

# ADEQ

ARKANSAS  
Department of Environmental Quality

**OCT 11 2007**

Lacey A. Ivey  
Environmental Specialist  
CenterPoint Energy – Mississippi River Transmission Corp.  
P.O. Box 21734  
Shreveport, LA 71151

Re: Title V Administrative Amendment  
CenterPoint Energy – Malvern Compressor Station  
AFIN: 30-00081 - Permit No.: 1102-AOP-R2

Dear Ms. Ivey:

Enclosed are the following amendment to Permit 1102-AOP-R2 completed in accordance with the provisions of §19.407 of Regulation No. 19, Regulations of the Arkansas Plan of Implementation for Air Pollution Control.

- Additional monitoring and reporting requirements regarding the Total Sulfur content of natural gas fuel have been added.

Please place the revised permit in your files.

Sincerely,



Mike Bates  
Chief, Air Division

JH  
Enclosure  
cc: Central Records

OCT 1 1 1903

# ADEQ OPERATING AIR PERMIT

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

Permit No. : 1102-AOP-R2

Renewal #1

IS ISSUED TO:

CenterPoint Energy Gas Transmission Company

Malvern Compressor Station

Ridge Road, 6 miles South of Malvern

Malvern, AR 72104

Hot Spring County

AFIN: 30-00081

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 24, 2005 AND August 23, 2010

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

Signed:



Mike Bates  
Chief, Air Division

**OCT 11 2007**

Date Amended

CenterPoint Energy Gas Transmission Company  
Malvern Compressor Station  
Permit #: 1102-AOP-R2  
AFIN: 30-00081

Table of Contents

<b>SECTION I: FACILITY INFORMATION</b>	4
<b>SECTION II: INTRODUCTION</b>	5
<b>Summary of Permit Activity</b>	5
<b>Process Description</b>	5
<b>Regulations</b>	5
<b>Emission Summary</b>	6
<b>SECTION III: PERMIT HISTORY</b>	8
<b>SECTION IV: SPECIFIC CONDITIONS</b>	9
SN- 01 thru SN-04	9
SN- 05	12
SN-12	14
<b>SECTION V: COMPLIANCE PLAN AND SCHEDULE</b>	16
<b>SECTION VI: PLANTWIDE CONDITIONS</b>	17
<b>SECTION VII: INSIGNIFICANT ACTIVITIES</b>	20
<b>SECTION VIII: GENERAL PROVISIONS</b>	21

0008 1 1 000

CenterPoint Energy Gas Transmission Company  
Malvern Compressor Station  
Permit #: 1102-AOP-R2  
AFIN: 30-00081

#### 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

CenterPoint Energy Gas Transmission Company  
Malvern Compressor Station  
Permit #: 1102-AOP-R2  
AFIN: 30-00081

## **SECTION I: FACILITY INFORMATION**

PERMITTEE: CenterPoint Energy Gas Transmission Company  
Malvern Compressor Station

AFIN: 30-00081

PERMIT NUMBER: 1102-AOP-R2

FACILITY ADDRESS: Ridge Road, 6 miles South of Malvern  
Malvern, AR 72104

MAILING ADDRESS: PO Box 21734  
Shreveport, LA 71151

COUNTY: Hot Spring

CONTACT POSITION: Laura Guthrie

TELEPHONE NUMBER: (318) 429-3706

REVIEWING ENGINEER: Thomas Rheaume, PE

UTM North South (Y): Zone 15: 3791.850

UTM East West (X): Zone 15: 516.008

CenterPoint Energy Gas Transmission Company  
Malvern Compressor Station  
Permit #: 1102-AOP-R2  
AFIN: 30-00081

## **SECTION II: INTRODUCTION**

### **Summary of Permit Activity**

CenterPoint Energy Gas Transmission Company currently operates a natural gas compressor station in Hot Spring County, Arkansas approximately six miles south of Malvern. The facility is located in the northeast quarter, Section 27, Township 5 South, Range 17 West at Universal Transverse Mercator Coordinates of 516.008 kilometers east and 3791.85 kilometers north.

This permit is a renewal of the facility's operating permit. HAP emission rates are decreasing based on the latest emission factors available. Sources SN-01 through 04 are renumbered based on the facility set up, but both the new and old designations are included in the permit for reference. No other changes are occurring in this permit.

### **Process Description**

Friction losses cause a drop in pressure in natural gas pipelines. To maintain required transmission pressures, compressor stations are located on the pipeline. In this facility the compressors are reciprocating engines which use natural gas as fuel.

The facility is a major source of Hazardous Air Pollutants (HAPs) and therefore potentially subject to 40 CFR 63 Subparts HHH, ZZZZ and DDDDD. However, the facility does not have the specific types of units regulated by these rules.

### **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 December 19, 2004
Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective September 26, 2002

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

CenterPoint Energy Gas Transmission Company  
Malvern Compressor Station  
Permit #: 1102-AOP-R2  
AFIN: 30-00081

### Emission Summary

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
Criteria Pollutant Totals		VOC	8.52	32.4
		CO	50.3	214.0
		NO <sub>x</sub>	75.7	246.0
HAPs Totals		Acetaldehyde*	0.25	1.04
		Acrolein*	0.66	2.93
		Formaldehyde*	3.03	12.94
		Benzene*	0.05	0.14
		Methanol*	0.25	1.04
SN	Description	Pollutant	lb/hr	tpy
01 (Formerly SN-04)	Cooper- Bessemer 16W330C2 Compressor Engine (8000 HP) 2 cycle clean burn	VOC	4.0	17.4
		CO	26.5	115.9
		NO <sub>x</sub>	30.0	131.3
		Acetaldehyde	0.13	0.56
		Acrolein	0.36	1.58
		Formaldehyde	1.60	7.01
		Benzene	0.02	0.08
		Methanol	0.13	0.56
02 (Formerly SN-01)	Cooper- Bessemer GMVH-10C2 Compressor Engine (2250 HP) 2 cycle clean burn	VOC	1.2	4.9
		CO	7.5	32.6
		NO <sub>x</sub>	8.5	36.9
		Acetaldehyde	0.04	0.16
		Acrolein	0.10	0.45
		Formaldehyde	0.45	1.97
		Benzene	0.01	0.02
		Methanol	0.04	0.16
03 (Formerly SN-02)	Cooper- Bessemer GMVH-10C2 Compressor Engine (2250 HP) 2 cycle clean burn	VOC	1.2	4.9
		CO	7.5	32.6
		NO <sub>x</sub>	8.5	36.9
		Acetaldehyde	0.04	0.16
		Acrolein	0.10	0.45
		Formaldehyde	0.45	1.97
		Benzene	0.01	0.02
		Methanol	0.04	0.16



CenterPoint Energy Gas Transmission Company  
 Malvern Compressor Station  
 Permit #: 1102-AOP-R2  
 AFIN: 30-00081

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
04 (Formerly SN-03)	Cooper- Bessemer GMVH-10C2 Compressor Engine (2250 HP) 2 cycle clean burn	VOC	1.2	4.9
		CO	7.5	32.6
		NOx	8.5	36.9
		Acetaldehyde	0.04	0.16
		Acrolein	0.10	0.45
		Formaldehyde	0.45	1.97
		Benzene	0.01	0.02
		Methanol	0.04	0.16
05	Emergency Generator	VOC	0.8	0.2
		CO	0.8	0.2
		NOx	14.0	3.5
		Formaldehyde	0.08	0.02
12	Standby Air Compressor	VOC	0.12	0.1
		CO	0.5	0.1
		NOx	6.2	0.5

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

CenterPoint Energy Gas Transmission Company  
Malvern Compressor Station  
Permit #: 1102-AOP-R2  
AFIN: 30-00081

### **SECTION III: PERMIT HISTORY**

Permit No. 1102-A was issued to ARKLA, Inc. for the construction and operation of this facility November 15, 1990. The initial permit was for the construction of four engine compressor (SN-01 through SN-04) and their associated equipment (SN-05 through SN-12). A Continuous Emissions Monitoring System (CEMS) was required for NO<sub>x</sub> and CO for the four engine compressors. Criteria pollutant limits were NO<sub>x</sub> - 243.7 tpy; CO - 213.3 tpy; NMHC - 32.2 tpy and SO<sub>2</sub> - 0.34 tpy.

Permit No. 1102-AR-1 was issued to ARKLA, Inc. May 13, 1991. A second 3.25 MMBTU/Hr heating boiler (SN-13) was added to the facility. Criteria pollutant limits were changed to NO<sub>x</sub> - 244.1 tpy; CO - 213.4 tpy; NMHC - 32.2 tpy and SO<sub>2</sub> - 0.34 tpy.

On July 26, 1996, a permit decision was issued by the Permits Section that based on operating history the CEMS for NO<sub>x</sub> and CO were no longer needed for compliance monitoring. A variance was issued allowing the operation of the CEMS to be discontinued. The actual permit change is to occur upon issuance of the initial Title V permit.

1102-AOP-RO issued on November 13, 1998 was the initial Title V issued for the facility. There were no physical changes to the facility.

1102-AOP-R1 was issued in response to an appeal of 1102-AOP-R0. In order to avoid confusion with the final permit issued on November 13, 1998, and agreed upon changes in the Permit Appeal Resolution (PAR), the permit number was being changed to 1102-AOP-R1.

CenterPoint Energy Gas Transmission Company  
Malvern Compressor Station  
Permit #: 1102-AOP-R2  
AFIN: 30-00081

#### SECTION IV: SPECIFIC CONDITIONS

SN- 01 thru SN-04

**Source Name**  
Compressor Engines

##### **Source Description**

SN-01 through SN-04 are compressor engines used to pressurize natural gas. All compressors (SN-01 through SN-04) have 2-stroke clean burn reciprocating engines. SN-02 through SN-04 are Cooper-Bessemer Model GMVH-10C2 rated 2,250 Horsepower which were installed in 1991. SN-01 is a Cooper-Bessemer Model 16W330C2 rated 8,000 Horsepower which was also installed in 1991. The numbering system is changed in permit 1102-AOP-R2 so that SN-01 through SN-03 were renamed SN-02 through SN-04. The engine formerly designated SN-04 is now SN-01.

The compressors may be ambient rated and operated up to 120% of rated load and their emission limits and fuel usages reflect the higher rating. Negligible amounts of particulate matter and sulfur dioxide may be emitted by these sources. Due to the extremely low calculated potential emissions of the pollutants, numerical limits have not been included in the permit for these sources, but such emissions are not prohibited.

##### **Specific Conditions**

1. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by the use of natural gas and operating at or below maximum capacity of the equipment. [Regulation 19, §19.501 et seq., effective December 19, 2004 and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
01 (Former ly SN- 04)	Cooper- Bessemer 16W330C2 Compressor Engine (8000 HP) 2 cycle clean burn	VOC CO NOx	4.0 26.5 30.0	17.4 115.9 131.3
02 (Former ly SN- 01)	Cooper- Bessemer GMVH-10C2 Compressor Engine (2250 HP) 2 cycle clean burn	VOC CO NOx	1.2 7.5 8.5	4.9 32.6 36.9

CenterPoint Energy Gas Transmission Company  
Malvern Compressor Station  
Permit #: 1102-AOP-R2  
AFIN: 30-00081

03 (Formerly SN-02)	Cooper- Bessemer GMVH-10C2 Compressor Engine (2250 HP) 2 cycle clean burn	VOC	1.2	4.9
		CO	7.5	32.6
		NOx	8.5	36.9
04 (Formerly SN-03)	Cooper- Bessemer GMVH-10C2 Compressor Engine (2250 HP) 2 cycle clean burn	VOC	1.2	4.9
		CO	7.5	32.6
		NOx	8.5	36.9

2. The permittee shall not exceed the HAP emission rates set forth in the following table. Compliance with HAPs emissions will be assured through the use of natural gas and operating at or below maximum capacity of the equipment. The HAP emissions listed for this source were based upon published emission factors at the time of permit issuance. Any change in these emission factors will not constitute a violation of the HAP emission rates listed below. [Regulation 18, §18.801, effective February 15, 1999, 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 (Formerly SN-04)	Cooper- Bessemer 16W330C2 Compressor Engine (8000 HP) 2 cycle clean burn	Acetaldehyde	0.13	0.56
		Acrolein	0.36	1.58
		Formaldehyde	1.60	7.01
		Benzene	0.02	0.08
		Methanol	0.13	0.56
02 (Formerly SN-01)	Cooper- Bessemer GMVH-10C2 Compressor Engine (2250 HP) 2 cycle clean burn	Acetaldehyde	0.04	0.16
		Acrolein	0.10	0.45
		Formaldehyde	0.45	1.97
		Benzene	0.01	0.02
		Methanol	0.04	0.16
03 (Formerly SN-02)	Cooper- Bessemer GMVH-10C2 Compressor Engine (2250 HP) 2 cycle clean burn	Acetaldehyde	0.04	0.16
		Acrolein	0.10	0.45
		Formaldehyde	0.45	1.97
		Benzene	0.01	0.02
		Methanol	0.04	0.16
04 (Formerly SN-03)	Cooper- Bessemer GMVH-10C2 Compressor Engine (2250 HP) 2 cycle clean burn	Acetaldehyde	0.04	0.16
		Acrolein	0.10	0.45
		Formaldehyde	0.45	1.97
		Benzene	0.01	0.02
		Methanol	0.04	0.16

CenterPoint Energy Gas Transmission Company  
Malvern Compressor Station  
Permit #: 1102-AOP-R2  
AFIN: 30-00081

3. Visible emissions may not exceed the limits 5% for these sources as measured by EPA Reference Method. Compliance with this condition shall be demonstrated by burning natural gas. [Regulation No. 18 §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

CenterPoint Energy Gas Transmission Company  
Malvern Compressor Station  
Permit #: 1102-AOP-R2  
AFIN: 30-00081

SN- 05

**Source Name**  
Emergency Generator

**Source Description**

Source SN-05, a 420 HP Waukesha F3521GU engine driving an emergency electrical generator was installed or last modified in 1991. This unit provides power to the station in the event of a power failure. This unit is being permitted to operate at 100% of its rated capacity.

**Specific Conditions**

4. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance through the use of natural gas and a restriction on the hours of operation of the equipment. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
VOC	0.8	0.2
CO	0.8	0.2
NOx	14.0	3.5

5. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through the use of natural gas and a restriction on the hours of operation of the equipment. The HAP emissions listed for this source were based upon published emission factors at the time of permit issuance. Any change in these emission factors will not constitute a violation of the HAP emission rates listed below. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
Formaldehyde	0.08	0.02

6. The permittee shall not exceed 5% opacity from source SN-05 as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated by burning natural gas. [Regulation No. 18 §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

CenterPoint Energy Gas Transmission Company  
Malvern Compressor Station  
Permit #: 1102-AOP-R2  
AFIN: 30-00081

7. The permittee shall use only natural gas as a fuel in SN-05. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and CFR Part 52, Subpart E]
8. The permittee shall not operate the emergency generator more than 500 hours in any consecutive twelve month period. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and CFR Part 52, Subpart E]
9. The permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition #8 and may be used by the Department for enforcement purposes. These records shall be updated on a monthly basis, shall be kept at the nearest manned site, shall be provided to Department personnel upon request and submitted in accordance with General Provision 7. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]

CenterPoint Energy Gas Transmission Company  
Malvern Compressor Station  
Permit #: 1102-AOP-R2  
AFIN: 30-00081

SN-12

**Source Name**  
Standby Air Compressor

**Source Description**

Source SN-12, a 400 HP diesel engine driving an emergency air compressor was installed or last modified in 1991. This unit provides compressed air to the station during periods of extremely high air usage. This unit is being permitted to operate at 100% of its rated capacity.

**Specific Conditions**

10. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition 13. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
VOC	0.12	0.1
CO	0.5	0.1
NO <sub>x</sub>	6.2	0.5

11. Visible emissions may not exceed 20% from SN-12 as measured by EPA Reference Method 9. [Regulation No. 19 §19.503 and 40 CFR 52, Subpart E]
12. Daily observations of the opacity from source SN-12 shall be conducted, when in operation more than three hours at a time, by a person trained in EPA Reference Method 9. If visible emissions appear to be in excess of 20%, the permittee shall immediately take action to identify the cause of the excess visible emissions, implement corrective action, and document that visible emissions do not appear to be in excess of the permitted opacity following the corrective action. The permittee shall maintain records of any visible emissions which appeared to be in excess of the permitted opacity, the corrective action taken, and if visible emissions were present following the corrective action. These records shall be kept on site and made available to Department personnel upon request. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]
13. The permittee shall not operate the emergency air compressor more than 168 hours in any consecutive twelve month period. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and CFR Part 52, Subpart E]



CenterPoint Energy Gas Transmission Company  
Malvern Compressor Station  
Permit #: 1102-AOP-R2  
AFIN: 30-00081

14. The permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition #13 and may be used by the Department for enforcement purposes. These records shall be updated on a monthly basis, shall be kept at the nearest manned site, shall be provided to Department personnel upon request and submitted in accordance with General Provision 7. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]

CenterPoint Energy Gas Transmission Company  
Malvern Compressor Station  
Permit #: 1102-AOP-R2  
AFIN: 30-00081

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

CenterPoint Energy Gas Transmission Company Malvern 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 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: [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]
  - 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.
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. The permittee shall use good maintenance practices to control emissions from valves, fittings, flanges, seals and other associated equipment. [Regulation No. 19 §19.303 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
7. The permittee shall only use pipeline quality natural gas to fire the compressor engines and/or turbines located at this facility. Pipeline quality natural gas is defined as gas which contains less than 20 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, or periodic testing. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and 40 CFR 70.6]

8. The permittee shall test the fuel combusted in the compressor engines and/or turbines for Total Sulfur within 180 days of issuance of the amendment to permit 1202-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 CenterPoint'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]
9. The permittee shall simultaneously conduct tests for CO and NO<sub>x</sub> on one-half of each type of compressor engine in accordance with Plantwide Condition #3 and every five years thereafter. EPA Reference Method 7E shall be used to test 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(s) to be tested. The engines tested shall be rotated so that no such engine is tested twice before another similar (make and model) engine of equal horsepower is tested once. If the tested emission rate for any pollutant is in excess of the permitted emission rate, all similar (make and model) engines shall be tested for that pollutant. [Regulation No. 19 §19.702 and 40 CFR Part 52, Subpart E]
10. The permittee may replace any existing engines on a temporary or permanent basis with an engine(s) that has the same or lower emission rates on a pound per hour basis; has the same or lower horsepower; and which replacement does not result in a significant emissions increase as defined and applied pursuant to 40 CFR 52.21, and as set out below:
  - a. The permittee shall notify ADEQ of the replacement within 30 days after the replacement is made, which notification shall identify the previous and replacement engines, and provide the reason why the replacement was necessary. If applicable, the notification shall also provide a permit application and, when required, a CAM plan under 40 CFR Part 64.

CenterPoint Energy Gas Transmission Company  
Malvern Compressor Station  
Permit #: 1102-AOP-R2  
AFIN: 30-00081

- b. The permittee shall conduct NOx and CO emission testing within 90 days of the date of replacement to verify the emissions from the newly installed engine(s). The testing shall be conducted in accordance with EPA Reference Method 7E for NOx and EPA Reference Method 10 for CO.
  - c. Notwithstanding the above, as provided by Regulation 26, in the event an emergency occurs, the permittee shall have an affirmative defense of emergency to an action brought for non-compliance with technology-based limitations if the conditions of Regulation 26, §26.707 are met. [Regulation No.19, §19.705, A~A 8-4-203 as referenced by ACA 8-4-304 and 8-4-311, 19-304 and 40 CFR Part 64]
11. 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]

## 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 December 14, 2004.

Description		Category
BOILER-1	3.25 MMBtu/hr Heating Boiler	A-1
HEATER-1	0.15 MMBtu/hr Fuel Gas Heater	A-1
BD-VENT1	Piping Blowdown Vent	A-13
BD-VENT2	Unit Blowdown Vent	A-13
TK-W01	8,820 gal Waste Oil Storage Tank	A-3
TK-L01	7,520 gal Lube Oil Storage Tank	A-3
BOILER-2	3.25 MMBtu/hr Heating Boiler	A-1
SMI	Smart Ash Incinerator	A-13
TK-PW1	8,820 gal Produced Water Storage Tank	A-3
TK-AF1	7,250 gal Glycol Storage Tank	A-3
TK-AF2	1,000 gal Glycol Settling Storage Tank	A-3
TK-WW1	8,820 gal Waste Water Storage Tank	A-3
TK-OS1	1,000 gal Oil Settling Storage Tank	A-3
TK-DIES	1,000 gal Diesel Storage Tank	A-3
FUG	Piping Component and Fugitive Emissions	A-13

### **SECTION VIII: GENERAL PROVISIONS**

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute. [40 CFR 70.6(b)(2)]
2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective September 26, 2002]
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. [40 CFR 70.6(a)(3)(ii)(A) and Regulation 26, §26.701(C)(2)]
  - 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.

CenterPoint Energy Gas Transmission Company  
Malvern Compressor Station  
Permit #: 1102-AOP-R2  
AFIN: 30-00081

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

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

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.

CenterPoint Energy Gas Transmission Company  
Malvern Compressor Station  
Permit #: 1102-AOP-R2  
AFIN: 30-00081

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;
  - e. and 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]

