



ARKANSAS  
Department of Environmental Quality

August 8, 2008

Steven Liddell  
Arkansas Western Gas - Woolsey Compressor Station  
P.O. Box 13288  
Fayetteville, AR 72703-1002

Dear Mr. Liddell:

The enclosed Permit No. 0972-AOP-R2 is issued pursuant to the Arkansas Operating Permit Program, Regulation # 26.

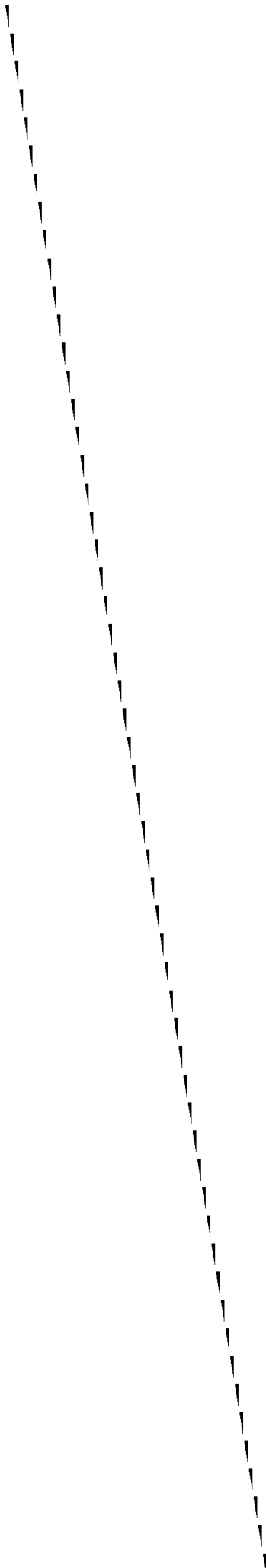
After considering the facts and requirements of A.C.A. §8-4-101 et seq., and implementing regulations, I have determined that Permit No. 0972-AOP-R2 for the construction, operation and maintenance of an air pollution control system for Arkansas Western Gas - Woolsey Compressor Station to be issued and effective on the date specified in the permit, unless a Commission review has been properly requested under §2.1.14 of Regulation No. 8, Arkansas Department of Pollution Control & Ecology Commission's Administrative Procedures, within thirty (30) days after service of this decision.

All persons submitting written comments during this thirty (30) day period, and all other persons entitled to do so, may request an adjudicatory hearing and Commission review on whether the decision of the Director should be reversed or modified. Such a request shall be in the form and manner required by §2.1.14 of Regulation No. 8.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Bates".

Mike Bates  
Chief, Air Division



# ADEQ OPERATING AIR PERMIT

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

Permit No. : 0972-AOP-R2

Renewal # 2

IS ISSUED TO:

Arkansas Western Gas - 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:


August 8, 2008

AND

August 7, 2013

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

Signed:

  
Mike Bates  
Chief, Air Division

August 8, 2008

Date

Arkansas Western Gas - Woolsey Compressor Station

Permit #: 0972-AOP-R2

AFIN: 24-00068

Table of Contents

<b>SECTION I: FACILITY INFORMATION .....</b>	<b>4</b>
<b>SECTION II: INTRODUCTION .....</b>	<b>5</b>
<b>Summary of Permit Activity .....</b>	<b>5</b>
<b>Process Description .....</b>	<b>5</b>
<b>Regulations .....</b>	<b>5</b>
<b>Emission Summary .....</b>	<b>6</b>
<b>SECTION III: PERMIT HISTORY .....</b>	<b>8</b>
<b>SECTION IV: SPECIFIC CONDITIONS .....</b>	<b>9</b>
SN-01 & SN-03.....	9
SN-02 .....	11
SN-04 .....	12
<b>SECTION V: COMPLIANCE PLAN AND SCHEDULE .....</b>	<b>13</b>
<b>SECTION VI: PLANTWIDE CONDITIONS .....</b>	<b>14</b>
Title VI Provisions .....	15
Permit Shield.....	17
<b>SECTION VII: INSIGNIFICANT ACTIVITIES.....</b>	<b>19</b>
<b>SECTION VIII: GENERAL PROVISIONS .....</b>	<b>20</b>

Arkansas Western Gas - Woolsey Compressor Station  
Permit #: 0972-AOP-R2  
AFIN: 24-00068

#### List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO <sub>x</sub>	Nitrogen Oxide
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter Smaller Than Ten Microns
SNAP	Significant New Alternatives Program (SNAP)
SO <sub>2</sub>	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

Arkansas Western Gas - Woolsey Compressor Station  
Permit #: 0972-AOP-R2  
AFIN: 24-00068

## **SECTION I: FACILITY INFORMATION**

PERMITTEE: Arkansas Western Gas - Woolsey Compressor Station

AFIN: 24-00068

PERMIT NUMBER: 0972-AOP-R2

FACILITY ADDRESS: 2002 Cataberry Run Road  
Ozark, AR 72949

MAILING ADDRESS: P.O. Box 13288  
Fayetteville, AR 72703-1002

COUNTY: Franklin County

CONTACT NAME: Steven Liddell

CONTACT POSITION: Environmental Engineer

TELEPHONE NUMBER: 479-582-8635

REVIEWING ENGINEER: Joseph Hurt

UTM North South (Y): Zone 15: 3931885.48 m

UTM East West (X): Zone 15: 425124.49 m

Arkansas Western Gas - Woolsey Compressor Station  
Permit #: 0972-AOP-R2  
AFIN: 24-00068

## **SECTION II: INTRODUCTION**

### **Summary of Permit Activity**

Arkansas Western Gas Company (AWG) owns and operates a natural gas compressor station located near Ozark, Arkansas. This is the second Title V renewal for the facility. SN-01 has been removed from service and the emissions have been removed with this permit renewal. PM, PM<sub>10</sub>, and SO<sub>2</sub> emissions, which were considered negligible in the past, are being added to the permit with this renewal. Total permitted emission increases include 0.9 tpy of PM and 0.3 tpy of SO<sub>2</sub>. Total permitted emission decreases include 6.0 tpy of VOC, 15.8 tpy of CO, and 11.9 tpy of NO<sub>x</sub>.

### **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.

### **Regulations**

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective February 15, 1999
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective October 15, 2007
Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective September 26, 2002

**Emission Summary**

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

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
Total Allowable Emissions		PM	0.4	0.9
		PM <sub>10</sub>	0.3	0.4
		SO <sub>2</sub>	0.3	0.3
		VOC	6.4	37.6
		CO	13.7	59.5
		NO <sub>x</sub>	27.6	120.4
HAPs		Acrolein*	0.11	0.41
		Formaldehyde*	0.90	3.93
01	Waukesha Model 3521 GL 615 HP 4 stroke lean burn reciprocating engine	Source removed from service in 2008		
02	Ajax DPC 600 600 HP 4 stroke rich burn reciprocating engine	PM	0.1	0.2
		PM <sub>10</sub>	0.1	0.2
		SO <sub>2</sub>	0.1	0.1
		VOC	1.7	7.3
		CO	1.4	5.8
		NO <sub>x</sub>	19.9	87.0
		Acrolein*	0.02	0.05
		Formaldehyde*	0.09	0.40
03	Waukesha Model 3521 GL 615 HP 4 stroke lean burn reciprocating engine	PM	0.1	0.2
		PM <sub>10</sub>	0.1	0.1
		SO <sub>2</sub>	0.1	0.1
		VOC	1.4	6.0
		CO	3.6	15.8
		NO <sub>x</sub>	2.8	11.9
		Acrolein*	0.03	0.11
		Formaldehyde*	0.24	1.04
04	Waukesha Model 7042 GL 1478 HP 4 stroke lean burn reciprocating engine	PM	0.2	0.5
		PM <sub>10</sub>	0.1	0.1
		SO <sub>2</sub>	0.1	0.1
		VOC	3.3	14.3



Arkansas Western Gas - Woolsey Compressor Station

Permit #: 0972-AOP-R2

AFIN: 24-00068

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
		CO	8.7	37.9
		NO <sub>x</sub>	4.9	21.5
		Acrolein*	0.06	0.25
		Formaldehyde*	0.57	2.49

\* - HAPs included in the VOC totals. Other HAPs are not included in any other totals unless specifically stated.

Arkansas Western Gas - Woolsey Compressor Station

Permit #: 0972-AOP-R2

AFIN: 24-00068

### **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.

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.

Air permit # 0972-AOP-R1 was issued on November 10, 2003. This was the first renewal for the facility. There were no physical changes, and no new construction or modifications were proposed. However, there were some small changes in the emission rates which were a result of calculation accuracy.

## SECTION IV: SPECIFIC CONDITIONS

### SN-01 & 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 compressor (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 and produce exhaust gases.

#### Specific Conditions

- The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by using pipeline quality natural gas fuel and by operating at or below the maximum operating capacity.  
 [Regulation 19, §19.501 et seq., and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
01	Waukesha Model 3521 GL 615 HP 4 stroke lean burn reciprocating engine	Removed from service in 2008		
03	Waukesha Model 3521 GL 615 HP 4 stroke lean burn reciprocating engine	PM <sub>10</sub>	0.1	0.1
		SO <sub>2</sub>	0.1	0.1
		VOC	1.4	6.0
		CO	3.6	15.8
		NO <sub>x</sub>	2.8	11.9

- The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by using pipeline quality natural gas fuel and by operating at or below the maximum operating capacity.  
 [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	Waukesha Model 3521 GL 615 HP 4 stroke lean burn reciprocating engine	Removed from service in 2008		
03	Waukesha Model 3521 GL 615 HP 4 stroke lean burn reciprocating engine	PM	0.1	0.2
		Acrolein	0.03	0.11
		Formaldehyde	0.24	1.04

Arkansas Western Gas - Woolsey Compressor Station  
Permit #: 0972-AOP-R2  
AFIN: 24-00068

3. The permittee shall not exceed 5% opacity from SN-03 as measure by EPA Reference Method 9. Compliance with this Specific Condition shall be demonstrated by burning pipeline quality natural gas for fuel. [Regulation 18, §18.501, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, Subpart E]

Arkansas Western Gas - Woolsey Compressor Station  
Permit #: 0972-AOP-R2  
AFIN: 24-00068

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.

Specific Conditions

4. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by using pipeline quality natural gas fuel and by operating at or below the maximum operating capacity.  
[Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
02	Ajax DPC 600 600 HP 4 stroke rich burn reciprocating engine	PM <sub>10</sub>	0.1	0.2
		SO <sub>2</sub>	0.1	0.1
		VOC	1.7	7.3
		CO	1.4	5.8
		NO <sub>x</sub>	19.9	87.0

5. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by using pipeline quality natural gas fuel and by operating at or below the maximum operating capacity.  
[Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
02	Ajax DPC 600 600 HP 4 stroke rich burn reciprocating engine	PM	0.1	0.2
		Acrolein	0.02	0.05
		Formaldehyde	0.09	0.40

6. The permittee shall not exceed 5% opacity from SN-02 as measure by EPA Reference Method 9. Compliance with this Specific Condition shall be demonstrated by burning pipeline quality natural gas for fuel. [Regulation 18, §18.501, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, Subpart E]

Arkansas Western Gas - Woolsey Compressor Station  
Permit #: 0972-AOP-R2  
AFIN: 24-00068

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.

Specific Conditions

7. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by using pipeline quality natural gas fuel and by operating at or below the maximum operating capacity.  
[Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
04	Waukesha Model 7042 GL 1478 HP 4 stroke lean burn reciprocating engine	PM <sub>10</sub>	0.1	0.1
		SO <sub>2</sub>	0.1	0.1
		VOC	3.3	14.3
		CO	8.7	37.9
		NO <sub>x</sub>	4.9	21.5

8. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by using pipeline quality natural gas fuel and by operating at or below the maximum operating capacity.  
[Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
04	Waukesha Model 7042 GL 1478 HP 4 stroke lean burn reciprocating engine	PM	0.2	0.5
		Acrolein	0.06	0.25
		Formaldehyde	0.57	2.49

9. The permittee shall not exceed 5% opacity from SN-04 as measure by EPA Reference Method 9. Compliance with this Specific Condition shall be demonstrated by burning pipeline quality natural gas for fuel. [Regulation 18, §18.501, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, Subpart E]

Arkansas Western Gas - Woolsey Compressor Station  
Permit #: 0972-AOP-R2  
AFIN: 24-00068

## **SECTION V: COMPLIANCE PLAN AND SCHEDULE**

Arkansas Western Gas - 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 VI: PLANTWIDE CONDITIONS

1. The permittee shall notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation 19, §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation 19, §19.410(B) and 40 CFR Part 52, Subpart E]
3. The permittee must test any equipment scheduled for testing, unless otherwise stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) new equipment or newly modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee shall submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation 19, §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. The permittee must provide:
  - a. Sampling ports adequate for applicable test methods;
  - b. Safe sampling platforms;
  - c. Safe access to sampling platforms; and
  - d. Utilities for sampling and testing equipment.

[Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee shall maintain the equipment in good condition at all times. [Regulation 19, §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation 26 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
7. The permittee shall simultaneously conduct tests for CO and NO<sub>x</sub> on each model engine operating at the station in accordance with Plantwide Condition #3, and every five years thereafter. EPA Reference Method 7E shall be used to determine NO<sub>x</sub> 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. [Regulation 19, §19.702 and 40 CFR 52, Subpart E]

8. The permittee shall only use pipeline quality natural gas to fire the compressor engines located at this facility. Pipeline quality natural gas is defined as gas which contains less than 0.2 grains total sulfur per 100 standard cubic feet of natural gas. Additionally, pipeline natural gas must either be composed of at least 70 percent methane by volume or have a gross calorific value between 950 and 1100 BTU per standard cubic foot. Compliance with this condition may be demonstrated by a valid gas tariff, purchase contract, fuel analysis or other appropriate documentation, and periodic testing. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, 40 CFR 70.6, and 40 CFR 72.2]
9. The permittee shall test the fuel combusted in the compressor engines for Total Sulfur within 180 days of issuance of permit 0972-AOP-R2 to show compliance with SO<sub>2</sub> emission limits. The natural gas must contain 0.2 grains of Total Sulfur per 100 standard cubic feet of natural gas or less. The permittee shall use test methods outlined in sections 2.3.5 or 2.3.3.1.2 of 40 CFR Part 75, Appendix D, or other test method upon the Department's approval, to test for Total Sulfur. The results of these tests shall be submitted to the Department at the address listed in General Provision # 7. Testing for Total Sulfur shall be conducted every five years for the fuel combusted in the compressor engines and/or turbines located at Arkansas Western Gas Company's compressor stations in the State of Arkansas. The natural gas testing of the fuel on one pipeline may be representative for all compressor engines and/or turbines located along that pipeline. [Regulation No. 19 §19.702, and 40 CFR Part 52, Subpart E]

#### Title VI Provisions

10. The permittee must comply with the standards for labeling of products using ozone-depleting substances. [40 CFR Part 82, Subpart E]
  - a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
  - b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
  - d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.

11. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]
  - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - d. Persons disposing of small appliances, MVACs, and MVAC like appliances must comply with record keeping requirements pursuant to §82.166. (“MVAC like appliance” as defined at §82.152)
  - e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
  - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
12. 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.
13. 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.
14. 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.

Arkansas Western Gas - Woolsey Compressor Station  
 Permit #: 0972-AOP-R2  
 AFIN: 24-00068

Permit Shield

15. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements, as of the date of permit issuance, included in and specifically identified in the following table of this condition. The permit specifically identifies the following as applicable requirements based upon the information submitted by the permittee in an application dated April 9, 2008.

Applicable Regulations

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

The permit specifically identifies the following as inapplicable based upon information submitted by the permittee in an application dated April 9, 2008.

Inapplicable Regulations

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 26.1201	Acid rain sources provisions	The facility is not an acid rain source.
Varies	40 CFR 60	New source performance standards	<p>All engines at the facility are natural gas fueled spark ignition engines; therefore the facility is not subject to 40 CFR 60, Subpart IIII – <i>Standard of Performance for Stationary Compression Ignition Internal Combustion Engines</i>.</p> <p>All engines at the facility are natural gas fueled spark ignition engines manufactured before July 1, 2008; therefore the facility is not subject to 40 CFR 60, Subpart JJJJ - <i>Standards of Performance for Stationary Spark Ignition Internal Combustion Engines</i></p> <p>Source categories do not apply to any units at the facility as of the effective date of the permit.</p>

Arkansas Western Gas - Woolsey Compressor Station  
 Permit #: 0972-AOP-R2  
 AFIN: 24-00068

Source No.	Regulation	Description	Basis for Determination
Facility	40 CFR 63	National emission standards for hazardous air pollutants	The facility is subject to RICE MACT, however all engines are excluded because they are defined as existing RICE.
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.

Arkansas Western Gas - Woolsey Compressor Station

Permit #: 0972-AOP-R2

AFIN: 24-00068

## SECTION VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §26.304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated April 9, 2008.

Description	Category
Sivals 2.5 MMBtu/hr Dehydrator Unit Reboiler	A-1
Castle 0.8 MMBtu/hr Dehydrator Unit Reboiler	A-1
One 500 gallon lube oil storage tank	A-3
One 250 gallon lube oil storage tank	A-3
Non-Point Source Fugitive Emissions	A-13
ESD Blowdowns	A-13

## SECTION VIII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute. [40 CFR 70.6(b)(2)]
2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26)]
3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due. [Regulation 26, §26.406]
4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, et seq. (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation 26, §26.701(A)(2)]
5. The permittee must maintain the following records of monitoring information as required by this permit.
  - a. The date, place as defined in this permit, and time of sampling or measurements;
  - b. The date(s) analyses performed;
  - c. The company or entity performing the analyses;
  - d. The analytical techniques or methods used;
  - e. The results of such analyses; and
  - f. The operating conditions existing at the time of sampling or measurement.

[40 CFR 70.6(a)(3)(ii)(A) and Regulation 26, §26.701(C)(2)]

Arkansas Western Gas - Woolsey Compressor Station  
Permit #: 0972-AOP-R2  
AFIN: 24-00068

6. The permittee must retain the records of all required monitoring data and support information for at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [40 CFR 70.6(a)(3)(ii)(B) and Regulation 26, §26.701(C)(2)(b)]
7. The permittee must submit reports of all required monitoring every six (6) months. If permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due within thirty (30) days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26, §26.2 must certify all required reports. The permittee will send the reports to the address below:

Arkansas Department of Environmental Quality  
Air Division  
ATTN: Compliance Inspector Supervisor  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

[40 C.F.R. 70.6(a)(3)(iii)(A) and Regulation 26, §26.701(C)(3)(a)]

8. The permittee shall report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.
  - a. For all upset conditions (as defined in Regulation 19, § 19.601), the permittee will make an initial report to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include:
    - i. The facility name and location;
    - ii. The process unit or emission source deviating from the permit limit;
    - iii. The permit limit, including the identification of pollutants, from which deviation occurs;
    - iv. The date and time the deviation started;
    - v. The duration of the deviation;
    - vi. The average emissions during the deviation;
    - vii. The probable cause of such deviations;
    - viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future; and
    - ix. The name of the person submitting the report.

The permittee shall make a full report in writing to the Department within five (5) business days of discovery of the occurrence. The report must include, in addition to the information required by the initial report, a schedule of actions taken or planned to eliminate future occurrences and/or to minimize the amount the permit's limits were exceeded and to reduce the length of time the limits were exceeded. The permittee may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence, and the report will serve as both the initial report and full report.

- b. For all deviations, the permittee shall report such events in semi-annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 8a above. The semi-annual report must include all the information as required by the initial and full reports required in 8a.

[Regulation 19, §19.601 and §19.602, Regulation 26, §26.701(C)(3)(b), and 40 CFR 70.6(a)(3)(iii)(B)]

9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable. [40 CFR 70.6(a)(5), Regulation 26, §26.701(E), and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation 26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. §7401, et seq. and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation 26, §26.701(F)(1)]
11. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation 26, §26.701(F)(2)]
12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation 26, §26.701(F)(3)]
13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation 26, §26.701(F)(4)]



14. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation 26, §26.701(F)(5)]
15. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [40 CFR 70.6(a)(7) and Regulation 26, §26.701(G)]
16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation 26, §26.701(H)]
17. If the permit allows different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation 26, §26.701(I)(1)]
18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation 26, §26.702(A) and (B)]
19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation 26, §26.2. [40 CFR 70.6(c)(1) and Regulation 26, §26.703(A)]
20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation 26, §26.703(B)]
  - a. Enter upon the permittee's premises where the permitted source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

- d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.
- 21. The permittee shall submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation 26, §26.703(E)(3)]
  - a. The identification of each term or condition of the permit that is the basis of the certification;
  - b. The compliance status;
  - c. Whether compliance was continuous or intermittent;
  - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
  - e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.
- 22. Nothing in this permit will alter or affect the following: [Regulation 26, §26.704(C)]
  - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
  - b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
  - c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
  - d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
- 23. This permit authorizes only those pollutant emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 24. The permittee may request in writing and at least 15 days in advance of the deadline, an extension to any testing, compliance or other dates in this permit. No such extensions are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion in the following circumstances:
  - a. Such an extension does not violate a federal requirement;
  - b. The permittee demonstrates the need for the extension; and
  - c. The permittee documents that all reasonable measures have been taken to meet the current deadline and documents reasons it cannot be met.

Arkansas Western Gas - Woolsey Compressor Station  
Permit #: 0972-AOP-R2  
AFIN: 24-00068

[Regulation 18, §18.102(C-D), Regulation 19, §19.103(D), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and CFR Part 52, Subpart E]

25. The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Department approval. Any such emissions shall be included in the facility's total emissions and reported as such. The Department may grant such a request, at its discretion under the following conditions:
- a. Such a request does not violate a federal requirement;
  - b. Such a request is temporary in nature;
  - c. Such a request will not result in a condition of air pollution;
  - d. The request contains such information necessary for the Department to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
  - e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
  - f. The permittee maintains records of the dates and results of such temporary emissions/testing.

[Regulation 18, §18.102(C-D), Regulation 19, §19.103(D), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and CFR Part 52, Subpart E]

26. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion under the following conditions:
- a. The request does not violate a federal requirement;
  - b. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
  - c. Any such request, if approved, is incorporated in the next permit modification application by the permittee.

[Regulation 18, §18.102(C-D), Regulation 19, §19.103(D), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and CFR Part 52, Subpart E]

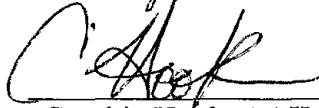


**CERTIFICATE OF SERVICE**

I, Cynthia Hook, hereby certify that a copy of this permit has been mailed by first class mail to

Arkansas Western Gas - Woolsey Compressor Station, P.O. Box 13288, Fayetteville, AR,

72703-1002, on this 8<sup>th</sup> day of August, 2008.

A handwritten signature in black ink, appearing to read 'C. Hook', written over a horizontal line.

Cynthia Hook, AAIL, Air Division

