

ADEQ OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation No. 26:

Permit No. : 972-AOP-R1

Renewal #1 is issued to:

Arkansas Western Gas Company

Woolsey Compressor Station

2002 Cataberry Run Road

Ozark, AR 72949

Franklin County

AFIN: 24-00068

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

IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith Michaels

Date

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Table 1 - List of Acronyms

A.C.A.	Arkansas Code Annotated
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CSN	County Serial Number
HAP	Hazardous Air Pollutant
lb/hr	Pound per hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate matter
PM ₁₀	Particulate matter smaller than ten microns
SNAP	Significant New Alternatives Program (SNAP)
SO ₂	Sulfur dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Ton per year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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Section I: FACILITY INFORMATION

PERMITTEE: Arkansas Western Gas Company - Woolsey Compressor Station

AFIN: 24-00068

PERMIT NUMBER: 972-AOP-R1

FACILITY ADDRESS: 2002 Cataberry Run Road
Ozark, AR

MAILING ADDRESS P. O. Box 1288,
Fayetteville, AR

COUNTY: Franklin

CONTACT POSITION: Steven Liddell, Environmental Engineer

TELEPHONE NUMBER: (501)-582-8635

REVIEWING ENGINEER: James G. Siganos, P. E.

UTM North - South (Y): Zone 15, 3932.0 km N

UTM East - West (X): Zone 15, 425.0 km E



Section II: INTRODUCTION

Summary of Permit Activity

Permit # 972-AOP-R1 is being issued to Arkansas Western Gas Company (AWG) as a renewal for the Title V operating air permit # 972-AOP-R0 which has an expiration date of December 15, 2003. The Woolsey natural gas compressor station is located on Franklin County Road 508 near Ozark, Arkansas.

There are no physical changes, and no new construction or modification is being proposed. However, there are some small changes in the emission rates which are a result of calculation accuracy.

Process Description

The function of the Woolsey Compressor Station is to compress sweet dry natural gas from a gas gathering system into a gas pipeline transmission system for delivery to customers in Northwest Arkansas. Gas enters the station and passes through dehydrator absorbers which remove water vapor from the gas. This absorption occurs in a glycol medium. This water rich glycol is reconcentrated by the reboilers. In the reboiler, water vapor is boiled off and released to the atmosphere. 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 start-up, 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 from the site.

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Regulations

This facility is subject to regulation under the *Clean Air Act* as amended, the *Arkansas Water and Air Pollution Control Act*, the *Arkansas Air Pollution Control Code* (Regulation 18), the *Regulations of the Arkansas Plan of Implementation for Air Pollution Control* (Regulation 19), and the *Regulation of the Arkansas Operating Air Permit Program* (Regulation 26).



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The following table is a summary of emissions from the facility. The following table contains cross-references to the pages containing specific conditions and emissions for each source. This table, in itself, is not an enforceable condition of the permit.

Table 2 – Emission Summary

EMISSION SUMMARY							
SN	Description		Pollutant	Emission Rates		Cross Reference Page	
				lb/hr	Tpy		
Total Allowable Emissions			VOC	7.8	33.6	-----	
			CO	17.3	75.3		
			NO _x	30.4	132.3		
			HAPs	Formaldehyde	1.14		4.97
				Acrolein*	0.14		0.52
01	Waukesha Model 3521 GL, four stroke lean burn reciprocating engine, 615 HP.		VOC	1.4	6.0	10	
			CO	3.6	15.8		
			NO _x	2.7	11.9		
			Formaldehyde*	0.24	1.04		
			Acrolein*	0.03	0.11		
02	Ajax DPC 600, four stroke rich burn reciprocating engine, 600 HP.		VOC	1.7	7.3	13	
			CO	1.4	5.80		
			NO _x	19.9	87.0		
			Formaldehyde*	0.09	0.40		
			Acrolein*	0.02	0.05		

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03	Waukesha Model 3521 GL, four stroke lean burn reciprocating engine, 615 HP.	VOC	1.4	6.0	10
		CO	3.6	15.8	
		NO _x	2.8	11.9	
		Formaldehyde*	0.24	1.04	
		Acrolein*	0.03	0.11	
04	Waukesha Model 7042 GL engine, (1478 HP), 4 stroke lean burn reciprocating engine	VOC	3.3	14.3	15
		CO	8.7	37.9	
		NO _x	4.9	21.5	
		Formaldehyde*	0.6	2.49	
		Acrolein*	0.06	0.25	

*HAPs included in the VOC totals.

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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.


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.

Section III: SPECIFIC CONDITIONS

SN-01 and SN-03,

Waukesha 3521 GL Natural Gas Reciprocating Engines

Source Description

The purpose of the compressor station is to compress and dehydrate sweet natural gas. The dehydrated gas is sent to the compressors (SN-01 and SN-03) to be compressed, cooled, and delivered to the discharge piping system. The compressors are driven by Waukesha manufactured reciprocating engines, which run on natural gas as a fuel  produce exhaust gases.

Negligible amounts of particulate matter, sulfur dioxide and fugitives may be emitted by these sources. Due to the extremely low potential emission of these pollutants, numerical limits have not been included in these sources, but such emissions are not prohibited.

Specific Conditions

1. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition using natural gas fuel and operating at or less than maximum capacity. [Regulation No. 19 §19.501 *et seq.* effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Table 3 – Maximum Criteria Emission Rates

Source No.	Description	Pollutant	lb/hr	tpy
01	Waukesha Model 3521 GL, four stroke lean burn reciprocating engine, 615 HP.	VOC	1.4	6.0
		CO	3.6	15.8
		NO _x	2.7	11.9
03	Waukesha Model 3521 GL, four stroke lean burn reciprocating engine, 615 HP.	VOC	1.4	6.0
		CO	3.6	15.8
		NO _x	2.7	11.9

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2. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by using natural gas as fuel and operating at or less than capacity. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

The HAPS emissions listed for this source were based upon published emission factors at the time of permit issuance. Any changes in these emission factors will not constitute a violation of the HAP emission rates listed below.

Table 4 – Maximum Non-Criteria Emission Rates

Source No.	Description	HAP	lb/hr	tpy
01	Waukesha Model 3521 GL, four stroke lean burn reciprocating engine, 615 HP.	Formaldehyde	0.24	1.03
		Acrolein	0.03	0.11
03	Waukesha Model 3521 GL, four stroke lean burn reciprocating engine, 615 HP.	Formaldehyde	0.06	0.25
		Acrolein	0.03	0.11

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3. Pursuant to §18.501 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity from SN-01 and SN-03 as measured by EPA Reference Method 9. Compliance with this Specific Condition shall be demonstrated by compliance with Plantwide Condition No. 8.

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 the compressor (SN-02), compressed, cooled, and delivered to the discharge piping system. The compressor is driven by an Ajax manufactured engine, which operates on natural gas as a fuel and produces exhaust gases.

Negligible amounts of particulate matter, sulfur dioxide and fugitives may be emitted by this source. Due to the extremely low potential emission of these pollutants, numerical limits have not been included in this source, but such emissions are not prohibited.

Specific Conditions

4. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by using natural gas as fuel and operating at or less than capacity. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311].

SN-#	Description	Pollutant	lb/hr	Tpy
02	Ajax DPC 600, four stroke rich burn reciprocating engine, 600 HP.	VOC	1.7	7.3
		CO	1.4	5.8
		NO _x	19.9	87.0

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5. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by using natural gas as fuel and operating at or less than capacity. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

The HAPS emissions listed for this source were based upon published emission factors at the time of permit issuance. Any changes in these emission factors will not constitute a violation of the HAP emission rates listed below.

Source No.	Description	HAP	lb/hr	tpy
02	Ajax DPC 600, four stroke rich burn reciprocating engine, 600 HP.	Formaldehyde	0.09	0.40
		Acrolein	0.02	0.05

6. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, Subpart E, the permittee shall not exceed 5% opacity from SN-02 as measured by EPA Reference Method 9. Compliance with this Specific Condition shall be demonstrated by compliance with Plantwide Condition No. 8.

SN-04

Waukesha 7042 GL Natural Gas Reciprocating Engine

Source Description

The purpose of the compressor station is to compress and dehydrate sweet natural gas. The dehydrated gas is sent to the compressor (SN-04) to be compressed, cooled, and delivered to the discharge piping system. The compressor is driven by Waukesha manufactured reciprocating engines, which run on natural gas as a fuel and produce exhaust gases.

Negligible amounts of particulate matter, sulfur dioxide and fugitives may be emitted by these sources. Due to the extremely low potential emission of these pollutants, numerical limits have not been included in these sources, but such emissions are not prohibited.

Specific Conditions

7. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition using natural gas fuel and operating at or less than maximum capacity. [Regulation No. 19 §19.501 *et seq.* effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Source No.	Description	Pollutant	lb/hr	tpy
04	Waukesha Model 7042 GL engine, (1478 HP), 4 stroke lean burn reciprocating engine.	VOC	3.3	14.3
		CO	8.7	37.9
		NO _x	4.9	21.5

8. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by using natural gas as fuel and operating at or less than capacity. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

The HAPS emissions listed for this source were based upon published emission factors at the time of permit issuance. Any changes in these emission factors will not constitute a violation of the HAP emission rates listed below.

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Source No.	Description	HAP	lb/hr	tpy
04	Waukesha Model 7042 GL engine, (1478 HP), 4 stroke lean burn reciprocating engine.	Formaldehyde	0.60	2.49
		Acrolein	0.06	0.25

9. Pursuant to §18.501 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity from SN-04 as measured by EPA Reference Method 9. Compliance with this Specific Condition shall be demonstrated by compliance with Plantwide Condition No. 8.

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Section IV: 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 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 V: PLANTWIDE CONDITIONS

1. The permittee will 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 No. 19 §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §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 No.19 §19.410(B) and 40 CFR Part 52, Subpart E]
3. The permittee must 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) 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 will submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation No.19 §19.702 and/or Regulation No. 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: [Regulation No.19 §19.702 and/or Regulation No.18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Sampling ports adequate for applicable test methods

Safe sampling platforms

Safe access to sampling platforms

Utilities for sampling and testing equipment.

5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee will maintain the equipment in good condition at all times. [Regulation No.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 No. 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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7. Pursuant to §19.702 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall simultaneously conduct tests for CO and NO_x on one of the Waukesha Model 3521 GL compressor engines (SN-01 or SN-03) in accordance with Plantwide Condition #3, and every five (5) years thereafter. The permittee shall also simultaneously conduct tests for CO and NO_x on the other model engines operating in the station in accordance with Plantwide Condition #3, and every five years thereafter. 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 engines within 90% of their rated capacity. If the tests are not performed 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 to be tested. The engines tested shall be rotated so that no engine is tested twice before an engine of equal HP is tested once. If the tested emission rate for any pollutant is in excess of the permitted emission rate, all engines shall be tested for that pollutant.

Testing shall be performed in accordance with the following parameters:

Compressor Engines	Last Date Tested	Remarks
SN-1 and 03 Waukesha Model 3521GL engines	2/5/97	Test one engine within 180 days of permit (972-AOP-R1) issuance.
SN-02 Ajax DPC – 600 engine	2/5/97	Test engine within 180 days of permit (972-AOP-R1) issuance.
SN-04 Waukesha Model L7042 GL engine	2/5/97	Test engine within 180 days of permit (972-AOP-R1) issuance

8. Pursuant to §19.705 of Regulation 19, 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. Pipeline quality natural gas is defined as gas which contains less than 0.3 grains/100 scf of H₂S and that H₂S constitutes greater than 50% by weight of the sulfur by weight in the natural gas.

Title VI Provisions

9. The permittee must comply with the standards for labeling of products using ozone-depleting substances. [40 CFR Part 82, Subpart E]

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.

The placement of the required warning statement must comply with the requirements pursuant to §82.108.

The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.

No person may modify, remove, or interfere with the required warning statement except as described in §82.112.

The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]

10. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.

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.

Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.

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.)

Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.

11. 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.

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12. 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.

13. 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, "Significant New Alternatives Policy Program".

Permit Shield

14. 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 April 29, 2003.

Source No.	Regulation	Description	Basis for Determination
Facility	Regulation 19.801	111(d) Designated facilities	The facility is not identified in the list of regulated sources.
Facility	Regulation 26.401(g)	Applications for initial Phase II acid rain permits.	The facility is not an acid rain category source.
Facility	Regulation 26.501(a)-(d), (f)	Action on applications	These rules apply only to state and federal agencies.

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Facility	Regulation 26.601(a), (d)-(g)	Permit review	These rules apply only to state and federal agencies.
Facility	Regulation 26.1201	Acid rain sources provisions	The facility is not an acid rain source.
Facility	Test engine within 180 days of permit (1185-AOP-R2) issuance 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.

15. 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

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

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Section VI: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement is a significant activity even if this activity meets the criteria of §304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated May 15, 2003.

Table 5 - Insignificant Activities

Description	Reason
Sivals 2,000,000 Btu/hr Dehydrator Unit Reboiler	Group A1
Castle 800,000 Btu/hr Dehydrator Unit Reboiler	Group A1
Fugitive Emissions	Group A13
Safety Kleen parts washer	Group A13
One 500 gallon lube oil storage tank	Group A3
One 250 gallon lube oil storage tank	Group A3
ESD Blowdowns	Group A13
202 barrel fluids collection tank	Group A3
Two- 70 barrel fluids collection tanks	Group A3

Pursuant to §26.304 of Regulation 26, the Department determined the emission units, operations, or activities contained in Regulation 19, Appendix A, Group B, to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.

Section VII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation No. 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), effective August 10, 2000]
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 No. 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 No. 26 §26.701(A)(2)]
5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and Regulation No. 26 §26.701(C)(2)]
 - The date, place as defined in this permit, and time of sampling or measurements;
 - The date(s) analyses performed;
 - The company or entity performing the analyses;
 - The analytical techniques or methods used;
 - The results of such analyses; and
 - The operating conditions existing at the time of sampling or measurement.

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6. The permittee must retain the records of all required monitoring data and support information for 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. [40 CFR 70.6(a)(3)(ii)(B) and Regulation No. 26 §26.701(C)(2)(b)]
7. The permittee must submit reports of all required monitoring every 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 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: [40 C.F.R. 70.6(a)(3)(iii)(A) and §26.701(C)(3)(a) of Regulation #26]

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor
Post Office Box 8913
Little Rock, AR 72219

8. The permittee will report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit. 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: [40 CFR 70.6(a)(3)(iii)(B), Regulation #26 §26.701(C)(3)(b), and Regulation #19 §19.601 and §19.602]
 - The facility name and location
 - The process unit or emission source deviating from the permit limit,
 - The permit limit, including the identification of pollutants, from which deviation occurs,
 - The date and time the deviation started,
 - The duration of the deviation,
 - The average emissions during the deviation,
 - The probable cause of such deviations,
 - Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
 - The name of the person submitting the report.

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The permittee will 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. [40 CFR 70.6(a)(3)(iii)(B), Regulation No. 26 §26.701(C)(3)(b), Regulation No. 19 §19.601 and §19.602]

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), §26.701(E) of Regulation No. 26, and A.C.A. §8-4-203, as referenced by §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 No. 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 No. 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 No. 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 No. 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 No. 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 No. 26 §26.701(F)(5)]
15. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [40 CFR 70.6(a)(7) and Regulation No. 26 §26.701(G)]

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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 No. 26 §26.701(H)]
17. If the permit allows different operating scenarios, the permittee will, 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 No. 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 No. 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 No. 26 §26.2. [40 CFR 70.6(c)(1) and Regulation No. 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 No. 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 will 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 No. 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;

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- 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 No. 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.