

# ADEQ DRAFT OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation 26:

Permit No. : 1204-AOP-R3  
[Renewal # 2]  
IS ISSUED TO:

CenterPoint Energy Gas Transmission Company - Walker Compressor  
Station  
334 West Hwy 96 Cecil, AR 72930  
Ozark, AR 72930  
Franklin County  
AFIN: 24-00081

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

THE PERMITTEE IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

\_\_\_\_\_  
Mike Bates  
Chief, Air Division

\_\_\_\_\_  
Date

CenterPoint Energy Gas Transmission Company - Walker Compressor Station  
Permit #: 1204-AOP-R3  
AFIN: 24-00081

Table of Contents

<b>SECTION I: FACILITY INFORMATION</b> .....	4
<b>SECTION II: INTRODUCTION</b> .....	5
<b>Summary of Permit Activity</b> .....	5
<b>Process Description</b> .....	5
<b>Regulations</b> .....	6
<b>Emission Summary</b> .....	7
<b>SECTION III: PERMIT HISTORY</b> .....	10
<b>SECTION IV: SPECIFIC CONDITIONS</b> .....	11
SN-04 through SN-07 .....	11
<b>SECTION V: COMPLIANCE PLAN AND SCHEDULE</b> .....	14
<b>SECTION VI: PLANTWIDE CONDITIONS</b> .....	15
<b>Title VI Provisions</b> .....	17
<b>SECTION VII: INSIGNIFICANT ACTIVITIES</b> .....	19
<b>SECTION VIII: GENERAL PROVISIONS</b> .....	20
Appendix A: 40 CFR Part 63 Subpart HH	

CenterPoint Energy Gas Transmission Company - Walker Compressor Station  
Permit #: 1204-AOP-R3  
AFIN: 24-00081

#### List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
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	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

CenterPoint Energy Gas Transmission Company - Walker Compressor Station  
Permit #: 1204-AOP-R3  
AFIN: 24-00081

**SECTION I: FACILITY INFORMATION**

PERMITTEE: CenterPoint Energy Gas Transmission Company - Walker  
Compressor Station

AFIN: 24-00081

PERMIT NUMBER: 1204-AOP-R3

FACILITY ADDRESS: 334 West Hwy 96 Cecil, AR 72930  
Ozark, AR 72930

MAILING ADDRESS: P.O. Box 21734  
Shreveport, LA 71151

COUNTY: Franklin County

CONTACT NAME: Lacey Ivey

CONTACT POSITION: Environmental Specialist

TELEPHONE NUMBER: 318-429-3297

REVIEWING ENGINEER: Ambrosia Brown

UTM North South (Y): Zone 15: 3922273.84 m

UTM East West (X): Zone 15: 413786.45 m

CenterPoint Energy Gas Transmission Company - Walker Compressor Station  
Permit #: 1204-AOP-R3  
AFIN: 24-00081

## **SECTION II: INTRODUCTION**

### **Summary of Permit Activity**

CenterPoint Energy Gas Transmission Company operates a natural gas compressor station, Walker Compressor Station, which is located about ½ mile west of Cecil off State Highway 96 in Franklin County, Arkansas. This permit is being issued in order to renew the Title V permit for the facility and to change the glycol dehydrator from an insignificant activity to an emission source. Stack tests confirm that the previous permitted emissions limits for NO<sub>x</sub> and CO have not exceeded and these limits will be maintained. The resulting increases in the annual permitted emissions are 0.2 tpy PM/PM<sub>10</sub>, 0.1 tpy SO<sub>2</sub>, 0.8 tpy VOC, 0.3 tpy CO, and 0.4 tpy NO<sub>x</sub>.

### **Process Description**

The compressor station receives natural gas from a pipeline, dehydrates, pressurizes, and returns it to the pipeline. Sources of significant emissions at the Walker Compressor Station include three (3) 750 hp Worthington SLHC-8 compressor engines (SN-04 through SN-06) and one (1) 880 hp Worthington SLHC-8A compressor engine (SN-07). The only fuel used by the combustion equipment is pipeline quality natural gas.

Prior to routing the natural gas to the compressors, the gas is first passed through a scrubber and separator. After compression the natural gas is dehydrated by passing through a dehydration unit (SN-08) which uses triethylene glycol. The glycol is regenerated by boiling off the absorbed water in the dehydration unit regenerator. The dehydrator is owned and operated by CenterPoint Energy Field Services, Inc. Condensate/pipeline liquids are stored in the produced water tank and removed from the station via tanker truck when necessary. Piping components are a source of fugitive emissions.

Support activities include natural gas venting (blowdowns) and fugitive component leaks. Support equipment includes one (1) dehydration unit reboiler, glycol regenerator vent, one (1) waste water tank, one (1) lube oil tank, one (1) waste oil tank, one (1) fresh water storage tank, one (1) naphtha tank, and one (1) antifreeze tank. Oil is used for lubricating purposes only. These activities and units are considered to be de minimis emission sources. Low pressure pipeline gas is pulled off line into the compressor station, and is then depressurized with reciprocating engine powered compressors and placed back into the transmission system

CenterPoint Energy Gas Transmission Company - Walker Compressor Station  
Permit #: 1204-AOP-R3  
AFIN: 24-00081

### Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective January 25, 2009
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective July 18, 2009
Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective January 25, 2009
NESHAP: The glycol dehydrator unit is subject to limited requirements of Title 40 CFR Part 63, Subpart HH

**Emission Summary**

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
Total Allowable Emissions		PM	0.5	1.5
		PM <sub>10</sub>	0.5	1.5
		SO <sub>2</sub>	0.5	0.5
		VOC	3.5	13.8
		CO	21.0	91.9
		NO <sub>x</sub>	81.5	357.3
HAPs		Total HAPs	1.86	7.44
Air Contaminants **		Acetaldehyde*	0.25	0.89
		Acrolein*	0.15	0.57
		Benzene*	0.05	0.09
		Formaldehyde*	1.29	5.57
		Methanol*	0.09	0.29
		Dichlorobenzene*	0.01	0.01
		Napthalene*	0.01	0.01
04 750 hp Worthington SLHC-8 Compressor Engine		PM	0.1	0.4
		PM <sub>10</sub>	0.1	0.4
		SO <sub>2</sub>	0.1	0.1
		VOC	0.9	3.8
		CO	5.0	21.9
		NO <sub>x</sub>	19.5	85.5
		Acetaldehyde*	0.06	0.24
		Acrolein*	0.04	0.15
		Benzene*	0.01	0.02
		Formaldehyde*	0.35	1.53
		Methanol*	0.02	0.08

CenterPoint Energy Gas Transmission Company - Walker Compressor Station  
 Permit #: 1204-AOP-R3  
 AFIN: 24-00081

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
05	750 hp Worthington SLHC-8 Compressor Engine	PM	0.1	0.3
		PM <sub>10</sub>	0.1	0.3
		SO <sub>2</sub>	0.1	0.1
		VOC	0.8	3.1
		CO	5.0	21.9
		NO <sub>x</sub>	19.5	85.5
		Acetaldehyde*	0.06	0.20
		Acrolein*	0.03	0.13
		Benzene*	0.01	0.02
		Formaldehyde*	0.29	1.27
		Methanol*	0.02	0.06
06	750 hp Worthington SLHC-8 Compressor Engine	PM	0.1	0.3
		PM <sub>10</sub>	0.1	0.3
		SO <sub>2</sub>	0.1	0.1
		VOC	0.8	3.1
		CO	5.0	21.9
		NO <sub>x</sub>	19.5	85.5
		Acetaldehyde*	0.06	0.20
		Acrolein*	0.03	0.13
		Benzene*	0.01	0.02
		Formaldehyde*	0.29	1.27
		Methanol*	0.02	0.06
07	880 hp Worthington SLHC-8A Compressor Engine	PM	0.1	0.4
		PM <sub>10</sub>	0.1	0.4
		SO <sub>2</sub>	0.1	0.1
		VOC	0.9	3.7
		CO	5.9	25.9
		NO <sub>x</sub>	22.9	100.4
		Acetaldehyde*	0.06	0.24
		Acrolein*	0.04	0.15
		Benzene*	0.01	0.02
		Formaldehyde*	0.35	1.49
		Methanol*	0.02	0.08

CenterPoint Energy Gas Transmission Company - Walker Compressor Station  
 Permit #: 1204-AOP-R3  
 AFIN: 24-00081

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
08	Glycol Dehydration Unit 0.75 MM Btu/hr Reboiler	PM	0.1	0.1
		PM <sub>10</sub>	0.1	0.1
		SO <sub>2</sub>	0.1	0.1
		VOC	0.1	0.1
		CO	0.1	0.3
		NO <sub>x</sub>	0.1	0.4
		Benzene*	0.01	0.01
		Dichlorobenzene*	0.01	0.01
		Formaldehyde*	0.01	0.01
		Napthalene*	0.01	0.01
		Toluene*	0.01	0.01

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

\*\*Air Contaminants such as ammonia, acetone, and certain halogenated solvents are not VOCs or HAPs.

CenterPoint Energy Gas Transmission Company - Walker Compressor Station  
Permit #: 1204-AOP-R3  
AFIN: 24-00081

### **SECTION III: PERMIT HISTORY**

The facility has been in existence since 1961.

The first air permit #1204-A was issued in October, 1991. The permit did not address any modification to the existing facility. The permit included the following sources: SN-01 through SN-07. All equipment was permitted to be operated 8760 hours per year. The permitted emissions included VOC, CO, and NOX.

In October, 1995, the facility was issued permit #1204-AR-1. The permit was modified to include sources not previously permitted: SN-08 through SN-14. The permit modification did not involve any physical change or change in the method of operation at the compressor station.

Air Permit 1204-AOP-R0 was issued on August 30, 1999. This was the first Title V Operating Permit for the facility. The facility was subject to Title V because NO<sub>x</sub> emissions are greater than 100 tons per year.

Permit 1204-AOP-R1 was issued on November 5, 2004. This Title V air permit renewal revised PM/PM<sub>10</sub>, SO<sub>2</sub>, and HAPs emission limits of the five compressor engines by using the USEPA AP-42 emission factors. The stack testing schedule for the compressor engines was also clarified. There were no physical changes or changes in the method of operation at the facility.

Permit 1204-AOP-R2 was issued on August 22, 2005. This permit was issued in order to revise the language of engine replacement flexibility and the agreed upon changes in the Permit Appeal Resolution (PAR). There were no physical or operational changes with this permitting action.

**SECTION IV: SPECIFIC CONDITIONS**

SN-04 through SN-07

Three (3) 750 hp Worthington SLHC-8 Compressor Engines and  
 one (1) 880 hp Worthington SLHC-8A Compressor Engines

Source Description

Pipeline quality natural gas is used as fuel at all compressor engines. SN-04 and SN-05 were installed in 1961. SN-06 was installed in 1964, and SN-07 was installed in 1970. All compressors have 4-stroke lean-burn engines. These compressor engines are capable of running at 105% of their rated capacity and are being permitted to do so.

Specific Conditions

- The permittee shall not exceed the emission rates set forth in the following table.  
 [Regulation 19, §19.501 et seq., and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
04	750 hp Worthington SLHC-8 Compressor Engine	PM <sub>10</sub>	0.1	0.4
		SO <sub>2</sub>	0.1	0.1
		VOC	0.9	3.8
		CO	5.0	21.9
		NO <sub>x</sub>	19.5	85.5
05	750 hp Worthington SLHC-8 Compressor Engine	PM <sub>10</sub>	0.1	0.3
		SO <sub>2</sub>	0.1	0.1
		VOC	0.8	3.1
		CO	5.0	21.9
		NO <sub>x</sub>	19.5	85.5
06	750 hp Worthington SLHC-8 Compressor Engine	PM <sub>10</sub>	0.1	0.3
		SO <sub>2</sub>	0.1	0.1
		VOC	0.8	3.1
		CO	5.0	21.9
		NO <sub>x</sub>	19.5	85.5

CenterPoint Energy Gas Transmission Company - Walker Compressor Station  
 Permit #: 1204-AOP-R3  
 AFIN: 24-00081

SN	Description	Pollutant	lb/hr	tpy
07	880 hp Worthington SLHC-8A Compressor Engine	PM <sub>10</sub>	0.1	0.4
		SO <sub>2</sub>	0.1	0.1
		VOC	0.9	3.7
		CO	5.9	25.9
		NO <sub>x</sub>	22.9	100.4
08	Glycol Dehydration Unit 0.75 MM Btu/hr Reboiler	PM <sub>10</sub>	0.1	0.1
		SO <sub>2</sub>	0.1	0.1
		VOC	0.1	0.1
		CO	0.1	0.3
		NO <sub>x</sub>	0.1	0.4

2. The permittee shall not exceed the emission rates set forth in the following table.  
 [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
04	750 hp Worthington SLHC-8 Compressor Engine	PM	0.1	0.4
		Acetaldehyde*	0.06	0.24
		Acrolein*	0.04	0.15
		Benzene*	0.01	0.02
		Formaldehyde*	0.35	1.53
		Methanol*	0.02	0.08
05	750 hp Worthington SLHC-8 Compressor Engine	PM	0.1	0.3
		Acetaldehyde*	0.06	0.20
		Acrolein*	0.03	0.13
		Benzene*	0.01	0.02
		Formaldehyde*	0.29	1.27
		Methanol*	0.02	0.06
06	750 hp Worthington SLHC-8 Compressor Engine	PM	0.1	0.3
		Acetaldehyde*	0.06	0.20
		Acrolein*	0.03	0.13
		Benzene*	0.01	0.02
		Formaldehyde*	0.29	1.27
		Methanol*	0.02	0.06
07	880 hp Worthington SLHC-8A Compressor Engine	PM	0.1	0.4
		Acetaldehyde*	0.06	0.24
		Acrolein*	0.04	0.15
		Benzene*	0.01	0.02
		Formaldehyde*	0.35	1.49
		Methanol*	0.02	0.08

CenterPoint Energy Gas Transmission Company - Walker Compressor Station  
 Permit #: 1204-AOP-R3  
 AFIN: 24-00081

SN	Description	Pollutant	lb/hr	tpy
08	Glycol Dehydration Unit 0.75 MM Btu/hr Reboiler	PM	0.1	0.1
		Benzene*	0.01	0.01
		Dichlorobenzene*	0.01	0.01
		Formaldehyde*	0.01	0.01
		Napthalene*	0.01	0.01
		Toluene*	0.01	0.01

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

- Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. The permittee will demonstrate compliance with this condition by Plantwide Condition No. 6.

SN	Limit	Regulatory Citation
04, 05, 06, 07 and 08	5%	§18.501

CenterPoint Energy Gas Transmission Company - Walker Compressor Station  
Permit #: 1204-AOP-R3  
AFIN: 24-00081

#### **SECTION V: COMPLIANCE PLAN AND SCHEDULE**

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

## SECTION VI: PLANTWIDE CONDITIONS

1. The permittee shall 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 19, §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by A.C.A. §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 19, §19.410(B) and 40 CFR Part 52, Subpart E]
3. The permittee must test any equipment scheduled for testing, unless otherwise 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 shall submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation 19, §19.702 and/or Regulation 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:
  - 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.

[Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee shall maintain the equipment in good condition at all times. [Regulation 19, §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. Pipeline quality natural gas shall be the only fuel used to fire the compressor engines at this facility. [Regulation No.19 §19.705 and/or Regulation No. 18 §18.1004, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR 70.6]

7. The permittee shall simultaneously conduct tests for CO and NO<sub>x</sub> on the compressor engines every 5 years in accordance with Plantwide Condition 3 and the schedule set forth in the following table. EPA Reference Method 10 and 7E shall be used for CO and NO<sub>x</sub>, respectively. The permittee shall test the engine within 90% of its rated capacity. If the engine is not tested within this range, the permittee shall be limited to operating within 10% above the tested rate. The Department reserves the right to select the engine(s) to be tested. The engine(s) tested shall be rotated so that no such engine(s) is tested twice before another similar (make and model) engine of equal horsepower is tested once. If the tested emission rate for any pollutant is in excess of the permitted emission rate, all similar (make and model) engines shall be tested for that pollutant. The records of testing are to be kept on site and provided to Department personnel upon request. [Regulation No.19 §19.702, and 40 CFR Part 52, Subpart E]

**Testing**

SN	Description	Testing Requirement
04, 05, and 06	750 HP Worthington SLHC-8 Compressor Engines	The permittee will be required to test two (2) within the specified time frame* and the other one (1) within five years
07	880 HP Worthington SLHC-8A Compressor Engine	Every five years

*The existing time frame was established by Air Permit 1204-AOP-R0.*

8. The permittee may replace any existing engines on a temporary or permanent basis with an engine(s) that has the same or lower emission rates on a pound per hour basis; has the same or lower horsepower; and which replacement does not result in a significant emissions increase as defined and applied pursuant to 40 CFR 52.21, and as set out below:
- a. The permittee shall notify ADEQ of the replacement within 30 days after the replacement is made, which notification shall identify the previous and replacement engines, and provide the reason why the replacement was necessary. If applicable, the notification shall also provide a permit application and, when required, a CAM plan under 40 CFR Part 64.
  - b. 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(s). The testing shall be conducted in accordance with EPA Reference Method 7E for NO<sub>x</sub> and EPA Reference Method 10 for CO.
  - c. 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 limitations if the conditions of Regulation 26, §26.707 are met.

[Regulation No.19 §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, §19.304 and 40 CFR Part 64]

CenterPoint Energy Gas Transmission Company - Walker Compressor Station  
Permit #: 1204-AOP-R3  
AFIN: 24-00081

9. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation 26 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. The permittee shall use good maintenance practices to control emissions from valves, fittings, flanges, seals and other associated equipment. [Regulation 19, §19.303 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

#### **Title VI Provisions**

11. 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.
12. 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.

CenterPoint Energy Gas Transmission Company - Walker Compressor Station  
Permit #: 1204-AOP-R3  
AFIN: 24-00081

13. 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.
14. 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.

15. 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.

#### **NESHAP requirements**

16. The actual average emissions of benzene from the glycol dehydration unit (SN-08) process vent to the atmosphere must be less than 1 tpy as demonstrated by NESHAP requirement #17. [40 CFR Part 63 Subpart HH § 63.764(e)(1)(ii)]
17. The permittee shall determine actual average benzene emissions of SN-08 using the model GRI-GLYCalc<sup>TM</sup>, Version 3.0 or higher, and the procedures presented in the associated GRI- GLYCalc<sup>TM</sup>, Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled “Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions” (GRI-95/0368). [40 CFR Part 63 Subpart HH, §63.772 (b)(2)]
18. The permittee shall maintain records of the actual average benzene emissions from the glycol dehydration unit (SN-08) as determined by NESHAP requirement #17. The records are to be updated upon any modification of conditions or throughput of the glycol dehydration unit that may result in a change in benzene emissions. These records are to be kept on site and provided to Department personnel upon request. [40 CFR Part 63 Subpart HH, §63.774(d)(1)]

CenterPoint Energy Gas Transmission Company - Walker Compressor Station  
 Permit #: 1204-AOP-R3  
 AFIN: 24-00081

**SECTION VII: INSIGNIFICANT ACTIVITIES**

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §26.304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated May 4, 2009.

Description	Category
8,820 gallons waste oil storage tank	A-3
8,820 gallons lube oil storage tank	A-3
8,820 gallons waste water storage tank	A-3
500 gallons naphtha tank	A-3
1,500 gallons antifreeze storage tank	A-3
Compressors blowdowns	A-13
Fugitive emissions	A-13

### SECTION VIII: GENERAL PROVISIONS

1. 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 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)]
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 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 26, §26.701(A)(2)]
5. The permittee must maintain the following records of monitoring information as required by this permit.
  - 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.

[40 CFR 70.6(a)(3)(ii)(A) and Regulation 26, §26.701(C)(2)]

CenterPoint Energy Gas Transmission Company - Walker Compressor Station  
Permit #: 1204-AOP-R3  
AFIN: 24-00081

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 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:

Arkansas Department of Environmental Quality  
Air Division  
ATTN: Compliance Inspector Supervisor  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

[40 C.F.R. 70.6(a)(3)(iii)(A) and Regulation 26, §26.701(C)(3)(a)]

8. The permittee shall report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.
  - a. For all upset conditions (as defined in Regulation 19, § 19.601), 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:
    - i. The facility name and location;
    - ii. The process unit or emission source deviating from the permit limit;
    - iii. The permit limit, including the identification of pollutants, from which deviation occurs;
    - iv. The date and time the deviation started;
    - v. The duration of the deviation;
    - vi. The average emissions during the deviation;
    - vii. The probable cause of such deviations;
    - viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future; and
    - ix. The name of the person submitting the report.

The permittee shall 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.

- b. For all deviations, the permittee shall report such events in semi-annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 8a above. The semi-annual report must include all the information as required by the initial and full reports required in 8a.

[Regulation 19, §19.601 and §19.602, Regulation 26, §26.701(C)(3)(b), and 40 CFR 70.6(a)(3)(iii)(B)]

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), Regulation 26, §26.701(E), and A.C.A. §8-4-203 as referenced by A.C.A. §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 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 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 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 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 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 26, §26.701(F)(5)]
15. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [40 CFR 70.6(a)(7) and Regulation 26, §26.701(G)]
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 26, §26.701(H)]
17. If the permit allows different operating scenarios, the permittee shall, 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 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 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 26, §26.2. [40 CFR 70.6(c)(1) and Regulation 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 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 shall 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 26, §26.703(E)(3)]
  - a. The identification of each term or condition of the permit that is the basis of the certification;
  - b. The compliance status;
  - c. Whether compliance was continuous or intermittent;
  - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
  - e. 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 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 A.C.A. §8-4-304 and §8-4-311]
24. The permittee may request in writing and at least 15 days in advance of the deadline, an extension to any testing, compliance or other dates in this permit. No such extensions are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion in the following circumstances:
  - a. Such an extension does not violate a federal requirement;
  - b. The permittee demonstrates the need for the extension; and
  - c. The permittee documents that all reasonable measures have been taken to meet the current deadline and documents reasons it cannot be met.

CenterPoint Energy Gas Transmission Company - Walker Compressor Station  
Permit #: 1204-AOP-R3  
AFIN: 24-00081

[Regulation 18, §18.314(A), Regulation 19, §19.416(A), Regulation 26, §26.1013(A), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

25. The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Department approval. Any such emissions shall be included in the facility's total emissions and reported as such. The Department may grant such a request, at its discretion under the following conditions:

- a. Such a request does not violate a federal requirement;
- b. Such a request is temporary in nature;
- c. Such a request will not result in a condition of air pollution;
- d. The request contains such information necessary for the Department to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
- e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
- f. The permittee maintains records of the dates and results of such temporary emissions/testing.

[Regulation 18, §18.314(B), Regulation 19, §19.416(B), Regulation 26, §26.1013(B), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

26. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion under the following conditions:

- d. The request does not violate a federal requirement;
- e. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
- f. Any such request, if approved, is incorporated in the next permit modification application by the permittee.

[Regulation 18, §18.314(C), Regulation 19, §19.416(C), Regulation 26, §26.1013(C), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]