

OPERATING AIR PERMIT

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

Permit #: 972-AOP-R0

IS ISSUED TO:

Arkansas Western Gas Company-Woolsey Compressor Station
County Road 508
Ozark, Arkansas 72949
Franklin County
CSN: 24-0068

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

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels

Date

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SECTION I: FACILITY INFORMATION

PERMITTEE:	Arkansas Western Gas-Woolsey Compressor Station
CSN:	24-0068
PERMIT NUMBER:	972-AOP-R0
FACILITY ADDRESS:	County Road 508 Ozark, Arkansas 72949
COUNTY:	Franklin
CONTACT NAME:	Ron Carver
TELEPHONE NUMBER:	(501) 521-5400
REVIEWING ENGINEER:	Blake McCord
UTM North-South (X):	425.0
UTM East-West (Y):	3932.0

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SECTION II: INTRODUCTION

Arkansas Western Gas Company (AWG) operates a compression and dehydration station near Ozark in Franklin County. The function of the Woolsey Compressor Station is to dehydrate and compress sweet natural gas, which is moved into Arkansas Western's pipeline system for subsequent delivery to customers in Northwest and Northeast Arkansas.

Gas enters the station and passes through the dehydrator absorbers which remove water vapor from the gas. This absorption occurs in a glycol medium. Several over-pressure reliefs are on these absorbers for safety purposes. This water rich glycol is reconcentrated by the reboilers. In the reboiler, water vapor is boiled off and released to the atmosphere. Several pressure relief valves are in place for safety reasons. The glycol is recirculated by gas driven pumps where the driver gas is burned as fuel when the compressors are running; during the summer months the gas is released. The dehydrated gas is sent to the compressors to be compressed, cooled, and delivered to the discharge piping system. The compressor engines use natural gas as fuel. The burned exhaust gases are released through a muffler and stack arrangement. The compressor system has other atmospheric releases as part of startup, shutdown, and safety. Any compression fluids are removed before the remaining gases are sent to a pipeline. These fluids are collected in a tank and removed.

Air permit 972-AOP-R0 is the first operating permit issued to AWG-Woolsey Compressor Station under Regulation 26. There were no physical changes to the facility to alter the emissions.

This facility is subject to Title V permitting because it has the potential to emit in excess of 100 tons per year (tpy) of oxides of nitrogen (NO_x). The emission levels for NO_x and other air contaminants are governed by Federal and State emission and ambient air regulations. A summary of facility wide emissions is provided in the following table. Specific emission unit information is located by the indicated cross reference pages.

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
Total Allowable Emissions		NO _x	31.0	134.3	
		CO	17.5	75.8	
		VOC*	8.0	33.9	
		Formaldehyde	1.3	5.4	
		Acrolein	0.4	0.9	
SN-01	Waukesha 3521 GL Natural Gas Reciprocating Engine	NO _x	2.8	11.9	8
		CO	3.6	15.8	
		VOC	1.4	6.0	
		Formaldehyde	0.2	0.8	
		Acrolein	0.1	0.2	
SN-02	Ajax DPC-600 Natural Gas Reciprocating Engine	NO _x	19.9	87.0	8
		CO	1.4	5.8	
		VOC	1.7	7.3	
		Formaldehyde	0.2	0.6	
		Acrolein	0.1	0.2	
SN-03	Waukesha 3521 GL Natural Gas Reciprocating Engine	NO _x	2.8	11.9	8
		CO	3.6	15.8	
		VOC	1.4	6.0	
		Formaldehyde	0.2	0.8	
		Acrolein	0.1	0.2	
SN-04	Waukesha 7042 GL Natural Gas Reciprocating Engine	NO _x	4.9	21.4	8
		CO	8.7	37.9	
		VOC	3.3	14.3	
		Formaldehyde	0.8	3.4	
		Acrolein	0.1	0.3	
SN-05	REMOVED FROM SERVICE (Permit 972-AR-1)				
SN-06	Dehydrator Reboiler Exhaust	SEE INSIGNIFICANT ACTIVITIES LIST			
SN-07	Dehydrator/Reboiler Exhaust	SEE INSIGNIFICANT ACTIVITIES LIST			

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
SN-08	REMOVED FROM SERVICE (Permit 972-AR-2)				
SN-9 Thru SN-45	Fugitive Emissions/ESD Blow Downs**	SEE INSIGNIFICANT ACTIVITIES LIST			

*Formaldehyde and Acrolein are accounted for in the total VOCs.

**These sources were recalculated during the review of this permit and found to be insignificant due to the extremely low VOC content in natural gas.

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SECTION III: PERMIT HISTORY

Air permit 972-A was the first air permit issued to AWG-Woolsey Compressor Station. The only emissions that were addressed were from the natural gas reciprocating engines and natural gas dehydrator reboilers.

Air permit 972-AR-1 was issued on July 19, 1993. The modification included the removal of a small reboiler, SN-05, and replacement with a larger unit, SN-07.

Air permit 972-AR-2 was issued to Woolsey Compressor Station on January 31, 1995. The permit modification included the replacement of SN-01 with a newer unit, movement of the existing dehydrator reboiler, absorber tower, and scrubber tank to new locations, and quantification of existing sources not addressed in previous permitting issues.

Air permit 972-AR-3 was issued to Woolsey Compressor Station on March 12, 1996. AR-3 modification was required after test results revealed that source number SN-04 was over the permitted limit for CO emissions. The permit was modified to increase the CO emission limit for SN-04.

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SECTION IV: EMISSION UNIT INFORMATION

SN-01 & SN-03

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Waukesha 3521 GL Natural Gas Reciprocating Engine

Source Description

The compressor station compresses and dehydrates sweet natural gas. Dehydrated gas is sent to compressors (SN-01 thru SN-04), compressed, cooled, and delivered to the discharge piping system. The compressors are driven by various manufactured engines, which run on natural gas as a fuel and produce exhaust gases. The engines may be operated at 120% of rated capacity.

Specific Conditions

1. Pursuant to §19.5 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control, effective July 1, 1997 (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this specific condition shall be demonstrated by maximum operating capacity.

SN-#	Description	Pollutant	lb/hr	tpy
01	Waukesha 3521 GL Natural Gas Reciprocating Engine	NO _x	2.8	11.9
		CO	3.6	15.8
		VOC	1.4	6.0
03	Waukesha 3521 GL Natural Gas Reciprocating Engine	NO _x	2.8	11.9
		CO	3.6	15.8
		VOC	1.4	6.0

2. Pursuant to §18.8 of the Arkansas Air Pollution Control Code (Regulation 18), the permittee shall not exceed the emission rates set forth in the following table. Compliance with this specific condition shall be demonstrated by maximum operating capacity. The HAP emissions listed for this source were based upon published emission factors at the time of issuance. Any change in these emission factors will not constitute a violation of the HAP emission rates listed below.

SN-#	Description	Pollutant	lb/hr	tpy
01	Waukesha 3521 GL Natural Gas Reciprocating Engine	formaldehyde	0.4	1.4
		acrolein	0.1	0.2

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SN-#	Description	Pollutant	lb/hr	tpy
03	Waukesha 3521 GL Natural Gas Reciprocating Engine	formaldehyde acrolein	0.4 0.1	1.4 0.2

- Pursuant to §18.5 of the Arkansas Air Pollution Control Code (Regulation 18), the permittee shall not exceed 5% opacity from SN-01 thru SN-04 as measured by EPA Reference Method 9. Compliance with this specific condition shall be demonstrated by using only natural gas as a fuel supply in these sources.

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SN-02
 Ajax DPC-600 Natural Gas Reciprocating Engine

Source Description

The compressor station compresses and dehydrates sweet natural gas. Dehydrated gas is sent to compressors (SN-01 thru SN-04), compressed, cooled, and delivered to the discharge piping system. The compressors are driven by various manufactured engines, which run on natural gas as a fuel and produce exhaust gases. The engines may be operated at 120% of rated capacity.

Specific Conditions

4. Pursuant to §19.5 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control, effective July 1, 1997 (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this specific condition shall be demonstrated by maximum operating capacity.

SN-#	Description	Pollutant	lb/hr	tpy
02	Ajax DPC-600 Natural Gas Reciprocating Engine	NO _x	19.9	87.0
		CO	1.4	5.8
		VOC	1.7	7.3

5. Pursuant to §18.8 of the Arkansas Air Pollution Control Code (Regulation 18), the permittee shall not exceed the emission rates set forth in the following table. Compliance with this specific condition shall be demonstrated by maximum operating capacity. The HAP emissions listed for this source were based upon published emission factors at the time of issuance. Any change in these emission factors will not constitute a violation of the HAP emission rates listed below.

SN-#	Description	Pollutant	lb/hr	tpy
02	Ajax DPC-600 Natural Gas Reciprocating Engine	formaldehyde	0.4	1.4
		acrolein	0.1	0.2

6. Pursuant to §18.5 of the Arkansas Air Pollution Control Code (Regulation 18), the permittee shall not exceed 5% opacity from SN-01 thru SN-04 as measured by EPA Reference Method 9. Compliance with this specific condition shall be demonstrated by

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using only natural gas as a fuel supply in these sources.

SN-04
Waukesha 7042 GL Natural Gas Reciprocating Engine

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Source Description

The compressor station compresses and dehydrates sweet natural gas. Dehydrated gas is sent to compressors (SN-01 thru SN-04), compressed, cooled, and delivered to the discharge piping system. The compressors are driven by various manufactured engines, which run on natural gas as a fuel and produce exhaust gases. The engines may be operated at 120% of rated capacity.

Specific Conditions

- Pursuant to §19.5 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control, effective July 1, 1997 (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this specific condition shall be demonstrated by maximum operating capacity.

SN-#	Description	Pollutant	lb/hr	tpy
04	Waukesha 7042 GL Natural Gas Reciprocating Engine	NO _x	4.9	21.4
		CO	8.7	37.9
		VOC	3.3	14.3

- Pursuant to §18.8 of the Arkansas Air Pollution Control Code (Regulation 18), the permittee shall not exceed the emission rates set forth in the following table. Compliance with this specific condition shall be demonstrated by maximum operating capacity. The HAP emissions listed for this source were based upon published emission factors at the time of issuance. Any change in these emission factors will not constitute a violation of the HAP emission rates listed below.

SN-#	Description	Pollutant	lb/hr	tpy
04	Waukesha 7042 GL Natural Gas Reciprocating Engine	formaldehyde	0.8	3.3
		acrolein	0.1	0.4

- Pursuant to §18.5 of the Arkansas Air Pollution Control Code (Regulation 18), the permittee shall not exceed 5% opacity from SN-01 thru SN-04 as measured by EPA Reference Method 9. Compliance with this specific condition shall be demonstrated by using only natural gas as a fuel supply in these sources.

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SECTION V: COMPLIANCE PLAN AND SCHEDULE

Arkansas Western Gas Company, Woolsey Compressor Station is in compliance with the applicable regulations cited in the permit application. Arkansas Western Gas Company, Woolsey Compressor Station will continue to operate in compliance with those identified regulatory

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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: PLANT WIDE CONDITIONS

1. Pursuant to §19.4(o) of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the Director shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the

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equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.

2. Pursuant to §19.4(q) of Regulation 19, and 40 CFR Part 52, Subpart E, the Director may cancel all or part of this permit if the construction or modification authorized herein is not begun within 18 months from the date of the permit issuance if the work involved in the construction or modification is suspended for a total of 18 months or more.
3. Pursuant to §19.7 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, each emission point for which an emission test method is specified in this permit shall be tested in order to determine compliance with the emission limitations contained herein within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing. The permittee shall provide:
 - (1) Sampling ports adequate for applicable test methods
 - (2) Safe sampling platforms
 - (3) Safe access to sampling platforms
 - (4) Utilities for sampling and testing equipment
4. Pursuant to Regulation 19.3 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.
5. Pursuant to §19.7 of the Regulation of the Arkansas State Implementation Plan of Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall perform stack testing of half of each type of the engines for carbon monoxide (CO), nitrogen oxides (NO_x), and VOC emissions. The Department reserves the right to select the engine to be tested. Testing of each source shall be performed simultaneously for CO and NO_x emissions. Testing shall be performed in accordance with Plantwide Conditions 3 and 4. Testing for CO, NO_x, and VOC emissions shall be performed in accordance with EPA Reference Methods 10, 7E, and 25A, respectively, as found in 40 CFR, Part 60, Appendix A. Testing shall be coordinated in advance with the Compliance Inspector Supervisor, at the address below:

Arkansas Department of Pollution Control and Ecology
Air Division
Attn: Compliance Inspector Supervisor

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P.O. Box 8913
 Little Rock, AR 72219-8913

6. Pursuant to Regulation 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit subsumes and incorporates all previously issued air permits for this facility.
7. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and 40 CFR 70.6, pipeline quality natural gas shall be the only fuel used to fire the compressor engines at the facility.

Permit Shield

8. 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 item A of this condition:

- A. The following have been specifically identified as applicable requirements based upon information submitted by the permittee in an application dated April 29, 1998.

Source No.	Regulation	Description
Facility	19	Compilation of Regulations of the Arkansas State Implementation Plan for Air Pollution Control
Facility	26	Regulations of the Arkansas Operating Air Permit Program

- B. The following requirements have been specifically identified as not applicable, based upon information submitted by the permittee in an application dated October 14, 1966.

Source No.	Regulation	Description	Basis for Determination
Facility	Regulation 19.8	111(d) Designated facilities	The facility is not identified in the list of regulated sources.
Facility	Regulation 26.4(g)	Applications for initial Phase II acid rain permits.	The facility is not an acid rain category source.
Facility	Regulation 26.5(a)-(d), (f)	Action on applications	These rules apply only to state and federal agencies.

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Source No.	Regulation	Description	Basis for Determination
Facility	Regulation 26.6(a), (d)-(g)	Permit review	These rules apply only to state and federal agencies.
Facility	Regulation 26.12	Acid rain sources provisions	The facility is not an acid rain source.
Facility	40 CFR 60	New source performance standards	Source categories do not apply to any units at the facility as of the effective date of the permit.
Facility	40 CFR 62	State plans for designated facilities	This rule is administrative and jurisdictional.
Facility	40 CFR 63	National emission standards for hazardous air pollutants	The facility is not in any source category as of the effective date of the permit.
Facility	40 CFR 79	Registration of fuels and fuel additives.	The facility is not in this source category.
Facility	40 CFR 80	Registration of fuels and fuel additives.	The facility is not in this source category.
Facility	40 CFR 81.304	Non-attainment	The facility is not located in a non-attainment area as of the effective date of the permit.

C. Nothing shall alter or affect the following:

Provisions of Section 303 of the Clean Air Act;

The liability of an owner or operator for any violation of applicable requirements prior to or at the time of permit issuance;

The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; or

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The ability of the EPA to obtain information under Section 114 of the Clean Air Act.

SECTION VII: INSIGNIFICANT ACTIVITIES LIST

Pursuant to §26.3(d) of Regulation 26, the following sources are below the de minimis emission levels. Insignificant and trivial activities will be allowable after approval and federal register notice publication of a final list as part of the operating air permit program. Any activity for which a state or federal applicable requirement applies is not de minimis, even if this activity meets the criteria of §3(e) of Regulation 26 or is listed below. De minimis emission determinations rely upon the information submitted by the permittee in an application dated February 10, 1997.

- Dehydrator Reboiler Exhausts (2 Each) (Group A, 1)
- 50 Bbl Tank of Water, Glycol, and Hydrocarbon (Group A, 3)
- 202 Bbl Scrubber Water Storage Tank (Group A, 3)
- Lube oil Storage Tank (Group C, 5)
- Fluids Collection Tank (Group C, 5)
- Safety Kleen Parts Washer (Group C, 5)
- Particulate and Sulfur Dioxide Emissions (Group C, 5)
- Fugitive and Blow Down Emissions (Group C, 5)

Pursuant to §26.3(d) of Regulation 26, the following emission units, operations, or activities have been determined by the Department to be below the de minimis emission levels. Activities included in this list are allowable under this permit and need not be specifically identified.

1. Natural gas-burning equipment with a design rate less than 1 million BTU per hour.
2. Combustion emissions from propulsion of mobile sources and emissions from refueling these sources unless regulated by Title II and required to obtain a permit under Title V of the federal Clean Air Act, as amended. This does not include emissions from any transportable units, such as temporary compressors or boilers. This does not include emissions from loading racks or fueling operations covered under any applicable federal requirements.
3. Air conditioning and heating units used for comfort that do not have applicable requirements under Title VI of the Act.
4. Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing/industrial or commercial process.
5. Non-commercial food preparation or food preparation at restaurants, cafeterias, or caterers,

etc.

6. Consumer use of office equipment and products, not including commercial printers or businesses primarily involved in photographic reproduction.
7. Janitorial services and consumer use of janitorial products.
8. Internal combustion engines used for landscaping purposes.
9. Laundry activities, except for dry-cleaning and steam boilers.
10. Bathroom/toilet emissions.
11. Emergency (backup) electrical generators at residential locations.
12. Tobacco smoking rooms and areas.
13. Blacksmith forges.
14. Maintenance of grounds or buildings, including: lawn care, weed control, pest control, and water washing activities.
15. Repair, up-keep, maintenance, or construction activities not related to the sources' primary business activity, and not otherwise triggering a permit modification. This may include, but is not limited to such activities as general repairs, cleaning, painting, welding, woodworking, plumbing, re-tarring roofs, installing insulation, paved/paving parking lots, miscellaneous solvent use, application of refractory, or insulation, brazing, soldering, the use of adhesives, grinding, and cutting.¹
16. Surface-coating equipment during miscellaneous maintenance and construction activities. This activity specifically does not include any facility whose primary business activity is surface-coating or includes surface coating or products.
17. Portable electrical generators that can be "moved by hand" from one location to another.²

¹ Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must get a permit.

²"Moved by hand" means that it can be moved by one person without assistance of any motorized or non-motorized vehicle, conveyance, or device.

18. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning, or machining wood, metal, or plastic.
19. Brazing or soldering equipment related to manufacturing activities that do not result in emission of HAPs.³
20. Air Compressors and pneumatically operated equipment, including hand tools.
21. Batteries and battery charging stations, except at battery manufacturing plants.
22. Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOCs or HAPs.⁴
23. Containers of less than or equal to 5 gallons in capacity that do not emit any detectable VOCs or HAPs when closed. This includes filling, blending, or mixing of the contents of such containers by a retailer.
24. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oils, grease, animal fat, and non-volatile aqueous salt solutions, provided appropriate lids and covers are used and appropriate odor control is achieved.
25. Equipment used to mix and package soaps, vegetable oil, grease, animal fat, and non-volatile aqueous salt solution, provided appropriate lids and covers are used and appropriate odor control is achieved.
26. Drop hammers or presses for forging or metalworking.
27. Equipment used exclusively to slaughter animals, but not including other equipment at slaughter-houses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
28. Vents from continuous emission monitors and other analyzers.

³Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals are more appropriate for treatment as insignificant activities based on size or production thresholds. Brazing, soldering, and welding equipment, and cutting torches related directly to plant maintenance and upkeep and repair or maintenance shop activities that emit HAP metals are treated as trivial and listed separately.

⁴Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids are based on size and limits including storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.

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29. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
30. Hand-held applicator equipment for hot melt adhesives with no VOCs in the adhesive.
31. Equipment used for surface coating, painting, dipping, or spraying operations, containing less than 0.4 lb/gal VOCs, any hexavalent chromium, or that emit no more than 0.1 tpy of all other HAPs.
32. Lasers used only on metals and other materials which do not emit HAPs in the process.
33. Consumer use of paper trimmers/binders.
34. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boiler deliver the steam.
35. Salt baths using non-volatile salts that do not result in emissions of any air pollutant covered by this regulation.
36. Laser trimmers using dust collection to prevent fugitive emissions.
37. Bench-scale laboratory equipment used for physical or chemical analysis.
38. Routine calibration and maintenance of laboratory equipment or other analytical instruments.
39. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
40. Hydraulic and hydrostatic testing equipment.
41. Environmental chambers not using hazardous air pollutant gases.
42. Shock chambers, humidity chambers and solar simulators.
43. Fugitive emissions related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
44. Process water filtration systems and demineralizers.

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45. Demineralized water tanks and demineralizer vents.
46. Boiler water treatment operations, not including cooling towers.
47. Emissions from storage or use of water treatment chemicals, except for hazardous air pollutants or pollutants listed under regulations promulgated pursuant to Section 112(r) of the Act, for use in cooling towers, drinking water systems, and boiler water/feed systems.
48. Oxygen scavenging (de-aeration) of water.
49. Ozone generators.
50. Fire suppression systems.
51. Emergency road flares.
52. Steam vents and safety relief valves.
53. Steam leaks.
54. Steam cleaning operations.
55. Steam and microwave sterilizers.
56. Site assessment work to characterize waste disposal or remediation sites.
57. Miscellaneous additions or upgrades of instrumentation.
58. Emissions from combustion controllers or combustion shutoff devices.
59. Use of products for the purpose of maintaining motor vehicles operated by the facility, not including air cleaning units on such vehicles (i.e. antifreeze, fuel additives).
60. Stacks or vents to prevent escape of sanitary sewer gases through the plumbing traps.
61. Emissions from equipment lubricating systems (i.e. oil mist), not including storage tanks, unless otherwise exempt.
62. Residential wood heaters, cookstoves, or fireplaces.
63. Barbecue equipment or outdoor fireplaces used in conjunction with any residence or recreation.

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64. Log wetting areas and log fumes.
65. Periodic use of pressurized air for cleanup.
66. Solid waste dumpsters.
67. Emissions of wet lime from lime mud tanks, lime mud washers, lime mud piles, lime mud filter and filtrate tanks, and lime mud slurry tanks.
68. Natural gas odoring activities unless the Department determines that a nuisance may occur.
69. Emissions from engine crankcase vents.
70. Storage tanks used for the temporary containment of materials resulting from an emergency reporting to an unanticipated release.
71. Equipment used exclusively to mill or grind coatings in roll grinding rebuilding, and molding compounds where all materials charged are in paste form.
72. Mixers, blenders, roll mills, or calendars for rubber or plastic for which no materials in powder form are added and in which no organic solvents, diluents, or thinners are used.
73. The storage, handling, and handling equipment for bark and wood residues not subject to fugitive dispersion offsite (this applies to equipment only).
74. Maintenance dredging of pulp and paper mill surface impoundments and ditches containing cellulosic and cellulosic derived biosolids and inorganic materials such as lime, ash, or sand.
75. Tall oil soap storage, skimming, and loading.
76. Water heaters used strictly for domestic (non-process) purposes.
77. Facility roads and parking areas, unless necessary to control offsite fugitive emissions.
78. Agricultural operations, including onsite grain storage.
79. The following natural gas and oil exploration production site equipment: separators, dehydration units, natural gas fired compressors, and pumping units. This does not include compressors located on natural gas transmission pipelines.

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SECTION VIII: GENERAL PROVISIONS

1. Pursuant to 40 C.F.R. 70.6(b) (2), any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 as the 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 as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. Pursuant to 40 C.F.R. 70.6(a) (2) and §26.7 of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), 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.
3. Pursuant to §26.4 of Regulation #26, it is the duty of the permittee to submit a complete application for permit renewal at least six (6) months prior to the date of permit expiration. Permit expiration terminates the permittee's right to operate unless a complete renewal application was submitted at least six (6) months prior to permit expiration, in which case the existing permit shall 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.
4. Pursuant to 40 C.F.R. 70.6(a) (1) (ii) and §26.7 of Regulation #26, 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, both provisions are incorporated into the permit and shall be enforceable by the Director or Administrator.
5. Pursuant to 40 C.F.R. 70.6(a) (3) (ii) (A) and §26.7 of Regulation #26,

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records of monitoring information required by this permit shall include the following:

- a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and
 - f. The operating conditions as existing at the time of sampling or measurement.
6. Pursuant to 40 C.F.R. 70.6(a) (3) (ii) (B) and §26.7 of Regulation #26, records of all required monitoring data and support information shall be retained for a period of at least 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.
7. Pursuant to 40 C.F.R. 70.6(a) (3) (iii) (A) and §26.7 of Regulation #26, the permittee shall submit reports of all required monitoring every 6 months. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official as defined in §26.2 of Regulation #26 and must be sent to the address below.
- Arkansas Department of Pollution Control and Ecology
Air Division
ATTN: Enforcement
Post Office Box 8913
Little Rock, AR 72119
8. Pursuant to 40 C.F.R. 70.6(a) (3) (iii) (B), §26.7 of Regulation #26, and §19.6 of Regulation #19, all deviations from permit requirements, including those attributable to upset conditions as defined in the permit

shall be reported to the Department. An initial report shall be made to the Department within 24 hours of discovery of the occurrence. The initial report may be made by telephone and shall include:

- a. The facility name and location,
 - b. The process unit or emission source which is deviating from the permit limit,
 - c. The permit limit, including the identification of pollutants, from which deviation occurs,
 - d. The date and time the deviation started,
 - e. The duration of the deviation,
 - f. The average emissions during the deviation,
 - g. The probable cause of such deviations,
 - h. Any corrective actions or preventive measures taken or being take to prevent such deviations in the future, and
 - i. The name of the person submitting the repoA full report shall be made in writing to
9. Pursuant to 40 C.F.R. 70.6(a) (5) and §26.7 of Regulation #26 and A.C.A §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, if any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity shall 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.
10. Pursuant to 40 C.F.R. 70.6(a) (6) (i) and §26.7 of Regulation #26, the permittee must comply with all conditions of this part 70 permit. Any permit noncompliance 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, or modification; or for denial of a permit renewal application.
11. Pursuant to 40 C.F.R. 70.6(a) (6) (ii) and §26.7 of Regulation #26, 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 in order to maintain compliance with the conditions of this permit.

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12. Pursuant to 40 C.F.R. 70.6(a) (6) (iii) and §26.7 of Regulation #26, this permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
13. Pursuant to 40 C.F.R. 70.6(a) (6) (iv) and §26.7 of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.
14. Pursuant to 40 C.F.R. 70.6(a) (6) (v) and §26.7 of Regulation #26, the permittee shall 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 shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the permittee may be required to furnish such records directly to the Administrator along with a claim of confidentiality.
15. Pursuant to 40 C.F.R. 70.6(a) (7) and §26.7 of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.

16. Pursuant to 40 C.F.R. 70.6(a)(8) and §26.7 of Regulation #26, no permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for elsewhere in this permit.
17. Pursuant to 40 C.F.R. 70.6(a) (9) (i) and §26.7 of Regulation #26, if the permittee is allowed to operate under 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 scenario under which the facility or source is operating.
18. Pursuant to 40 C.F.R. 70.6(b) and §26.7 of Regulation #26, all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Act unless the Department has specifically designated as not being federally enforceable under the Act any terms and conditions included in the permit that are not required under the Act or under any of its applicable requirements.
19. Pursuant to 40 C.F.R. 70.6(c) (1) and §26.7 of Regulation #26, any document (including reports) required by this permit shall contain a certification by a responsible official as defined in §26.2 of Regulation #26.
20. Pursuant to 40 C.F.R. 70.6(c) (2) and §26.7 of Regulation #26, the permittee shall allow an authorized representative of the Department, upon presentation of credentials, to perform the following:
 - 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 that must be kept 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 the purpose of assuring compliance with this permit or applicable requirements.

21. Pursuant to 40 C.F.R. 70.6(c) (5) and §26.7 of Regulation #26, the permittee shall submit a compliance certification with terms and conditions contained in the permit, including emission limitations, standards, or work practices. This compliance certification shall be submitted annually and shall be submitted to the Administrator as well as to the Department. All compliance certifications required by this permit shall include the following:
 - 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. Pursuant to §26.7 of Regulation #26, nothing in this permit shall alter or affect the following:
 - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
 - b. The liability 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. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.

Route To: **FELICIA INMAN**
Administration

AIR DIVISION
INVOICE REQUEST FORM

(9-96)

Facility Name & Address:

AWG-Woolsey Compressor Station
P.O. Box 1288
Fayetteville, Arkansas 72702-1288

CSN: 24-0068

Permit No: 972-AOP-R0

Permit Description: V

(e.g. A = AIR CODE, S=SIP, H=NESHAP, P=PSD, N=NSPS, V= Title V)

Initial Fee Calculations:

Title V = 3(17.78)(TPY each pollutant, except CO) - amount of last annual air permit fee
= (17.78)*(134.3 + 33.9) - \$2346.00
= \$ 645.00

NOTE: Do Not double count HAPs and VOCs!!!
No greater than 4000 tpy per pollutant or less than \$1000

Mod Fee Calculations:

Title V = 3 (17.78)(TPY increase of each pollutant, except CO)

NOTE: Do Not double count HAPs and VOCs!!!
No greater than 4000 tpy for each contaminant but not less than \$1000

F =

Fee Amount: \$ 1000.00

Engineer: Blake McCord

Date: September 30, 1998

Public Notice

Pursuant to the Arkansas Operating Air Permit Program (Regulation #26) Section 6(b), the Air Division of the Arkansas Department of Pollution Control and Ecology gives the following notice:

Arkansas Western Gas Company (AWG) operates a compression and dehydration station near Ozark in Franklin County. The function of the Woolsey Compressor Station is to dehydrate and compress sweet natural gas, which is moved into Arkansas Western's pipeline system for subsequent delivery to customers in Northwest and Northeast Arkansas. Air permit 972-AOP-R0 is the first operating permit issued to Woolsey Compressor Station. No changes in the method of operation occurred prompting this permit issuance.

The application has been reviewed by the staff of the Department and has received the Department's tentative approval subject to the terms of this notice.

Citizens wishing to examine the permit application and staff findings and recommendations may do so by contacting Rhonda Sharp. Citizens desiring technical information concerning the application or permit should contact Blake McCord. Both Rhonda Sharp and Blake McCord can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, telephone: (501) 682-0744.

The draft permit and permit application are available for copying at the above address. A copy of the draft permit has also been placed at the Ozarks Regional Library Headquarters, 217 E. Dickson, Fayetteville, Arkansas 72701. This information may be reviewed during normal business hours.

Interested or affected persons may also submit written comments or request a hearing on the proposal to the Department at the above address - Attention: Rhonda Sharp. In order to be considered, the comments must be submitted within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, one will be scheduled if significant comments on the permit provisions are received. If a hearing is scheduled, adequate public notice will be given in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director shall make a final decision to issue or deny this application or to impose special conditions in accordance with Section 2.1 of the Arkansas Pollution Control and Ecology Commission's Administrative Procedures (Regulation #8) and Regulation #26.

Dated this
Randall Mathis
Director