

DEQ GENERAL AIR PERMIT FOR MINOR SOURCE NATURAL GAS COMPRESSION STATIONS

Permit No. : 1868-AGP-000

IS ISSUED TO:

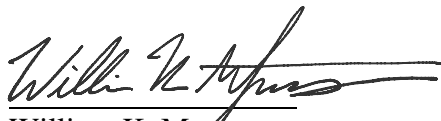
All Qualifying Minor Source Natural Gas Compression Stations within the State of Arkansas

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

December 14, 2020 AND December 13, 2025

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

Signed:



William K. Montgomery
Interim Associate Director
DEQ, Office of Air Quality

May 21, 2020
Date

Table of Contents

Section I: INTRODUCTION	4
Summary of Permit Activity	4
Process Description	5
Regulations	6
Total Allowable Emissions	7
Section II: PERMIT HISTORY	8
Section III: EMISSION UNIT INFORMATION	10
Section IV: INSIGNIFICANT ACTIVITIES	16
Section V: GENERAL CONDITIONS	17

Natural Gas Compression Stations

Permit #: 1868-AGP-000

List of Acronyms and Abbreviations

Ark. Code Ann.	Arkansas Code Annotated
AFIN	Arkansas DEQ Facility Identification Number
C.F.R.	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
No.	Number
NOI	Notice of Intent
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM ₁₀	Particulate Matter Smaller Than Ten Microns
SO ₂	Sulfur Dioxide
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

Section I: INTRODUCTION

Summary of Permit Activity

This permit is a renewal of Air Permit #1868-AGP-000 for certain minor source Natural Gas Compression Stations in Arkansas (referred to as either the “General Permit” or “GP”). A condition allowing for units subject to 40 C.F.R. § 60 Subpart OOOOa – *Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced After September 18, 2015* has been added during this renewal. There are no permitted emission changes.

Definitions

The following definitions shall serve for the purposes of this permit. Those terms and phrases used in this General Permit, which are not specifically defined herein, shall have the same meaning as those terms which are used in APC&EC Regulation No. 19 Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19).

Air Contaminant - any solid, liquid, gas, or vapor, or any combination thereof. The following shall not be considered air contaminants: water vapor, oxygen, carbon dioxide, nitrogen, hydrogen, and inert gases. This definition can be found in Regulation 18 and is regulated by the Arkansas Code Annotated § 8-4-303.

Air Pollution - the presence in the outdoor atmosphere of one (1) or more air contaminants in quantities, or characteristics, and or a duration which are materially injurious, or can be reasonably expected to become materially injurious, to human, plant, animal life or property, or which unreasonably interfere with enjoyment of life or use of property throughout the state or throughout the area of the state as shall be affected thereby. This definition can be found in Regulation 18 and is regulated by the Arkansas Code Annotated § 8-4-303.

CO – Carbon Monoxide as measured by EPA Reference Method 10.

Confirmation Letter – a letter submitted by the Division of Environmental Quality to (1) an applicant for qualification under this General Permit to confirm approval of the applicable Notice of Intent to operate; or (2) an existing permittee to confirm approval of an applicable Notice of Intent for startup of a new or replacement unit at the facility authorized to operate under this General Permit.

Facility - for the purposes of this permit a “facility” is defined as all natural gas compression stations equipment located on the same or adjoining properties which share a common owner or operator.

Gas Processing Plant Process Unit - Equipment assembled for the extraction of natural gas liquids from field gas, the fractionation of the liquids into natural gas products, or other operations associated with the processing of natural gas products. A process unit can operate independently if supplied with sufficient feed or raw materials and sufficient storage facilities for the products

Natural Gas Compression Stations
Permit #: 1868-AGP-000

Gas well - An onshore well drilled principally for production of natural gas

Hazardous Air Pollutants (HAPs) - are any compounds listed in 112(b) of the Clean Air Act.

H₂S – Hydrogen Sulfide

Insignificant Activity - activities which are deemed by the Division to be insignificant based on size, emission rate, production rate, or activity. Any activity for which a state or federal applicable requirement applies (such as NSPS, NESHAP, or MACT) is not insignificant, even if this activity meets the criteria in Regulation 19 Appendix A or B. A list of activities considered by the Division to be insignificant can be found in Appendices A and B of the *Arkansas Plan of Implementation for Air Pollution Control*.

Long Ton – Unit of measure weighing 2240 pounds.

Natural Gas Compression Station - is defined as compressors and related auxiliary equipment utilized to compress natural gas.

NESHAPs – means any Federal standard contained in 40 C.F.R. § 61 National Emission Standards for Hazardous Air Pollutants or 40 C.F.R. § 63, National Emission Standards for Hazardous Air Pollutants for Source Categories

Notice of Intent (or NOI) – a notice submitted to the Division by (1) a new facility, in order to obtain initial coverage under this General Permit; or (2) an existing facility under this General Permit, in order to begin startup of a new or replacement unit.

NO_x – all oxides of nitrogen, except nitrous oxide, as measured by EPA Reference Method 7E (i.e. NO, NO₂, NO₃, etc.)

NSPS – means any Federal standard contained in 40 C.F.R. § 60, Standards of Performance for New Stationary Sources

Opacity – the degree to which air emissions reduce the transmission of light and obscure the view of an object in the background

PM – particulate matter, any airborne finely divided solid or liquid material with an aerodynamic diameter equal to or less than 100 micrometers.

PM₁₀ – particulate matter smaller than 10 micrometers in diameter.

SO₂ – Sulfur Dioxide, for the purposes of this permit, emissions of sulfur dioxide shall be determined by a mass balance calculation based on the sulfur content of the natural gas used at the facility.

VOC – Volatile Organic Compounds as measured by EPA Reference Method 25A.

Process Description

A natural gas compression station is defined as compressors and related auxiliary equipment used for the agglomeration of gas supplies in a production region or compression of natural gas in a transportation station. The auxiliary equipment may include amine sweetening (if the design capacity is less than two long tons per day of hydrogen sulfide (H₂S) per unit in the acid gas, expressed as sulfur), triethylene glycol dehydrators and natural gas emergency engines.

Natural Gas Compression Stations
Permit #: 1868-AGP-000

This permit is intended as an alternative to a traditional Regulation 18/19 minor source permit for facilities that are minor sources without considering certain traditional operating restrictions. Use of non-selective catalytic converters with a fuel-air ratio controller (for a rich burn engine) or an oxidation catalyst (for a lean burn engine) to control CO and NO_x emissions are not considered an operating restriction and would not disqualify a facility from otherwise applying for this General Permit.

This permit allows gas sweetening for sweetening units with a design of less than two long tons per day of hydrogen sulfide expressed as sulfur in order to avoid all but recordkeeping requirements of 40 C.F.R. § 60, Subparts LLL and OOOO. Facilities are still limited to 2.37 tons per year of H₂S emissions.

The general permit allows operation of stationary natural gas fired spark ignition engines and natural gas fired turbine engines. The engines may be subject to 40 C.F.R. § 60, Subparts JJJJ, GG, KKK, or § 63 Subpart ZZZZ.

The facility may operate triethylene glycol (TEG) dehydrators subject to 40 C.F.R. 63 Subpart HH - National Emission Standards for Hazardous Air Pollutants from Oil and Gas Production Facilities. Natural gas combustion for reboilers and miscellaneous combustion sources are insignificant activities or permitted under the facility wide emission limits.

Facilities with actual emissions less than the Reg.18.315 thresholds of Regulation 18 do not require any permit as long as records are available to demonstrate the level of emissions and the facilities are not subject to any state or federal applicable requirement (such as NSPS, NESHAP, or MACT) not excluded from permitting by Reg.18.301(B)(3). Facilities with emissions at the Reg.18.315 levels must apply for permit registration, the General Permit or a minor source permit.

This permit is not intended for sources which are before the custody transfer meter but could be used in such cases. Such facilities may be exempt from permitting as an Insignificant Activity under Regulation 19, Appendix B, Item 76, depending on applicable federal requirements. This permit is also not intended for gas wells or gas processing plants.

Facilities operating under this permit must comply with all conditions and requirements set forth herein.

Regulations

The following table contains the regulations applicable to this permit. The listed federal regulations that are in effect as of the effective date of the General Permit renewal shall be applicable, as well as any subsequent amendments to such regulations, during the pendency of each General Permit renewal.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective March 14, 2016
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective October 10, 2019
40 C.F.R. § 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

Natural Gas Compression Stations
Permit #: 1868-AGP-000

40 C.F.R. § 60 Subpart LLL – Standards Of Performance For Onshore Natural Gas Processing
40 C.F.R. § 63 Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
40 C.F.R. § 63 Subpart HH - National Emission Standards for Hazardous Air Pollutants from Oil and Gas Production Facilities
40 C.F.R. § 60 Subpart OOOO - Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification, or Reconstruction Commenced After August 23, 2011, and on or before September 18, 2015
40 C.F.R. § 60 Subpart OOOOa - Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification, or Reconstruction Commenced After September 18, 2015
40 C.F.R. § 60 Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
40 C.F.R. § 60 Subpart GG - Standards of Performance for Stationary Gas Turbines
40 C.F.R. § 60 Subpart KKKK - Standards of Performance for Stationary Combustion Turbines
40 C.F.R. § 63 Subpart CCCCCC - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities

Total Allowable Emissions

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

TOTAL ALLOWABLE EMISSIONS	
Pollutant	Emission Rates
	tpy
PM	10
PM ₁₀	10
SO ₂	25
VOC	95
CO	95
NO _x	95
H ₂ S	2.37
Single HAP	9.9
Total HAPs	24.9

Section II: PERMIT HISTORY

The initial General Permit was issued on February 9, 2000.

The General Permit was administratively amended on March 6, 2000 to clarify the compliance mechanism for annual emissions (i.e. compliance is demonstrated by burning natural gas).

The General Permit was modified on February 21, 2002. This modification was to provide a specific testing methodology and time frame to demonstrate compliance with the fuel gas sulfur content limits and to allow for the use of sorbent tubes. In addition, the testing time frame for facilities with allowable emissions of 50 - 80 tons per year was clarified by adding the words “every five years” which were omitted. Further, applicability requirements are clarified and definitions were added in this modification.

The General Permit was renewed in 2005. The renewal increased the testing intervals from one year to five years, added Hazardous Air Pollutants and clarified that Act 163 notices were not required and that the testing for gas sulfur content pertains to new wells and zones.

The General Permit was administratively modified on August 22, 2007, to change the address of Arkansas Department of Environmental Quality.

The General Permit was modified on August 27, 2008 to include the requirements of 40 C.F.R. Part 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines, 40 C.F.R. 63 Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines and 40 C.F.R. 60 Subpart LLL – Standards of Performance for Onshore Natural Gas Processing for facilities with a design capacity of less than two long tons per day of H₂S expressed as sulfur.

The General Permit was renewed on December 14, 2010. This permit allowed operation of amine sweetening if the design capacity is less than two long tons per day of hydrogen sulfide (H₂S) in the acid gas (expressed as sulfur), triethylene glycol dehydrators and miscellaneous natural gas engines at sites where compression is not performed. The permit added the conditions for triethylene glycol dehydrators found in 40 C.F.R. § 63, Subpart HH, National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities and the requirements for minor sources for 40 C.F.R. § 63 Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. The General Permit made all minor source natural gas compression stations eligible for the General Permit.

The General Permit was renewed on December 14, 2015. Changes included an increase of the VOC emission limit to 95 tons per year, the allowance of the FERC tariff for sulfur to substitute for the requirement to sample for sulfur by Dräger tubes, the removal of the specific emission limit for benzene, and the incorporation by reference of the following applicable federal regulations:

Natural Gas Compression Stations

Permit #: 1868-AGP-000

40 C.F.R. § 63 Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

40 C.F.R. § 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

40 C.F.R. § 60 Subpart LLL – Standards of Performance for Onshore Natural Gas Processing

40 C.F.R. § 63 Subpart HH - National Emission Standards for Hazardous Air Pollutants from Oil and Gas Production Facilities

40 C.F.R. § 60 Subpart OOOO - Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution

40 C.F.R. § 60 Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

40 C.F.R. § 60 Subpart GG - Standards of Performance for Stationary Gas Turbines

40 C.F.R. § 60 Subpart KKKK - Standards of Performance for Stationary Combustion Turbines

40 C.F.R. § 63 Subpart CCCCCC - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities

Section III: EMISSION UNIT INFORMATION

Specific Conditions

1. The permittee shall comply with all emission rates and applicable requirements identified in the NOI submitted to and approved by the Division of Environmental Quality for the facility. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
2. The permittee will not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by burning natural gas. The sources covered under this condition include all air pollution emitting activities at the facility [Reg.19.501 *et seq.* and 40 C.F.R. § 52 Subpart E]

SN	Description	Pollutant	lb/hr	tpy
N/A	Facility Wide	PM ₁₀	N/A	10
		SO ₂		40
		VOC		95
		CO		95
		NO _x		95

3. The permittee shall not exceed the criteria pollutant (PM₁₀, SO₂, VOC, CO, NO_x) emission limits established in the Confirmation Letter for this General Permit. The Confirmation Letter is considered part of the General Permit. The permittee must keep a copy of the letter at the nearest manned facility at all times. [Reg.19.501 *et seq.* and 40 C.F.R. § 52 Subpart E]
4. The permittee will not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by burning natural gas. Compliance with the Hydrogen Sulfide emissions is shown by maximum capacity as stated in the NOI. The sources covered under this condition include all air pollution emitting activities at the facility. [Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Description	Pollutant	lb/hr	tpy
N/A	Facility Wide	PM	N/A	10
		Any Single HAP		9.9
		Total All HAPs		24.9
N/A	Amine Sweeteners	Hydrogen Sulfide	0.55	2.37

5. Visible emissions will not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. For combustion sources, compliance with this condition will be demonstrated by burning natural gas only. [Reg.18.501 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Limit	Regulatory Citation
Facility Wide	5%	Reg.18.501

6. The permittee will not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of Ark. Code Ann. § 8-4-303. [Reg.18.801 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
7. The permittee will not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [Reg.18.901, and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
8. The permittee shall use only natural gas with sulfur content less than 154 ppm as fuel. [Reg.19.705, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
9. For a new facility obtaining initial coverage under this general permit, the permittee shall test the fuel gas to the compressor engine within thirty (30) days from the date of its receipt of the Confirmation Letter from the Division of Environmental Quality approving the initial coverage Notice of Intent. The permittee shall test using sorbent tubes supplied by National Draeger, Incorporated or equivalent. Testing shall be used to confirm that the sulfur in the fuel does not exceed the limit in Specific Condition No. 8. The permittee shall retest every five (5) years after the date of the initial test or when the composition of the raw natural gas is altered by addition of new wells or producing zones, whichever occurs first. The permittee may use the applicable FERC tariff to satisfy this requirement. [Reg.19.702 and 40 C.F.R. § 52 Subpart E]
10. The permittee shall maintain written logs of the tests required by Specific Condition No. 9 at the location or the nearest field office. The permittee must keep a copy of the FERC tariff if using the tariff to comply with the sulfur requirement. The permit shall be available for inspection on the premises where the control apparatus is located as required by General Condition 15, or in the event such premises is unmanned, the permit shall be available for inspection at the nearest manned location. [Reg.19.705 and 40 C.F.R. § 52 Subpart E]
11. If the total potential emissions, as listed in the facility's NOI, for compressor engines are greater than 50 tons per year for either NO_x or CO, the permittee shall simultaneously conduct tests for CO and NO_x on one-half of each type of compressor engine every five years in accordance with General Condition #7 for engines not subject to periodic testing under 40 C.F.R. § 63 Subpart ZZZZ or 40 C.F.R § 60 Subpart JJJJ. The permittee will conduct stack testing using EPA reference method 10 and 7E for CO and NO_x, respectively. Unless otherwise approved by the Division of Environmental Quality, the permittee shall test the engines within ninety (90%) of their rated capacity. Emission testing results shall be extrapolated to correlate with 100% of the permitted capacity to

demonstrate compliance. Extrapolation shall be the standard linear extrapolation or other method of extrapolation as approved by the Division of Environmental Quality prior to testing. The permittee shall measure the operation rate during the test. If the tests are not performed within this range, the permittee shall be limited to operating within 10% above the tested rate. The Division of Environmental Quality reserves the right to select the engine(s) to be tested. The engine(s) tested shall be rotated so that no similar (i.e. make and model) engine(s) is tested twice before a similar engine (i.e. make and model) of equal HP is tested once. If the tested emission rate for any pollutant is in excess of the permitted emission rate, the engine shall be re-tested for both pollutants. The permittee shall notify the Division of Environmental Quality of any testing as required by General Condition 7. The testing requirement does not apply to emergency engines operated less than 500 hours per year. [Reg.19.702 and 40 C.F.R. § 52 Subpart E]

12. If the total allowable emissions in Specific Condition #1 are greater than 50 ton per year for either NO_x or CO and the new unit has not been previously undergone a compliance test pursuant to General Condition #7 within the last five years, the permittee must simultaneously conduct tests for CO and NO_x on any new or replacement engine within 180 days of the startup of the new unit or the requirements of 40 C.F.R. § 60 Subpart JJJJ, whichever is later. The permittee will conduct stack testing using EPA reference method 10 and 7E for CO and NO_x, respectively. Unless otherwise approved by the Division of Environmental Quality, the permittee shall test the engines within ninety (90%) of their rated capacity. Emission testing results shall be extrapolated to correlate with 100% of the permitted capacity to demonstrate compliance. Extrapolation shall be the standard linear extrapolation or other method of extrapolation as approved by the Division of Environmental Quality prior to testing. If the tests are not performed within this range, the permittee shall be limited to operating within 10% above the tested rate. The permittee shall notify the Division of Environmental Quality of any testing as required by General Condition 7. Emergency engines that operate less than 500 hours per year are not required to test. [Reg.19.702 and 40 C.F.R. § 52 Subpart E]
13. For a facility currently covered under the General Permit, the permittee must submit an updated Notice of Intent before the startup of any new or replacement unit. Records for the date of startup must be updated at the nearest manned facility within twenty-four (24) hours of operation. The Division will send the permittee an updated Confirmation Letter which is to be kept at the nearest manned facility at all times. The permittee may begin construction and/or operation upon submittal of the updated Notice of Intent for such startup of a new or replacement unit or for any modifications or amendments to the NOI. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
14. A facility applying for initial coverage under the General Permit must obtain a Confirmation Letter before beginning construction and operation of new sources. In the event a Confirmation Letter is not received by the applicant within thirty (30) calendar days from the submittal of the complete NOI to the Division, the applicant may construct and operate the facility at its own risk. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

15. Only spark ignition reciprocating engines and stationary natural gas turbines are allowed in this general permit. The facility must comply with any and all applicable sections of 40 C.F.R. § 60 Subpart JJJJ – *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines*. The facility must comply with any and all applicable sections 40 C.F.R. § 60 Subpart GG - Standards of Performance for Stationary Gas Turbines or 40 C.F.R. § 60 Subpart KKKK - Standards of Performance for Stationary Combustion Turbines. The facility will comply with the requirements as identified in the NOI. [Reg.19.303, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R § 60 Subpart JJJJ]
16. Only facilities that have a design capacity less than 2 long tons per day (LT/D) of hydrogen sulfide (H₂S) in the acid gas (expressed as sulfur) amine sweeteners are allowed. The facility must comply with all applicable sections of 40 C.F.R. § 60 Subpart LLL – *Standards of Performance for Onshore Natural Gas Processing*. The permittee may not exceed a design capacity of 2 long tons per day (LT/D) of hydrogen sulfide (H₂S) in the acid gas (expressed as sulfur) as described by 40 C.F.R. § 60.640(b). The facility will comply with the recordkeeping requirements of 40 C.F.R. § 60.647(c) and with the requirements as identified in the NOI. [Reg.19.303, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R § 60 Subpart LLL]
17. The facility must comply with any and all applicable sections of 40 C.F.R. § 63 Subpart ZZZZ – *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*. The facility will comply with the requirements as identified in the NOI. This permit does not allow coverage for compression ignition engines. [Reg.19.303, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R § 63 Subpart ZZZZ]
18. Only TEG units meeting the exemptions of 40 C.F.R. § 63.764(e) which are specified as follows are allowed. The permittee must show that either 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 § 63.772(b)(1), or that the actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere are less than 0.90 megagrams (1 ton) per year, as determined by the procedures specified in § 63.772(b)(2). The facility must comply with all applicable sections of 40 C.F.R. § 63 Subpart HH – *National Emission Standards for Hazardous Air Pollutants from Oil and Gas Production Facilities*. The facility will comply with the requirements as identified in the NOI. [Reg.19.303, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 63 Subpart HH]
19. The facility must comply with all applicable sections of 40 C.F.R. § 60 Subpart OOOO – *Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification, or Reconstruction Commenced After August 23, 2011, and on or before September 18, 2015*. The only sections of OOOO that are included are reciprocating compressors standards of § 60.5385, pneumatic controller

- standards of § 60.5390, and sweetening units that do not exceed a design capacity of 2 long tons per day (LT/D) of hydrogen sulfide (H₂S) in the acid gas (expressed as sulfur) as described by 40 C.F.R. § 60.5365(g)(3). The facility will comply with the recordkeeping requirements of the subpart and with the requirements as identified in the NOI. [Reg.19.303, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R § 60 Subpart OOOO]
20. The facility must comply with all applicable sections of 40 C.F.R. § 60 Subpart OOOOa – *Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced After September 18, 2015*. The only sections of OOOOa that are included are reciprocating compressors standards of § 60.5385a, pneumatic controller standards of §§ 60.5390a and 60.5393a, and sweetening units that do not exceed a design capacity of 2 long tons per day (LT/D) of hydrogen sulfide (H₂S) in the acid gas (expressed as sulfur) as described by 40 C.F.R. § 60.5365(g)(3). The facility will comply with the recordkeeping requirements of the subpart and with the requirements as identified in the NOI. [Reg.19.303, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R § 60 Subpart OOOOa]
 21. Any reboiler must be rated at less than 100,000,000 BTU/hr heat input and burn natural gas only. The facility must comply with all applicable sections of 40 C.F.R. § 60 Subpart Dc – *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*. The facility will comply with the recordkeeping requirements of the subpart and with the requirements as identified in the NOI. [Reg.19.303, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R § 60 Subpart Dc]
 22. For any turbine meeting the applicability requirements of § 60.330, the facility must comply with all applicable sections of 40 C.F.R. § 60 Subpart GG – *Standards of Performance for Stationary Gas Turbines*. The facility will comply with the requirements as identified in the NOI. [Reg.19.303, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R § 60 Subpart GG]
 23. For any turbine meeting the applicability requirements of § 60.4305 the facility must comply with all applicable sections of 40 C.F.R. § 60 Subpart KKKK – *Standards of Performance for Stationary Combustion Turbines*. The facility will comply with the requirements as identified in the NOI. [Reg.19.303, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R § 60 Subpart KKKK]
 24. For any gasoline storage tank, the facility must comply with all applicable sections of 40 C.F.R. § 63 Subpart CCCCCC – *National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities*. The permittee must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. The facility must have a monthly throughput of less than 10,000 gallons of gasoline. The facility will comply with the requirements as

Natural Gas Compression Stations
Permit #: 1868-AGP-000

identified in the NOI. [Reg.19.303, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R § 63 Subpart CCCCCC]

Section IV: INSIGNIFICANT ACTIVITIES

The permittee must submit a list of activities which are considered insignificant in Regulations 18 and 19 (Appendix A). The Division of Environmental Quality will document these activities in the Confirmation Letter if the insignificant activities are categorized in Group A. Blowdowns and fugitives may be included in the insignificant activities if documented on the Notice of Intent.

Section V: GENERAL CONDITIONS

1. Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (Ark. Code Ann. § 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 (Ark. Code Ann. § 8-4-101 *et seq.*). Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (Ark. Code Ann. § 8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. This permit does not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated under the Act. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
3. The permittee shall notify the Division of Environmental Quality in writing within thirty (30) days after each of the following events: commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [Reg.19.704 and/or Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [Reg.19.410(B) and/or Reg.18.309(B) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
5. The permittee must keep records for five years to enable the Division of Environmental Quality to determine compliance with the terms of this permit such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Division of Environmental Quality may use the records, at the discretion of the Division of Environmental Quality, to determine compliance with the conditions of the permit. [Reg.19.705 and/or Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
6. A responsible official, as defined in Regulations 18 and 19, must certify any reports requiring certification under any applicable federal regulation, Regulation 18, or Regulation 19. All reports shall be submitted to the Division of Environmental Quality at the address below. [Reg.19.705 and/or Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Arkansas Division of Environmental Quality
Office of Air Quality
ATTN: Compliance Inspector Supervisor

Natural Gas Compression Stations

Permit #: 1868-AGP-000

5301 Northshore Drive
North Little Rock, AR 72118-5317

7. The permittee shall test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) newly constructed or 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) existing equipment already operating according to the time frames set forth by the Division of Environmental Quality. The permittee must notify the Division of Environmental Quality of the scheduled date of compliance testing at least fifteen (15) business days in advance of such test. The permittee must submit compliance test results to the Division of Environmental Quality within thirty (30) calendar days after the completion of testing. [Reg.19.702 and/or Reg.18.1002 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
8. The permittee shall provide: [Reg.19.702 and/or Reg.18.1002 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
 - a. Sampling ports adequate for applicable test methods;
 - b. Safe sampling platforms;
 - c. Safe access to sampling platforms; and
 - d. Utilities for sampling and testing equipment
9. The permittee shall operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee shall maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [Reg.19.303 and/or Reg.18.1104 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will be subject to enforcement action. The Division of Environmental Quality may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [Reg.19.601 and/or Reg.18.1101 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
 - a. The permittee demonstrates to the satisfaction of the Division of Environmental Quality that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.
 - b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Division of Environmental Quality by the end of the next business day after the occurrence or the discovery of the occurrence.

- c. The permittee must submit to the Division of Environmental Quality, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, the information need not be submitted again.
11. The permittee shall allow representatives of the Division of Environmental Quality upon the presentation of credentials: [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
 - a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit;
 - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act;
 - c. To inspect any monitoring equipment or monitoring method required in this permit;
 - d. To sample any emission of pollutants; and
 - e. To perform an operation and maintenance inspection of the permitted source.
12. The Division of Environmental Quality issued this permit in reliance upon the statements and presentations made in the NOI. The Division of Environmental Quality has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
13. The Division of Environmental Quality may revoke or modify this permit when, in the judgment of the Division of Environmental Quality, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated the Arkansas Water and Air Pollution Control Act. [Reg.19.410(A) and/or Reg.18.309(A) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
14. This permit may be transferred. An applicant for a transfer must submit a written request for transfer of the permit on a form provided by the Division of Environmental Quality and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Division of Environmental Quality denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. The Division of Environmental Quality may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [Reg.19.407(B) and/or

Natural Gas Compression Stations

Permit #: 1868-AGP-000

Reg.18.307(B) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

15. This permit shall be available for inspection on the premises where the control apparatus is located. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
 16. This permit authorizes only those pollutant emitting activities addressed herein. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
 17. This permit supersedes and voids all previously issued air permits for this facility. [Reg. 18 and/or Reg. 19 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
 18. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [Ark. Code Ann. § 8-1-105(c)]
 19. 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 Division of Environmental Quality approval. The Division of Environmental Quality 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.
- [Reg.18.314(A) and/or Reg.19.416(A), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]
20. 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 Division of Environmental Quality approval. Any such emissions shall be included in the facility's total emissions and reported as such. The Division of Environmental Quality 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 Division of Environmental Quality to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;

Natural Gas Compression Stations

Permit #: 1868-AGP-000

- 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.

[Reg.18.314(B) and/or Reg.19.416(B), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

21. 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 Division of Environmental Quality approval. The Division of Environmental Quality may grant such a request, at its discretion under the following conditions:
- a. The request does not violate a federal requirement; and
 - b. The request provides an equivalent or greater degree of actual monitoring to the current requirements.

[Reg.18.314(C) and/or Reg.19.416(C), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

22. Any credible evidence based on sampling, monitoring, and reporting may be used to determine violations of applicable emission limitations. [Reg.18.1001, Reg.19.701, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]