

# ADEQ DRAFT OPERATING AIR PERMIT

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

Permit No. : 1513-AOP-R3  
Renewal # 2  
IS ISSUED TO:

CenterPoint Energy - Mississippi River Transmission Corp. - Biggers  
Compressor Station  
278 Gas Plant Road  
Biggers, AR 72413  
Randolph County  
AFIN: 61-00076

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

Table of Contents

|   |    |
|---|----|
| SECTION I: FACILITY INFORMATION .....               | 4  |
| SECTION II: INTRODUCTION.....                       | 5  |
| Summary of Permit Activity .....                    | 5  |
| Process Description.....                            | 5  |
| Regulations .....                                   | 5  |
| Emission Summary .....                              | 6  |
| SECTION III: PERMIT HISTORY.....                    | 10 |
| SECTION IV: SPECIFIC CONDITIONS.....                | 11 |
| 1,100 Hp Natural Gas Compressors.....               | 11 |
| SN-01, SN-02, & SN-04 Natural Gas Compressors ..... | 11 |
| 1,000 Hp Natural Gas Compressors.....               | 13 |
| SN-05, SN-06, & SN-07 Natural Gas Compressors ..... | 13 |
| Miscellaneous .....                                 | 15 |
| SN-09 300 Hp Generator Engine .....                 | 15 |
| SN-11 5,850 Hp Turbine.....                         | 17 |
| SN-12 64 Hp Generator Engine .....                  | 19 |
| SECTION V: COMPLIANCE PLAN AND SCHEDULE.....        | 21 |
| SECTION VI: PLANTWIDE CONDITIONS.....               | 22 |
| Title VI Provisions .....                           | 24 |
| SECTION VII: INSIGNIFICANT ACTIVITIES.....          | 26 |
| SECTION VIII: GENERAL PROVISIONS .....              | 27 |
| Appendix A – 40 CFR 60, Subpart GG                  |    |

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 - Mississippi River Transmission Corp. - Biggers Compressor Station  
Permit #: 1513-AOP-R3  
AFIN: 61-00076

SECTION I: FACILITY INFORMATION

PERMITTEE: CenterPoint Energy - Mississippi River Transmission Corp.  
- Biggers Compressor Station

AFIN: 61-00076

PERMIT NUMBER: 1513-AOP-R3

FACILITY ADDRESS: 278 Gas Plant Road  
Biggers, AR 72413

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

COUNTY: Randolph County

CONTACT NAME: Lacey Ivey

CONTACT POSITION: Environmental Specialist

TELEPHONE NUMBER: 318-429-3297

REVIEWING ENGINEER: Joseph Hurt

UTM North South (Y): Zone 15: 4021557.33 m

UTM East West (X): Zone 15: 695028.04 m

## SECTION II: INTRODUCTION

### Summary of Permit Activity

CenterPoint Energy - Mississippi River Transmission Corporation owns and operates the Biggers Natural Gas Compressor Station which is located in Biggers, Randolph County, Arkansas. This is the second Title V renewal for the facility. The facility has requested to add a 4,700 gallon wastewater storage tank to the A-3 Insignificant Activities list as an Administrative Amendment. The total permitted emissions include 4.9 tpy of PM/PM<sub>10</sub>, 1.4 tpy of SO<sub>2</sub>, 11 tpy of VOC, 1230.7 tpy of CO, and 1205.3 tpy of NO<sub>x</sub>.

### Process Description

Friction losses cause a drop in pressure in natural gas pipelines. To maintain flow, gas must be removed from the pipeline, compressed, and returned to the pipeline. The pressure is increased by compressors which are driven by natural gas fired reciprocating engines and/or turbines; then it is piped back into the transmission system. Prior to compression, the gas passes through an inlet separator where entrained liquids are removed from the gas stream. 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 emission. This compressor station currently has three 1,100 Hp Ingersoll-Rand KVG compressor engines (SN-01, SN-02, and SN-04), three 1,000 Hp Ingersoll-Rand KVG compressor engines (SN-05, SN-06, and SN-07), one Solar Taurus 5,850 Hp turbine drive centrifugal compressor (SN-11), one Caterpillar G-379 300 Hp engine generator (SN-09), and one Olympian 64 Hp engine generator (SN-12). This compressor station will use only pipeline-quality natural gas in the firing of the compressor engines.

Support equipment includes several tanks and an engine oil filter incinerator which are considered to be insignificant activities based on Arkansas regulations. Oil is used for lubricating purposes only, kerosene is used to clean engine parts, and diesel is used only for mobile equipment.

### 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                  |
| 40 CFR 60, Subpart GG – <i>Standards of Performance for Stationary Gas Turbines.</i>                                 |

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               | 1.9            | 4.9    |
|                           |   | PM <sub>10</sub> | 1.9            | 4.9    |
|                           |   | SO <sub>2</sub>  | 1.1            | 1.4    |
|                           |   | VOC              | 2.9            | 11.0   |
|                           |   | CO               | 296.0          | 1230.7 |
|                           |   | NO <sub>x</sub>  | 297.7          | 1205.3 |
| HAPs                      |   | Acetaldehyde*    | 0.43           | 1.12   |
|                           |   | Acrolein*        | 0.18           | 0.61   |
|                           |   | Benzene*         | 0.15           | 0.40   |
|                           |   | Formaldehyde*    | 1.24           | 4.76   |
|                           |   | Methanol*        | 0.20           | 0.66   |
|                           |   | Toluene*         | 0.09           | 0.16   |
|                           |   | 1,3-Butadiene*   | 0.09           | 0.21   |
| 01                        | 1,100 Hp Ingersoll-Rand<br>KVG Compressor Engine<br>Serial No. 103KL588 | PM               | 0.2            | 0.6    |
|                           |   | PM <sub>10</sub> | 0.2            | 0.6    |
|                           |   | SO <sub>2</sub>  | 0.1            | 0.1    |
|                           |   | VOC              | 0.4            | 1.7    |
|                           |   | CO               | 44.9           | 196.7  |
|                           |   | NO <sub>x</sub>  | 42.2           | 184.9  |
|                           |   | Acetaldehyde*    | 0.03           | 0.10   |
|                           |   | Acrolein*        | 0.03           | 0.10   |
|                           |   | Benzene*         | 0.02           | 0.06   |
|                           |   | Formaldehyde*    | 0.17           | 0.72   |
|                           |   | Methanol*        | 0.03           | 0.11   |
|                           |   | Toluene*         | 0.01           | 0.02   |
|                           |   | 1,3-Butadiene*   | 0.01           | 0.03   |

| EMISSION SUMMARY |   |                  |                |       |
|------------------|---|------------------|----------------|-------|
| Source Number    | Description   | Pollutant        | Emission Rates |       |
|                  |   |                  | lb/hr          | tpy   |
| 02               | 1,100 Hp Ingersoll-Rand<br>KVG Compressor Engine<br>Serial No. 103KL589 | PM               | 0.2            | 0.6   |
|                  |   | PM <sub>10</sub> | 0.2            | 0.6   |
|                  |   | SO <sub>2</sub>  | 0.1            | 0.1   |
|                  |   | VOC              | 0.4            | 1.7   |
|                  |   | CO               | 44.9           | 196.7 |
|                  |   | NO <sub>x</sub>  | 42.2           | 184.9 |
|                  |   | Acetaldehyde*    | 0.03           | 0.10  |
|                  |   | Acrolein*        | 0.03           | 0.10  |
|                  |   | Benzene*         | 0.02           | 0.06  |
|                  |   | Formaldehyde*    | 0.17           | 0.72  |
|                  |   | Methanol*        | 0.03           | 0.11  |
|                  |   | Toluene*         | 0.01           | 0.02  |
| 1,3-Butadiene*   | 0.01  | 0.03             |                |       |
| 04               | 1,100 Hp Ingersoll-Rand<br>KVG Compressor Engine<br>Serial No. 103KL591 | PM               | 0.2            | 0.6   |
|                  |   | PM <sub>10</sub> | 0.2            | 0.6   |
|                  |   | SO <sub>2</sub>  | 0.1            | 0.1   |
|                  |   | VOC              | 0.4            | 1.7   |
|                  |   | CO               | 44.9           | 196.7 |
|                  |   | NO <sub>x</sub>  | 42.2           | 184.9 |
|                  |   | Acetaldehyde*    | 0.03           | 0.10  |
|                  |   | Acrolein*        | 0.03           | 0.10  |
|                  |   | Benzene*         | 0.02           | 0.06  |
|                  |   | Formaldehyde*    | 0.17           | 0.72  |
|                  |   | Methanol*        | 0.03           | 0.11  |
|                  |   | Toluene*         | 0.01           | 0.02  |
| 1,3-Butadiene*   | 0.01  | 0.03             |                |       |
| 05               | 1,000 Hp Ingersoll-Rand<br>KVG Compressor Engine<br>Serial No. 103HL530 | PM               | 0.2            | 0.6   |
|                  |   | PM <sub>10</sub> | 0.2            | 0.6   |
|                  |   | SO <sub>2</sub>  | 0.1            | 0.1   |
|                  |   | VOC              | 0.4            | 1.7   |
|                  |   | CO               | 44.9           | 196.7 |
|                  |   | NO <sub>x</sub>  | 42.2           | 184.9 |
|                  |   | Acetaldehyde*    | 0.03           | 0.09  |
|                  |   | Acrolein*        | 0.02           | 0.09  |
|                  |   | Benzene*         | 0.02           | 0.06  |
|                  |   | Formaldehyde*    | 0.15           | 0.66  |
|                  |   | Methanol*        | 0.03           | 0.10  |
|                  |   | Toluene*         | 0.01           | 0.02  |
| 1,3-Butadiene*   | 0.01  | 0.03             |                |       |

| EMISSION SUMMARY |   |                  |                |       |
|------------------|---|------------------|----------------|-------|
| Source Number    | Description   | Pollutant        | Emission Rates |       |
|                  |   |                  | lb/hr          | tpy   |
| 06               | 1,000 Hp Ingersoll-Rand<br>KVG Compressor Engine<br>Serial No. 103HL529 | PM               | 0.2            | 0.6   |
|                  |   | PM <sub>10</sub> | 0.2            | 0.6   |
|                  |   | SO <sub>2</sub>  | 0.1            | 0.1   |
|                  |   | VOC              | 0.4            | 1.7   |
|                  |   | CO               | 44.9           | 196.7 |
|                  |   | NO <sub>x</sub>  | 42.2           | 184.9 |
|                  |   | Acetaldehyde*    | 0.03           | 0.09  |
|                  |   | Acrolein*        | 0.02           | 0.09  |
|                  |   | Benzene*         | 0.02           | 0.06  |
|                  |   | Formaldehyde*    | 0.15           | 0.66  |
|                  |   | Methanol*        | 0.03           | 0.10  |
|                  |   | Toluene*         | 0.01           | 0.02  |
| 1,3-Butadiene*   | 0.01  | 0.03             |                |       |
| 07               | 1,000 Hp Ingersoll-Rand<br>KVG Compressor Engine<br>Serial No. 103GL380 | PM               | 0.2            | 0.6   |
|                  |   | PM <sub>10</sub> | 0.2            | 0.6   |
|                  |   | SO <sub>2</sub>  | 0.1            | 0.1   |
|                  |   | VOC              | 0.4            | 1.7   |
|                  |   | CO               | 44.9           | 196.7 |
|                  |   | NO <sub>x</sub>  | 42.2           | 184.9 |
|                  |   | Acetaldehyde*    | 0.03           | 0.09  |
|                  |   | Acrolein*        | 0.02           | 0.09  |
|                  |   | Benzene*         | 0.02           | 0.06  |
|                  |   | Formaldehyde*    | 0.15           | 0.66  |
|                  |   | Methanol*        | 0.03           | 0.10  |
|                  |   | Toluene*         | 0.01           | 0.02  |
| 1,3-Butadiene*   | 0.01  | 0.03             |                |       |
| 09               | 300 Hp Caterpillar G379<br>Generator Engine<br>Serial No. 72B01205      | PM               | 0.1            | 0.1   |
|                  |   | PM <sub>10</sub> | 0.1            | 0.1   |
|                  |   | SO <sub>2</sub>  | 0.1            | 0.1   |
|                  |   | VOC              | 0.2            | 0.3   |
|                  |   | CO               | 16.8           | 33.9  |
|                  |   | NO <sub>x</sub>  | 10.3           | 20.7  |
|                  |   | Acetaldehyde*    | 0.01           | 0.02  |
|                  |   | Acrolein*        | 0.01           | 0.02  |
|                  |   | Benzene*         | 0.01           | 0.01  |
|                  |   | Formaldehyde*    | 0.05           | 0.10  |
|                  |   | Methanol*        | 0.01           | 0.02  |
|                  |   | Toluene*         | 0.01           | 0.01  |
| 1,3-Butadiene*   | 0.01  | 0.01             |                |       |

| EMISSION SUMMARY |   |                  |                |      |
|------------------|---|------------------|----------------|------|
| Source Number    | Description   | Pollutant        | Emission Rates |      |
|                  |   |                  | lb/hr          | tpy  |
| 11               | 5,850 Hp Solar Taurus<br>Model 60 T7000 Turbine<br>Serial No. OHL06-T0039 | PM               | 0.5            | 1.1  |
|                  |   | PM <sub>10</sub> | 0.5            | 1.1  |
|                  |   | SO <sub>2</sub>  | 0.3            | 0.6  |
|                  |   | VOC              | 0.2            | 0.4  |
|                  |   | CO               | 7.0            | 15.9 |
|                  |   | NO <sub>x</sub>  | 32.5           | 74.7 |
|                  |   | Acetaldehyde*    | 0.23           | 0.52 |
|                  |   | Acrolein*        | 0.01           | 0.01 |
|                  |   | Benzene*         | 0.01           | 0.02 |
|                  |   | Formaldehyde*    | 0.22           | 0.51 |
|                  |   | Toluene*         | 0.01           | 0.02 |
| 1,3-Butadiene*   | 0.01  | 0.01             |                |      |
| 12               | 64 Hp Olympian Standby<br>Generator Engine<br>Serial No. 83034 Olympia    | 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               | 2.8            | 0.7  |
|                  |   | NO <sub>x</sub>  | 1.7            | 0.5  |
|                  |   | Acetaldehyde*    | 0.01           | 0.01 |
|                  |   | Acrolein*        | 0.01           | 0.01 |
|                  |   | Benzene*         | 0.01           | 0.01 |
|                  |   | Formaldehyde*    | 0.01           | 0.01 |
|                  |   | Methanol*        | 0.01           | 0.01 |
| Toluene*         | 0.01  | 0.01             |                |      |
| 1,3-Butadiene*   | 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.

### SECTION III: PERMIT HISTORY

Mississippi River Transmission Corporation -Biggers Compressor Station began operation in 1950.

Permit No. 1513-A was issued to MRTC on March 14, 1994. This permit was for seven reciprocating engines, one engine driven generator, one emergency engine driven generator, and one heating boiler. No blowdown or fugitive emissions were listed. Hourly and annual emissions were listed for each source. Facility wide annual emissions were listed. Permitted pollutants were sulfur dioxide, volatile organic compounds, carbon monoxide, and oxides of nitrogen.

Permit No. 1513-AR-1 was issued to MRTC on March 13, 1995. The facility was changed by removing one compressor engine from service (Ingersoll-Rand KVG 1,100 HP compressor engine - SN-03) and one of the engine generators (Ingersoll-Rand PVG - SN-08), and adding a Solar Taurus 5,850 HP turbine driven compressor (SN-11). Blowdown emissions and minor emissions from the station tanks were added. This permit involved a PSD netting to ensure that addition of the Solar Taurus turbine driven compressor resulted in a less than 40 tpy increase. This new turbine (SN-11) and the existing power generator (SN-09) were restricted in allowable hours of operation.

Permit No. 1513-AR-2 was issued to MRTC on March 12, 1996 as a minor modification to the above permit. A 64HP Olympian standby generator (SN-12) was added. The standby generator was restricted in allowable hours of operation.

Permit No. 1513-AOP-R1 was the initial Title V permit. There were no physical changes to the facility.

Permit No. 1513-AOP-R2 was issued on July 1, 2005. This was the first Title V Renewal permit for the facility. Permitted emissions included 5.6 tpy of PM/PM<sub>10</sub>, 1.0 tpy of SO<sub>2</sub>, 10.9 tpy of VOC, 1,230.4 tpy of CO, and 1,204.8 tpy of NO<sub>x</sub>.

SECTION IV: SPECIFIC CONDITIONS

1,100 Hp Natural Gas Compressors

SN-01, SN-02, & SN-04  
 Natural Gas Compressors

Source Description

Source SN-01, SN-02, and SN-04, 1,100 HP Ingersoll-Rand KVG Compressor Engines, were last modified or installed in 1950. These engines are capable of running at 120% 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. The permittee will demonstrate compliance with this condition by complying with Plantwide Conditions # 7, # 8, and # 9, and operating at or below maximum capacity of the equipment. [Regulation 19, §19.501 et seq., and 40 CFR Part 52, Subpart E]

| SN | Description  | Pollutant        | lb/hr | tpy   |
|----|--|------------------|-------|-------|
| 01 | 1,100 Hp Ingersoll-Rand KVG Compressor Engine<br>Serial No. 103KL588 | PM <sub>10</sub> | 0.2   | 0.6   |
|    |  | SO <sub>2</sub>  | 0.1   | 0.1   |
|    |  | VOC              | 0.4   | 1.7   |
|    |  | CO               | 44.9  | 196.7 |
|    |  | NO <sub>x</sub>  | 42.2  | 184.9 |
| 02 | 1,100 Hp Ingersoll-Rand KVG Compressor Engine<br>Serial No. 103KL589 | PM <sub>10</sub> | 0.2   | 0.6   |
|    |  | SO <sub>2</sub>  | 0.1   | 0.1   |
|    |  | VOC              | 0.4   | 1.7   |
|    |  | CO               | 44.9  | 196.7 |
|    |  | NO <sub>x</sub>  | 42.2  | 184.9 |
| 04 | 1,100 Hp Ingersoll-Rand KVG Compressor Engine<br>Serial No. 103KL591 | PM <sub>10</sub> | 0.2   | 0.6   |
|    |  | SO <sub>2</sub>  | 0.1   | 0.1   |
|    |  | VOC              | 0.4   | 1.7   |
|    |  | CO               | 44.9  | 196.7 |
|    |  | NO <sub>x</sub>  | 42.2  | 184.9 |

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by complying with Plantwide Condition # 7 and operating at or below maximum capacity of the equipment. [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  |
|----|--|---------------|-------|------|
| 01 | 1,100 Hp Ingersoll-Rand KVG Compressor Engine<br>Serial No. 103KL588 | PM            | 0.2   | 0.6  |
|    |  | Acetaldehyde  | 0.03  | 0.10 |
|    |  | Acrolein      | 0.03  | 0.10 |
|    |  | Benzene       | 0.02  | 0.06 |
|    |  | Formaldehyde  | 0.17  | 0.72 |
|    |  | Methanol      | 0.03  | 0.11 |
|    |  | Toluene       | 0.01  | 0.02 |
|    |  | 1,3-Butadiene | 0.01  | 0.03 |
| 02 | 1,100 Hp Ingersoll-Rand KVG Compressor Engine<br>Serial No. 103KL589 | PM            | 0.2   | 0.6  |
|    |  | Acetaldehyde  | 0.03  | 0.10 |
|    |  | Acrolein      | 0.03  | 0.10 |
|    |  | Benzene       | 0.02  | 0.06 |
|    |  | Formaldehyde  | 0.17  | 0.72 |
|    |  | Methanol      | 0.03  | 0.11 |
|    |  | Toluene       | 0.01  | 0.02 |
|    |  | 1,3-Butadiene | 0.01  | 0.03 |
| 04 | 1,100 Hp Ingersoll-Rand KVG Compressor Engine<br>Serial No. 103KL591 | PM            | 0.2   | 0.6  |
|    |  | Acetaldehyde  | 0.03  | 0.10 |
|    |  | Acrolein      | 0.03  | 0.10 |
|    |  | Benzene       | 0.02  | 0.06 |
|    |  | Formaldehyde  | 0.17  | 0.72 |
|    |  | Methanol      | 0.03  | 0.11 |
|    |  | Toluene       | 0.01  | 0.02 |
|    |  | 1,3-Butadiene | 0.01  | 0.03 |

3. The permittee shall not exceed 5% opacity from sources SN-01, SN-02, and SN-04 as measured by EPA Reference Method 9. Compliance with this specific condition shall be demonstrated through compliance with Plantwide Condition # 7. [Regulation 18, §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

1,000 Hp Natural Gas Compressors

SN-05, SN-06, & SN-07  
 Natural Gas Compressors

Source Description

Source SN-05 thru SN-07, 1,000 HP Ingersoll-Rand KVG Compressor Engines, were last modified or installed in 1968. These engines are capable of running at 120% of their rated capacity, and are being permitted to do so.

Specific Conditions

4. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by complying with Plantwide Conditions # 7, # 8, and # 9, and operating at or below maximum capacity of the equipment. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

| SN | Description   | Pollutant        | lb/hr | tpy   |
|----|---|------------------|-------|-------|
| 05 | 1,000 Hp Ingersoll-Rand<br>KVG Compressor Engine<br>Serial No. 103HL530 | PM <sub>10</sub> | 0.2   | 0.6   |
|    |   | SO <sub>2</sub>  | 0.1   | 0.1   |
|    |   | VOC              | 0.4   | 1.7   |
|    |   | CO               | 44.9  | 196.7 |
|    |   | NO <sub>x</sub>  | 42.2  | 184.9 |
| 06 | 1,000 Hp Ingersoll-Rand<br>KVG Compressor Engine<br>Serial No. 103HL529 | PM <sub>10</sub> | 0.2   | 0.6   |
|    |   | SO <sub>2</sub>  | 0.1   | 0.1   |
|    |   | VOC              | 0.4   | 1.7   |
|    |   | CO               | 44.9  | 196.7 |
|    |   | NO <sub>x</sub>  | 42.2  | 184.9 |
| 07 | 1,000 Hp Ingersoll-Rand<br>KVG Compressor Engine<br>Serial No. 103GL380 | PM <sub>10</sub> | 0.2   | 0.6   |
|    |   | SO <sub>2</sub>  | 0.1   | 0.1   |
|    |   | VOC              | 0.4   | 1.7   |
|    |   | CO               | 44.9  | 196.7 |
|    |   | NO <sub>x</sub>  | 42.2  | 184.9 |

5. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by complying with Plantwide Condition # 7 and operating at or below maximum capacity of the equipment. [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  |
|----|--|---------------|-------|------|
| 05 | 1,000 Hp Ingersoll-Rand KVG Compressor Engine<br>Serial No. 103HL530 | PM            | 0.2   | 0.6  |
|    |  | Acetaldehyde  | 0.03  | 0.09 |
|    |  | Acrolein      | 0.02  | 0.09 |
|    |  | Benzene       | 0.02  | 0.06 |
|    |  | Formaldehyde  | 0.15  | 0.66 |
|    |  | Methanol      | 0.03  | 0.10 |
|    |  | Toluene       | 0.01  | 0.02 |
|    |  | 1,3-Butadiene | 0.01  | 0.03 |
| 06 | 1,000 Hp Ingersoll-Rand KVG Compressor Engine<br>Serial No. 103HL529 | PM            | 0.2   | 0.6  |
|    |  | Acetaldehyde  | 0.03  | 0.09 |
|    |  | Acrolein      | 0.02  | 0.09 |
|    |  | Benzene       | 0.02  | 0.06 |
|    |  | Formaldehyde  | 0.15  | 0.66 |
|    |  | Methanol      | 0.03  | 0.10 |
|    |  | Toluene       | 0.01  | 0.02 |
|    |  | 1,3-Butadiene | 0.01  | 0.03 |
| 07 | 1,000 Hp Ingersoll-Rand KVG Compressor Engine<br>Serial No. 103GL380 | PM            | 0.2   | 0.6  |
|    |  | Acetaldehyde  | 0.03  | 0.09 |
|    |  | Acrolein      | 0.02  | 0.09 |
|    |  | Benzene       | 0.02  | 0.06 |
|    |  | Formaldehyde  | 0.15  | 0.66 |
|    |  | Methanol      | 0.03  | 0.10 |
|    |  | Toluene       | 0.01  | 0.02 |
|    |  | 1,3-Butadiene | 0.01  | 0.03 |

6. The permittee shall not exceed 5% opacity from sources SN-05, SN-06, and SN-07 as measured by EPA Reference Method 9. Compliance with this specific condition shall be demonstrated through compliance with Plantwide Condition # 7. [Regulation 18, §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Miscellaneous

SN-09  
 300 Hp Generator Engine

Source Description

Source SN-09, a 300 HP Caterpillar G-379 Generator Engine, was last installed or modified in 1984. This engine is being permitted to run at 100% of its rated load capacity. The unit is restricted on hours of operation (per rolling 12 months period) and therefore tons emissions per year (because of the netting done in Permit No. 1513-AR-1).

Specific Conditions

7. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by complying with Specific Condition # 10 and Plantwide Condition # 7. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

| SN | Description   | Pollutant        | lb/hr | tpy  |
|----|---|------------------|-------|------|
| 09 | 300 Hp Caterpillar G379 Generator Engine<br>Serial No. 72B01205 | PM <sub>10</sub> | 0.1   | 0.1  |
|    |   | SO <sub>2</sub>  | 0.1   | 0.1  |
|    |   | VOC              | 0.2   | 0.3  |
|    |   | CO               | 16.8  | 33.9 |
|    |   | NO <sub>x</sub>  | 10.3  | 20.7 |

8. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by complying with Specific Condition # 10 and Plantwide Condition # 7. [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  |
|----|---|---------------|-------|------|
| 09 | 300 Hp Caterpillar G379 Generator Engine<br>Serial No. 72B01205 | PM            | 0.1   | 0.1  |
|    |   | Acetaldehyde  | 0.01  | 0.02 |
|    |   | Acrolein      | 0.01  | 0.02 |
|    |   | Benzene       | 0.01  | 0.01 |
|    |   | Formaldehyde  | 0.05  | 0.10 |
|    |   | Methanol      | 0.01  | 0.02 |
|    |   | Toluene       | 0.01  | 0.01 |
|    |   | 1,3-Butadiene | 0.01  | 0.01 |

CenterPoint Energy - Mississippi River Transmission Corp. - Biggers Compressor Station  
Permit #: 1513-AOP-R3  
AFIN: 61-00076

9. The permittee shall not exceed 5% opacity from source SN-09 as measured by EPA Reference Method 9. Compliance with this specific condition shall be demonstrated through compliance with Plantwide Condition # 7. [Regulation 18, §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
10. The permittee shall not operate the generator (SN-09) in excess of 4,032 hours during any consecutive twelve-month period. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
11. The permittee shall maintain records of the hours of operation of the generator (SN-09) which demonstrate compliance with Specific Condition # 10. 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. Such documentation shall be maintained on-site and shall be made available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-11  
 5,850 Hp Turbine

Source Description

Source SN-11, a 5850 HP Solar Taurus Model 60 - T7000 natural gas fired turbine, was last installed or modified in 1995. This turbine is being permitted at its highest emission rate for each pollutant based on operating map testing by the manufacturer. The unit is restricted on hours of operation (per rolling 12 months period) and therefore tons emissions per year (because of the netting done in Permit No. 1513-AR-1). *This unit is subject to 40 CFR, Subpart GG - Standards of Performance for Stationary Gas Turbines.*

Specific Conditions

12. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by complying with Specific Conditions # 15, # 18, and # 19, and Plantwide Conditions # 7, # 8, and # 9. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

| SN | Description   | Pollutant        | lb/hr | tpy  |
|----|---|------------------|-------|------|
| 11 | 5,850 Hp Solar Taurus Model 60 T7000 Turbine Serial No. OHL06-T0039 | PM <sub>10</sub> | 0.5   | 1.1  |
|    |   | SO <sub>2</sub>  | 0.3   | 0.6  |
|    |   | VOC              | 0.2   | 0.4  |
|    |   | CO               | 7.0   | 15.9 |
|    |   | NO <sub>x</sub>  | 32.5  | 74.7 |

13. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by complying with Specific Condition # 15 and Plantwide Condition # 7. [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  |
|----|---|---------------|-------|------|
| 11 | 5,850 Hp Solar Taurus Model 60 T7000 Turbine Serial No. OHL06-T0039 | PM            | 0.5   | 1.1  |
|    |   | Acetaldehyde  | 0.23  | 0.52 |
|    |   | Acrolein      | 0.01  | 0.01 |
|    |   | Benzene       | 0.01  | 0.02 |
|    |   | Formaldehyde  | 0.22  | 0.51 |
|    |   | Toluene       | 0.01  | 0.02 |
|    |   | 1,3-Butadiene | 0.01  | 0.01 |

14. The permittee shall not exceed 5% opacity from source SN-11 as measured by EPA Reference Method 9. Compliance with this specific condition shall be demonstrated through compliance with Plantwide Condition # 7. [Regulation 18, §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
15. The permittee shall not operate the turbine (SN-11) in excess of 4,600 hours during any consecutive twelve-month period. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
16. The permittee shall maintain records of the hours of operation of the turbine (SN-11) which demonstrate compliance with Specific Condition # 15. 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. Such documentation shall be maintained on-site and shall be made available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

#### NSPS Requirements

17. The turbine (SN-11) 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). These requirements include, but are not limited to, Specific Conditions # 18 thru # 20.
18. Nitrogen oxide (NO<sub>x</sub>) emissions from the gas turbine (SN-11) shall not exceed 230 parts per million (0.0230% by volume) on a dry basis at 15% oxygen. [Regulation 19, §19.304 and 40 CFR §60.332(a)(2)]
19. The permittee shall comply with the Sulfur Dioxide (SO<sub>2</sub>) standards by either demonstrating the SO<sub>2</sub> emissions from the gas turbine (SN-11) do not exceed 0.015 percent by volume on a dry basis at 15% oxygen or that the fuel burned in the gas turbine (SN-01) contains sulfur in excess of 0.8 percent by weight. [Regulation 19, §19.304; 40 CFR §60.333(a); and 40 CFR §60.333(b)]
20. The permittee shall maintain documentation verifying the fuel used in SN-11 qualifies as natural gas: contains no more than 20 grains of total sulfur per 100 standard cubic feet, 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 standard cubic feet. Such documentation shall be maintained on-site and shall be made available to Department personnel upon request. [Regulation 19, §19.304 and 40 CFR §60.334(h)(3)]

SN-12  
 64 Hp Generator Engine

Source Description

Source SN-12, a 64 HP Olympian standby generator engine, was last installed or modified in 1995. This engine is being permitted at 100% of its rated load capacity. The unit is restricted on hours of operation (per rolling 12 months period) and therefore tons emissions per year (because of the netting done in Permit No. 1513-AR-2).

Specific Conditions

21. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by complying with Specific Condition # 24 and Plantwide Condition # 7. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

| SN | Description   | Pollutant        | lb/hr | tpy |
|----|---|------------------|-------|-----|
| 12 | 64 Hp Olympian Standby Generator Engine<br>Serial No. 83034 Olympia | PM <sub>10</sub> | 0.1   | 0.1 |
|    |   | SO <sub>2</sub>  | 0.1   | 0.1 |
|    |   | VOC              | 0.1   | 0.1 |
|    |   | CO               | 2.8   | 0.7 |
|    |   | NO <sub>x</sub>  | 1.7   | 0.5 |

22. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by complying with Specific Condition # 24 and Plantwide Condition # 7. [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  |
|----|---|---------------|-------|------|
| 12 | 64 Hp Olympian Standby Generator Engine<br>Serial No. 83034 Olympia | PM            | 0.1   | 0.1  |
|    |   | Acetaldehyde  | 0.01  | 0.01 |
|    |   | Acrolein      | 0.01  | 0.01 |
|    |   | Benzene       | 0.01  | 0.01 |
|    |   | Formaldehyde  | 0.01  | 0.01 |
|    |   | Methanol      | 0.01  | 0.01 |
|    |   | Toluene       | 0.01  | 0.01 |
|    |   | 1,3-Butadiene | 0.01  | 0.01 |

23. The permittee shall not exceed 5% opacity from source SN-12 as measured by EPA Reference Method 9. Compliance with this specific condition shall be demonstrated through compliance with Plantwide Condition # 7. [Regulation 18, §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

24. The permittee shall not operate the generator (SN-12) in excess of 500 hours during any consecutive twelve-month period. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
25. The permittee shall maintain records of the hours of operation of the emergency generator (SN-12) which demonstrate compliance with Specific Condition # 24. 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. Such documentation shall be maintained on-site and shall be made available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

CenterPoint Energy - Mississippi River Transmission Corp. - Biggers Compressor Station  
Permit #: 1513-AOP-R3  
AFIN: 61-00076

#### SECTION V: COMPLIANCE PLAN AND SCHEDULE

CenterPoint Energy - Mississippi River Transmission Corp. - Biggers 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. 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]
7. The permittee shall only use pipeline quality natural gas to fire the compressor engines and/or turbines located at this facility. Pipeline quality natural gas is defined as gas which contains less than 0.20 grains total sulfur per 100 standard cubic feet of natural

gas. Additionally, pipeline natural gas must either be composed of at least 70 percent methane by volume or have a gross calorific value between 950 and 1100 BTU per standard cubic foot. Compliance with this condition may be demonstrated by a valid gas tariff, purchase contract, fuel analysis or other appropriate documentation, or periodic testing. [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 test the fuel combusted in the compressor engines and/or turbines for Total Sulfur within 180 days of issuance of the amendment to permit 1513-AOP-R2 to show compliance with SO<sub>2</sub> emission limits. Initial testing was completed on May 16, 2008. The natural gas must contain 0.20 grains of Total Sulfur per 100 standard cubic feet of natural gas or less. The permittee shall use test methods outlined in sections 2.3.5 or 2.3.3.1.2 of 40 CFR Part 75, Appendix D, or other test method upon the Department's approval, to test for Total Sulfur. The results of these tests shall be submitted to the Department at the address listed in General Provision # 7. Testing for Total Sulfur shall be conducted every five years for the fuel combusted in the compressor engines and/or turbines located at CenterPoint's compressor stations in the State of Arkansas. The natural gas testing of the fuel on one pipeline may be representative for all compressor engines and/or turbines located along that pipeline. [Regulation 19, §19.702 and 40 CFR Part 52, Subpart E]
  
9. The permittee shall simultaneously conduct tests for NO<sub>x</sub> and CO on the turbine (SN-11) exhaust stack, and for NO<sub>x</sub> and CO on one-half of each type of compressor engine(s) (SN-01, SN-02, and SN-04 – SN-07), same model and HP, in accordance with Plantwide Condition #3 and every five years thereafter as shown in the table below. EPA Reference Method 10 shall be used to determine CO. EPA Reference Method 7E shall be used to determine NO<sub>x</sub> for the compressor engines and EPA Reference Method 20 shall be used to determine NO<sub>x</sub> for the turbine. The permittee shall test the engines and turbine within 90% of permitted limit. If testing is conducted at a rate lower than 90%, the engine/turbine shall be limited to an operating rate of 110% of the tested rate until compliance at a higher rate is demonstrated. If any test results indicate emissions in excess of any permitted rates, the permittee shall conduct a new stack test within 90 days of the date of the last failing stack test. 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. [Regulation 19, §19.702 and 40 CFR Part 52, Subpart E]

| Source Number | Last Date Tested | Next Test Date         |
|---------------|------------------|------------------------|
| 01            | 2/20/2003        | On or before 2/20/2013 |
| 02, 06, & 07  | 2/26/2003        | On or before 2/26/2003 |
| 04 & 05       | 1/9/2008         | On or before 1/9/2018  |
| 11            | 7/17/2007        | On or before 7/17/2012 |

10. The permittee may replace any existing engines on a temporary or permanent basis with engines which have the same or lower emission rates on a pound per hour basis, and have the same or lower horsepower, and which result in the same or lower actual emissions from the facility on pound per hour basis and which do not exceed permitted emissions on a ton per year basis, and do not violate any regulations promulgated by the EPA. 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. The testing shall be conducted in accordance with EPA Reference Method 7E for NO<sub>x</sub> and Reference Method 10 for CO. The permittee shall notify ADEQ of the replacement within 30 days of startup. This does not apply to modifications which must go through a PSD review as defined in 40 CFR 52.21. 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 7(f) are met. [Regulation 19, §19.705 and A.C.A § 8-4-203 as referenced by A.C.A. §8-4-304 and A.C.A. §8-4-311]
11. 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 A.C.A. §8-4-304 and §8-4-311]

#### Title VI Provisions

12. 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.
13. 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.
14. 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.
15. 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.
16. 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.

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 October 29, 2009.

| Description                         | Category |
|-------------------------------------|----------|
| Boiler                              | A-1      |
| Methanol Tank (168 gal)             | A-2      |
| Kerosene Tank (168 gal)             | A-2      |
| Used Oil Tank (1,176 gal)           | A-3      |
| Entrained Liquids Tank (7,518 gal)  | A-3      |
| Antifreeze Tank (4,200 gal)         | A-3      |
| Antifreeze Mix Tank (7,000 gal)     | A-3      |
| Diesel Tank (1,134 gal)             | A-3      |
| Wastewater Tank (4,700 gal)         | A-3      |
| Oil Storage Tank (11,298 gal)       | A-13     |
| Gasoline Tank (548 gal)             | A-13     |
| Engine Blowdowns                    | A-13     |
| Piping Component Fugitive Emissions | A-13     |
| Smart Ash 100 incinerator           | 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)]

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.

[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:

- a. The request does not violate a federal requirement;
- b. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
- c. 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]

**APPENDIX A**

**40 CFR 60 Subpart GG**

*Standards of Performance for Stationary Gas Turbines*