

# ADEQ OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation No. 26:

Permit No. : 1725-AOP-RO

IS ISSUED TO:

Centerpoint Energy Gas Transmission Company  
Round Mountain Compressor Station  
13 miles Northeast of Morrilton  
Morrilton, AR 72110  
Conway County  
AFIN: 15-00068

THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:

AND

IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

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Michael Bonds  
Chief, Air Division

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Date

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Permit #: 1725-AOP-R0  
AFIN: 15-00068

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**Table 1 - List of Acronyms**

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
HP	Horsepower
lb/hr	Pound per hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO <sub>x</sub>	Nitrogen Oxide
PM	Particulate matter
PM <sub>10</sub>	Particulate matter smaller than ten microns
SNAP	Significant New Alternatives Program (SNAP)
SO <sub>2</sub>	Sulfur dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Ton per year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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**Section I: FACILITY INFORMATION**

PERMITTEE: Centerpoint Energy - Round Mountain Compressor Station

AFIN: 15-00068

PERMIT NUMBER: 1725-AR-2

FACILITY ADDRESS: 13 miles North East of Morrilton  
Morrilton, AR 72110

COUNTY: Conway

MAILING ADDRESS CenterPoint Gas Transmission Company  
P. O. Box 21734  
Shreveport, LA 71151

CONTACT POSITION: Laura L. Guthrie, Senior Environmental Specialist

TELEPHONE NUMBER: (318) 429-3706

REVIEWING ENGINEER: James G. Siganos, P.E.

UTM North - South (Y): Zone 15, 529.7

UTM East - West (X): Zone 15, 3910.1



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## **Section II: INTRODUCTION**

### **Summary of Permit Activity**

CenterPoint Energy Gas Transmission Company (CEGT) operates the Round Mountain Compressor Station. It is located approximately thirteen (13) miles Northeast of Morrilton in Conway County. The function of this compressor station is to compress natural gas from a gas pipeline transmission system for delivery to natural gas customers. The permittee is proposing to install an additional 4700 HP Solar Centaur natural gas fired turbine (designated as SN-07) which drives a natural gas compressor. The additional emissions from SN-07 will bring the total potential facility-wide emissions above the major source threshold for NO<sub>x</sub> and CO. The addition of SN-07 results in increased potential emissions at the facility as follows: NO<sub>x</sub> @128.9 tpy, CO @ 95.4 tpy, and VOC @ 5.5 tpy. The Compressor Station will become a major source of criteria pollutants and will be subject to Title V requirements. This permit # 1725-AOP-R0 will become the initial Title V Operating Air Permit. The only fuel to be used by the combustion equipment will be pipeline quality natural gas.

The 210 barrel entrained liquids storage tank (SN-02) was reclassified as an insignificant activity. According to the permittee, the 210 barrel pigging containment tank (SN-03) shown in the previous permit was never installed, and it was removed from the permit.

### **Process Description**

The Round Mountain Compressor Station (RMCS) utilizes one (1) 4700 HP Solar Centaur T-4700 natural gas-fired turbine (SN-01), one (1) 4700 HP Solar Centaur T-4702 natural gas-fired turbine (SN-07), and one (1) 64 HP emergency generator (SN-06). Other emission points associated with the facility include the station blowdown vents (SN-04) and the compressor blowdown vents (SN-05). These blowdown vents have been determined to be insignificant activities and are listed as such in Section V of this permit. The facility also has one (1) 210-bbl (8820 gal) waste product storage tank (SN-02) which is used to collect entrained liquids from the natural gas pipeline.

The RMCS receives natural gas at a pressure of 700 psig from the main gas pipeline. This gas enters the facility's main suction piping and is sent through the filter/separators to the compressor unit's suction piping to remove moisture from the gas stream. The filtered gas is then compressed to 900 psig by the 4700 HP turbine driven compressors (SN-01 and SN-07) before being routed back to the main pipeline for further transport.

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### **Regulations**

This facility is subject to regulation under the *Clean Air Act* as amended, the *Arkansas Water and Air Pollution Control Act*, the *Arkansas Air Pollution Control Code* (Regulation 18), the *Regulations of the Arkansas Plan of Implementation for Air Pollution Control* (Regulation 19), and the *Regulation of the Arkansas Operating Air Permit Program* (Regulation 26). The 4700 HP natural gas turbines SN-01 and SN-07 are also subject to regulation under 40 CFR Part 60, Subpart GG – *Standards of Performance for Stationary Gas Turbines*.



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The following table is a summary of emissions from the facility. The following table contains cross-references to the pages containing specific conditions and emissions for each source. This table, in itself, is not an enforceable condition of the permit.

**Table 2 – Emission Summary**

EMISSION SUMMARY						
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page	
			lb/hr	tpy		
Total Allowable Emissions		VOC	2.34	10.0	---	
		CO	58.1	178.4		
		NO <sub>x</sub>	52.4	227.1		
		HAPS	*Acetaldehyde	0.30		1.34
		*Formaldehyde	0.36	1.56		
SN-01	4700 hp Solar Centaur Natural Gas Turbine/Compressor  Model T-4700	VOC	1.1	4.9	9	
		CO	17.9	78.4		
		NO <sub>x</sub>	22.4	98.0		
		*Acetaldehyde	0.15	0.67		
		*Formaldehyde	0.15	0.65		
SN-02	Entrained Liquids Storage Tank (210 bbl)	Reclassified as an Insignificant Activity				
SN-06	64 hp Emergency Generator	VOC	0.1	0.1	13	
		CO	18.4	4.6		
		NO <sub>x</sub>	0.5	0.2		
SN-07	4700 hp Solar Centaur Natural Gas Turbine/Compressor  Model T-4702	VOC	1.2	5.0	11	
		CO	21.8	95.4		
		NO <sub>x</sub>	29.5	128.9		
		*Acetaldehyde	0.15	0.67		
		*Formaldehyde	0.21	0.91		

\*HAPs included in the VOC totals. Other HAPs are not included in any other totals unless specifically stated.

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### **Section III: PERMIT HISTORY**

Permit No. 1725-A was issued to NorAm Gas Transmission Company on December 10, 1996. This was the initial permit issued for this new facility. Permitted emission points included one (1) 4000 HP compressor engine, two 210 bbl tanks, one emergency electrical generator, and facility and compressor blowdown vents. Total annual emissions were permitted at: 7.5 tpy VOC, 26.7 tpy CO, and 66.5 tpy NO<sub>x</sub>.

Permit No. 1725-AR-1 was issued to NorAm Gas Transmission Company on November 6, 1998. This modification was issued in order to allow for the replacement of the existing 4000 hp compressor engine with a new 4700 hp turbine compressor engine. Additionally, the blowdown vent emission sources were moved to the permit's insignificant activities list at this time. No other changes occurred at the facility with this modification. Total annual emissions were permitted at: 4.5 tpy VOC, 83.0 tpy CO, and 98.0 tpy NO<sub>x</sub>.

Permit No. 1725-AR-2 was issued to CenterPoint Energy Gas Transmission Services on September 11, 2003. This is the second modification to the Minor Source Air Permit for this facility. This modification was issued in order to allow for the facility to operate year-round and to update the emission calculations from the natural gas turbine to incorporate test results which indicate that emissions from the unit are lower than had been previously estimated. This results in a decrease in hourly emission limitations for CO and NO<sub>x</sub> from this engine. CenterPoint requested that the annual emission limits for these two pollutants remain unchanged. VOC emissions have increased by 0.4 tpy due to updated calculations for year-round operation. Individual hazardous air pollutant emission limits are quantified for the first time with this modification at 0.67 tpy acetaldehyde and 0.65 tpy formaldehyde.



**Section IV: SPECIFIC CONDITIONS**

**SN-01 - Solar Centaur Turbine Engine**

**Source Description**

The purpose of the compressor station is to compress natural gas. The gas is sent to the compressors to be compressed, and delivered to the discharge piping system for pipeline transmission. The compressors are driven by Solar Centaur turbine engines (SN-01 & SN-07), which run on natural gas as a fuel and produce exhaust gases. These units are subject to 40 CFR 60, Subpart GG - Standards of Performance for Stationary Gas Turbines.

**Specific Conditions**

1. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition 7. [§19.501 et seq. of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control, effective February 15, 1999 (Regulation 19) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 3 – Maximum Criteria Emission Rates**

SN	Description	Pollutant	lb/hr	Tpy
01	4700 Hp Solar Centaur Natural Gas Turbine/Compressor, Model T-4700. Serial No.: 0923C41	VOC	1.1	4.9
		CO	17.9	78.4
		NO <sub>x</sub>	22.4	98.0

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition 7. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 4 – Maximum Non-Criteria Emission Rates**

SN	Description	Pollutant	lb/hr	Tpy
01	4700 Hp Solar Centaur Natural Gas Turbine/Compressor. Model T-4700 Serial No.: 0923C41	Acetaldehyde	0.15	0.67
		Formaldehyde	0.15	0.65

3. The permittee shall not exceed 5% opacity from source SN-01, as measured by EPA Reference Method 9. Compliance with this specific condition shall be demonstrated through compliance with Plantwide Condition 7. [§18.501 of Regulation 18 and 40 CFR Part 52, Subpart E]

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### **NSPS Requirements**

4. The gas turbine (SN-01) is subject to and shall comply with the provisions of 40 CFR Part 60 Subpart GG – *Standards of Performance for Stationary Gas Turbine*. (See Appendix A).
5. Nitrogen oxide (NO<sub>x</sub>) emissions from the gas turbine (SN-01) shall not exceed 230 parts per million (0.0230% by volume) on a dry basis at 15% oxygen. [§19.304 of Regulation 19 and 40 CFR §60.332(a)(2)]
6. Sulfur dioxide (SO<sub>2</sub>) emissions from the gas turbine (SN-01) shall not exceed 0.015 percent by volume on a dry basis at 15% oxygen. [§19.304 of Regulation 19 and 40 CFR §60.333(a)]
7. No fuel shall be burned in the gas turbine (SN-01) which contains sulfur in excess of 0.8 percent by weight. [§19.304 of Regulation 19 and 40 CFR §60.333(b)]
8. The permittee shall maintain documentation verifying the fuel used in SN-01 qualifies as natural gas: contains no more than 20 grains of total sulfur per 100 dscfs, is composed of at least 70% methane by volume or the fuel has a gross heating value between 950 and 1100 Btu/scf. Such documentation may involve a current valid purchase contract, tariff sheet, or transporting contract for the gaseous fuel, specifying the maximum total sulfur content is 20 grains per 100 dscf. Such documentation shall be maintained on-site and shall be made available to Department personnel upon request. [§19.304 of Regulation 19 and 40 CFR §60.334(h)(3)]

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**SN-07 - Solar Centaur Turbine Engine**

**Source Description**

The purpose of the compressor station is to compress natural gas. The gas is sent to the compressors to be compressed, and delivered to the discharge piping system for pipeline transmission. The compressors are driven by Solar Centaur turbine engines (SN-01 & SN-07), which run on natural gas as a fuel and produce exhaust gases. These units are subject to 40 CFR 60, Subpart GG - Standards of Performance for Stationary Gas Turbines.

**Specific Conditions**

- The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition 7. [§19.501 et seq. of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control, effective February 15, 1999 (Regulation 19) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 5 – Maximum Criteria Emission Rates**

SN	Description	Pollutant	lb/hr	Tpy
07	4700 Hp Solar Centaur Natural Gas Turbine/Compressor, Model T-4702.	VOC	1.2	5.0
		CO	21.8	95.4
		NO <sub>x</sub>	29.5	128.9

- The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition 7. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 6 – Maximum Non-Criteria Emission Rates**

SN	Description	Pollutant	lb/hr	Tpy
07	4700 Hp Solar Centaur Natural Gas Turbine/Compressor Model T-4702.	Acetaldehyde	0.15	0.67
		Formaldehyde	0.21	0.91

- The permittee shall not exceed 5% opacity from source SN-07 as measured by EPA Reference Method 9. Compliance with this specific condition shall be demonstrated through compliance with Plantwide Condition 7. [§18.501 of Regulation 18 and 40 CFR Part 52, Subpart E]

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### **NSPS Requirements**

12. The gas turbine (SN-07) is subject to and shall comply with the provisions of 40 CFR Part 60 Subpart GG – *Standards of Performance for Stationary Gas Turbine*. (See Appendix A).
13. Nitrogen oxide (NO<sub>x</sub>) emissions from the gas turbine (SN-07) shall not exceed 230 parts per million (0.0230% by volume) on a dry basis at 15% oxygen. [§19.304 of Regulation 19 and 40 CFR §60.332(a)(2)]
14. Sulfur dioxide (SO<sub>2</sub>) emissions from the gas turbine (SN-07) shall not exceed 0.015 percent by volume on a dry basis at 15% oxygen. [§19.304 of Regulation 19 and 40 CFR §60.333(a)]
15. No fuel shall be burned in the gas turbine (SN-07) which contains sulfur in excess of 0.8 percent by weight. [§19.304 of Regulation 19 and 40 CFR §60.333(b)]
16. The permittee shall maintain documentation verifying the fuel used in SN-07 qualifies as natural gas: contains no more than 20 grains of total sulfur per 100 dscfs, is composed of at least 70% methane by volume or the fuel has a gross heating value between 950 and 1100 Btu/scf. Such documentation may involve a current valid purchase contract, tariff sheet, or transporting contract for the gaseous fuel, specifying the maximum total sulfur content is 20 grains per 100 dscf. Such documentation shall be maintained on-site and shall be made available to Department personnel upon request. [§19.304 of Regulation 19 and 40 CFR §60.334(h)(3)]

### **Testing**

17. The permittee shall conduct a performance test on SN-07 within 60 days after achieving maximum production rate, but not later than 180 days after initial start-up. [§19.304 of Regulation 19 and 40 CFR §60.8]

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**SN-06 - Stand-by Generator Engine**

**Source Description**

The electric power emergency generator is driven by a 64 Hp natural gas fired engine. It will only be used during an emergency during an electrical outage.

18. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition 7. [§19.501 et seq. of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control, effective February 15, 1999 (Regulation 19) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 7**

SN	Description	Pollutant	lb/hr	Tpy
06	64 Hp Olympian stand-by emergency generator	VOC	0.1	0.1
		CO	18.4	4.6
		NO <sub>x</sub>	0.5	0.2

19. The permittee shall not operate the emergency generator (SN-06) in excess of 500 hours during any consecutive twelve-month period. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
20. The permittee shall maintain records of the hours of operation of the emergency generator (SN-06) which demonstrate compliance with Specific Condition #8. These records shall indicate the date for each occurrence when the generator is used, as well as the duration of the usage for each date. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
21. The permittee shall not exceed 5% opacity from source SN-06 as measured by EPA Reference Method 9. Compliance with this specific condition shall be demonstrated through compliance with Plantwide Condition 7. [§18.501 of Regulation 18 and 40 CFR Part 52, Subpart E]

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**Section V: COMPLIANCE PLAN AND SCHEDULE.**

CenterPoint Energy Gas Transmission Company – Round Mountain Compressor Station will continue to operate in compliance with those identified regulatory provisions. The facility shall examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

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## **Section VI: PLANTWIDE CONDITIONS**

1. The permittee will notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation No. 19 §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation No.19 §19.410(B) and 40 CFR Part 52, Subpart E]
3. The permittee must test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) New Equipment or newly modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start-up of the permitted source or (2) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee will submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation No.19 §19.702 and/or Regulation No. 18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. The permittee must provide: [Regulation No.19 §19.702 and/or Regulation No.18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
  - a. Sampling ports adequate for applicable test methods;
  - b. Safe sampling platforms;
  - c. Safe access to sampling platforms; and
  - d. Utilities for sampling and testing equipment.
5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee will maintain the equipment in good condition at all times. [Regulation No.19 §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation No. 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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7. The permittee shall only use pipeline quality natural gas to fire the turbine/compressor engines located at this facility. Pipeline quality natural gas is defined as gas which contains less than 0.3 grains/100 scf of H<sub>2</sub>S and that H<sub>2</sub>S constitutes greater than 50% by weight of the sulfur in the natural gas. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and 40 CFR 70.6].
  
8. The permittee shall conduct tests for NO<sub>x</sub> and CO on the turbine/compressor (SN-07) exhaust stack in accordance with Plantwide Condition #3 and every five years thereafter as shown in the table below. The permittee shall test the turbine/compressor exhaust stack (SN-01) for NO<sub>x</sub> and CO as shown in the table below. EPA Reference Method 20 shall be used to determine NO<sub>x</sub> and EPA Reference Method 10 shall be used to determine CO. Testing shall be performed with the turbine/compressor operating at or above 90% of its design capacity. If the tested emission rate for any pollutant is in excess of the permitted emission rate, the engine shall be tested for that pollutant. [§19.702 of Regulation 19 and 40 CFR Part 52, Subpart E]

**Table 8**

Compressor Engines	Last Date Tested	Remarks
SN-01 Solar Centaur natural gas fired turbine,  Model T – 4700  Serial No. 0923C41	2/18/03	Test SN-01 within 5 years of last date tested. Next test shall be performed on or before 2/18/08 and every five years thereafter.
SN-07 Solar Centaur natural gas fired turbine,  Model T - 4702	N/A	Test SN-07 within 60 days after achieving maximum production rate but not later than 180 days after initial start-up, and every five years thereafter.



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9. Pursuant to Regulation 19, section 19.705 and A.C.A. 8-4-203 as referenced by A.C.A. 8-4-304 and 8-4-311, the permittee may replace any existing turbine/compressor engine(s) (SN-01 or SN-07) on a temporary or permanent basis with an engine(s) that:

- Has the same or lower emission rate on a pound per hour basis;
- Has the same or lower horsepower.

The permittee shall conduct NO<sub>x</sub> and CO emission testing within 90 days of the date of replacement to verify the emissions from the newly installed engine. This testing shall be conducted in accordance with EPA Reference Methods 20 for NO<sub>x</sub> and Method 10 for CO. The permittee shall notify ADEQ of the replacement within 30 days of startup. Notwithstanding the above, as provided by Regulation 26, in the event an emergency occurs, the permittee shall have an affirmative defense of emergency to an action brought for non-compliance with technology-based emission limitations if the conditions of Regulation 26, Section 26.707 are met.

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## **Title VI Provisions**

10. The permittee must comply with the standards for labeling of products using ozone-depleting substances. [40 CFR Part 82, Subpart E]
  - a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
  - b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
  - d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
11. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]
  - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. (“MVAC-like appliance” as defined at §82.152.)
  - e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
  - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
12. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.

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13. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant.

14. The permittee can switch from any ozone-depleting substance to any alternative listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, "Significant New Alternatives Policy Program".

**Permit Shield**

15. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements, as of the date of permit issuance, included in and specifically identified in Table 8 - Applicable Regulations of this condition. The permit specifically identifies the following as applicable requirements based upon the information submitted by the permittee in an application received by the Department on February 20, 2004.

**Table 9- Applicable Regulations**

SN.	Regulation	Description
Facility	Arkansas Regulation #19	Compilation of Regulations of the Arkansas State Implementation Plan for Air Pollution Control
Facility	Arkansas Regulation #26	Regulations of the Arkansas Operating Air Permits Program
SN-01 and SN-07	Standards of Performance for New Stationary Sources (NSPS)	Sources are subject to and must comply with 40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbines.

The permit specifically identifies the following as inapplicable based upon information submitted by the permittee in an application dated October 2003.

**Table 10 - Inapplicable Regulations**

Source No.	Regulation	Description	Basis for determination
Facility	Regulation 19.8	Regulations for 111(d) designated facility	This facility is not identified in the list of designated facilities.
Facility	Regulation 19.9	Prevention of Significant Deterioration	Facility is not a PSD source.
Facility	Regulation 19.10	Regulations for the	This facility is not located in an ozone

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Source No.	Regulation	Description	Basis for determination
		control of volatile organic compounds	maintenance area (Pulaski County)
Facility	Regulation 26.304	Emission units subject to permitting	This rule applies only to state and federal agencies
Facility	Regulation 26.402	Standard application form and required information	This rule applies only to state and federal agencies
Facility	Regulation 26.501-504	Actions on applications	This rule applies only to state and federal agencies
Facility	Regulation 26.601	Permit review	This rule applies only to state and federal agencies
Facility	Regulation 26.1201	Regulations for acid rain sources	This facility is not in this source category.
Facility	40 CFR 62	State plans for designate facilities	This rule is administrative and procedural
Facility	40 CFR 63	National Emission standards for hazardous air pollutants.	This facility is not in any source category as of the effective date of this permit.
Facility	40 CFR 72	Acid rain Permits	This facility is not in this source category
Facility	40 CFR 79	Registration of fuels and fuel additives	This facility is not in this source category
Facility	40 CFR 80	Registration of fuels and fuel additives	This facility is not in this source category
Facility	40 CFR 80.304	Non - Attainment	This facility is not in a non-attainment area.

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### **Section VII: INSIGNIFICANT ACTIVITIES**

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement is a significant activity even if this activity meets the criteria of §304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application received by the Department on February 20, 2004 and subsequent e-mail dated June 25, 2004

**Table 11 - Insignificant Activities**

<b>Description</b>	<b>Category</b>
210 barrel entrained liquids, produced water, storage tank (former SN-02)	A-13
Facility blowdown vents (former SN-04)	A-13
Turbine blowdown vents (former SN-05)	A-13

Pursuant to §26.304 of Regulation 26, the Department determined the emission units, operations, or activities contained in Regulation 19, Appendix A, Group B, to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.

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### Section VIII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation No. 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.[40 CFR 70.6(b)(2)]
2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective August 10, 2000]
3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due. [Regulation No. 26 §26.406]
4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation No. 26 §26.701(A)(2)]
5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and Regulation No. 26 §26.701(C)(2)]
  - a. The date, place as defined in this permit, and time of sampling or measurements;
  - b. The date(s) analyses performed;
  - c. The company or entity performing the analyses;
  - d. The analytical techniques or methods used;
  - e. The results of such analyses; and
  - f. The operating conditions existing at the time of sampling or measurement.

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6. The permittee must retain the records of all required monitoring data and support information for at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [40 CFR 70.6(a)(3)(ii)(B) and Regulation No. 26 §26.701(C)(2)(b)]
7. The permittee must submit reports of all required monitoring every six (6) months. If permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due within thirty (30) days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26 §26.2 must certify all required reports. The permittee will send the reports to the address below: [40 C.F.R. 70.6(a)(3)(iii)(A) and §26.701(C)(3)(a) of Regulation #26]

Arkansas Department of Environmental Quality  
Air Division  
ATTN: Compliance Inspector Supervisor  
Post Office Box 8913  
Little Rock, AR 72219

8. The permittee will report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit. The permittee will make an initial report to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include: [40 CFR 70.6(a)(3)(iii)(B), Regulation #26 §26.701(C)(3)(b), and Regulation #19 §19.601 and §19.602]
  - a. The facility name and location,
  - b. The process unit or emission source deviating from the permit limit,
  - c. The permit limit, including the identification of pollutants, from which deviation occurs,
  - d. The date and time the deviation started,
  - e. The duration of the deviation,
  - f. The average emissions during the deviation,
  - g. The probable cause of such deviations,
  - h. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
  - i. The name of the person submitting the report.

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The permittee will make a full report in writing to the Department within five (5) business days of discovery of the occurrence. The report must include, in addition to the information required by the initial report, a schedule of actions taken or planned to eliminate future occurrences and/or to minimize the amount the permit's limits were exceeded and to reduce the length of time the limits were exceeded. The permittee may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence, and the report will serve as both the initial report and full report. [40 CFR 70.6(a)(3)(iii)(B), Regulation No. 26 §26.701(C)(3)(b), Regulation No. 19 §19.601 and §19.602]

9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable. [40 CFR 70.6(a)(5), §26.701(E) of Regulation No. 26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311]
10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation No. 26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. §7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation No. 26 §26.701(F)(1)]
11. 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 to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation No. 26 §26.701(F)(2)]
12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation No. 26 §26.701(F)(3)]
13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation No. 26 §26.701(F)(4)]
14. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director 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 must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation No. 26 §26.701(F)(5)]
15. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [40 CFR 70.6(a)(7) and Regulation No. 26 §26.701(G)]



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16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation No. 26 §26.701(H)]
17. If the permit allows different operating scenarios, the permittee will, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation No. 26 §26.701(I)(1)]
18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation No. 26 §26.702(A) and (B)]
19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation No. 26 §26.2. [40 CFR 70.6(c)(1) and Regulation No. 26 §26.703(A)]
20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation No. 26 §26.703(B)]
  - a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.
21. The permittee will submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation No. 26 §26.703(E)(3)]
  - e. The identification of each term or condition of the permit that is the basis of the certification;

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- f. The compliance status;
- g. Whether compliance was continuous or intermittent;
- a. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
- b. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.

22. Nothing in this permit will alter or affect the following: [Regulation No. 26 §26.704(C)]

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

23. This permit authorizes only those pollutant-emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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## **APPENDIX A**