

BEFORE THE MISSISSIPPI COMMISSION
ON ENVIRONMENTAL QUALITY

MISSISSIPPI COMMISSION ON
ENVIRONMENTAL QUALITY

VS. ORDER NO.

MZX TECH LLC
2875 STANTON ROAD
SOUTHAVEN
DESOTO, MISSISSIPPI

AGREED ORDER

COME NOW the Mississippi Commission on Environmental Quality (Commission), acting through the staff and Executive Director of the Mississippi Department of Environmental Quality (MDEQ), and MZX Tech LLC (MZX), in the above captioned cause and agree as follows:

1.

MZX operates sixty-nine (69) portable, temporary simple cycle natural gas-fired combustion turbines (as more fully described in Appendix A) on its property located at 2875 Stanton Road, Southaven, Desoto County, Mississippi (Stanton Road Facility).

By letter dated July 29, 2025, MDEQ confirmed that portable, temporary turbines are

“mobile sources” that are not subject to stationary source air permitting requirements pursuant to 11 Mississippi Administrative Code Part 2, Chapter 2, Rule 2.13.D.

MDEQ’s July 29, 2025, letter requested that MZX operate the mobile turbines in a manner that minimizes the emission of nitrogen oxides (NO_x) and particulate matter less than 2.5 microns in diameter (PM_{2.5}) through the implementation of additional emission control technology available and applicable to portable combustion turbines. MZX implemented such controls.

MDEQ’s July 29, 2025, letter also recognized MZX’s representation that the use of each mobile turbine would be temporary. MDEQ exercised its discretion to implement what constitutes a “mobile source” under the state’s EPA-approved State Implementation Plan and asked MZX to use each mobile turbine for no more than one year and ensure each mobile turbine would remain portable at all times.

From time to time and most recently on June 12, 2026, MZX provided the unit number, unit type, emission control, total power output, and the date added for each mobile turbine. Appendix A is MZX’s most recent and up-to-date turbine list.

Of these turbines, fourteen (14) Solar Mobile Turbomachinery Titan 130 turbines (SMT-130) include state-of-the-art selective catalytic reduction (SCR) emission controls for the control of nitrogen dioxide and oxidation catalyst (oxcat) emission controls for the control of carbon monoxide and volatile organic compounds.

Following an approximately seven-month process, on March 11, 2026, MDEQ issued a Prevention of Significant Deterioration (PSD) Authority to Construct Air Emission Equipment at the Stanton Road Facility. Among other things, the PSD permit authorized the construction of forty-one (41) stationary combustion turbines.

Although only the MZX PSD permit imposes the most stringent emission limitations applicable to stationary combustion turbines located at a major stationary source, the 14 SMT-130 mobile turbines in use at the Stanton Road Facility are capable of meeting or exceeding the emission limitations in the MZX PSD permit.

Due to supply chain challenges, the construction schedule for some of the 41 stationary combustion turbines has been delayed. As a result, MZX has informed MDEQ of the need to operate the 14 SMT-130 mobile turbines until more stationary turbines can be constructed.

MZX has proposed a retirement schedule for the use of mobile turbines as outlined in Appendix A. Because all of the mobile turbines except for the SMT-130 turbines will cease operation no later than twelve months after they were brought onsite, and because the SMT-130 turbines will meet the emission limitations in the MZX PSD permit applicable to stationary combustion turbines and will cease operations no later than December 31, 2026, MDEQ concludes that all the turbines will remain portable and temporary and therefore

“mobile sources” pursuant to 11 Mississippi Administrative Code Part 2, Chapter 2, Rule 2.13.D.

2.

In light of the foregoing, MDEQ and MZX agree as follows:

A. MDEQ and MZX agree that MZX’s operation of the mobile turbines identified in Appendix A without separate construction or operating permits has not violated Mississippi air permitting requirements. MZX’s continued operation of those turbines through their respective deactivation deadlines established by this Agreed Order likewise will not constitute a violation, provided that MZX fully and timely complies with all applicable conditions of this Agreed Order. Nothing in this paragraph authorizes operation of a turbine after its applicable deadline or relieves MZX of compliance with any requirement not expressly addressed in this Agreed Order

B. MDEQ and MZX agree that as a continued condition of the July 29, 2025, letter, MZX shall continue to operate the emission controls designated for each turbine in Appendix A until such time as each turbine ceases operation at the Stanton Road Facility.

C. MDEQ and MZX agree that as a continued condition of the July 29, 2025, letter that all turbines in Appendix A other than the SMT-130s must cease operations at the Stanton Road Facility no later than twelve months after the identified “Date Added” for each turbine on Appendix A.

D. MDEQ and MZX agree that as a continued condition of the July 29, 2025, letter that all SMT-130 turbines in Appendix A must cease operation at the Stanton Road Facility no later than December 31, 2026.

E. MDEQ and MZX agree that MZX will not add any further mobile source turbines at the Stanton Road Facility after August 1, 2026.

F. MDEQ and MZX agree that if MZX fails to adhere to any of these conditions B through D at a particular turbine, that turbine will immediately cease to qualify as a “mobile source” under 11 Mississippi Administrative Code Part 2, Chapter 2, Rule 2.13.D. and become subject to stationary source permitting requirements.

3.

Nothing in this Agreed Order shall limit the rights of MDEQ or the Commission in the event MZX fails to comply with this Agreed Order. The Agreed Order shall be strictly construed to apply to those matters expressly resolved herein.

4.

Nothing in this Agreed Order shall limit the rights of MDEQ or the Commission to take enforcement action or other actions against MZX for matters not addressed herein and for future violations of environmental laws, rules, and regulations.

ORDERED, this the ___ day of July, 2026.

MISSISSIPPI COMMISSION ON
ENVIRONMENTAL QUALITY

[BY: _____]

CHRIS WELLS

EXECUTIVE DIRECTOR

MISSISSIPPI DEPARTMENT OF
ENVIRONMENTAL QUALITY

AGREED, this the ___ day of July, 2026.

MZX TECH LLC

BY: _____

TITLE: _____

STATE OF _____

COUNTY OF _____

PERSONALLY appeared before me, the undersigned authority in and for the jurisdiction aforesaid, the within named _____ who first being duly sworn, did state upon his/her oath and acknowledge to me that he/she is the _____ of MZX TECH LLC and is authorized to sign and enter this Agreement.

APPENDIX A

Unit	Unit Type	Control	Nameplate Capacity (MW)	Expected Local Power Output (MW)	Date Added
1	SMT-130	SCR + oxcat	16.48	13	8/1/2025
2	SMT-130	SCR + oxcat	16.48	13	8/1/2025
3	SMT-130	SCR + oxcat	16.48	13	8/1/2025
4	SMT-130	SCR + oxcat	16.48	13	8/18/2025
5	SMT-130	SCR + oxcat	16.48	13	8/19/2025
6	SMT-130	SCR + oxcat	16.48	13	8/20/2025
7	SMT-130	SCR + oxcat	16.48	13	8/21/2025
8	Gen 8 TM2500	Demin Water	30	30	8/19/2025
9	Gen 8 TM2500	Demin Water	30	30	8/23/2025

10	Gen 7 TM2500	Demin Water	25	25	8/28/2025
11	Gen 7 TM2500	Demin Water	25	25	8/28/2025
12	Gen 6 TM2500	Demin Water	25	22	8/26/2025
13	Gen 6 TM2500	Demin Water	25	22	8/26/2025
14	Gen 6 TM2500	Demin Water	25	22	8/27/2025
15	Gen 6 TM2500	Demin Water	25	22	8/28/2025
16	Gen 7 TM2500	Demin Water	25	25	8/28/2025
17	Gen 7 TM2500	Demin Water	25	25	8/29/2025
18	Gen 8 TM2500	Demin Water	30	25	8/25/2025
19	Gen 8 TM2500	Demin Water	30	25	12/18/2025
20	Gen 7 TM2500	Demin Water	25	25	12/18/2025
21	SMT-130	SCR + oxcat	16.48	13	11/30/2025
22	SMT-130	SCR + oxcat	16.48	13	11/30/2025
23	SMT-130	SCR + oxcat	16.48	13	11/30/2025
24	SMT-130	SCR + oxcat	16.48	13	12/3/2025

25	SMT-130	SCR + oxcat	16.48	13	12/5/2025
26	SMT-130	SCR + oxcat	16.48	13	12/7/2025
27	SMT-130	SCR + oxcat	16.48	13	1/6/2026
28	Gen 8 TM2500	Demin Water	30	30	3/25/2026
29	Gen 8 TM2500	Demin Water	30	30	5/2/2026
30	Gen 8 TM2500	Demin Water	30	30	4/3/2026
31	Gen 8 TM2500	Demin Water	30	30	3/25/2026
32	Gen 8 TM2500	Demin Water	30	30	4/27/2026
33	Gen 8 TM2500	Demin Water	30	30	3/27/2026
34	Mitsubishi FT8	Demin Water	30	30	3/24/2026
35	Mitsubishi FT8	Demin Water	30	30	3/25/2026
36	Mitsubishi FT8	Demin Water	30	30	3/25/2026
37	Mitsubishi FT8	Demin Water	30	30	3/25/2026
38	Mitsubishi FT8	Demin Water	30	30	4/3/2026
39	Mitsubishi FT8	Demin Water	30	30	4/3/2026

40	Mitsubishi FT8	Demin Water 30	30	4/23/2026
41	Mitsubishi FT8	Demin Water 30	30	4/28/2026
42	Gen 4 TM2500 (Savvi)	Demin Water 25	25	4/28/2026
43	Gen 4 TM2500 (Savvi)	Demin Water 25	25	4/28/2026
44	Gen 4 TM2500 (Savvi)	Demin Water 25	25	4/28/2026
45	Gen 4 TM2500 (Kratos)	Demin Water 20	20	5/1/2026
46	Gen 4 TM2500 (Kratos)	Demin Water 20	20	6/10/2026
47	Gen 4 TM2500	Demin Water 20	20	5/1/2026
48	Gen 8 TM2500	Demin Water 30	30	5/6/2026
49	Gen 8 TM2500	Demin Water 30	30	5/2/2026
50	Gen 8 TM2500	Demin Water 30	30	5/2/2026
51	Gen 8 TM2500	Demin Water 30	30	5/2/2026
52	Gen 8 TM2500	Demin Water 30	30	5/2/2026
53	Gen 8 TM2500	Demin Water 30	30	5/2/2026
54	Gen 6 TM2500	Demin Water 25	25	5/3/2026

55	Gen 6 TM2500	Demin Water 25	25	6/9/2026
56	Mitsubishi FT8	Demin Water 30	30	5/7/2026
57	Mitsubishi FT8	Demin Water 30	30	5/6/2026
58	Mitsubishi FT8	Demin Water 30	30	5/9/2026
59	Mitsubishi FT8	Demin Water 30	30	5/9/2026
60	Gen 6 TM2500	Demin Water 25	22	5/9/2026
61	Mitsubishi FT8	Demin Water 30	30	7/9/2026
62	Mitsubishi FT8	Demin Water 30	30	7/9/2026
63	Mitsubishi FT8	Demin Water 30	30	7/9/2026
64	Mitsubishi FT8	Demin Water 30	30	7/10/2026
65	Mitsubishi FT8	Demin Water 30	30	7/10/2026
66	Mitsubishi FT8	Demin Water 30	30	7/10/2026
67	Mitsubishi FT8	Demin Water 30	30	7/14/2026
68	Mitsubishi FT8	Demin Water 30	30	7/15/2026
69	Mitsubishi FT8	Demin Water 30	30	7/15/2026