

ADEQ DRAFT OPERATING AIR PERMIT

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

Permit No. : 2216-AOP-R0

IS ISSUED TO:

DeSoto Gathering Company, LLC - New Quitman CPF-2
28 Pumpkin Center Circle
Quitman, AR 72131
Cleburne County
AFIN: 23-00969

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

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List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
b-hp	brake horsepower
BTU	British Thermal Unit
CFR	Code of Federal Regulations
CO	Carbon Monoxide
g/bhp-hr	grams/break horsepower-hour
gr	grains
HAP	Hazardous Air Pollutant
HP	Horsepower
H ₂ S	Hydrogen Sulfide
lb/hr	Pound Per Hour
Mg	megagram (10 ⁶ grams)
MM	million
MVAC	Motor Vehicle Air Conditioner
NSPS	New Standards of Performance Standards
NESHAP	National Emission Standards for Hazardous Air Pollutants
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM ₁₀	Particulate Matter Smaller Than Ten Microns (µm) in Diameter
psi	pounds per square inch
RICE	Reciprocating Engine
S	Sulfur
scf	standard cubic feet
SN	Source Number
SNAP	Significant New Alternatives Program (SNAP)
SO ₂	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction Plan
tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound
4SLB	four stroke lean burn [engine]
4SRB	four stroke rich burn [engine]
µg	microgram (10 ⁻⁶ grams)

DeSoto Gathering Company, LLC - New Quitman CPF-2
Permit #: 2216-AOP-R0
AFIN: 23-00969

SECTION I: FACILITY INFORMATION

PERMITTEE: DeSoto Gathering Company, LLC - New Quitman CPF-2

AFIN: 23-00969

PERMIT NUMBER: 2216-AOP-R0

FACILITY ADDRESS: 28 Pumpkin Center Circle
Quitman, AR 72131

MAILING ADDRESS: P.O. Box 789
Conway, AR 72033

COUNTY: Cleburne County

CONTACT NAME: Tory Thompson

CONTACT POSITION: Operations Manager

TELEPHONE NUMBER: 501-548-6703

REVIEWING ENGINEER: Andrea Sandage

UTM North South (Y): Zone 15: 565.66 m

UTM East West (X): Zone 15: 3911.89 m

SECTION II: INTRODUCTION

Summary of Permit Activity

DeSoto Gathering Company, LLC - New Quitman CPF-2 (23-00969) operates a facility located at 28 Pumpkin Center Circle, Quitman, AR 72131. The facility is currently a minor source operating under general permit #1868-AGP-118. This facility has submitted an application to expand by adding nine (9) four stroke lean burn, Natural Gas-fired Compressor Engines (SN-7 through SN-15), three (3) four stroke rich burn, natural gas-fired emergency generators (SN-20 through SN-22), and four (4) Triethylene Glycol Dehydration Units (SN-16 through SN-19). This modification will cause the facility to become a Title V major source. The total annual emissions are permitted at: 8.9 tpy of PM/PM₁₀ , 1.8 tpy of SO₂ , 171.5 tpy of VOC, 170.8 tpy of CO, 213.2 tpy of NO_x , 9.34 tpy Formaldehyde, 0.04 tpy Benzene, and 0.16 tpy Hydrogen Sulfide.

Process Description

The New Quitman CPF-2 is a natural gas gathering facility that performs compression, separation and treating of natural gas collected from area wells.

The produced gas from nearby wells enters the facility where it passes through inlet separators to remove entrained water. The separated water is routed to a storage tank where it is removed from the site by tanker truck.

The gas is then compressed in the compressors. The facility has two types of engines, 4SLB and 4SRB. The four stroke lean burn compressor engines (4SLB) are SN-01 thru SN-15. The four stroke rich burn (4SRB) emergency generator engines are SN-20 thru SN-22. The compressor engines are fueled with natural gas and are the major emissions units at the facility. The engines are equipped with catalytic oxidizer systems to reduce CO emissions.

The natural gas then passes to the glycol dehydration units (SN-16 through SN-19) where it is dried to sales gas contract specifications in a continuous process by contact with regenerated glycol in an absorber tower. Wet glycol will go to the glycol regenerator where absorber water is removed by heating. Regenerated glycol is cooled and pumped to the absorber tower in a continuous cycle. The dehydrator still vent is vented to the atmosphere while the sweet dry gas is delivered to the sales line. Most of the vented gas is water vapor and non-VOC organics (methane and ethane). A trace amount of VOCs (non-methane, non-ethane) are also emitted.

The dry sweet residue gas is then piped to the sales point.

Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective January 25, 2009

Regulations
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 Part 60, Subpart JJJJ– Stationary Spark Ignition Internal Combustion Engines
40 CFR Part 63, Subpart HH – Oil and Natural Gas Production Facilities
40 CFR Part 63, Subpart ZZZZ – Stationary Reciprocating Internal Combustion Engines

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	3.3	8.9
		PM ₁₀	3.3	8.9
		SO ₂	1.8	1.8
		VOC	42.7	171.5
		CO	41.7	170.8
		NO _x	51.3	213.2
Hazardous Air Pollutants		Formaldehyde*	2.34	9.34
		Benzene*	0.04	0.04
Air Contaminants **		Hydrogen Sulfide H ₂ S **	0.04	0.16
01	G3516 Natural Gas-Fired Compressor Engine with Catalyst	PM/PM ₁₀	0.2	0.5
		SO ₂	0.1	0.1
		VOC	2.2	9.4
		CO	2.2	9.4
		NO _x	4.6	20.0
		Formaldehyde*	0.19	0.80
02	G3516 Natural Gas-Fired Compressor Engine with Catalyst	PM/PM ₁₀	0.2	0.5
		SO ₂	0.1	0.1
		VOC	2.2	9.4
		CO	2.2	9.4
		NO _x	4.6	20.0
		Formaldehyde*	0.19	0.80

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
03	G3516 Natural Gas-Fired Compressor Engine with Catalyst	PM/PM ₁₀	0.2	0.5
		SO ₂	0.1	0.1
		VOC	2.2	9.4
		CO	2.2	9.4
		NO _x	4.6	20.0
		Formaldehyde*	0.19	0.80
04	G3516 Natural Gas-Fired Compressor Engine with Catalyst	PM/PM ₁₀	0.2	0.5
		SO ₂	0.1	0.1
		VOC	2.2	9.4
		CO	2.2	9.4
		NO _x	4.6	20.0
		Formaldehyde*	0.19	0.80
05	G3606 Natural Gas-Fired Compressor Engine with Catalyst	PM/PM ₁₀	0.2	0.6
		SO ₂	0.1	0.1
		VOC	2.8	12.0
		CO	2.8	12.0
		NO _x	2.8	12.0
		Formaldehyde*	0.13	0.55
06	G3606 Natural Gas-Fired Compressor Engine with Catalyst	PM/PM ₁₀	0.2	0.6
		SO ₂	0.1	0.1
		VOC	2.8	12.0
		CO	2.8	12.0
		NO _x	2.8	12.0
		Formaldehyde*	0.13	0.55
07	G3606 Natural Gas-Fired Compressor Engine with Catalyst	PM/PM ₁₀	0.2	0.6
		SO ₂	0.1	0.1
		VOC	2.8	12.0
		CO	2.8	12.0
		NO _x	2.8	12.0
		Formaldehyde*	0.13	0.55
08	G3606 Natural Gas-Fired Compressor Engine with Catalyst	PM/PM ₁₀	0.2	0.6
		SO ₂	0.1	0.1
		VOC	2.8	12.0
		CO	2.8	12.0
		NO _x	2.8	12.0
		Formaldehyde*	0.13	0.55
09	G3606 Natural Gas-Fired Compressor Engine with Catalyst	PM/PM ₁₀	0.2	0.6
		SO ₂	0.1	0.1
		VOC	2.8	12.0
		CO	2.8	12.0
		CO	2.8	12.0

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
		NO _x	2.8	12.0
		Formaldehyde*	0.13	0.55
10	G3606 Natural Gas-Fired Compressor Engine with Catalyst	PM/PM ₁₀	0.2	0.6
		SO ₂	0.1	0.1
		VOC	2.8	12.0
		CO	2.8	12.0
		NO _x	2.8	12.0
		Formaldehyde*	0.13	0.55
11	G3606 Natural Gas-Fired Compressor Engine with Catalyst	PM/PM ₁₀	0.2	0.6
		SO ₂	0.1	0.1
		VOC	2.8	12.0
		CO	2.8	12.0
		NO _x	2.8	12.0
		Formaldehyde*	0.13	0.55
12	G3606 Natural Gas-Fired Compressor Engine with Catalyst	PM/PM ₁₀	0.2	0.6
		SO ₂	0.1	0.1
		VOC	2.8	12.0
		CO	2.8	12.0
		NO _x	2.8	12.0
		Formaldehyde*	0.13	0.55
13	G3606 Natural Gas-Fired Compressor Engine with Catalyst	PM/PM ₁₀	0.2	0.6
		SO ₂	0.1	0.1
		VOC	2.8	12.0
		CO	2.8	12.0
		NO _x	2.8	12.0
		Formaldehyde*	0.13	0.55
14	G3606 Natural Gas-Fired Compressor Engine with Catalyst	PM/PM ₁₀	0.2	0.6
		SO ₂	0.1	0.1
		VOC	2.8	12.0
		CO	2.8	12.0
		NO _x	2.8	12.0
		Formaldehyde*	0.13	0.55
15	G3606 Natural Gas-Fired Compressor Engine with Catalyst	PM/PM ₁₀	0.2	0.6
		SO ₂	0.1	0.1
		VOC	2.8	12.0
		CO	2.8	12.0
		NO _x	2.8	12.0
		Formaldehyde*	0.13	0.55

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
16	TEG Dehydrator	VOC	0.1	0.1
		Benzene*	0.01	0.01
		H ₂ S**	0.01	0.04
17	TEG Dehydrator	VOC	0.1	0.1
		Benzene*	0.01	0.01
		H ₂ S**	0.01	0.04
18	TEG Dehydrator	VOC	0.1	0.1
		Benzene*	0.01	0.01
		H ₂ S**	0.01	0.04
19	TEG Dehydrator	VOC	0.1	0.1
		Benzene*	0.01	0.01
		H ₂ S**	0.01	0.04
20	Cummins GTA855G1 Natural Gas-Fired Emergency Generator Engine with Catalyst	PM/PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.9	0.5
		CO	0.7	0.4
		NO _x	0.7	0.4
		Formaldehyde*	0.05	0.03
21	Cummins GTA855G1 Natural Gas-Fired Emergency Generator Engine with Catalyst	PM/PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.9	0.5
		CO	0.7	0.4
		NO _x	0.7	0.4
		Formaldehyde*	0.05	0.03
22	Cummins GTA855G1 Natural Gas-Fired Emergency Generator Engine with Catalyst	PM/PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.9	0.5
		CO	0.7	0.4
		NO _x	0.7	0.4
		Formaldehyde*	0.05	0.03
23	Cummins GTA855G1 Natural Gas-Fired Emergency Generator Engine with Catalyst	PM/PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.9	0.5
		CO	0.7	0.4
		NO _x	0.7	0.4
		Formaldehyde*	0.05	0.03

*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.

DeSoto Gathering Company, LLC - New Quitman CPF-2
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SECTION III: PERMIT HISTORY

Permit # 1868-AGP-121 was issued to DeSoto Gathering Company, LLC – New Quitman CPF2 on June 29, 2009. This permit included six (6) compressor engines, produced water tank, fiberglass dehydrator drip tank, glycol dehydrator, gas-fired dehydrator reboiler, lube oil, antifreeze drums and storage tanks. Emissions were listed for 0.6 tpy of particulate matter, 0.6 tpy of sulfur dioxide, 25.2 tpy of volatile organic compounds, 85.8 tpy of carbon monoxide and 92.4 tpy of oxides of nitrogen.

SECTION IV: SPECIFIC CONDITIONS

SN-01 through SN-04

G3516B Natural Gas-Fired Compressor Engine

Source Description

Sources SN-01 through SN-04 are 1,380 HP Four-Stroke Lean Burn (4SLB) Compressor Engines which pressurize natural gas. The engines are powered by natural gas.

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by using natural gas to fire the engines and operating at or below the 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	G3516B 1,380 HP Compressor Engine with Catalyst (Installed 2007)	PM ₁₀	0.2	0.5
		SO ₂	0.1	0.1
		VOC	2.2	9.4
		CO	2.2	9.4
		NO _x	4.6	20.0
02	G3516B 1,380 HP Compressor Engine with Catalyst (Installed 2007)	PM ₁₀	0.2	0.5
		SO ₂	0.1	0.1
		VOC	2.2	9.4
		CO	2.2	9.4
		NO _x	4.6	20.0
03	G3516B 1,380 HP Compressor Engine with Catalyst (Installed 2007)	PM ₁₀	0.2	0.5
		SO ₂	0.1	0.1
		VOC	2.2	9.4
		CO	2.2	9.4
		NO _x	4.6	20.0
04	G3516B 1,380 HP Compressor Engine with Catalyst (Installed 2008)	PM ₁₀	0.2	0.5
		SO ₂	0.1	0.1
		VOC	2.2	9.4
		CO	2.2	9.4
		NO _x	4.6	20.0

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by using natural gas to fire the engines, by operating at or below maximum capacity of the equipment, and by demonstrating compliance with Plantwide Condition #10. The HAP emissions listed for these sources are based upon published emission factors at the time of permit issuance. Any change in these emission factors will not constitute a violation of the HAP rates listed below. [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	G3516B 1,380 HP Compressor Engine with Catalyst	PM Formaldehyde*	0.2 0.19	0.5 0.80
02	G3516B 1,380 HP Compressor Engine with Catalyst	PM Formaldehyde*	0.2 0.19	0.5 0.80
03	G3516B 1,380 HP Compressor Engine with Catalyst	PM Formaldehyde*	0.2 0.19	0.5 0.80
04	G3516B 1,380 HP Compressor Engine with Catalyst	PM Formaldehyde*	0.2 0.19	0.5 0.80

* HAPs included in VOC totals.

3. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. Compliance with this specific condition shall be demonstrated through the use of natural gas as the only fuel.

SN	Limit	Regulatory Citation
SN-01 through SN-04	5%	§18.501, §19.503 & Dept Guidance

SN-05 through SN-15

G3606 Natural Gas-Fired Compressor Engine

Source Description

Sources SN-05 through SN-15 are 1,775 HP Four-Stroke Lean Burn (4SLB) Compressor Engines which pressurize natural gas. The engines are powered by natural gas.

Specific Conditions

- The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by using natural gas to fire the engines and operating at or below the 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	G3606 1,775 HP Compressor Engine with Catalyst (Installed 2009)	PM ₁₀	0.2	0.6
		SO ₂	0.1	0.1
		VOC	2.8	12.0
		CO	2.8	12.0
		NO _x	2.8	12.0
06	G3606 1,775 HP Compressor Engine with Catalyst (Installed 2009)	PM ₁₀	0.2	0.6
		SO ₂	0.1	0.1
		VOC	2.8	12.0
		CO	2.8	12.0
		NO _x	2.8	12.0
07	G3606 1,775 HP Compressor Engine with Catalyst (Installed 2009)	PM ₁₀	0.2	0.6
		SO ₂	0.1	0.1
		VOC	2.8	12.0
		CO	2.8	12.0
		NO _x	2.8	12.0
08	G3606 1,775 HP Compressor Engine with Catalyst (Installed 2009)	PM ₁₀	0.2	0.6
		SO ₂	0.1	0.1
		VOC	2.8	12.0
		CO	2.8	12.0
		NO _x	2.8	12.0
09	G3606 1,775 HP Compressor Engine with Catalyst (Installed 2009)	PM ₁₀	0.2	0.6
		SO ₂	0.1	0.1
		VOC	2.8	12.0
		CO	2.8	12.0
		NO _x	2.8	12.0

SN	Description	Pollutant	lb/hr	tpy
10	G3606 1,775 HP Compressor Engine with Catalyst (Installed 2009)	PM ₁₀	0.2	0.6
		SO ₂	0.1	0.1
		VOC	2.8	12.0
		CO	2.8	12.0
		NO _x	2.8	12.0
11	G3606 1,775 HP Compressor Engine with Catalyst (Installed 2009)	PM ₁₀	0.2	0.6
		SO ₂	0.1	0.1
		VOC	2.8	12.0
		CO	2.8	12.0
		NO _x	2.8	12.0
12	G3606 1,775 HP Compressor Engine with Catalyst (Installed 2009)	PM ₁₀	0.2	0.6
		SO ₂	0.1	0.1
		VOC	2.8	12.0
		CO	2.8	12.0
		NO _x	2.8	12.0
13	G3606 1,775 HP Compressor Engine with Catalyst (Installed 2009)	PM ₁₀	0.2	0.6
		SO ₂	0.1	0.1
		VOC	2.8	12.0
		CO	2.8	12.0
		NO _x	2.8	12.0
14	G3606 1,775 HP Compressor Engine with Catalyst (Installed 2009)	PM ₁₀	0.2	0.6
		SO ₂	0.1	0.1
		VOC	2.8	12.0
		CO	2.8	12.0
		NO _x	2.8	12.0
15	G3606 1,775 HP Compressor Engine with Catalyst (Installed 2009)	PM ₁₀	0.2	0.6
		SO ₂	0.1	0.1
		VOC	2.8	12.0
		CO	2.8	12.0
		NO _x	2.8	12.0

5. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by using natural gas to fire the engines, by operating at or below maximum capacity of the equipment, and by demonstrating compliance with Plantwide Condition #10. The HAP emissions listed for these sources are based upon published emission factors at the time of permit issuance. Any change in these emission factors will not constitute a violation of the HAP rates listed below. [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	G3606 1,775 HP Compressor Engine with Catalyst	PM	0.2	0.6
		Formaldehyde*	0.13	0.55

SN	Description	Pollutant	lb/hr	tpy
06	G3606 1,775 HP Compressor Engine with Catalyst	PM	0.2	0.6
		Formaldehyde*	0.13	0.55
07	G3606 1,775 HP Compressor Engine with Catalyst	PM	0.2	0.6
		Formaldehyde*	0.13	0.55
08	G3606 1,775 HP Compressor Engine with Catalyst	PM	0.2	0.6
		Formaldehyde*	0.13	0.55
09	G3606 1,775 HP Compressor Engine with Catalyst	PM	0.2	0.6
		Formaldehyde*	0.13	0.55
10	G3606 1,775 HP Compressor Engine with Catalyst	PM	0.2	0.6
		Formaldehyde*	0.13	0.55
11	G3606 1,775 HP Compressor Engine with Catalyst	PM	0.2	0.6
		Formaldehyde*	0.13	0.55
12	G3606 1,775 HP Compressor Engine with Catalyst	PM	0.2	0.6
		Formaldehyde*	0.13	0.55
13	G3606 1,775 HP Compressor Engine with Catalyst	PM	0.2	0.6
		Formaldehyde*	0.13	0.55
14	G3606 1,775 HP Compressor Engine with Catalyst	PM	0.2	0.6
		Formaldehyde*	0.13	0.55
15	G3606 1,775 HP Compressor Engine with Catalyst	PM	0.2	0.6
		Formaldehyde*	0.13	0.55

* HAPs included in VOC totals.

6. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. Compliance with this specific condition shall be demonstrated through the use of natural gas as the only fuel.

SN	Limit	Regulatory Citation
SN-05 through SN-15	5%	§18.501, §19.503 & Dept Guidance

SN-16 thru SN-19

Triethylene Glycol Dehydration Units

Source Description

The facility operates five (4) TEG dehydration units, each has benzene emissions below 0.9 Mg per year (1.0 tons/year).

Specific Conditions

7. The permittee shall not exceed the emission rates set forth in the following table. The pound per hour rates are based on maximum capacity. The permittee shall demonstrate compliance with this condition by operating at or less than maximum capacity. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
16	TEG dehydrator (Installed 2009)	VOC	0.1	0.1
17	TEG dehydrator (Installed 2009)	VOC	0.1	0.1
18	TEG dehydrator (Installed 2009)	VOC	0.1	0.1
19	TEG dehydrator (Installed 2009)	VOC	0.1	0.1

8. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with the ton per year benzene limits by Specific Condition #10 and #12. [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
16	TEG dehydrator	Benzene*	0.01	0.01
		H ₂ S**	0.01	0.04
17	TEG dehydrator	Benzene*	0.01	0.01
		H ₂ S**	0.01	0.04
18	TEG dehydrator	Benzene*	0.01	0.01
		H ₂ S**	0.01	0.04
19	TEG dehydrator	Benzene*	0.01	0.01
		H ₂ S**	0.01	0.04

*HAPs included in the VOC totals.

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

NESHAP Subpart HH Requirements

9. The TEG dehydration units are subject to 40 CFR 63, Subpart HH. The permittee is exempt from the requirements of paragraph §63.764 (c)(1) and (d) if the criteria listed in Specific Condition #10 are met, except that the records of the determination of these criteria must be maintained as required in §63.774(d)(1). [Regulation 19, §19.304 and 40 CFR Part 63, Subpart HH, §63.764(e)(1)]
10. The permittee must demonstrate that the actual annual average flowrate of natural gas to the glycol dehydration unit is less than 85 thousand standard cubic meters per day, as determined by the procedures specified in Specific Condition #11 or demonstrate that the actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere are less than 0.90 Megagram per year, as determined by the procedures specified in Specific Condition #12. [Regulation 19, §19.304 and 40 CFR Part 63, Subpart HH, §63.764(e)(1)(i) and §63.764(e)(1)(ii)]
11. If the permittee demonstrates exemption by determining glycol dehydration unit natural gas flowrate, the permittee shall do one of the following:
 - a. The permittee shall install and operate a monitoring instrument that directly measures natural gas flowrate to each glycol dehydration unit with an accuracy of plus or minus 2 percent or better. The permittee shall convert annual natural gas flowrate to a daily average by dividing the annual flowrate by the number of days per year the glycol dehydration unit processed natural gas. [Regulation 19, §19.304 and 40 CFR Part 63, Subpart HH, §63.772(b)(1)(i)]; or
 - b. The permittee shall document, to the Administrator's satisfaction, that the actual annual average natural gas flowrate to each glycol dehydration unit is less than 85 thousand standard cubic meters per day. [Regulation 19, §19.304 and 40 CFR Part 63, Subpart HH, §63.772(b)(1)(ii)]
12. If the permittee demonstrates exemption by determining the actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere are less than 0.90 Megagram per year (emissions shall be determined either uncontrolled, or with federally enforceable controls in place), the permittee shall do one of the following:
 - a. The permittee shall determine actual average benzene emissions using the model GRI-GLYCalc™, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc™ 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-95/0368.1); or
 - b. The permittee shall determine an average mass rate of benzene emissions in kilograms per hour through direct measurement using the methods in §63.772(a)(1)(i) or (ii), or an

alternative method according to §63.7(f). Annual emissions in kilograms per year shall be determined by multiplying the mass rate by the number of hours the unit is operated per year. This result shall be converted to Megagram per year. [Regulation 19, §19.304 and 40 CFR Part 63, Subpart HH, §63.772(b)(2)(i) and §63.772(b)(2)(ii)]

13. The permittee shall maintain records to demonstrate compliance with Specific Condition #10. The records shall be retained for at least five years following the date of each record. All applicable records shall be maintained in such a manner that they can be readily accessed. The most recent twelve months of records shall be retained on site or shall be accessible from a central location by computer or other means that provides access within two hours after a request. The remaining four years of records may be retained offsite. Records may be maintained in hard copy or computer-readable form including, but not limited to, on paper, microfilm, computer, floppy disk, magnetic tape, or microfiche. [Regulation 19, §19.304 and 40 CFR Part 63, Subpart HH, §63.774]

SN-20 through SN-22

Emergency Generator Engine

Source Description

Sources SN-20 through SN-22 are 293 HP Four-Stroke Rich Burn (4SRB) Emergency Generator Engines. The engines are powered by natural gas. These sources provide electric power to the station in the event of a power failure.

Specific Conditions

14. The permittee shall not exceed the emission rates set forth in the following table. The pound per hour rates are based on maximum capacity and compliance with the ton per year limits will be demonstrated by compliance with Specific Condition #17 and by using natural gas to fire the engines and operating at or below the maximum capacity of the equipment. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
20	Cummins GTA855-G1 Natural Gas-Fired Emergency Generator Engine with Catalyst (Installed 2009)	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.9	0.5
		CO	0.7	0.4
		NO _x	0.7	0.4
21	Cummins GTA855-G1 Natural Gas-Fired Emergency Generator Engine with Catalyst (Installed 2009)	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.9	0.5
		CO	0.7	0.4
		NO _x	0.7	0.4
22	Cummins GTA855-G1 Natural Gas-Fired Emergency Generator Engine with Catalyst (Installed 2009)	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.9	0.5
		CO	0.7	0.4
		NO _x	0.7	0.4

15. The permittee shall not exceed the emission rates set forth in the following table. The pound per hour rates are based on maximum capacity and compliance with the ton per year limits will be demonstrated by compliance with Specific Condition # 17 and burning natural gas as fuel. [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
20	Cummins GTA855-G1 Natural Gas-Fired	PM Formaldehyde*	0.1 0.05	0.1 0.03

SN	Description	Pollutant	lb/hr	tpy
	Emergency Generator Engine with Catalyst			
21	Cummins GTA855-G1 Natural Gas-Fired Emergency Generator Engine with Catalyst	PM Formaldehyde*	0.1 0.05	0.1 0.03
22	Cummins GTA855-G1 Natural Gas-Fired Emergency Generator Engine with Catalyst	PM Formaldehyde*	0.1 0.05	0.1 0.03

* HAPs included in VOC totals

16. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. Compliance with this specific condition shall be demonstrated through the use of natural gas as the only fuel.

SN	Limit	Regulatory Citation
SN-20 through SN-22	5%	§18.501, §19.503 & Dept Guidance

17. The permittee shall not operate the emergency generators more than a combined total of 1,000 hours in any consecutive twelve month period. [Regulation 19, §19.705, A.C.A §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]
18. The permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition #17. These records shall be updated on a monthly basis, shall be kept at the nearest manned site, and shall be provided to Department personnel upon request. An annual total and each individual month's data shall be submitted in accordance with General Provision # 7. [Regulation 19, §19.705 and 40 CFR Part 52 Subpart E]

DeSoto Gathering Company, LLC - New Quitman CPF-2
Permit #: 2216-AOP-R0
AFIN: 23-00969

SECTION V: COMPLIANCE PLAN AND SCHEDULE

DeSoto Gathering Company, LLC - New Quitman CPF-2 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 keep on site a listing of engines, with serial numbers, similar to the listing in Appendix D and make this listing available to Department personnel. The permittee may replace any existing compressor 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_x and CO emission testing in accordance with Plantwide Condition #11 or Plantwide Conditions #18 through #24, whichever is applicable, within 60 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_x and Reference Method 10 for CO. The permittee shall notify ADEQ of the replacement within 30 days of startup. This condition 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 26.707 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 §8-4-311]

8. The permittee shall test the fuel combusted in the compressor engines for sulfur within 180 days of issuance of permit 2216-AOP-R0 to show compliance with SO₂ emission limits. The natural gas must contain 2.0 grains of sulfur per 100 standard cubic feet of natural gas or less. The permittee shall use sorbent tubes supplied by National Draeger, Incorporated or equivalent. The results of these tests shall be submitted to the Department at the address listed in General Provision # 7. Testing for sulfur shall be conducted every five years for the fuel combusted in the compressor engines or within 60 days after the volume through the compressor is altered by addition of new wells or producing zones, whichever occurs first. The natural gas testing of the fuel on one pipeline may be representative for all compressor engines located along that pipeline. [Regulation No. 19 §19.702, and 40 CFR Part 52, Subpart E]

NESHAP Subpart ZZZZ Conditions

9. Sources SN-01 through SN-15, SN-20 through SN-22 are potentially subject to 40 CFR Part 63, Subpart ZZZZ (National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). As allowed by this regulation, compliance will be achieved via compliance with the requirements of 40 CFR Part 60, Subpart JJJJ (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines) for spark ignition engines. [Regulation 19, §19.304 and CFR Part 63, Subpart ZZZZ]

Testing Requirements

10. The permittee shall conduct tests for formaldehyde at the exhaust of each type of the compressor engines and each type of emergency generator engines, as shown in the table below, at the time of the next otherwise required test. This is a one-time test for each model of compressor engines in accordance with Plantwide Condition No. 3. EPA

Reference Method 320 or 323 of 40 CFR part 63, appendix A; or ASTM D6348-03, provided in ASTM D6348-03 Annex A5 (Analyte Spiking Technique); or an alternative method as approved by the Department prior to testing shall be used to test for formaldehyde. 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. [Regulation 19 and 40 CFR Part 52, Subpart E]

SN	Description	Testing Requirements
05-15	G3606 Natural Gas-Fired Compressor Engine w/ Catalyst	Five of eleven
01-04	G3516 Natural Gas-Fired Compressor Engine w/ Catalyst	Two of four
20-22	Natural Gas Emergency Generator Engine w/ Catalyst	One of three

11. For compressor engines not subject to NSPS Subpart JJJJ, the permittee shall test for CO and NO_x on at least one half of each type of compressor engine every 5 years. For each individual engine tested, the emissions for CO and NO_x shall be tested simultaneously. These testing requirements may be satisfied in part or in whole by testing that occurred under the previous air permits. Upon the issuance of permit 2191-AOP-R0, the initial testing for previously untested compressor engines will be completed within 180 days of issuance of this permit. EPA Reference Method 7E shall be used to determine NO_x and EPA Reference Method 10 shall be used to determine CO. 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 engine(s) is tested twice before another engine is tested once. If the tested emission rate for any pollutant is in excess of the permitted emission rate, the engine shall be retested for both pollutants within 60 days of receipt of the testing results. [Regulation 19, §19.702 and 40 CFR Part 52, Subpart E]

NSPS Subpart JJJJ Conditions

12. SN-01 through SN-15, SN-20 through SN-22 may be subject to 40 CFR Part 60, Subpart JJJJ- Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. The provisions of Subpart JJJJ are applicable to permittees of stationary spark ignition (SI) internal combustion engines (ICE), as specified in §60.4230(a)(1) through (5). The permittee shall maintain a list of engines subject to Subpart JJJJ, which includes the model of year of each engine and the date the engine was ordered by the permittee, and shall make the list available to Department personnel upon request. The engines subject to JJJJ shall comply with all applicable requirements under 40 CFR Part 60, Subpart JJJJ. These requirements include, but are not limited to, Plantwide Conditions #13 through #29. [§19.304 of Regulation 19 and 40 CFR Part 60, Subpart JJJJ]

13. The permittee shall comply with the emission standards in Table 1 of Subpart JJJJ for engines subject to Subpart JJJJ. [Regulation 19, §19.304 and 40 CFR Part 60, Subpart JJJJ, §60.4233(e)]
14. For all stationary spark ignition internal combustion engines subject to Subpart JJJJ with a maximum engine power greater than 19 KW (25 HP) that are rich burn engines that use LPG, for all, must comply with the emission standards in §60.4231(c). [Regulation 19, §19.304 and 40 CFR Part 63, Subpart JJJJ]
15. The permittee must operate and maintain all Stationary Spark Ignition (SI) Internal Combustion Engines (ICE) subject to 40 CFR Part 60 Subpart JJJJ in compliance with 40 CFR Part 60, Subpart JJJJ, §60.4233 over the entire life of the engine. [Regulation 19, §19.304 and 40 CFR Part 60, Subpart JJJJ, §60.4234]
16. After July 1, 2009, the permittee may not install stationary SI ICE subject to Subpart JJJJ with a maximum engine power of greater than or equal to 500 HP that do not meet the applicable requirements in §60.4233, except that lean burn engines with a maximum engine power greater than or equal to 500 HP and less than 1,350 HP that do not meet the applicable requirements in §60.4233 may not be installed after January 1, 2010. The requirements of this section do not apply to owners and operators of stationary SI ICE that have been modified or reconstructed, and they do not apply to engines that were removed from one existing location and reinstalled at a new location. [Regulation 19, §19.304 and 40 CFR Part 60, Subpart JJJJ, §60.4236(b) and §60.4236(e)]
17. For emergency stationary SI ICE subject to subpart JJJJ with a maximum engine power of greater than 19 KW (25 HP), the permittee may not install engines that do not meet the applicable requirements in §60.4233 after January 1, 2011. The requirements of this section do not apply to owners and operators of stationary SI ICE that have been modified or reconstructed, and they do not apply to engines that were removed from one existing location and reinstalled at a new location. [Regulation 19, §19.304 and 40 CFR Part 60, Subpart JJJJ, §60.4236(c) and §60.4236(e)]
18. For all stationary SI internal combustion engine(s) (SN-20 through SN-22) subject to Subpart JJJJ greater than or equal to 100 HP and less than or equal to 500 HP, the permittee must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, the permittee must conduct an initial performance test within 1 year of engine startup to demonstrate compliance. [Regulation 19, §19.304 and 40 CFR Part 60, Subpart JJJJ, §60.4243(a)(2)(ii)]
19. For all stationary SI internal combustion engine(s) (SN-01 through SN-15) subject to Subpart JJJJ greater than or equal to 500 HP, the permittee must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for

minimizing emissions. In addition, the permittee must conduct an initial performance test and conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first to demonstrate compliance. [Regulation 19, §19.304 and 40 CFR Part 60, Subpart JJJJ, §60.4243(b)(2)(ii)]

20. For engines subject to testing under Subpart JJJJ (SN-01 through SN-15, SN-20 through SN-22 and any replacement engine for these sources, per PWC #7), the permittee shall conduct performance tests within 10 percent of 100 percent peak load (or the highest achievable) and according to the requirements in §60.8 and under the specific conditions that are specified by Table 2 of Subpart JJJJ. [Regulation 19, §19.304 and 40 CFR Part 60, Subpart JJJJ, §60.4244(a)]
21. The permittee shall not conduct performance tests during periods of startup, shutdown, or malfunction, as specified in §60.8(c). If the stationary Spark Ignition internal combustion engine is non-operational, the permittee must conduct the performance test immediately upon startup of the engine. [Regulation 19, §19.304 and 40 CFR Part 60, Subpart JJJJ, §60.4244(b)]
22. For engines subject to testing under Subpart JJJJ (SN-01 through SN-15, SN-20 through SN-22 and any replacement engine for these sources, per PWC #7), the permittee must conduct three separate test runs for each performance test required in Plantwide Conditions #20 and #21, as specified in General Provisions to Subpart JJJJ, §60.8(f). Each test run must be conducted within 10 percent of 100 percent peak (or the highest achievable) load and last at least 1 hour. [Regulation 19, §19.304 and 40 CFR 60.4244 (c)]
23. To determine compliance with the NO_x mass per unit output emission limitation, the permittee shall convert the concentration of NO_x in the engine exhaust using Equation 1:

$$ER = \frac{C_d \times 1.912 \times 10^{-3} \times Q \times T}{HP - hr} \quad (\text{Eq. 1})$$

Where:

ER = Emission rate of NO_x in g/HP-hr.

C_d = Measured NO_x concentration in parts per million by volume (ppmv).

1.912×10⁻³ = Conversion constant for ppm NO_x to grams per standard cubic meter at 20 degrees Celsius.

Q = Stack gas volumetric flow rate, in standard cubic meter per hour, dry basis.

T = Time of test run, in hours.

HP-hr = Brake work of the engine, horsepower-hour (HP-hr).

[Regulation 19, §19.304 and 40 CFR 60.4244 (d)]

24. To determine compliance with the CO mass per unit output emission limitation, the permittee shall convert the concentration of CO in the engine exhaust using Equation 2:

$$ER = \frac{C_d \times 1.164 \times 10^{-3} \times Q \times T}{HP - hr} \quad (\text{Eq. 2})$$

Where:

ER = Emission rate of CO in g/HP-hr.

Cd= Measured CO concentration in ppmv.

1.164×10^{-3} = Conversion constant for ppm CO to grams per standard cubic meter at 20 degrees Celsius.

Q = Stack gas volumetric flow rate, in standard cubic meters per hour, dry basis.

T = Time of test run, in hours.

HP-hr = Brake work of the engine, in HP-hr.

[Regulation 19, §19.304 and 40 CFR 60.4244 (e)]

25. When calculating emissions of VOC, emissions of formaldehyde should not be included. To determine compliance with the VOC mass per unit output emission limitation, the permittee shall convert the concentration of VOC in the engine exhaust using Equation 3:

$$ER = \frac{C_d \times 1.833 \times 10^{-3} \times Q \times T}{HP - hr} \quad (\text{Eq. 3})$$

Where:

ER = Emission rate of VOC in g/HP-hr.

Cd= VOC concentration measured as propane in ppmv.

1.833×10^{-3} = Conversion constant for ppm VOC measured as propane, to grams per standard cubic meter at 20 degrees Celsius.

Q = Stack gas volumetric flow rate, in standard cubic meters per hour, dry basis.

T = Time of test run, in hours.

HP-hr = Brake work of the engine, in HP-hr.

[Regulation 19, §19.304 and 40 CFR 60.4244 (f)]

26. The permittee must meet the following notification, reporting and recordkeeping requirements for all 40 CFR Part 60 Subpart JJJJ engines.

(1) All notifications submitted to comply with 40 CFR Part 60 Subpart JJJJ and all documentation supporting any notification.

(2) Maintenance conducted on the engine.

(3) Documentation that the engine meets the emission standards.

[Regulation 19, §19.304 and 40 CFR 60.4245 (a) (1-2) and (4)]

27. For all stationary SI emergency ICE greater than or equal to 130 HP and less than 500 HP manufactured on or after July 1, 2011 that do not meet the standards applicable to non-emergency engines, the permittee must keep records of the hours of operation of the

engine that is recorded through the non-resettable hour meter. For all stationary SI emergency ICE greater than 25 HP and less than 130 HP manufactured on or after July 1, 2008, that do not meet the standards applicable to non-emergency engines, the permittee must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation; including what classified the operation as emergency and how many hours are spent for non-emergency operation. [Regulation 19, §19.304 and 40 CFR Part 60, Subpart JJJJ, §60.4245(b)]

28. For stationary SI ICE greater than or equal to 500 HP that have not been certified by an engine manufacturer to meet the emission standards in §60.4231, the permittee must submit an initial notification as required in §60.7(a)(1). The notification must include the following information.

- (1) Name and address of the owner or operator;
- (2) The address of the affected source;
- (3) Engine information including make, model, engine family, serial number, model year, maximum engine power, and engine displacement;
- (4) Emission control equipment; and
- (5) Fuel used.

[Regulation 19, §19.304 and 40 CFR 60.4245 (c) 1-5]

29. The permittee must submit a copy of each performance test as conducted in §60.4244 within 60 days after the test has been completed. [Regulation 19, §19.304 and 40 CFR 60.4245 (d)]

Title VI Provisions

30. The permittee must comply with the standards for labeling of products using ozone-depleting substances. [Regulation 19, §19.304 and 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.
31. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [Regulation 19, §19.304 and 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.
32. 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.
33. 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.
34. 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.

Permit Shield

35. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements, as of the date of permit issuance, included in and specifically identified in the following table of this condition. The permit specifically identifies the following as applicable requirements based upon the information submitted by the permittee in an application dated September 22, 2009.

Applicable Regulations

Source No.	Regulation	Description
Plantwide	Arkansas Regulation 19	Regulations of the Arkansas Plan of Implementation for Air Pollution Control
Plantwide	Arkansas Regulation 26	Regulations of the Arkansas Operating Air Permit Program
Plantwide	40 CFR 60, Subpart HH	National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities
Plantwide	40 CFR 60, Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
Plantwide	40 CFR 63, Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

The permit specifically identifies the following as inapplicable based upon information submitted by the permittee in an application dated September 22, 2009.

Inapplicable Regulations

Source No.	Regulation	Description	Discussion
Plantwide	40 CFR 60, Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984	No storage vessels with capacity greater than 19,815 gallon threshold.
Plantwide	40 CFR, Subpart KKK	Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants	Facility does not meet definition of "natural gas processing plant." Natural gas liquids not processed.
Plantwide	40 CFR, Subpart LLL	Standards of Performance for Onshore Natural Gas Processing: SO ₂ Emissions	Facility does not utilize sweetening unit.
Plantwide	40 CFR, Subpart III	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	No compression ignition engines on site.
Plantwide	40 CFR, Subpart 64	Compliance Assurance Monitoring (CAM)	No individual engine will emit greater than 100 tpy of a pollutant in the absence of the controls.

DeSoto Gathering Company, LLC - New Quitman CPF-2

Permit #: 2216-AOP-R0

AFIN: 23-00969

Source No.	Regulation	Description	Discussion
Plantwide	40 CFR, Subpart 68	Chemical Accident Prevention	Facility not subject to program.

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 September 22, 2009.

Description	Category
Four (4) Gas-Fired Dehydrator Reboilers, 0.75 MMBtu/hr each	A-1
Twenty-one (21) Fiberglass Packing Vent Tanks, 5 bbl each	A-2
Four (4) dehydrator Vent Tanks, 5 bbl each	A-2
Two (2) TEG Tanks, 1000 gallons each	A-3
Sixteen (16) Compressor Oil Tanks, 366 gallons each	A-3
Sixteen (16) Antifreeze Tanks, 366 gallons each	A-3
Eighteen (18) Engine Oil Tanks, 366 gallons each	A-3
Blowdown Vent	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)]

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 Part 60, Subpart JJJJ- *Standards of Performance for Stationary Spark
Ignition Internal Combustion Engines*

Appendix B – 40 CFR Part 63, Subpart HH-*National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities*

Appendix C – 40 CFR Part 63, Subpart ZZZZ-National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Appendix D – Source Engine List with Serial Numbers

DeSoto Gathering Company New Quitman CPF-2 - List of Engines

Source	Description	Installation/ Modification Date	HP	Serial Number
SN-01	G3516 Compressor Engine with Catalyst	2007	1340	WPW00761
SN-02	G3516 Compressor Engine with Catalyst	2007	1340	WPW00837
SN-03	G3516 Compressor Engine with Catalyst	2007	1340	WPW00785
SN-04	G3516 Compressor Engine with Catalyst	2008	1340	WPW00666
SN-05	G3606 Compressor Engine with Catalyst	2009	1775	4ZS01126
SN-06	G3606 Compressor Engine with Catalyst	2009	1775	4ZS01128