula, MS**. A Preliminary Determination has been prepared that contains a discussion of the decision-making that went into the development of the permit and provides the permitting authority, the public, and other government bodies a record of the technical issues surrounding issuance of the permit. The Preliminary Determination also addresses the changes to emissions resulting from the modification of the facility.

The Pascagoula Refinery can currently process 361,000 barrels per operating day of crude oil, which yields about 5.5 million gallons of motor gasoline per day, in addition to jet and diesel fuel, aviation gasoline, liquefied petroleum gas, petroleum coke, ammonia, sulfur, and benzene. The applicant's operations fall within SIC Code 2911 (Petroleum Refining), with secondary SIC Codes of 2819 (Industrial Inorganic Chemicals), 2865 (Cyclic Organic Crudes and Intermediates), and 5171 (Petroleum Terminals). Chevron is proposing to increase the daily crude throughput to 394,000 barrels per operating day through upgrades and improvements to equipment, such as heat exchangers, pumps, and piping, which will debottleneck operations at the Crude I Unit (Plant 11), Crude II Unit (Plant 61), Hydrofiner (Plant 22), and Residuum Desulfurization Unit Module A (Plant 81A). These improvements will also allow the Pascagoula Refinery to process lighter crude slates. With the exception of new piping, the changes proposed to accommodate the increased throughput do not include new emission units or the modification of existing emission units. However, a number of units may experience increased utilization due to the increased crude processing capacity. Because an increase in crude throughput can impact numerous downstream processes, the project is referred to as the "Pascagoula Aggregates PSD Project."

The Pascagoula Refinery is considered an existing major stationary source under the PSD regulations, and the "Pascagoula Aggregates PSD Project" is considered a major modification for the following air pollutants: particulate matter (PM), PM less than 10 microns (PM_{10}), PM less than 2.5 microns ($PM_{2.5}$), nitrogen oxides (NO_x), volatile organic compounds (VOC), and greenhouse gases (GHGs). Therefore, this project is subject to the PSD regulations, including requirements regarding the best available control technology and air quality impacts. The project will be located in a PSD Class II area. The Preliminary Determination provides more details regarding the impacts to air quality for PM_{10}/$PM_{2.5}$, NO_x, and Ozone. The following consumption of air quality increments is predicted to occur:

Particulate Matter Less than 2.5 microns

Annual	0.060 micrograms per cubic meter or
	1.5% of the 4 micrograms per cubic meter increment.
24-Hour	0.98 micrograms per cubic meter or
	10.9% of the 9 micrograms per cubic meter increment.

Particulate Matter Less than 10 microns

Annual	< 3.19 micrograms per cubic meter or
	< 18.8% of the 17 micrograms per cubic meter increment.
24-Hour	3.19 micrograms per cubic meter or
	10.6% of the 30 micrograms per cubic meter increment.

Nitrogen Dioxide

Annual	20.0 micrograms per cubic meter or

80% of the 25 micrograms per cubic meter increment.

The staff of the Permit Board has developed this draft permit based on information submitted to the Permit Board by the applicant, appropriate State and Federal agencies and other interested parties. The staff of the Permit Board is soliciting all relative information pertaining to the proposed activity, including public comment, to ensure that the final staff recommendation on the draft permit complies with all State and Federal regulations. Public review and comment on the draft permit and supporting documentation are an important element in the staff evaluation and resulting recommendation to the Permit Board. The draft permit conditions have been developed to ensure compliance with all State and Federal regulations but are subject to change based on information received as a result of public participation.

Persons wishing to comment upon or object to the proposed determinations are invited to submit comments in writing to Jeffrey Bland at https://www.mdeq.ms.gov/bland-jeffrey/ or to the Permit Board address shown above, no later than **January 22, 2026**. All comments received by this date will be considered in the formulation of final determinations regarding the application(s). Any comments related to zoning or economic and social impacts are within the jurisdiction of local zoning and planning authorities and should be addressed to them.

The Permit Board is created by Mississippi Law for the purpose of issuing or denying, under such conditions and limitations as it may prescribe, environmental protection permits to control or prevent the release of contaminants into the air and waters of the State. By law, the Board is composed of the Chief of the Bureau of Environmental Health within the State Department of Health; the Director of the Department of Wildlife, Fisheries, and Parks, the Director of the Office of Land and Water Resources within the Department of Environmental Quality, the Supervisor of the State Oil and Gas Board; the Director of the Department of Marine Resources; the Director of Geology within the Department of Environmental Quality; and the Commissioner of Agriculture and Commerce or their respective designees.

The Purpose of this hearing is to explain the proposed project and to receive comments from the public regarding the project and particularly the draft permit. Upon arrival at the public hearing, everyone will be asked to register and note if they expect to make a statement. Statements will be received in the order of registration (i.e., first to register will be the first to give public comment). However, everyone will be given an opportunity to comment, including those who indicated during registration that they did not expect to comment. Persons commenting will not be limited to any specific time so long as the comments are reasonably concise and relate, at least generally, to the responsibilities of the Permit Board. However, because a large number of people often wish to speak, comments should be as brief as reasonably possible. Comments can be presented in writing if preferred. In order to help facilitate understanding between citizens and the Permit Board staff, the staff will attempt to answer questions at the hearing. However, such exchanges should be as brief as possible so that everyone who wants to speak has the opportunity.

All comments made during this public hearing will be transcribed and made a part of the Permit Board file on this matter. Before making any decision, the Board will consider all issues and concerns raised regarding environmental protection. Any interested party aggrieved by the decision of the Permit Board may file a written request for a formal hearing, after the formal evidentiary hearing the Permit Board will make its final decision on the matter. Any person aggrieved by that decision may appeal to the chancery court in the county of the proposed project.

Additional details about the application, including a copy of the draft permit, are available by writing or calling the Public Records Request Officer at the above Permit Board address and telephone number or by completing the form at the following website: https://www.mdeq.ms.gov/about-mdeq/public-records-request/public-records-request-form/. Additionally, a copy of the draft permit and preliminary determination may be found on the MDEQ's website at: https://opc.deq.state.ms.us/publicnotice.aspx. Additional documents can be found on the Online Public Hearing link at: https://opcgis.deq.state.ms.us/ensearchonline/public-hearings.aspx. This information is also available for review at the office of the MDEQ at the Permit Board address shown above during normal business hours. Please bring the foregoing to the attention of persons whom you know will be interested.

Outlook

Chevron Public Hearing Notice

From Taaka Scott-Bailey <tbailey@mdeq.ms.gov>
Date Wed 12/17/2025 2:52 PM
To Jeffrey Bland <JBland@mdeq.ms.gov>
Cc Carla Brown <carla.brown@controlconceptsms.com>; Lynn Bradshaw <LBRADSHAW@mdeq.ms.gov>

1 attachment (181 KB)
Chevron PSD Public Hearing Notice.pub;

Good afternoon.

Please see the attached notice that was mailed to our Cherokee Community address list. There were a total of 246 notices, including a copy of the official public notice mailed out. Please let me know if you have any questions or need to discuss anything further.

Thanks

Taaka Scott Bailey, Director, CPM
MDEQ Office of Community Engagement
Phone: 601-961-5025
Cell: 769-798-3918
Fax: 601-961-5660
P.O. Box 2249
Jackson, Mississippi 39201

NOTICE OF PUBLIC HEARING

THURSDAY, JANUARY 22, 2026

6:00PM-8:00PM

PASCAGOULA SENIOR CENTER - 1912 LIVE OAK AVENUE

PASCAGOULA, MS 39567

THIS HEARING IS OPEN TO THE PUBLIC

Chevron USA Inc, Chevron Products Company, Pascagoula Refinery, located at 250 Industrial Road, in Pascagoula, MS, has applied to the Mississippi Department of Environmental Quality (MDEQ) for the issuance of the following permitting action:

- Prevention of Significant Deterioration (PSD) Permit to Construct Air Emissions Equipment.

MDEQ is soliciting input on the above referenced permitting action on behalf of the MDEQ Permit Board. Persons wishing to comment on the proposed action are invited to submit comments in writing to Jeffrey Bland at https://www.mdeq.ms.gov/bland-jeffrey/ or by hand-mail to the address below. Comments must be received electronically by 11:59 p.m. or postmarked no later than January 22, 2026. Any questions regarding this permitting action may be directed to Jeffrey Bland at 601-961-5112.

Mississippi Environmental Quality Permit Board | P.O. Box 2261 | Jackson, MS 39225

NOTICE OF PUBLIC HEARING

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6:00PM-8:00PM

PASCAGOULA SENIOR CENTER - 1912 LIVE OAK AVENUE

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Mississippi Environmental Quality Permit Board | P.O. Box 2261 | Jackson, MS 39225

SECTION 4: EMAILS TO EPA AND JURISDICTIONAL BODIES

Outlook

Public Notice of a Hearing for Chevron USA, Chevron Products Company, Pascagoula Refinery - PSD Permit to Construct (AI 2299, Permit No. 1280-00058)

From Carla Brown <cbrown@mdeq.ms.gov>
Date Tue 12/16/2025 9:03 AM
To Ridgdell, Benjamin <ecyi@chevron.com>
Cc Jeffrey Bland <JBland@mdeq.ms.gov>

3 attachments (2 MB)

1280-00058 Preliminary Determination_10-29-2025.pdf; Chevron PSD Public Notice of Hearing.pdf; 1280-00058 Draft Permit_Aggregates PSD Project_12-5-2025.pdf;

Ben,

Attached are the public notice of a hearing, draft permit, and preliminary determination for the above referenced permit. If you have not already done so, you are invited to submit written comments by no later than January 22, 2026. A decision regarding the proposed permit will be made after all public comments have been considered. Please note that the attached documents should be available on MDEQ's enSearch online website tomorrow morning.

If you have any questions, please contact me by email or at 601-529-2312.

Thank you,

Carla

Carla Brown, P.E.
MDEQ Contractor
601.529.2312

EPD - enReview Email

PSD Notice

The Mississippi Department of Environmental Quality has prepared a draft PSD permit for the facility identified below. A copy of this draft permit and other relevant documents can be viewed using the following link.

Permit No. 1280-00058.

Additional facility information can be viewed at: Chevron USA Inc, Chevron Products Company, Pascagoula Refinery.

A summary of all PSD applications under review in Mississippi can be viewed at: MDEQ PSD enReview.

Facility Name: Chevron USA Inc, Chevron Products Company, Pascagoula Refinery
City: Pascagoula
County: Jackson

Please contact the permit writer, Jeffrey Bland ((601) 961-5112 / JBland@mdeq.ms.gov), or the branch manager, Jeffrey Bland ((601) 961-5112 / JBland@mdeq.ms.gov), for additional information or if any of the associated documents are not available.

Recipients: JBland@mdeq.ms.gov, NSRsubmittals@epa.gov, PBRADLEY@MDEQ.MS.GOV, Shepherd.Lorinda@epa.gov, adams.yolanda@epa.gov, asmith@mdeq.ms.gov, gillam.rick@epa.gov, howard.chris@epa.gov, ipilgrim@mdeq.ms.gov, kmertes@mdeq.ms.gov, rcuevas@mdeq.ms.gov.

This email was electronically generated on Mon 15-Dec-2025 21:30:00 and is intended to complete the notification requirements under 40 CFR 51.166(q)(2)(iv) adopted by reference in Mississippi Commission on Environmental Quality Regulation 11, Mississippi Administrative Code, Part 2, Chapter 5.

Outlook

Public Notice of a Hearing for Chevron USA, Chevron Products Company, Pascagoula Refinery - PSD Permit to Construct (AI 2299, Permit No. 1280-00058)

From Carla Brown <cbrown@mdeq.ms.gov>
Date Wed 12/17/2025 7:15 AM
To jwillis@cityofpascagoula.com <jwillis@cityofpascagoula.com>
Cc Jeffrey Bland <JBland@mdeq.ms.gov>

1 attachment (129 KB)
Chevron PSD Public Notice of Hearing.pdf;

Dear Mayor Willis:

Attached please find a copy of the public notice of a hearing to be held for the above referenced facility. Additional information regarding the proposed permitting action may be obtained from the Mississippi Department of Environmental Quality (MDEQ) office or at the following website: https://opcgis.deq.state.ms.us/ensearchonline/epd-permits-at-public-notice.aspx.

If you have any comments concerning the proposed permitting action, please notify MDEQ in writing no later than January 22, 2026. If you would like to contact me to discuss any of these concerns, you may email or call me at 601-529-2312.

Thank you,

Carla

Carla Brown, P.E.
MDEQ Contractor
601.529.2312

Outlook

Public Notice of a Hearing for Chevron USA, Chevron Products Company, Pascagoula Refinery - PSD Permit to Construct (AI 2299, Permit No. 1280-00058)

From Carla Brown <cbrown@mdeq.ms.gov>

Date Wed 12/17/2025 7:15 AM

To barry_cumbest@co.jackson.ms.us <barry_cumbest@co.jackson.ms.us>; ennit_morris@co.jackson.ms.us <ennit_morris@co.jackson.ms.us>; ken_taylor@co.jackson.ms.us <ken_taylor@co.jackson.ms.us>; troy_ross@co.jackson.ms.us <troy_ross@co.jackson.ms.us>; randy_bosarge@co.jackson.ms.us <randy_bosarge@co.jackson.ms.us>; brian_fulton@co.jackson.ms.us <brian_fulton@co.jackson.ms.us>

Cc Jeffrey Bland <JBland@mdeq.ms.gov>

1 attachment (129 KB)

Chevron PSD Public Notice of Hearing.pdf;

Dear Supervisors:

Attached please find a copy of the public notice of a hearing to be held for the above referenced facility. Additional information regarding the proposed permitting action may be obtained from the Mississippi Department of Environmental Quality (MDEQ) office or at the following website: https://opcgis.deq.state.ms.us/ensearchonline/epd-permits-at-public-notice.aspx.

If you have any comments concerning the proposed permitting action, please notify MDEQ in writing no later than January 22, 2026. If you would like to contact me to discuss any of these concerns, you may email or call me at 601-529-2312.

Thank you,

Carla

Carla Brown, P.E.
MDEQ Contractor
601.529.2312

SECTION 5: COMMENTS RECEIVED

See Attachment A of the Response to Comments Document in Section 7

SECTION 6: PUBLIC HEARING TRANSCRIPT

See Attachment B of the Response to Comments Document in Section 7

SECTION 7: RESPONSE TO COMMENTS

MDEQ Response to Comments

Chevron USA Inc., Chevron Products Company, Pascagoula Refinery
Pascagoula Aggregates PSD Project

The Mississippi Department of Environmental Quality (MDEQ) provided a public comment period from December 17, 2025, to January 22, 2026, regarding the proposed Prevention of Significant Deterioration (PSD) Permit to Construct Air Emissions Equipment (i.e., "PSD Permit") for the "Pascagoula Aggregates PSD Project." The public comment period culminated in a public hearing held on January 22, 2026, at the Pascagoula Senior Center in Pascagoula, MS. During the public hearing, three (3) individuals presented verbal comments. Two (2) of the overall three individuals also submitted written comments and one (1) individual presented only verbal comments. The public hearing transcript is included as Attachment B.

During the overall public comment period, MDEQ received written comments from one (1) community group and three (3) individuals. The comments are summarized below followed by MDEQ's response to each. The comments in their entirety can be found in Attachment A.

Cherokee Concerned Citizens (1/22/2026):

1. **Comment:** The community has not had an opportunity to comment on the Title V draft permit since its renewal has been delayed for years. MDEQ's focus on the PSD permit is a misdirection of agency resources, and the PSD permit should not be issued until the Title V permit renewal is complete.

   MDEQ Response: MDEQ acknowledges that work on the renewal of the Chevron Pascagoula Refinery's Title V Operating Permit (TVOP) has been lengthy. As noted in the comment, Chevron submitted a timely renewal application and continues operating under the TVOP issued in 2014, as authorized by 11 Miss. Admin. Code Pt. 2, R. 6.4.B., and under the federally enforceable State-issued construction permits issued since 2014, pursuant to 11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).

   The Pascagoula Refinery is the most complex facility in the Mississippi and is subject to more federal air regulations than any other facility in the state. Because federal regulations are frequently promulgated, revised, and challenged in court, MDEQ has worked to develop a draft TVOP that reflects the most current regulatory requirements and incorporates applicable State-issued construction permits [e.g., 40 CFR Part 63, Subpart R was revised on May 8, 2024; 40 CFR Part 63, Subpart CC was revised on April 4, 2024; and 40 CFR Part 60, Subpart Kc was promulgated on

October 15, 2024.]. In addition, staff turnover at both MDEQ and Chevron has also contributed to delays by reducing institutional knowledge.

To maintain continuity, MDEQ has engaged the same contractor for the past five (5) years to assist with the Title V renewal process. Because the PSD Permit under consideration does not authorize construction of new emission sources and involves only minimal modifications to existing sources, the contractor is prepared to promptly incorporate any necessary revisions into the current draft TVOP. MDEQ anticipates initiating a public comment period on the draft Title V permit during the second quarter of 2026.

2. **Comment:** The PSD project would consume approximately 80% of the allowable annual NO_2 PSD increment. Consumption of such a large fraction of the remaining increment by a single project raises serious concerns about whether the draft permit adequately protects the remaining increment for future sources and modifications, as is required under the PSD program. MDEQ's Permit Board should require additional justification demonstrating that this level of increment consumption will not unreasonably constrain future air quality protection or lead to cumulative adverse impacts. There are multiple other permitted facilities in the area, none of which can significantly expand, once the allowable NO_2 increment is consumed.

   MDEQ Response: The percentage of the annual nitrogen dioxide (NO_2) PSD increment consumed is not fixed; rather, it reflects modeling of all new major sources that have constructed or undergone modifications since the major source baseline date of November 8, 1988, as well as minor source construction and modifications occurring after the minor source baseline date of June 30, 1992, for Jackson County. The increment can be expanded through enforceable decreases, thereby supporting future growth in the area, provided the decreases are permanent and enforceable (e.g., facility or emissions unit shutdowns, or reductions mandated by new federal regulations). Accordingly, Chevron's proposed PSD project is not the sole contributor to NO_2 increment consumption.

   Chevron's annual NO_2 increment analysis was conservative; it did not take credit for the increment expansion generated by the permanent shutdowns of nearby major sources, such as Mississippi Phosphates Corporation or the numerous emissions units no longer operating at the former First Chemical site. Had these significant emissions reductions been explicitly modeled as increment-expanding credits, the

reported percentage of increment consumed would be notably lower, demonstrating even greater available capacity for future industrial growth.

Chevron's modeling also demonstrated that the cumulative impacts of nitrogen oxides (NO_x) emissions from the refinery, along with contributions from facilities as distant as Gulfport and Mobile, would not result in exceedances of either the annual or 1-hour NO_2 National Ambient Air Quality Standards (NAAQS).

3. **Comment:** Increased crude throughput at the refinery is reasonably expected to result in associated increases in mobile-source activity, including increased marine vessel traffic at port facilities serving the refinery, increased heavy-duty truck traffic associated with crude delivery and product transport, and potential increases in rail and on-road vehicle activity near the facility. These mobile sources are significant contributors to ambient NO_2 concentrations, particularly in industrial and port-adjacent areas. The Preliminary Determination does not clearly explain whether background concentrations and cumulative air quality conditions adequately account for existing and reasonably foreseeable ship and vehicle NO_2 emissions associated with increased refinery throughput.

   MDEQ Response: MDEQ has ensured that the air quality analysis conservatively accounts for both industrial and mobile source contributions through a combination of monitored background data and cumulative modeling.

   A. **Monitored Background Data:** The analysis utilized the highest annual NO_2 concentrations from the Pascagoula ambient monitor (AQS 28-059-0006). This monitor is strategically located near Highway 90, the Pascagoula industrial complex, and the port area. As such, the monitoring data inherently captures the real-world ambient impacts of existing mobile sources (cars, trucks, marine vessels) and area sources in the region. By adding this "real-world" background to the modeled industrial impacts, mobile source contributions are fully represented.

   B. **Cumulative Modeling & Double-Counting:** The cumulative modeling analysis included the **potential** emissions from the refinery and 40 other regional industrial sources (31 in Mississippi and 9 in Alabama) and assumes the sources operate at maximum capacity continuously. This is a highly conservative approach. In reality, these facilities rarely operate at maximum capacity simultaneously. By adding the "potential" industrial impacts to the

"monitored" background (which already includes actual industrial contributions), the analysis likely double counts some emissions, providing an additional margin of safety that more than accommodates any minor fluctuations in mobile source activity.

C. **Regulatory Scope of Mobile Sources:** Under federal PSD regulations (i.e., 40 CFR 52.21), secondary emissions from mobile sources (such as tailpipe emissions from trucks or ships in transit to/from the facility) are generally not included in stationary source dispersion modeling unless they are directly part of the stationary source's operation (e.g., internal facility transport). However, emissions associated with loading and unloading operations at the docks and terminals were included in the facility's potential-to-emit calculations and the subsequent modeling.

D. **Regional Trends:** It is also important to note that the closure of nearby major sources, such as Mississippi Phosphates Corporation and the First Chemical Corporation, has significantly reduced regional NO_x burdens. These permanent reductions create "headroom" in the airshed that further ensures the project will not cause or contribute to a violation of the NAAQS.

E. **Project Specifics:** Finally, as detailed in the "Additional Impacts Analysis" (Section 7 of the application), this project involves the debottlenecking of existing units and does not require a significant expansion of the workforce or a fundamental change in the logistics of crude delivery that would result in a significant, unanalyzed spike in mobile source traffic.

4. **Comment:** A review of the 2014 Title V permit shows that AM-111 and BP-511 were not previously permitted to emit any NO_x. The PSD is turning these into new and fairly large sources of NO_x, and imposing new stack test and reporting requirements on these two sources. Because this project will debottleneck operations and increase both inputs and outputs to the refinery systems, the stack testing associated with this PSD must use realistic operational parameters close to full capacity to ensure actual emissions are being captured and reported during stack tests.

   MDEQ Response: Emission Points AM-111 and BP-511 are existing process heaters/furnaces that have historically emitted NO_x; however, they have not previously undergone a modification or been included in a project requiring federally enforceable emission limits. In a Permit to Construct issued on April 11, 2017, both

units were evaluated as affected sources. At that time, federally enforceable limits on NO_x emissions, expressed in pounds per hour and tons per year (tpy), were established to ensure the project did not constitute a major modification. Initial stack testing was also required for both units.

Chevron now proposes to further reduce the NO_x emission limits established in the 2017 Permit to Construct to ensure that cumulative NO_2 modeling results remain below the 1-hour and annual NAAQS. The proposed stack testing requirements have been developed in coordination with the current internal draft of the TVOP. Stack testing must be conducted at operating conditions as close as practicable to the maximum firing capacity of the heaters, consistent with Condition 5.5 of the proposed PSD Permit. In addition, MDEQ retains the authority to approve or deny any request for a waiver of stack testing requirements.

5. **Comment:** The BACT specified in the draft PSD permit for leaks of VOCs does not address advanced leak detection options, such as optical gas imaging, higher frequency monitoring, or specialized sensors. Federal regulations should set the floor for BACT, but BACT should go further.

   MDEQ Response: MDEQ concurs that federal regulations establish the baseline for Best Available Control Technology (BACT); however, BACT determinations are made on a case-by-case basis and may consider technical feasibility, economic impacts, and environmental impacts. In this project, Chevron is replacing a limited number of valves and flanges in Plants 11, 22, and 61 that represent only a small portion of the refinery's piping components.

   Chevron evaluated the use of leakless valves, but the cost per ton of volatile organic compound (VOC) emissions reduction was determined to be uneconomical. MDEQ reviewed the U.S. Environmental Protection Agency's (EPA) database of BACT determinations for refinery equipment leaks in other states and found that compliance with NSPS Subpart GGGa or Texas' "28VHP program" has been deemed BACT. Given that the valves and flanges being replaced represent only a fraction of the total components in each Plant, requiring NSPS Subpart GGGa as BACT ensures consistency in the Leak Detection and Repair (LDAR) program across all piping equipment within each Plant.

6. **Comment:** Given the substantial increment consumption projected for NO_2 and particulate matter, the Preliminary Determination should clearly document whether

more stringent NO_X and PM control options were evaluated, whether operational limits or additional controls could further reduce emissions during high-throughput operation, and why the selected control options represent the maximum degree of emission reduction achievable. The administrative record should demonstrate that emissions—and corresponding increment consumption—have been minimized to the greatest extent feasible.

MDEQ Response: MDEQ has evaluated the increment consumption analysis provided by Chevron. The referenced consumption percentage reflects a cumulative modeling analysis that accounts for all increment-consuming sources in the region (major sources since 1988 and minor sources since 1992) and not just the proposed project. The project itself involves increased utilization of existing emission units within their permitted capacity without physical modification or change in the method of operation of those units. Therefore, a Best Available Control Technology (BACT) review was not triggered for these existing NO_x sources under PSD regulations.

The increment consumption analysis is a conservative projection based on potential emissions from all regional sources operating simultaneously at maximum capacity. Despite this conservatism, the modeling demonstrates that the Class II NO_2 increment is not exceeded.

Furthermore, the NAAQS for NO_2 is fully protected. Since the project complies with all applicable increments and NAAQS, and no new or modified NO_x sources are proposed that would trigger BACT, the current control strategy is appropriate and legally sufficient.

7. **Comment:** Condition 6.9 of the PSD permit requires the permittee submit a report to the DEQ if the annual emissions of SO_2, in tons per year, from affected emission units in exceed the baseline actual emissions by a significant amount (i.e., 40 tons per year). Requiring a 40-ton discrepancy before a reporting requirement is triggered is far too weak to adequately protect air quality. The "significant amount" in condition 6.9 should be revised substantially downward and the report must be made available on the MDEQ's online database associated with the Chevron facility.

   MDEQ Response: To evaluate sulfur dioxide (SO_2) increases associated with the "Pascagoula Aggregates PSD Project," Chevron applied the actual-to-projected-actual emissions applicability procedures specified in 40 CFR 52.21(a)(2)(iv)(C) for

existing emissions units. This analysis resulted in a projected increase of 30.69 tpy of SO_2 emissions, which is below the applicable "significant emission rate" of 40 tpy.

Under PSD applicability procedures, the permittee is required to calculate and maintain records of actual emissions from the affected units for a period of five (5) years when the use of projected actual emissions results in an increase equal to or greater than fifty (50) percent of the significant emission rate. These records must demonstrate that the projected emissions were reasonable and did not exceed the significant emission rate, as required by 40 CFR 52.21(r)(6).

The "40 tpy" PSD significance threshold is established by federal regulations [i.e., 40 CFR 52.21(b)(23)] and cannot be reduced by MDEQ.

8. **Comment:** The Permit Board should ensure that air dispersion modeling used in the PSD analysis is appropriately conservative, particularly in light of the magnitude of projected increment consumption. The Preliminary Determination should clarify how increased utilization of existing emission units was represented in the modeling, whether operational variability at higher throughput was considered, and whether sensitivity analyses were performed using higher background NO_2 concentrations reflective of increased mobile-source activity.

   MDEQ Response: For the pollutants modeled – PM_{10}, $PM_{2.5}$, and NO_X – Chevron applied the more conservative actual-to-potential evaluation of project emissions for comparison against EPA's significant impact levels. Because modeled NO_2 impacts exceeded both the 1-hour and annual significant impact levels (SILs), Chevron conducted cumulative modeling that included potential emissions from the refinery as well as potential emissions from minor and major facilities within a 50-kilometer radius.

   The use of potential emissions from these facilities is an inherently conservative approach, as facilities generally do not emit NO_X at their maximum potential rate continuously nor do all nearby facilities emit NO_x at their maximum rates simultaneously.

   Additional conservative measures were incorporated, including using the highest annual NO_2 concentration recorded at the Pascagoula ambient monitor (AQS 28-059-0006) from the most recent three-year period (2022-2024). Our review of the monitoring data confirms that the annual average NO_2 concentrations at this site are

consistently low (approximately 3.6 ppb), which is well below the 53-ppb standard. This background value was added to the modeled impacts of the facility and all other regional sources (within 50 km). Sensitivity analyses are not required when the primary analysis, using the most conservative assumptions (potential emissions + conservative background), demonstrates compliance with all standards.

9. **Comment:** The Preliminary Determination should clearly explain the selection of baseline air quality data and confirm that background concentrations fully account for emissions from nearby industrial sources, mobile sources, and port-related activities. Projects coming online in 2026, including construction, should also be accounted for. Accurate baseline determination is essential to ensure that PSD increment consumption is not underestimated.

   MDEQ Response: Section III.C.1 of the Preliminary Determination addresses the selection and representativeness of the background monitor for NO_2, PM_{10}, $PM_{2.5}$, and ozone. The background air quality data selected for the analysis comes from the Pascagoula monitor (AQS 28-059-0006), which is located in near the industrial and mobile sources of concern. As such, the monitoring data inherently captures the actual ambient impacts of existing nearby industrial sources, mobile sources (including those from the port and roadways), and other area sources.

   To prevent double counting while ensuring conservatism, the cumulative modeling analysis also explicitly modeled NO_X emissions from thirty-one (31) industrial / commercial facilities in Mississippi and nine (9) in Alabama. By combining the monitored background (which captures real-world mobile/area source contributions) with modeled industrial potential emissions, the analysis provides a robust and protective assessment of total air quality impacts.

   With respect to future projects, only those for which a complete application was received prior to the submittal of Chevron's PSD application are required to be included in the air quality analysis.

10. **Comment:** MDEQ's focus on rushing through this PSD permit is a misallocation of agency resources and funding where projects such as timely Title V permit renewals and funded air monitoring operations are being downgraded.

MDEQ Response: As noted in the response to Comment #1, MDEQ has allocated funding over the past five (5) years to retain a contractor to assist with the Title V renewal process.

With respect to the special purpose monitor (SPM) MDEQ intends to operate for the "*Enhanced Air Quality Monitoring for Cherokee Community*" project, please know that the implementation of this SPM is being implemented by MDEQ staff that do not complete air permitting activities. As such, MDEQ believes the completion of the proposed PSD permitting action has no bearing on the denoted SPM.

11. **Comment:** While annual PM impacts appear relatively small, the project is predicted to consume over 10% of the 24-hour $PM_{2.5}$ increment and more than 10% of the 24-hour PM_{10} increment. Short-term particulate matter exposures are associated with acute respiratory and cardiovascular effects. The Permit Board should evaluate whether additional operational limits or control measures could further reduce short-term PM impacts, particularly during peak operating conditions.

    MDEQ Response: The modeling results demonstrate that the project's maximum predicted impacts for both PM_{10} and $PM_{2.5}$ are below the EPA's SILs. When a project's impacts are below the SILs, the EPA considers the facility to have a de minimis impact on ambient air quality and no further cumulative analysis is required.

    Furthermore, no physical modifications or changes in method of operation are proposed for the PM sources as part of this project. Consequently, a BACT review for PM controls is not triggered. Nevertheless, the permit includes requirements for a site-specific dust management plan to minimize fugitive emissions through best management practices and ensure practical as well as effective control of short-term dust emissions.

12. **Comment:** The project is considered a major modification for both NO_X and VOCs, which are ozone precursors. The Preliminary Determination should more clearly explain how increased precursor emissions may affect local or regional ozone formation, particularly when combined with ship and vehicle emissions, and whether the proposed controls adequately minimize these secondary air quality impacts.

    MDEQ Response: Sections III.D.1 and IV.E.3 of the Preliminary Determination explain the potential impacts of NO_X and VOC emissions on ozone concentrations. Applying EPA's guidance for evaluating ozone impacts, Chevron determined that the project's

contribution would not result in an exceedance of the NAAQS. Accordingly, no additional emission controls are required.

Leah Burks Written Comments (1/22/2026):

13. **Comment:** The fence line community has and continues to endure loss of life, poor health, and loss or damaged property as a result of current pollutants, which will continue to be exacerbated by granting this permit.

    MDEQ Response: Chevron's application was prepared in accordance with the regulations and guidelines established by MDEQ and EPA. MDEQ has determined that the proposed PSD Permit includes sufficient emission limitations, best management practices, and the necessary monitoring, recordkeeping, and reporting provisions to ensure the accuracy of the air quality analysis. The results of the modeling demonstrate that Chevron's project will not cause an exceedance of the NAAQS, which are designed to protect human health and the environment.

Julie Hambey Written Comments (1/22/2026):

14. **Comment:** There have been strong smells in the nearby neighborhood.

    MDEQ Response: When MDEQ receives odor complaints, they are referred to MDEQ's South Regional Office (SRO) for investigation. Over the past years, the SRO has investigated numerous odor complaints in the Pascagoula area. Staff typically are in the area within twenty-four (24) hours and often cannot confirm presence of odors, which make it difficult to discern the prospective origin(s) of the odor(s).

    MDEQ acknowledges that certain chemicals may be present at the Chevron Pascagoula Refinery, such as ammonia and hydrogen sulfide (H_2S), that can produce noticeable odors. However, the noted compounds have odor thresholds significantly lower than the ambient concentrations at which health effects may occur. As noted in the Agency for Toxic Substances and Disease Registry's (ATSDR) toxicological profile for ammonia (September 2004), "*you will probably smell ammonia before you are exposed to a concentration that may harm you*". The ATSDR's "ToxFAQs for Hydrogen Sulfide" (October 2024) indicates people can smell H_2S at low concentrations ranging from 0.0005 to 0.3 parts per million (ppm), which is well below the long-term exposure concentration of 5 to 50 ppm (noted as causing eye, nose, or throat irritation).

Chevron also maintains and publicizes a dedicated phone line for community residents to report odors and has coordinated with MDEQ to investigate the causes of prior complaints.

15. **Comment:** Both her daughter and granddaughter's toe nail clippings tested high for nickel.

    MDEQ Response: MDEQ does not employ professionals, such as epidemiologists, to evaluate health data of this nature and recommends that Ms. Hambey contact the Mississippi Department of Health for such expertise. In general, trace amounts of metals, including nickel, are present in natural gas and refinery fuel gas that may produce small quantities of nickel compounds upon combustion. To accommodate increased crude throughput, the Chevron Pascagoula Refinery may experience an actual increase in firing rates of boilers and process heaters that result in a projected potential increase of 0.73 tpy for nickel compound emissions.

    The Chevron Pascagoula Refinery is subject to multiple National Emission Standards for Hazardous Air Pollutants (NESHAPs) that regulate hazardous air pollutants, including nickel compounds. With respect to gas-fired boilers and process heaters regulated under 40 CFR Part 63, Subpart DDDDD (NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters), EPA has determined that no additional reductions of metal hazardous air pollutants (HAPs) are required, as no effective control technologies exist to further reduce the already low levels of these emissions, including nickel compounds.

Barbara Weckesser Written Comments (1/22/2026)

[Ms. Weckesser presented various attachments as part of her comments which are addressed below.]

16. **Comment:** Ms. Weckesser commented regarding the odors her and neighbors smell, which have caused burning eyes and headaches as noted in many attached text conversations provided by Ms. Weckesser.

    MDEQ Response: See the response to Comment #14.

17. **Comment:** OSHA standards should not be used to compare air quality to because Ms. Weckesser and her neighbors are often home all day and not 8 or 10 hours.

MDEQ Response: Ms. Weckesser correctly noted that occupational health standards, such as the permissible exposure limits (PELs) established by OSHA and the recommended exposure limits (RELs) established by NIOSH, are generally based on exposures occurring over an 8- or 10-hour workday. For this reason, many state air agencies apply a safety factor to account for the longer exposure durations experienced by residents. In addition, the U.S. EPA also considers these extended exposure times in its regulatory framework.

For example, under 40 CFR Part 63, Subpart CC (NESHAP for Petroleum Refineries), EPA established a fenceline action level concentration for benzene of 9 micrograms per cubic meter ($\mu g/m^3$) – averaged annually – that requires refineries to investigate exceedances and implement corrective measures. Although this concentration is not a health-based standard, it corresponds to 0.0028 ppm and is substantially lower than OSHA's PEL of 1 ppm (based on an 8-hour average).

18. **Comment:** An air quality report for July 1 – September 30, 2025, from an unknown source is provided.

MDEQ Response: MDEQ has reviewed the submitted information and independently analyzed the certified air quality data for the referenced period (July 1 – September 30, 2025) from the Pascagoula monitor (AQS 28-059-0006).

1. **$PM_{2.5}$:** Verified monitoring data confirms that all daily average $PM_{2.5}$ concentrations during this period were well below the 24-hour NAAQS of 35 $\mu g/m^3$. The maximum daily average recorded was approximately 28.2 $\mu g/m^3$ (on September 21, 2025).

2. **Ozone:** The analysis of the daily maximum 8-hour ozone concentrations confirms there were no exceedances of the 0.070 ppm (70 ppb) standard during this period. The highest daily maximum 8-hour average recorded was 0.068 ppm (on September 12, 2025), which is below the referenced standard.

3. **H_2S:** Reported H_2S levels are below reliable detection limits for standard equipment and below health-risk screening levels.

When properly analyzed against the applicable regulatory metrics, the data demonstrates compliance with all NAAQS.

19. **Comment:** Ms. Weckesser provided an email date 1/6/2026 from Katharine Duderstadt at the University of New Hampshire noting three comments presented below:

    a. The proposed increase of NO_x emissions results in 80% of the annual NO_2 increment being consumed, which may not provide sufficient headroom for other projects, such as the port expansion.

    b. The World Health Organization (WHO) recommends an annual NO_2 standard of 10 micrograms per cubic meter.

    c. MDEQ measured NO_2 levels of 0.058 ppm in the neighborhood which are greater than the current EPA annual standard.

    d. Recommend Chevron specifically describe the technology used to reduce NO_2 emissions.

MDEQ Response:

a. The 80% increment consumption figure cited is a product of a highly conservative screening analysis that significantly underestimates the actual available "headroom" for future growth, including port expansion.

    1. **Unclaimed Increment Credits:** The cumulative modeling analysis did not take credit for the significant increment expansion generated by the permanent shutdown of nearby major sources, most notably Mississippi Phosphates Corporation and the pre-existing units at the former First Chemical Corporation site (now Oleo-X). Under PSD regulations, the permanent shutdown of these major NO_X sources "expands" the available increment and effectively creates new capacity for growth. Chevron's analysis conservatively treated the baseline as if these facilities were still operating or did not explicitly calculate the expansion credits they provide. Had these credits been applied, the reported increment consumption would be substantially lower than 80% and reveals a much larger margin for future projects.

    2. **Potential vs. Actual Emissions:** The increment analysis assumes that the refinery and all other increment-consuming sources in the region (over a 50 km radius) are operating simultaneously at their maximum potential

emission rates 24 hours a day, 365 days a year. This "worst-case" theoretical scenario virtually never actually occurs. Actual increment consumption based on real-world operating data is significantly lower.

3. **Port Expansion:** It is important to clarify that mobile sources associated with port expansion (e.g., ships, trucks, trains) do not consume PSD increment, as increment consumption applies only to major stationary sources. Any future stationary infrastructure at the port (e.g., new terminals or processing units) would be able to utilize the significant unclaimed increment credits from the retired facilities mentioned above.

In summary, the 80% figure is a conservative ceiling for regulatory assurance and not a measure of the actual remaining capacity. Therefore, sufficient headroom exists for future economic development.

b. MDEQ is required by law to meet the U.S. EPA's NAAQS and not the WHO's recommended guidelines.

c. This claim is factually incorrect based on verified monitoring data. MDEQ maintains an ambient air quality monitor in Pascagoula (AQS 28-059-0006) and a review of the certified AQS data for the years 2022 through 2024 shows the following:
   - *2022 Annual Average:* 3.12 ppb (0.0031 ppm)
   - *2023 Annual Average:* 3.66 ppb (0.0037 ppm)
   - *2024 Annual Average:* 3.64 ppb (0.0036 ppm)

   The maximum 1-hour concentration recorded in this entire period was 37.9 ppb (in 2024), which is well below the 1-hour standard of 100 ppb. The annual average is approximately 7% of the 53 ppb annual standard. There is no record of an annual NO_2 concentration of 0.058 ppm (58ppb) at this site. It is possible the commenter has confused NO_2 with another pollutant (such as Ozone, where 0.058 ppm is a common value) or has misinterpreted a short-term reading as an annual average. In either case, the local air quality for NO_2 is well within federal health standards.

d. With this project, Chevron is not proposing to modify any existing sources or construct any new sources of NO_X emissions. Therefore, a BACT review is not required under the PSD regulations.

Public Hearing Comments

[Only one person provided an additional comment not already presented in the written comments addressed above.]

20. **Comment:** The publication of the notice had an incorrect address which may have kept people from attending the hearing.

    MDEQ Response: MDEQ is aware of the public hearing webpage malfunction, and the Information Technology Systems staff is diligently working to fix the issue. However, a copy of the public notice of the hearing, which is uploaded in the MDEQ database and automatically published on the MDEQ website, shows the correct address for the hearing. Additionally, the notice mailed to nearby residents by the MDEQ Office of Community Engagement also provided the correct address for the hearing. Therefore, we could not substantiate this comment. Both are attached to this document.

ATTACHMENT A

WRITTEN COMMENTS RECEIVED

January 22, 2026

Via online submission to https://www.mdeq.ms.gov/bland-jeffrey/
Jeffrey Bland
Mississippi Department of Environmental Quality
P.O. Box 2261
Jackson, MS 39225

Re: Chevron USA Inc., Pascagoula Refinery, Prevention of Significant Deterioration (PSD) Permit to Construct Air Emissions Equipment, Permit Ref. No. 1280-00058

Dear Mr. Bland,

On behalf of Cherokee Concerned Citizens, a neighborhood group living in the immediate vicinity of the Chevron Pascagoula Refinery and affected daily by the emission, noise and other activities on that Refinery, we submit the following comments responding to the publicly-available information on the "Pascagoula Aggregates PSD Project" submitted by Chevron USA Inc. ("Chevron"). Cherokee Concerned Citizens submitted a request for a short extension of time to submit comments on January 14, 2026, citing the lack of prejudice to Chevron and the public notice's release date over the 2025-2026 holiday season. This request, however, does not appear to have been granted and these comments are therefore submitted timely subject to a reservation of rights to supplement these comments if additional time is granted.

The Pascagoula Aggregates PSD Project is an effort to increase production by de-bottlenecking existing refinery operations and upgrade various infrastructure and emissions controls on site. Commenters appreciate the opportunity to review the draft permit and offer these specific comments to address shortcomings in the project and permit. Specifically, Commenters are concerned about: (1) the impact of this project and permitting process on the Title V permit, the renewal of which has been unlawfully delayed by MDEQ; (2) the accuracy of the calculated NO_2 emissions associated with this project; (3) accounting and testing of new NO_2 emissions sources; (4) the adequacy of proposed BACT for leak detection and repair; (5) SO_2 excess emission reporting requirements; (6) air modeling information and assumptions; (7) the sufficiency of the relied-upon air quality background data; (8) short-term PM impacts as a result of these project; and (9) consideration of potential ozone impacts.

The Unlawful Title V Renewal Delay Must Not be Further Delayed due to this Process

An overarching concern with this project is the MDEQ's ability to reasonably review and approve this change when the Chevron 2014 Title V permit – which should have expired and been renewed in 2019 – is still in force. MDEQ has failed for years to provide this community and the larger public with an opportunity to participate in public notice and comment on the Title V permit dictating the emissions limits, monitoring, and reporting requirements for this major

refinery. Chevron appears to have timely applied for a permit renewal yet no action has been taken – for years. The agency would need to incorporate this new PSD, if approved, into the Title V draft permit that has been already delayed for years. The community's opportunity to provide input into and gain knowledge of the potential changes in permitted air emissions, monitoring, and reporting requirements, cannot be further delayed by MDEQ's need to now incorporate even more changes to the draft permit. Even MDEQ's focus on this PSD permit is a misdirection of agency resources that should be spent in getting the facility in compliance with Title V.

Title V permits play an important role in enhancing transparency and protecting air quality and public health and welfare by enabling regulators and the public to determine what limits apply to major sources of air pollution and whether those limits are being met. Further, the Clean Air Act also specifically provides the public with several additional procedural and substantive opportunities to challenge the substantive requirements of a permit which are triggered by a permitting decision. Federal law requires that agencies take final action on permit modifications and renewals within 18 months of receiving an application. *See* 40 C.F.R. § 70.7(a)(2). Mississippi's own rules provide an even shorter timeline. *See* 11 M.A.C. Part 2, Rule 6.4(A)(2) (180 days). MDEQ's failure to issue a Title V permit to Chevron has deprived the Cherokee community members of the protection that a final Title V permit would provide, and also interferes with our clients' right to comment on the proposed permit, challenge a deficient permit, to know what the enforceable limitations applicable to the plant are, and to potentially enforce against violations of those limitations. To the extent that this PSD permit process will further impact the already unlawful delay in the Title V permit process, we object to its issuance and request that it be delayed until the Title V permit renewal process is complete. The community needs a state regulator that is managing, monitoring, and ensuring compliance from the actual refinery that already exists and that already releases pollution every day that this delay goes on. The PSD project – which is described as starting operations in 2027 – is not a valid basis or excuse to further delay the renewal of the Title V permit, which expired in 2019.

NO_2 Increment and Associated Mobile-Source Emissions

The PSD Project is Chevron's first publicly-noticed permit amendment in many years and involves a proposal to adjust and add some equipment in order to increase production. Major construction or facility configuration changes are not incorporated into the proposed permit. However, some additional emissions are anticipated as a result of the increase in production.

The Preliminary Determination indicates that the proposed project would consume approximately **80% of the allowable annual NO_2 PSD increment** for this area. Consumption of such a large fraction of the remaining increment by a single project raises serious concerns about whether the draft permit adequately protects the remaining increment for future sources and modifications, as is required under the PSD program. MDEQ's Permit Board should require additional justification demonstrating that this level of increment consumption will not unreasonably constrain future air quality protection or lead to cumulative adverse impacts. There are multiple other permitted facilities in the area, none of which can significantly expand, once the allowable NO_2 increment is consumed.

While PSD permitting focuses on stationary sources, the air quality analyses used to demonstrate compliance with PSD requirements must be representative of actual ambient conditions and sufficiently protective. Increased crude throughput at the refinery is reasonably expected to result in associated increases in mobile-source activity, including increased marine vessel traffic at port facilities serving the refinery, increased heavy-duty truck traffic associated with crude delivery and product transport, and potential increases in rail and on-road vehicle activity near the facility. For example, BWC Terminals has purchased an adjacent wharf and facility area to build a marine terminal – specifically in order to support the increase in incoming crude and outgoing refinery products from the facility as a result of this Pascagoula Aggregates PSD Project.[1]

These mobile sources are significant contributors to ambient NO_2 concentrations, particularly in industrial and port-adjacent areas. The Preliminary Determination does not clearly explain whether background concentrations and cumulative air quality conditions adequately account for existing and reasonably foreseeable ship and vehicle NO_2 emissions associated with increased refinery throughput. Given that the project alone consumes 80% of the NO_2 increment, even modest underestimation of mobile-source NO_2 emissions could materially affect the increment analysis and the conclusion that PSD requirements are met.

New NO_2 Emissions Sources and Stack Testing

Pages 12-13 of the PSD indicate that, "For Emission Points AM-111, BP-511, BQ-521, BQ-522, and BQ-523, upon permit issuance, the following NOx emission limits shall supersede any prior permitted NOx limits for the given emission point:

Emission Point	NO_x Limits	
	lb/hr (3-hour rolling average)	TPY (12-month rolling total)
AM-111	8.40	29.43
BP-511	9.00	31.32
BQ-521	24.93	87.40
BQ-522	24.93	87.40
BQ-523	27.92	87.40

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5 and 40 CFR 52.21(k) [PSD Air Quality Limit])

A review of the 2014 Title V permit, however, shows that AM-111 and BP-511 were not previously permitted to emit any NO_x. The PSD is turning these into new and fairly large sources of NO_x, and imposing new stack test and reporting requirements on these two sources.

[1] "The terminal's construction supports an agreement with Chevron to receive, store, and deliver petroleum products at the Chevron Pascagoula Refinery just down the road from the BWC site. The refinery expects to benefit from increased storage and throughput of various feedstocks as well." Frank Corder, "Magnolia Tribune: BWC Terminals break ground in Pascagoula," Dec. 2, 2025, *available at* https://bwcterminals.com/bwc-terminals-break-ground-in-pascagoula/

Commenters urge MDEQ to maintain the stack testing and reporting requirements to ensure that the new emissions sources are compliant. Previous stack testing throughout the facility has been waived at various points.

The 2014 Title V permit does allow for a waiver of stack testing in some circumstances: condition 5.8.1.2 states that, "The permittee may petition the MDEQ for a waiver from additional stack testing for each pollutant where the compliance demonstration results in an emission rate less than 50 percent of the short term (lb/hr) limit. Upon approval, the waiver shall remain in effect for the remainder of the permit term." (Emphasis added.) The "term" of the Title V permit is only 5 years but, given MDEQ's failure to renew or act on the Title V permit timely, that "term" can stretch on for many more years. Given the importance of stack testing, which is both standard across the industry and written into the requirements for most emissions sources across the facility, the PSD should specify that Condition 5.8.1.2 will not apply to these new sources of NO_x, at least not until the Title V permit incorporating these new sources is in force.

Additionally, Chevron has used operational parameters of around 50% when running stack testing on specific emissions sources in its past reporting of stack test results to MDEQ. Because this project will debottleneck operations and increase both inputs and outputs to the refinery systems, the stack testing associated with this PSD must use realistic operational parameters close to full capacity to ensure actual emissions are being captured and reported during stack tests.

Adequacy of Best Available Control Technology (BACT)

BACT is a mandatory requirement for PSD permits. BACT (Best Available Control Technology) options in an LDAR (Leak Detection and Repair) program should involve selecting advanced leak detection methods, such as Optical Gas Imaging (OGI) cameras, and using superior components or repair strategies to minimize emissions beyond basic requirements, often involving higher-frequency monitoring, specialized sensors (like burst indicators for rupture disks), or using software for better tracking and analysis to achieve lower emission thresholds and demonstrate compliance with stringent MACT/NSPS/NESHAP standards, ensuring quick identification and repair of fugitive VOC/HAP leaks. Recent advances in leak detection, including remote sensing technology, is now available to facilities attempting to detect and eliminate leaks quickly.[2]

The BACT specified in the draft PSD permit, however, does not address any of these options. Instead, the PSD Permit condition 3.1, p. 11, states that "For Emission Points AE-001, AM-001, and BE-001 (Equipment Leaks), compliance with 40 CFR 60, Subpart GGGa has been deemed the Best Available Control Technology for piping modifications in Plants 11, 22, and 61." The MDEQ's Preliminary Determination document justifies this selection by noting that "Subpart GGGa requirements are similar to TCEQ's 28VHP LDAR program used in ozone attainment areas. Therefore, MDEQ deemed BACT for new/modified equipment leak components in Plants

[2] *See* Felipe J. Cardoso-Saldaña, "Tiered Leak Detection and Repair Programs at Simulated Oil and Gas Production Facilities: Increasing Emission Reduction by Targeting High-Emitting Sources," Environ. Sci. Technol. May 2023, 57, 19, 7382–7390, *available at* https://doi.org/10.1021/acs.est.2c08582

11, 22, and 61 to be compliance with the provision of 40 CFR 60, Subpart GGGa." (MDEQ, Pre-Construction Review and Preliminary Determination, pp. 7-8.)

Compliance with regulatory requirements is a floor, not a ceiling, to establish the "best" control technologies for leak detection and repair. Moreover, Subpart GGGa is minimum standard for setting up inspection schedules and offers numerous exemptions and alternatives. Moreoever, TCEQ 28VHP LDAR program that MDEQ cites as comparable to Subpart GGGa actually goes further than Subpart GGGa including, for example:

> The following practices are generally considered to be the minimum for BACT. 1. Construction of new and reworked piping, valves, pump systems, and compressor systems shall conform to applicable American National Standards Institute (ANSI), American Petroleum Institute (API), American Society of Mechanical Engineers (ASME), or equivalent codes based on the material. 2. New and reworked buried connectors shall be welded. 3. To the extent that good engineering practice will permit, new and reworked valves and piping connections shall be reasonably accessible for leak checking during plant operation. 4. Damaged, leaking, or severely rusted valves, connectors, compressor seals, agitator seals, and pump seals found by visual inspection to be leaking (e.g., process fluids) shall be tagged and replaced or repaired. All leaking components that cannot be repaired until a scheduled shutdown shall be identified for such repair by tagging. 5. Open-ended lines are required to be equipped with a cap, plug, blind flange, or second valve. 6. New relief valves are required to vent to a control device for any potential releases and as a result, any fugitive emissions are reduced.[3]

MDEQ must go further than basic compliance with inspection scheduling, particularly when other states are demanding more as a "minimum" demonstration of BACT compliance. Alternative LDAR methods to reduce the length of leaks as well as the overall risks of leaks are readily available and should be considered.

Given the substantial increment consumption projected for NO_2 and particulate matter, the Preliminary Determination should clearly document whether more stringent NO_x and PM control options were evaluated, whether operational limits or additional controls could further reduce emissions during high-throughput operation, and why the selected control options represent the maximum degree of emission reduction achievable. The administrative record should demonstrate that emissions—and corresponding increment consumption—have been minimized to the greatest extent feasible.

SO_2 Excess Reporting

Condition 6.9 (pp. 32-33 of the PSD draft permit) states, "For the emission units affected by the 'Pascagoula PSD Aggregates Project,' the permittee shall submit a report to the DEQ if the annual emissions of SO2, in tons per year, from affected emission units in the 'Pascagoula PSD

[3] TCEQ, Air Permit Technical Guidance for Chemical Sources Fugitive Guidance, June 2018, available at https://www.tceq.texas.gov/assets/public/permitting/air/Guidance/NewSourceReview/fugitive-guidance.pdf

Aggregates Project' exceed the baseline actual emissions, as documented in the most recent version of the 'Pascagoula PSD Aggregates Project' Application, by a significant amount (i.e., **40 tons per year**) . . ." (Emphasis added.) Requiring a 40-ton discrepancy before a reporting requirement is triggered is far too weak to adequately protect air quality. The "significant amount" in condition 6.9 should be revised substantially downward and the report must be made available on the MDEQ's online database associated with the Chevron facility.

Air Quality Modeling Assumptions

The Permit Board should ensure that air dispersion modeling used in the PSD analysis is appropriately conservative, particularly in light of the magnitude of projected increment consumption. The Preliminary Determination should clarify how increased utilization of existing emission units was represented in the modeling, whether operational variability at higher throughput was considered, and whether sensitivity analyses were performed using higher background NO_2 concentrations reflective of increased mobile-source activity.

To the extent a modeling report or additional information about the modeling results was provided to MDEQ, such information has not been made available to the public. Although Commenters have requested the application materials from MDEQ's public information office, the compressed timeline and ensuing holidays have meant that this information is still forthcoming. We again reserve our rights to supplement these comments upon receipt and review of the file, including any additional modeling information available to MDEQ.

Baseline and Background Air Quality Data

MDEQ's Rule 2.2(B)(13) for General Standards Applicable to all permits (11 M.A.C. Part 2), states that;

> The Permit Board may, in any **permit to construct,** require the permittee to perform special environmental monitoring for the purpose of detecting, **quantifying**, and determining the impact of pollutants **existing prior to the date the permittee begins to emit** when, during the review of the application and the public participation process, questions arise, with regard to separate environmental impacts of pollution raised by the applicant or the Department and which cannot be determined by available scientific data and scientific methods.

(Emphasis added.)

The Preliminary Determination should clearly explain the selection of baseline air quality data and confirm that background concentrations fully account for emissions from nearby industrial sources, mobile sources, and port-related activities. Projects coming online in 2026, including construction, should also be accounted for. Accurate baseline determination is essential to ensure that PSD increment consumption is not underestimated.

One "hole" in the available data is the absence of air quality monitoring information from the Pascagoula – Cherokee air monitor, which was set up with grant funding and intended to be

operational as of 2024 but has yet to begin collecting and transmitting data.[4] Again, MDEQ's focus on rushing through this PSD permit is a misallocation of agency resources and funding where projects such as timely Title V permit renewals and funded air monitoring operations are being downgraded.

Short-term (24 hour) PM Impacts

While annual PM impacts appear relatively small, the project is predicted to consume over 10% of the 24-hour $PM_{2.5}$ increment and more than 10% of the 24-hour PM_{10} increment. Short-term particulate matter exposures are associated with acute respiratory and cardiovascular effects. The Permit Board should evaluate whether additional operational limits or control measures could further reduce short-term PM impacts, particularly during peak operating conditions.

Ozone Formation from NOx and VOCs

The project is considered a major modification for both NO_x and VOCs, which are ozone precursors. The Preliminary Determination should more clearly explain how increased precursor emissions may affect local or regional ozone formation, particularly when combined with ship and vehicle emissions, and whether the proposed controls adequately minimize these secondary air quality impacts.

Request

For these reasons, we request that the Permit Board require additional analysis and as indicated above, stronger permit conditions to ensure compliance with Clean Air Act and Mississippi state requirements and to adequately protect air quality in the Pascagoula area.

Sincerely,

/s/Sierre R. Anton
MSB # 106744
P.O. Box 1023
Jackson, MS 39215
Phone: 769-230-2841
Email: Santon@mscenterforjustice.org

/s/ Lauren E. Godshall
Earthjustice
845 Texas Avenue, Suite 200
Houston, Texas 77002
Phone: 773-828-0836
Email: lgodshall@earthjustice.org

Counsel for Cherokee Concerned Citizens

[4] *See* MDEQ, Enhanced Air Quality Monitoring in the Cherokee Community of Pascagoula, Mississippi Project 2024-2025, https://www.mdeq.ms.gov/air/enhanced-air-quality-monitoring-in-the-cherokee-community-of-pascagoula-mississippi-project-2024-2025/; *see also* Alex Rozier, "Waiting for government action on air pollution, Pascagoula community grabs the wheel," Mississippi Today, June 4, 2025, *available at* https://mississippitoday.org/2025/06/04/waiting-for-government-action-on-air-pollution-pascagoula-community-grabs-the-wheel/

Jeffrey Bland

From: Leah Kimble <leaha.kimble@yahoo.com>
Sent: Thursday, January 22, 2026 9:00 PM
To: Jeffrey Bland
Subject: Leah Burks Title V Comments

Leah Burks, Cherokee Concerned Citizens

January 22, 2026

SUBJECT: Chevron Pascagoula Refinery, Title V Permit Application

Greetings!

As a homeowner in the Cherokee Forest Community, I am vehemently opposed to granting Chevron permission to move forward with their plans to construct air emissions equipment.

We, the residents of Jackson County, have been levied with an exorbitant amount of air pollution (gas, ammonia, cat urine, sulfuric acid, particulate matter, and an odorless chemical, just to name a few) which has resulted in significant deteriorating, health issues and death. Unfortunately, many residents have prematurely passed away due to poor health conditions that may otherwise not have occurred had we been protected and our livelihoods taken into consideration.

Our fence line community has and continues to endure loss of life, poor health, and loss or damaged property as a result of current, pollutants. Now industry, whether intentional or not, will exacerbate this matter if the proposed measure for the Title V permit is granted without regard for the aforementioned lives already lost, continual health decline, due to negligence, lack of empathy, and a blatant disregard in our pleas for relocation from pervasive harm.

There seems to be an endless amount of disregard and lack of concern for the health and safety of the residents of Jackson County. Instead, Industry appears to be focused on expansion, consumption, increased productivity, and profits. All of which is great, if you are doing it reasonably, respectfully, morally, and empathetically for those affected by these decisions.

I hope MDEQ, carefully and thoroughly, considers the total impact in rendering its decision. We are a small group of residents, but we are concerned about the livelihood and well-being of all! However, we do not want to remain in the crossfire.

Respectfully,
Leah Burks

MDEQ Permit Board
01/22/2026

NO NO NO No new permit.

My 15 year old daughter was told she has Type 1 Diabetes. She spent over a week in USA Children's hospital Mobile, AL. This was a few years ago.

I say this to give background with our problems. I took her to visit DR there today. I ask the nurse, "Do you get a lot of children from MS?" Her answer was shocking: 40% of their patients come from lower MS.

My daughter can not go outside in our neighborhood and walk. She says never know when strong smells will come. She was playing outside few years ago when the smell was so strong all the children come running, screaming what that smell was.

Another child close by received the same news a few weeks ago.

We have children that tested positive for high nickel amounts in their toe nail clippings. My daughter and granddaughter were both high.

Again no new permit please MDEQ listen to our voices now we are suffering with health issues.

Relocate and restore then talk about a permit.

We are working to help Pascagoula with this issue through our Restore Relocate plan. If Industries are allowed to pollute more, more will deal with health issues.

Industries, city, county, and state need to take action to provide Clean Air and Water. It is the LAW. Act now by not granting this permit.

MDEQ Permit Board
01/22/2026

I really don't know where to start. As a group we were given a permit class to speak on permits that was in 2013 now we are presented with a new permit for Chevron Construction for more emissions. NO date for Title V permit that was to be renewed in 2014 along with a lot of other industries close by. Complete failure MDEQ!

I am going to state again that our neighborhood can not survive more emissions. Yesterday before coming to the Chevron meeting I was texting Kim Lawrence Biloxi MDEQ about the smell. It got stronger and stronger yesterday afternoon. I walked into the Chevron meeting explaining how when I got in the car with Julie, my neighbor , the smell of acid took my breath.

I am submitting scientific information that may be why we all complain of our eyes burning and headache. Text back and forth with one of my neighbors for the last 2 years.

Until industry, city, county, and state can find funding to relocate and restore this 60 acres back to forest no permit should be issued PERIOD! I will end by saying we have lost close to 40 residents since 2018, none from covid. We only have about 120 to 125 households. What more do you need to understand how bad the toxins are for us. We are home 24/7 and don't work an 8 hour or 10 hour shift so OSCO standards should not be used to base our health problems on.

Sincerely,

Barbara Weckesser

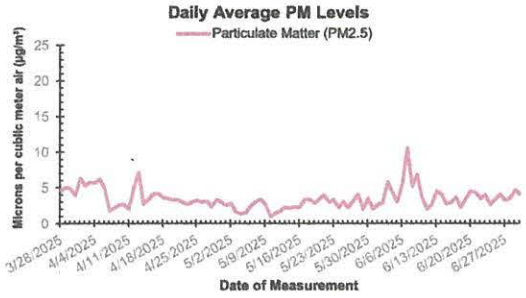
Barbara Weckesser
1502 Cherokee ST
Pascagoula, MS 39581

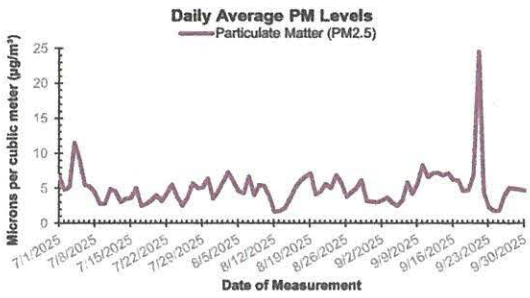
Air Quality Report: Pascagoula, Mississippi

July 1-September 30, 2025

Particulate matter ($PM_{2.5}$)

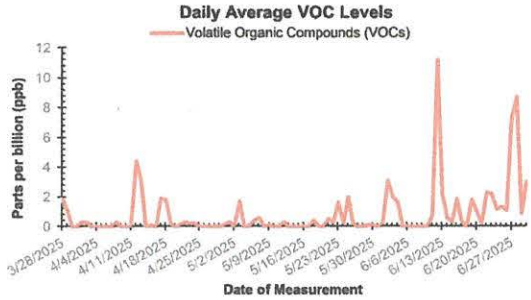
In general, particulate matter are microscopic solid or liquid particles that are suspended in the air. PM includes a wide range of substances, such as: dust, smoke, pollen, ash, bacteria, and viruses. We measure PM size 2.5 micrograms per cubic meter of air. We are interested in particles of this size because they can travel deep into the lungs, enter the bloodstream, and be distributed to various parts of our body. *"Good" $PM_{2.5}$ levels are 0.0-9.0 µg/m³, but 0-35.4 µg/m³ is acceptable by EPA standards.*

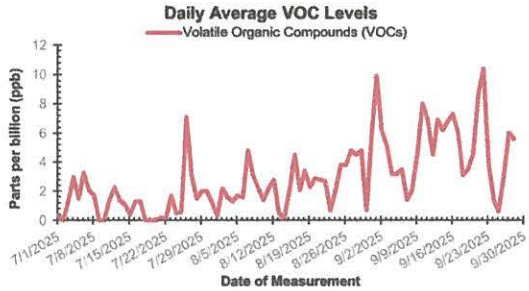




Total volatile organic compounds (VOCs)

VOCs are organic chemical compounds that easily evaporate at room temperature, meaning they turn into a gas. VOCs can be found in both indoor and outdoor environments They can be released from furniture, everyday cleaning products, vehicles, and industrial processes. In oil refining, VOCs are released during various stages of refining, including distillation, cracking, and hydrotreating.



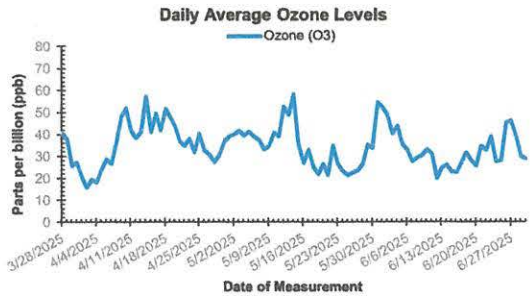


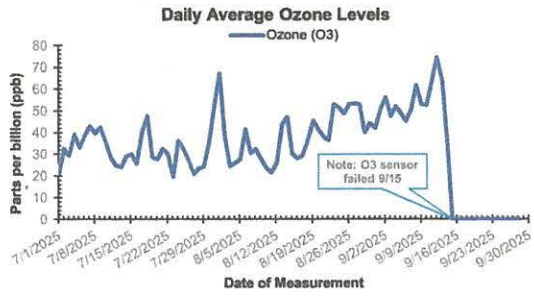
Nitrogen Dioxide (NO_2)

NO_2 is part of a group of pollutants called nitrogen oxides (NOx). It's formed when fuel is burned at high temperatures, such as in vehicles, power plants, and industrial facilities.

Ozone (O_3)

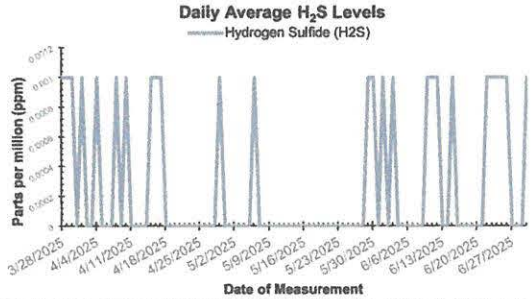
Ozone (O_3) is a highly reactive gas composed of three oxygen atoms. It is both a natural and a man-made product that occurs in the Earth's upper atmosphere. Man-made ozone (Tropospheric or ground-level ozone) is what we breathe. It is formed primarily from photochemical reactions between VOCs and nitrogen oxides (NOx), depending upon the presence of heat and sunlight. *Acceptable ozone levels are 0-70 ppb, and the EPA defines "Good" levels as 0-54 ppb.*

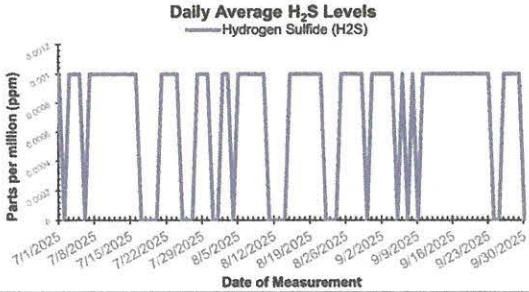




Hydrogen sulfide (H_2S)

Hydrogen sulfide is a colorless gas known for its characteristic "rotten egg" odor. It's a toxic, flammable, and corrosive substance found naturally in crude oil, natural gas, and as a byproduct of organic matter decomposition. It is commonly released during oil and gas refining, wastewater treatment, and pulp and paper production.





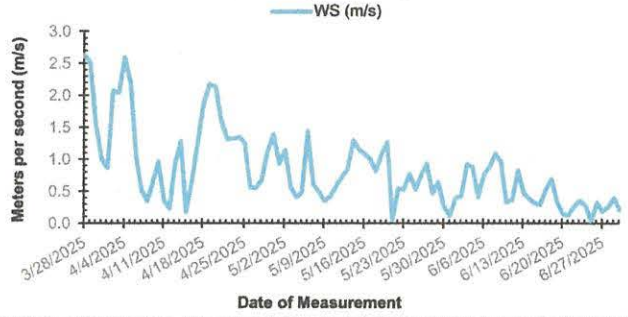
Meteorological Conditions

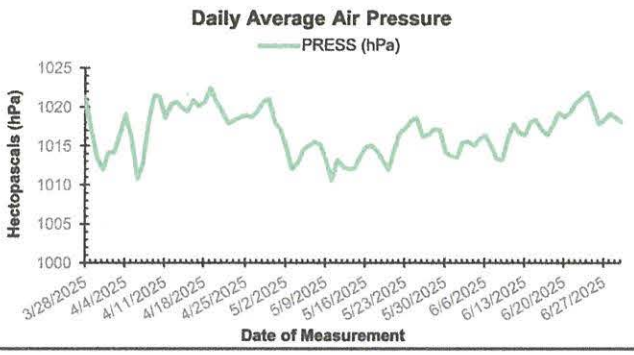
Pascagoula, Mississippi

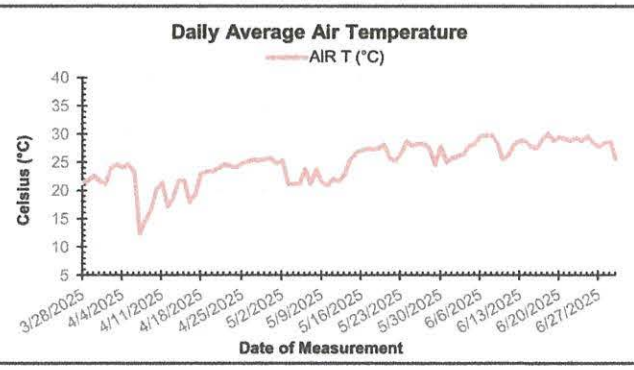
Meteorological conditions, such as temperature, relative humidity, air pressure, precipitation, wind speed, and wind direction, are also important to gather as they impact the distribution of pollutants into the community. For example, wind can carry pollutants further, while certain precipitation like rain can act as a natural air scrubber. Seasonal shifts can also affect changes in air quality.

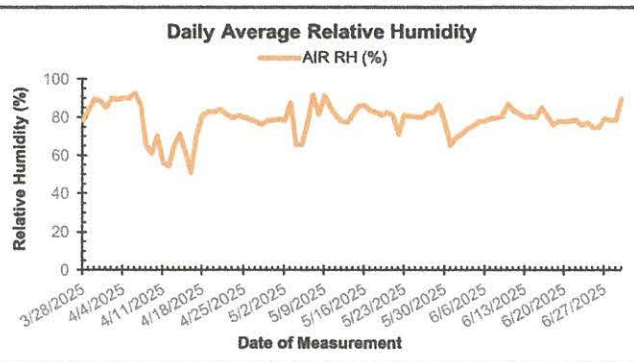
Previous Reported Quarter (Q2)

March 28-June 30, 2025



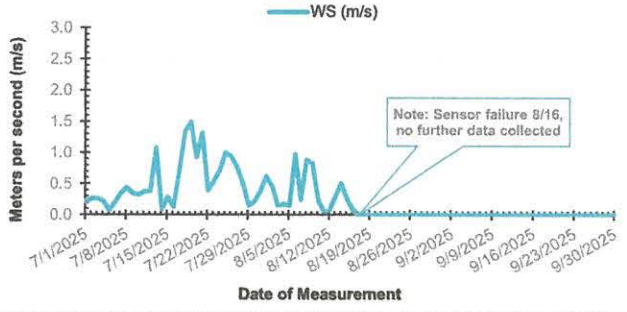


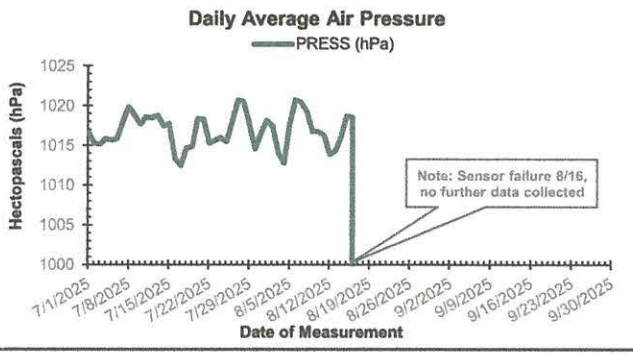


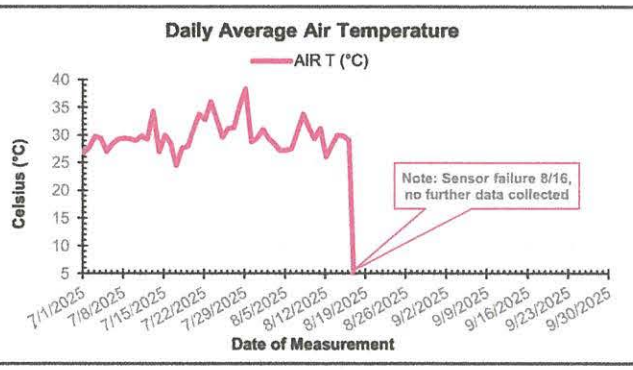


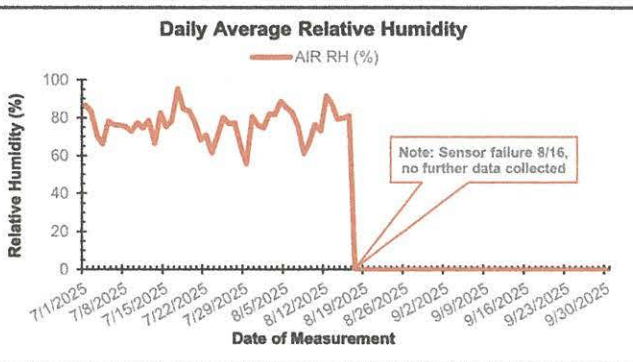
Current Reporting Quarter (Q3)

July 1-September 30, 2025









Coming soon: We will release our community noise reports, which will consist of A-, C-, and Z-weighting sound levels, as well as spectral analysis across the 1/3 octave band.

Re: Chevron Permit Renew.

From: Barbara Weckesser (disneygirlbarb@att.net)

To: Katharine.Duderstadt@unh.edu

Date: Tuesday, January 6, 2026 at 08:41 AM CST

Thank you so much.

On Jan 5, 2026 9:47 PM, Katharine Duderstadt <Katharine.Duderstadt@unh.edu> wrote:

Hi Barbara, Caroline, and Jen:

Although the language in this document is new to me, I'm particularly concerned about the 80% "consumption of air quality increments" of nitrogen dioxide (NO2).

Nitrogen Dioxide (NO2)
annual 20 micrograms per cubic meter
or 80% of the 25 micrograms per cubic meter increment

First, this takes up most of the allowable increase in NO2 pollution and does not account for other increases in NO2 sources that will most likely affect neighborhood air quality in the coming years, especially the increased ship and vehicle emissions with the planned port expansion and shipyard contracts. Deisel engines emit very high levels of NO2, so more ships will increase NO2. MDEQ needs to take into account cumulative increases to pollution.

Second, the World Health Organization recommends an NO2 annual limit of 10 micrograms per cubic meter. So, if I understand this correctly, Chevron is requesting an increase that is twice the current WHO limit. What am I missing?

Third, in 2017 MDEQ measured NO2 levels of 0.058 ppm in the neighborhood, which is approximately 110 micrograms per cubic meter, greater than the current EPA annual standard. (The 1-hour NO2 standard is 188 micrograms per cubic meter so this could easily be exceeded.)

NO2 is a pollutant that produces a reddish-brown haze, smells like car exhaust, and can cause throat irritation and make your eyes water. NO2 can also transform into pm2.5 (ammonium nitrate) that can irritating the lungs. And it reacts with VOCs to produce ozone which is really bad for lungs.

Recommend that Chevron specifically describe the state-of-the-art technologies it plans to use to reduce NO2 emissions both during and after combustion, making sure they are doing everything they can already to reduce this pollutant.

I won't be able to meet this Wednesday but am definitely available next week and beyond.

Best,

(No Subject)

From: Barbara Weckesser (weckesserbarbara@gmail.com)

To: disneygirlbarb@att.net

Date: Sunday, January 18, 2026 at 07:03 PM CST

I knew it VOC high last 3 nights. She thanked me for calling so she flagged for report.

Wed. June 18, 4:21 PM.
2025

Missed

Feb. 5 - 8:36AM
that smell is horrible
outside I called MDEQ

Friday
Dec 20, 2024
This be why I
woke up coughing
itching burning
purple Air (94)

(No Subject)

From: Barbara Weckesser (weckesserbarbara@gmail.com)

To: disneygirlbarb@att.net

Date: Sunday, January 18, 2026 at 07:09 PM CST

I hope you reported it my eyes are on fire. My throat is raw I feel so bad I took off this morning.

Sat. Oct 25, 7:18 AM
2025

Text on cell phone.

(No Subject)

From: Barbara Weckesser (weckesserbarbara@gmail.com)

To: disneygirlbarb@att.net

Date: Sunday, January 18, 2026 at 06:49 PM CST

Join the crowd. Same here. I haven't checked purple air yet. One day we will be where we can wake up without burning eyes and headache.

These are all 2024. I have each on my phone plus all the text back & forth.

(No Subject)

From: Barbara Weckesser (weckesserbarbara@gmail.com)

To: disneygirlbarb@att.net

Date: Sunday, January 18, 2026 at 06:49 PM CST

My head is hurting my eyes are itchy and burning, I hate waking up feeling like this

(No Subject)

From: Barbara Weckesser (weckesserbarbara@gmail.com)

To: disneygirlbarb@att.net

Date: Sunday, January 18, 2026 at 06:47 PM CST

Me too. Horrible headache eyes on fire.

(No Subject)

From: Barbara Weckesser (weckesserbarbara@gmail.com)

To: disneygirlbarb@att.net

Date: Sunday, January 18, 2026 at 06:47 PM CST

I woke up with my eyes heavy and burning, head hurts also

(No Subject)

From: Barbara Weckesser (weckesserbarbara@gmail.com)

To: disneygirlbarb@att.net

Date: Sunday, January 18, 2026 at 06:46 PM CST

Good morning I called out today, I woke up with my eyes burning and my head hurts, my neck my foot, what ever is in the air from the pollution is got Heaven coughing really bad also, she coughed all evening and night and still coughing she has a red rash on her face again that burns.

(No Subject)

From: Barbara Weckesser (weckesserbarbara@gmail.com)

To: disneygirlbarb@att.net

Date: Sunday, January 18, 2026 at 06:44 PM CST

They are destroying are life and crippling are health keeping us held hostage in are home like prisoners, it's just not fair we pay our taxes like everyone else to live in Hell, we are all good neighbors in this subdivision we don't deserve this. I'm literally sick of them trespassing and keeping us all sick.

(No Subject)

From: Barbara Weckesser (weckesserbarbara@gmail.com)

To: disneygirlbarb@att.net

Date: Sunday, January 18, 2026 at 06:44 PM CST

There is I think it is something to cover benezine smell. There was strong acid smell at 7 last night. My eyes are on fire throat is worse after 6 days meds not better worse. Rain coming so they turn the valve to open.

(No Subject)

From: Barbara Weckesser (weckesserbarbara@gmail.com)

To: disneygirlbarb@att.net

Date: Sunday, January 18, 2026 at 06:42 PM CST

My eyes are on fire. Used drops didn't help. Still burning.

(No Subject)

From: Barbara Weckesser (weckesserbarbara@gmail.com)

To: disneygirlbarb@att.net

Date: Sunday, January 18, 2026 at 06:42 PM CST

I woke up with a horrible headache and I took Tylenol and my eyes feel like they going roll in the back of my head, Aaliyah even said that her eyes started burning when she was outside with the kids waiting for there bus

(No Subject)

From: Barbara Weckesser (weckesserbarbara@gmail.com)

To: disneygirlbarb@att.net

Date: Sunday, January 18, 2026 at 06:38 PM CST

Sarah woke with eyes stuck together like me, and she had stuffy nose and itchy throat

(No Subject)

From: Barbara Weckesser (weckesserbarbara@gmail.com)

To: disneygirlbarb@att.net

Date: Sunday, January 18, 2026 at 06:31 PM CST

Still sick. He has a horrible cough. My eyes are still burning. How is everyone at your house. I went to bed at 7 last night.

(No Subject)

From: Barbara Weckesser (weckesserbarbara@gmail.com)

To: disneygirlbarb@att.net

Date: Sunday, January 18, 2026 at 06:29 PM CST

My eyes are burning like fire.

(No Subject)

From: Barbara Weckesser (weckesserbarbara@gmail.com)

To: disneygirlbarb@att.net

Date: Sunday, January 18, 2026 at 06:28 PM CST

Well I woke up with itchy burning red eyes

(No Subject)

From: Barbara Weckesser (weckesserbarbara@gmail.com)

To: disneygirlbarb@att.net

Date: Sunday, January 18, 2026 at 06:28 PM CST

Write it on your paper strong smell outside. My throat is raw and nose eyes burning.

(No Subject)

From: Barbara Weckesser (weckesserbarbara@gmail.com)

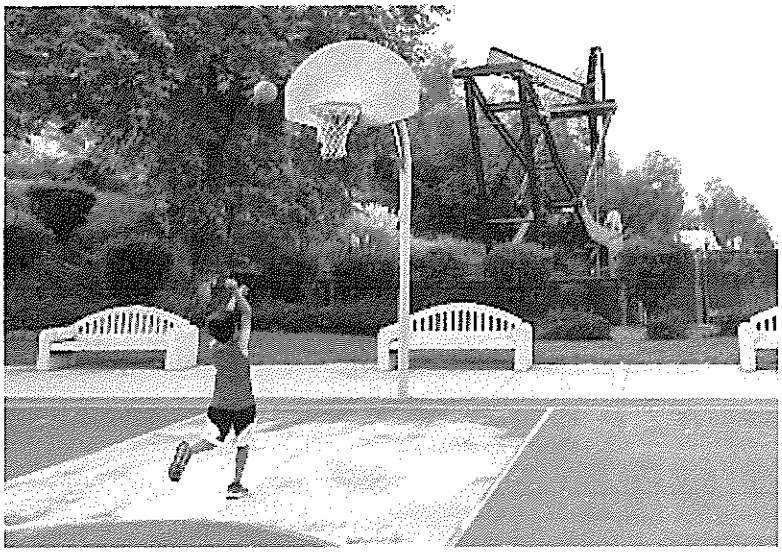
To: disneygirlbarb@att.net

Date: Sunday, January 18, 2026 at 06:27 PM CST

We drove by Chevron and there were two sheriffs with flashing lights parked at either entrance of Chevron. Something definitely seems to be up.

Sincerely,

Julie Hambey
4606 Mohawk DR
Pascagoula, MS 39581



A robust body of research has linked long-term exposure to fine particulate matter and ozone to premature death as well as asthma, dementia, and heart and lung disease. Meite Lamacov for The New York Times

The biggest driver of those deaths is fine particulate matter, or PM2.5, which refers to particles less than 2.5 micrometers in diameter, small enough to enter the bloodstream. Another silent killer is ozone, a smog-causing gas that forms when emissions from power plants, factories and vehicles mix in the air on hot, sunny days.

Re: Chevron Permit Renew.

From: Caroline Frischmon (caroline.frischmon@colorado.edu)

To: katharine.duderstadt@unh.edu; citizensbuyout@gmail.com; disneygirlbarb@att.net; jencrosslin@gmail.com

Date: Sunday, January 18, 2026 at 08:47 PM CST

Sorry for the delay in my response. I agree with Kathy though... Using 80% of the allowable increments seems like a big problem when there is also expected increases in ship and vehicle emissions with industry expansion. It seems like that would push the area over the allowable increments of NO2. I think asking for additional analysis of expected vehicle/ship emissions increases would be useful.

Due to the limited time from MDEQ, and my relative unfamiliarity with permits like this, I ran the pdf through chatgpt, which provided the following comments.... I thought they might be useful.

NO2 Increment and Associated Mobile-Source Emissions

The Preliminary Determination indicates that the proposed project would consume approximately **80% of the allowable annual NO_2 PSD increment** for this Class II area. Consumption of such a large fraction of the remaining increment by a single project raises serious concerns about whether the draft permit adequately protects the remaining increment for future sources and modifications, as required under the PSD program. The Permit Board should require additional justification demonstrating that this level of increment consumption will not unreasonably constrain future air quality protection or lead to cumulative adverse impacts.

While PSD permitting focuses on stationary sources, the air quality analyses used to demonstrate compliance with PSD requirements must be **representative of actual ambient conditions** and sufficiently protective. Increased crude throughput at the refinery is reasonably expected to result in **associated increases in mobile-source activity**, including increased marine vessel traffic at port facilities serving the refinery, increased heavy-duty truck traffic associated with crude delivery and product transport, and potential increases in rail and on-road vehicle activity near the facility.

These mobile sources are significant contributors to ambient NO_2 concentrations, particularly in industrial and port-adjacent areas. The Preliminary Determination does not clearly explain whether background concentrations and cumulative air quality conditions adequately account for existing and reasonably foreseeable **ship and vehicle NO_2 emissions associated with increased refinery throughput.** Given that the project alone consumes **80% of the NO_2 increment**, even modest underestimation of mobile-source NO_2 emissions could materially affect the increment analysis and the conclusion that PSD requirements are met.

Adequacy of Best Available Control Technology (BACT)

BACT is a mandatory requirement for PSD permits. Given the substantial increment consumption projected for NO_2 and particulate matter, the Preliminary Determination should clearly document whether more stringent NO_x and PM control options were evaluated, whether operational limits or additional controls could further reduce emissions during high-throughput operation, and why the selected control options represent the maximum degree of emission reduction achievable. The administrative record should

demonstrate that emissions—and corresponding increment consumption—have been minimized to the greatest extent feasible.

Air Quality Modeling Assumptions

The Permit Board should ensure that air dispersion modeling used in the PSD analysis is appropriately conservative, particularly in light of the magnitude of projected increment consumption. The Preliminary Determination should clarify how increased utilization of existing emission units was represented in the modeling, whether operational variability at higher throughput was considered, and whether sensitivity analyses were performed using higher background NO_2 concentrations reflective of increased mobile-source activity.

Baseline and Background Air Quality Data

The Preliminary Determination should clearly explain the selection of baseline air quality data and confirm that background concentrations fully account for emissions from nearby industrial sources, mobile sources, and port-related activities. Accurate baseline determination is essential to ensure that PSD increment consumption is not underestimated.

Short-term (24 hour) PM Impacts

While annual PM impacts appear relatively small, the project is predicted to consume over **10% of the 24-hour $PM_{2.5}$ increment** and more than **10% of the 24-hour PM_{10} increment**. Short-term particulate matter exposures are associated with acute respiratory and cardiovascular effects. The Permit Board should evaluate whether additional operational limits or control measures could further reduce short-term PM impacts, particularly during peak operating conditions.

Ozone Formation from NOx and VOCs

The project is considered a major modification for both NO_x and VOCs, which are ozone precursors. The Preliminary Determination should more clearly explain how increased precursor emissions may affect local or regional ozone formation, particularly when combined with ship and vehicle emissions, and whether the proposed controls adequately minimize these secondary air quality impacts.

Request

For these reasons, I request that the Permit Board require additional analysis and, where feasible, stronger permit conditions to ensure compliance with PSD requirements and the protection of air quality in the Pascagoula area.

From: Katharine Duderstadt <Katharine.Duderstadt@unh.edu>
Sent: Monday, January 5, 2026 8:47 PM
To: citizensbuyout <citizensbuyout@gmail.com>; Caroline Frischmon <Caroline.Frischmon@colorado.edu>; disneygirlbarb <disneygirlbarb@att.net>
Subject: Re: Chevron Permit Renew.

[External email - use caution]

Hi Barbara, Caroline, and Jen:

Although the language in this document is new to me, I'm particularly concerned about the 80% "consumption of air quality increments" of nitrogen dioxide (NO2).

Nitrogen Dioxide (NO2)

annual 20 micrograms per cubic meter
or 80% of the 25 micrograms per cubic meter increment

First, this takes up most of the allowable increase in NO2 pollution and does not account for other increases in NO2 sources that will most likely affect neighborhood air quality in the coming years, especially the increased ship and vehicle emissions with the planned port expansion and shipyard contracts. Deisel engines emit very high levels of NO2, so more ships will increase NO2. MDEQ needs to take into account cumulative increases to pollution.

Second, the World Health Organization recommends an NO2 annual limit of 10 micrograms per cubic meter. So, if I understand this correctly, Chevron is requesting an increase that is twice the current WHO limit. What am I missing?

Third, in 2017 MDEQ measured NO2 levels of 0.058 ppm in the neighborhood, which is approximately 110 micrograms per cubic meter, greater than the current EPA annual standard. (The 1-hour NO2 standard is 188 micrograms per cubic meter so this could easily be exceeded.)

NO2 is a pollutant that produces a reddish-brown haze, smells like car exhaust, and can cause throat irritation and make your eyes water. NO2 can also transform into pm2.5 (ammonium nitrate) that can irritating the lungs. And it reacts with VOCs to produce ozone which is really bad for lungs.

Recommend that Chevron specifically describe the state-of-the-art technologies it plans to use to reduce NO2 emissions both during and after combustion, making sure they are doing everything they can already to reduce this pollutant.

I won't be able to meet this Wednesday but am definitely available next week and beyond.

Best,

Kathy

From: AT&T Account Mail.® <disneygirlbarb@att.net>

ATTACHMENT B

PUBLIC HEARING TRANSCRIPT

Jeffrey Bland

From: Kenny Medley <kenny@brookscourtreporting.com>
Sent: Thursday, February 5, 2026 4:14 PM
To: Jeffrey Bland
Subject: 01/22/26 Transcript of Proceedings (In Re: MDEQ Pascagoula Public Hearing) (Final) & Invoice 56587
Attachments: 56587mdeq.pdf

Categories: Red Category

Below is the ShareFile link to the transcript. Please download files and save to your computer for the link is time sensitive and will expire. Once expired, you will not be able to access files.

https://brookscourtreporting.sharefile.com/public/share/web-s108c708f483549e0a8d426676cd4e2a5 [brookscourtreporting.sharefile.com]

Attached please find Invoice # 56587

You may need to do the following to view ptx & ptz.

To download the free E-Transcript Viewer

Go to www.brookscourtreporting.com [brookscourtreporting.com] select resources on the upper right-hand side and then select the download E-Transcript viewer. It's a one-time download.

Please confirm receipt.

Thanks

Kenny Medley
Production Manager

[brookscourtreporting.com] **(601) 362-1995 I (800) 245-3376**
https://brookscourtreporting.com [brookscourtreporting.com]

Scheduling: depo@brookscourtreporting.com; info@brookscourtreporting.com
Production: kenny@brookscourtreporting.com; services@brookscourtreporting.com
Accounting: charles@brookscourtreporting.com; info@brookscourtreporting.com

If you don't receive a response from someone in our office within 24 hours, please contact us at one of the above email addresses or at the phone number listed above. Thank you for your business.

MDEQ Public Hearing - Permit

MDEQ Pascagoula Public Hearing

January 22, 2026

All depositions & exhibits are available for downloading at
<<www.brookscourtreporting.com>>
Please call or e-mail depo@brookscourtreporting.com if you need a **Username** and **Password.**

Brooks Court Reporting

Mississippi - Louisiana - Tennessee - New York
1-800-245-3376

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
PUBLIC HEARING

Taken at the instance of the MS Department of Enovironmental Quality at Pascagoula Senior Center, 1912 Live Oak Avenue, Pascagoula, Mississippi 39567, on Thursday, January 22, 2026, beginning at 6:05 p.m.

REPORTED BY:

Kaitlyn Etherton, CCR #1963

APPEARANCES:

JEFFREY BLAND, ESQ.
Mississippi Department of Environmental Quality
P.O. Box 2261
Jackson, Mississippi 39225
JBland@mdeq.ms.gov

ALSO PRESENT: From MDEQ, Jarcus Whitlock and Chappell Ford

INDEX

MR. BLAND: Ladies and gentlemen, thank you for being here tonight. It is now 6:05 p.m., and we are ready to begin this public hearing. My name is Jeffrey Bland, and I am the Air Permitting Coordinator of the Air Division for the Mississippi Department of Environmental Quality (or "MDEQ" for short). This public hearing regards a proposed issuance of a Prevention of Significant Deterioration Permit to Construct Air Emission Equipment (commonly referred to as a "PSD Permit") to the Chevron USA, Inc., Chevron Products Company, Pascagoula Refinery, located at 250 Industrial Road in Pascagoula, Mississippi.

The public comment period for the proposed draft air permit began on December the 17th, 2025, and ends today, January 22nd, 2026.

The purpose of the public comment period and this public hearing is to receive comments on the proposed draft PSD Permit. MDEQ developed the draft permit based on our review of the information submitted by the applicant, including impacts to air quality, and all applicable regulations. Review of the application, particularly the air quality

analysis, was performed in close coordination with Region 4 of the Environmental Protection Agency. As a result, the conditions presented in the draft permit were developed to ensure compliance with such regulations required by the State of Mississippi and the Environmental Protection Agency. However, those conditions are subject to change based on any information provided through comments received tonight or as part of the overall public comment period.

A final decision on the permitting action is ultimately decided by the Mississippi Environmental Quality Permit Board.

Before proceeding, I will provide a brief summary of the proposed permit action under consideration for the Chevron Pascagoula Refinery.

Chevron currently operates 20 major refining process units, approximately 200 storage vessels, and four marine terminals on approximately 1,000 acres of the 3,000 acres owned by Chevron. The Pascagoula Refinery can currently process 361,000 barrels per operating day of crude oil, which yields about 5.5 million gallons of motor gasoline per day,

in addition to jet and diesel fuel, aviation gasoline, liquefied petroleum gas, petroleum coke, ammonia, sulfur, and benzene.

With this proposed permitting action, Chevron is requesting to increase the daily crude throughput from 361,000 barrels per operating day to 394,000 barrels per operating day through upgrades and improvements to equipment, such as heat exchangers, pumps, and piping, which would debottleneck operations at the Crude 1 Unit, Crude II Unit, Hydrofiner, and Residuum Desulfurization Unit. These improvements will also allow the Pascagoula Refinery to process lighter crude slates. With the exception of new piping, the changes proposed to accommodate the increased throughput do not include new emission units or the modification of existing emission units. However, a number of units may experience an increase in utilization due to the increase in crude processing capacity. Because an increase in crude throughput can impact numerous downstream processes, the project is referred to as the "Pascagoula Aggregates PSD Project."

When taking into account all the impacts

to downstream and support operations resulting from an increase in crude throughput, emissions of certain air pollutants are projected to increase. The potential increase of emissions of particular matter, particular matter of both 10 and 2.5 micrometers and smaller, nitrogen oxides, volatile organic compounds, and greenhouse gases exceed the significant emission rates specified in the PSD regulations. Therefore, the Pascagoula Aggregates PSD Project is considered a major modification, which require Chevron to evaluate the best available control technology for the new piping and conduct a source impact analysis to evaluate the impacts of emissions on air quality through modeling and other EPA-prescribed techniques.

After review and consideration of the information provided, MDEQ has concluded that the emission limits, operational restrictions, and compliance assurance mechanisms incorporated into the draft PSD Permit will comply with all applicable State of Mississippi and Federal environmental laws, regulations, and air quality standards.

All concerns and issues presented here tonight or during the public comment period will be considered by MDEQ to ensure that all relevant issues have been properly and adequately examined. After review and evaluation of the issues presented, MDEQ staff will develop final recommendations concerning the proposed PSD Permit and present such recommendations to the Permit Board for a final determination.

We are now ready to receive comments. For all who wish to provide comments, I ask that you please keep them as concise as possible and focused on the environmental issues as they pertain to the proposed permit action. We will take comments in the order that individuals registered upon arriving. We will first hear from those individuals who have indicated on their registration cards that they would like to make a comment. Afterwards, we will open the floor to anyone else who wishes to provide comments that have not already done so.

Lastly, I would like to go over the format for this portion of the public hearing so that all who wish to comment can do so:

First, please come to the podium before presenting your comment.

This public hearing is being recorded, so that all comments can be captured and transcribed for the public record. Therefore, I ask that you please speak loud and clearly into the microphone so that your comments can be properly archived. Also, if you are presenting written comments, I ask that you please submit them when you complete your presentation so that the written transcription of this hearing is correct.

Before sharing your comment, please provide both your name and where you are from. If you represent an organization, please share its name as well.

In lieu of presenting your comment at the podium, you may write your comments down and submit it for the public record. Located at the table near the entrance where you registered is a notepad and a pen. Upon completing your written comments, please submit them so that they may be noted as received for the public record.

All comments and concerns presented during

both the public comment period and this public hearing will be thoroughly evaluated prior to the MDEQ staff making a final recommendation. It is important to remember that a hearing record is being established tonight and may be presented to the Permit Board.

We will now begin with those that have indicated on their registration cards that they would like to make a comment.

First I have Barbara Weckesser.

BARBARA WECKESSER: I don't know if I need that. Am I going to need the microphone? I am.

I'm going to be representing myself first, Cherokee Concerned Citizens second.

I really don't know where to start. As a group, we were given a permit class to speak on permits, that was in 2013. Now we are presented with a new permit for Chevron Construction for more emissions. No date for Title V permit that was to be renewed in 2014 along with a lot of other industries close by. Complete failure MDEQ!

I'm going to state again that our neighborhood can not survive more emissions.

Yesterday before coming to the Chevron meeting I was texting Kim Lawrence, Biloxi MDEQ, about the smell. It got stronger and stronger yesterday afternoon. I walked into the Chevron meeting explaining how when I got in the car with Julie, my neighbor, the small of acid took my breath.

I am submitting scientific information that may be why we all complain of our eyes burning and headache. Text back and forth with one of my neighbors for the last 2 years.

Until industry, city, county, and state can find funding to relocate and restore this 60 acres back to forest, no permit should be issued PERIOD! I will end by saying we have lost over 40 residents since 2018, none from Covid. We only have about 120 to 125 households. What more do you need to understand how bad the toxins are for us. We are home 24/7 and don't work an 8 to 10-hour shift, so OSHA standards should not be used to base our health problems.

And with that, I have the draft of how much sulfur dioxide PM2 we are taking in. I have a PurpleAir monitor that has run

continuously on my back porch for 8 years. And I'm finished. Thank you.

MR. BLAND: Next up I have a Julie -- is it Hambey?

JULIE HAMBEY: Yes, sir.

Yes, I'm representing myself and Cherokee Concerned Citizens.

No no no new permit.

My 15-year-old daughter was diagnosed with Type 1 Diabetes three years ago. She spent a week at USA Children's Hospital in Mobile. This was a few years ago or three years ago.

I say this to give background with our problems. I took her to visit -- not visit, but her six-month checkup at her endocrinologist today. And I asked the nurse, do they have a lot of children from Mississippi that have Type 1 Diabetes, and she said 40 percent, 40 percent of their children that come to the pediatric endocrinologist are from the lower Mississippi. So I'm guessing maybe, you know, Jackson County and maybe a little bit of Hancock County, but Jackson County. I'm guessing, she didn't say. She couldn't say. She just said 40 percent of lower Mississippi

come to Mobile to get treated for diabetes.

And my daughter cannot go outside in our neighborhood and walk because of the smell. Because she gets headaches and her eyes, just like everybody else, start burning. She was playing outside a few years ago when the smell was so strong that all the kids come running in. That was in February of, not last year but the year before, when the smell was so strong.

Another child close by in our neighborhood was just diagnosed with Type 1 Diabetes. She's 10-years-old. That was a few weeks ago.

We have children that tested positive for high nickel in their toenail clippings. My daughter and granddaughter are one of them.

Again, no new permit, please, MDEQ. Listen to our voices now. We are suffering with health issues.

Relocate, restore, then talk about a permit.

We are working to help Pascagoula with this issue through our Restore and Relocate plan. If industries are allowed to pollute more and more, we'll deal with health issues.

Industries, city, county, state need to

take action to provide clean air and water. It is the law. Act now by not granting this permit.

MR. BLAND: At this time, we do not have anyone remaining that has registered to speak. Therefore, we will open the floor to anyone else wanting to make a comment. Again, before making your comments, please state your name and organization into the microphone for it to be included in the record.

SIERRE ANTON: Hello, my name is Sierre Anton. I'm an attorney with the Mississippi Center for Justice. I'm here in part on behalf of the Concerned Citizens of Cherokee. We are already going to submit written comments on this issue; however, I also wanted to add an issue that we just recognized in traveling down for this hearing.

That the publication of this notice for this hearing has an incorrect address for the hearing location. It states, Pascagoula Street 1912 Live Pasca N39 on MDEQ's website for this hearing notice. If you put that in, it takes you about 10 to 15 minutes away on Pascagoula Street. Thankfully, I was able to find it by

contacting other attorneys who are working on this matter. But other people may have still been confused and not been able to make it to this hearing because of that issue.

MR. BLAND: If there are no other individuals who wish to speak on the record, let me offer our thanks to you for your comments. Public review and commenting on the draft permit are an important element in our evaluation and resulting recommendation to the Permit Board. We will carefully review all comments and concerns received during the comment period and at tonight's hearing and develop responses to the comments.

As deemed necessary, we may modify the conditions of the draft permit. If presenting to the Permit Board, the Permit Board will be provided with a copy of the transcript, MDEQ's "Response to Comments" document, the draft permit, and any other information relevant to the application for review and consideration prior to rendering a decision on the permitting action. All interested parties will be provided a notice of the Permit Board meeting date and time if MDEQ decides to present this

permitting action to the Permit Board. At this time, I will officially close this public hearing. Thank you.

(Time Noted: 6:22 p.m.)

ORIGINAL: JEFFREY BLAND, ESQ.

CERTIFICATE OF COURT REPORTER

I, Kaitlyn Etherton, Court Reporter and Notary Public, in and for the State of Mississippi, hereby certify that the foregoing contains a true and correct transcript of the hearing, as taken by me in the aforementioned matter at the time and place heretofore stated, as taken by stenotype and later reduced to typewritten form under my supervision by means of computer-aided transcription.

I further certify that, to the best of my knowledge, I am not in the employ of or related to any party in this matter and have no interest, monetary or otherwise, in the final outcome of this matter.

Witness my signature and seal this the 5th day of February, 2026.

_____
Kaitlyn Etherton, CCR #1963

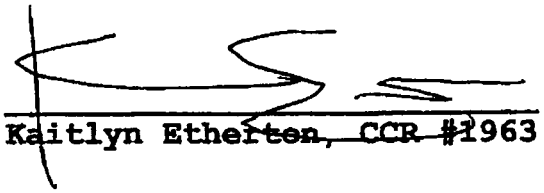
My Commission Expires:
October 11, 2027

CERTIFICATE OF COURT REPORTER

I, Kaitlyn Etherton, Court Reporter and Notary Public, in and for the State of Mississippi, hereby certify that the foregoing contains a true and correct transcript of the hearing, as taken by me in the aforementioned matter at the time and place heretofore stated, as taken by stenotype and later reduced to typewritten form under my supervision by means of computer-aided transcription.

I further certify that, to the best of my knowledge, I am not in the employ of or related to any party in this matter and have no interest, monetary or otherwise, in the final outcome of this matter.

Witness my signature and seal this the 5th day of February, 2026.



Kaitlyn Etherton, CCR #1963

My Commission Expires:
October 11, 2027

ATTACHMENT C

PUBLIC NOTICE OF HEARING AND COMMUNITY FLYER

Notice of Public Hearing
Mississippi Environmental Quality Permit Board
P. O. Box 2261 | Jackson, MS 39225
515 East Amite St. | Jackson, MS 39201
Telephone No. (601) 961-5171

Public Notice Start Date: **December 17, 2025** MDEQ Contact: Jeffrey Bland
Public Notice End Date and Date of Public Hearing: **January 22, 2026**

Chevron USA Inc, Chevron Products Company, Pascagoula Refinery, located at 250 Industrial Road, in Pascagoula, MS, (228) 938-4600, has applied to the Mississippi Department of Environmental Quality (MDEQ) for the issuance of a Prevention of Significant Deterioration (PSD) Permit to Construct Air Emissions Equipment, Permit Ref. No. 1280-00058. **The Permit Board will hold a public hearing on this matter at 6:00 p.m. on Thursday, January 22, 2026, at the Pascagoula Senior Center located at 1912 Live Oak Avenue, Pascagoula, MS**. A Preliminary Determination has been prepared that contains a discussion of the decision-making that went into the development of the permit and provides the permitting authority, the public, and other government bodies a record of the technical issues surrounding issuance of the permit. The Preliminary Determination also addresses the changes to emissions resulting from the modification of the facility.

The Pascagoula Refinery can currently process 361,000 barrels per operating day of crude oil, which yields about 5.5 million gallons of motor gasoline per day, in addition to jet and diesel fuel, aviation gasoline, liquefied petroleum gas, petroleum coke, ammonia, sulfur, and benzene. The applicant's operations fall within SIC Code 2911 (Petroleum Refining), with secondary SIC Codes of 2819 (Industrial Inorganic Chemicals), 2865 (Cyclic Organic Crudes and Intermediates), and 5171 (Petroleum Terminals). Chevron is proposing to increase the daily crude throughput to 394,000 barrels per operating day through upgrades and improvements to equipment, such as heat exchangers, pumps, and piping, which will debottleneck operations at the Crude I Unit (Plant 11), Crude II Unit (Plant 61), Hydrofiner (Plant 22), and Residuum Desulfurization Unit Module A (Plant 81A). These improvements will also allow the Pascagoula Refinery to process lighter crude slates. With the exception of new piping, the changes proposed to accommodate the increased throughput do not include new emission units or the modification of existing emission units. However, a number of units may experience increased utilization due to the increased crude processing capacity. Because an increase in crude throughput can impact numerous downstream processes, the project is referred to as the "Pascagoula Aggregates PSD Project."

The Pascagoula Refinery is considered an existing major stationary source under the PSD regulations, and the "Pascagoula Aggregates PSD Project" is considered a major modification for the following air pollutants: particulate matter (PM), PM less than 10 microns (PM_{10}), PM less than 2.5 microns ($PM_{2.5}$), nitrogen oxides (NO_x), volatile organic compounds (VOC), and greenhouse gases (GHGs). Therefore, this project is subject to the PSD regulations, including requirements regarding the best available control technology and air quality impacts. The project will be located in a PSD Class II area. The Preliminary Determination provides more details regarding the impacts to air quality for PM_{10}/$PM_{2.5}$, NO_x, and Ozone. The following consumption of air quality increments is predicted to occur:

Particulate Matter Less than 2.5 microns

Annual	0.060 micrograms per cubic meter or
	1.5% of the 4 micrograms per cubic meter increment.
24-Hour	0.98 micrograms per cubic meter or
	10.9% of the 9 micrograms per cubic meter increment.

Particulate Matter Less than 10 microns

Annual	< 3.19 micrograms per cubic meter or
	< 18.8% of the 17 micrograms per cubic meter increment.
24-Hour	3.19 micrograms per cubic meter or
	10.6% of the 30 micrograms per cubic meter increment.

Nitrogen Dioxide

Annual	20.0 micrograms per cubic meter or

80% of the 25 micrograms per cubic meter increment.

The staff of the Permit Board has developed this draft permit based on information submitted to the Permit Board by the applicant, appropriate State and Federal agencies and other interested parties. The staff of the Permit Board is soliciting all relative information pertaining to the proposed activity, including public comment, to ensure that the final staff recommendation on the draft permit complies with all State and Federal regulations. Public review and comment on the draft permit and supporting documentation are an important element in the staff evaluation and resulting recommendation to the Permit Board. The draft permit conditions have been developed to ensure compliance with all State and Federal regulations but are subject to change based on information received as a result of public participation.

Persons wishing to comment upon or object to the proposed determinations are invited to submit comments in writing to Jeffrey Bland at https://www.mdeq.ms.gov/bland-jeffrey/ or to the Permit Board address shown above, no later than **January 22, 2026**. All comments received by this date will be considered in the formulation of final determinations regarding the application(s). Any comments related to zoning or economic and social impacts are within the jurisdiction of local zoning and planning authorities and should be addressed to them.

The Permit Board is created by Mississippi Law for the purpose of issuing or denying, under such conditions and limitations as it may prescribe, environmental protection permits to control or prevent the release of contaminants into the air and waters of the State. By law, the Board is composed of the Chief of the Bureau of Environmental Health within the State Department of Health; the Director of the Department of Wildlife, Fisheries, and Parks, the Director of the Office of Land and Water Resources within the Department of Environmental Quality, the Supervisor of the State Oil and Gas Board; the Director of the Department of Marine Resources; the Director of Geology within the Department of Environmental Quality; and the Commissioner of Agriculture and Commerce or their respective designees.

The Purpose of this hearing is to explain the proposed project and to receive comments from the public regarding the project and particularly the draft permit. Upon arrival at the public hearing, everyone will be asked to register and note if they expect to make a statement. Statements will be received in the order of registration (i.e., first to register will be the first to give public comment). However, everyone will be given an opportunity to comment, including those who indicated during registration that they did not expect to comment. Persons commenting will not be limited to any specific time so long as the comments are reasonably concise and relate, at least generally, to the responsibilities of the Permit Board. However, because a large number of people often wish to speak, comments should be as brief as reasonably possible. Comments can be presented in writing if preferred. In order to help facilitate understanding between citizens and the Permit Board staff, the staff will attempt to answer questions at the hearing. However, such exchanges should be as brief as possible so that everyone who wants to speak has the opportunity.

All comments made during this public hearing will be transcribed and made a part of the Permit Board file on this matter. Before making any decision, the Board will consider all issues and concerns raised regarding environmental protection. Any interested party aggrieved by the decision of the Permit Board may file a written request for a formal hearing, after the formal evidentiary hearing the Permit Board will make its final decision on the matter. Any person aggrieved by that decision may appeal to the chancery court in the county of the proposed project.

Additional details about the application, including a copy of the draft permit, are available by writing or calling the Public Records Request Officer at the above Permit Board address and telephone number or by completing the form at the following website: https://www.mdeq.ms.gov/about-mdeq/public-records-request/public-records-request-form/. Additionally, a copy of the draft permit and preliminary determination may be found on the MDEQ's website at: https://opc.deq.state.ms.us/publicnotice.aspx. Additional documents can be found on the Online Public Hearing link at: https://opcgis.deq.state.ms.us/ensearchonline/public-hearings.aspx. This information is also available for review at the office of the MDEQ at the Permit Board address shown above during normal business hours. Please bring the foregoing to the attention of persons whom you know will be interested.

Outlook

Chevron Public Hearing Notice

From Taaka Scott-Bailey <tbailey@mdeq.ms.gov>
Date Wed 12/17/2025 2:52 PM
To Jeffrey Bland <JBland@mdeq.ms.gov>
Cc Carla Brown <carla.brown@controlconceptsms.com>; Lynn Bradshaw <LBRADSHAW@mdeq.ms.gov>

1 attachment (181 KB)
Chevron PSD Public Hearing Notice.pub;

Good afternoon.

Please see the attached notice that was mailed to our Cherokee Community address list. There were a total of 246 notices, including a copy of the official public notice mailed out. Please let me know if you have any questions or need to discuss anything further.

Thanks

Taaka Scott Bailey, Director, CPM
MDEQ Office of Community Engagement
Phone: 601-961-5025
Cell: 769-798-3918
Fax: 601-961-5660
P.O. Box 2249
Jackson, Mississippi 39201

NOTICE OF PUBLIC HEARING

THURSDAY, JANUARY 22, 2026

6:00PM-8:00PM

PASCAGOULA SENIOR CENTER - 1912 LIVE OAK AVENUE

PASCAGOULA, MS 39567

THIS HEARING IS OPEN TO THE PUBLIC

Chevron USA Inc, Chevron Products Company, Pascagoula Refinery, located at 250 Industrial Road, in Pascagoula, MS, has applied to the Mississippi Department of Environmental Quality (MDEQ) for the issuance of the following permitting action:

- Prevention of Significant Deterioration (PSD) Permit to Construct Air Emissions Equipment.

MDEQ is soliciting input on the above referenced permitting action on behalf of the MDEQ Permit Board. Persons wishing to comment on the proposed action are invited to submit comments in writing to Jeffrey Bland at https://www.mdeq.ms.gov/bland-jeffrey/ or by hand-mail to the address below. Comments must be received electronically by 11:59 p.m. or postmarked no later than January 22, 2026. Any questions regarding this permitting action may be directed to Jeffrey Bland at 601-961-5112.

Mississippi Environmental Quality Permit Board | P.O. Box 2261 | Jackson, MS 39225

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Mississippi Environmental Quality Permit Board | P.O. Box 2261 | Jackson, MS 39225