

RESPONSE TO COMMENTS (DRAFT)

CenterPoint Energy Gas Transmission Company - Piney Compressor Station Permit No.: 1178-AOP-R3 AFIN: 58-00224

On December 7, 2009 the Director of the Arkansas Department of Environmental Quality gave notice of a draft permitting decision for the above referenced facility. During the comment period, the facility submitted written comments, data, views, or arguments on the draft permitting decision. In addition to our responses above, we have revised Plantwide Condition #9. Specifically, the sentence stating "The permittee shall test the engine within 90% of its rated capacity" has been revised to state "permitted capacity" pursuant to Regulation No. 19 19.702 (D). The Department's response to these issues is as follows:

Correspondence from the facility dated January 7, 2010:

Comment #1

This permit was initially submitted as a Title V Renewal; however, it was later decided to add controls to all three units onsite, which would reduce the emissions below the Title V threshold. A new permit application was submitted requesting the facility be a synthetic minor due to the changes in emissions. CEGT understands that the permit cannot be changed until the controls are added. However, nothing is mentioned in the permit about this facility eventually being considered a synthetic minor source once the controls are implemented. CEGT assumes that ADEQ will agree to accept a permit modification or new permit application at that time to modify the title V permit to a minor source permit. CEGT requests guidance/comment on ADEQ as to how to proceed after the controls are added.

Response to Comment #1

CenterPoint may submit an application for Piney to become a minor source facility after the controls have been installed and plantwide emissions are below Title V thresholds.

Comment #2

In Specific Condition (SC) 6, the 2nd, 3rd and 4th sentences which state, "The permittee shall measure and record the pressure drop across the catalyst during the test. The permittee shall measure and record the temperature of the catalyst during the test. The pressure drop and the average temperature shall be documented by including the results of the measurements on the summary page of the test report" should be deleted. This is not a requirement for any of CEGT's other units that have controls and is burdensome on the facility. CEGT requests that ADEQ provide the reason and rationale for the requirements.

Response to Comment #2

Measuring and recording temperature and pressure drop during the test are necessary to demonstrate testing was conducted while the sources are operating within the stated parametric monitoring ranges. The condition will remain unchanged.

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Comment #3

SC 7 should state that the temperature of the catalyst will stay within the range of 750 °F to 1250 °F instead of stating that at least 90% control is attained. The next two sentences should also be removed. For the catalyst to stay within 90% control the temperature is not the only thing that is required. The unit will already need to stay within the % control to be able to meet the emission limits.

Response to Comment #3

Since the emission limits after control already include the 90% reduction in the subject to control the revision is acceptable. Specific Condition #7 will be revised to state:

The permittee shall maintain catalyst temperature for SN-01 and SN-02 between 750 °F to 1250 °F. Compliance with this condition shall be demonstrated by installing a thermocouple and continuously recording catalyst temperature. These records shall be kept onsite and be made available to Department personnel upon request. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]

Comment #4

SC 8 should provide that the permittee shall measure the pressure drop across the catalyst "at least once monthly when operating" instead of every 30 days. These two units might not operate 8760 hours and so there should be no requirement to have to measure the pressure drop during this period.

Response to Comment #4

The condition has been revised as requested.

Comment #5

SC 14 should provide that the controls will be added to SN-03 and not to SN-01 and SN-02 because those have already been addressed. Also, the 2nd, 3rd, and 4th sentences of SC 14 should be deleted for the same reason as listed above in #2.

Response to Comment#5

Specific Condition #14 was revised to state the testing requirements are for SN-03. The 2nd, 3rd, and 4th sentences were not deleted. See response to Comment #2.

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Comment #6

SC 15 should provide that the temperature range will stay within 450 °F to 1350 °F instead of stating that at least 90% control should be attained. Also, the next two sentences following the requirement should be deleted. In order for the catalyst to stay within 90% control, the temperature is not the only factor to be considered. The unit will already need to stay within the % control to comply with the emission limits.

Response to Comment #6

Since the emission limits after control already include the 90% reduction in the subject to control the revision is acceptable. Specific Condition #15 will be revised to state:

The permittee shall maintain catalyst temperature for SN-03 between 450 °F to 1350 °F. Compliance with this condition shall be demonstrated by installing a thermocouple and continuously recording catalyst temperature. These records shall be kept onsite and be made available to Department personnel upon request. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]

Comment #7

SC 16 should state that the permittee shall measure the pressure drop across the catalyst "at least once monthly when operating" instead of every 30 days. These two units might not operate 8760 hours and so there should be no requirement to have to measure the pressure drop during this period.

Response to Comment #7

The condition has been revised as requested.

Comment #8

With regard to Plantwide Condition (PC) 8, the total sulfur was tested in 2008 and this should not be required again until 2013. ADEQ requests that a Specific Condition be placed in the permit to so provide.

Response to Comment #8

A note was appended to Plantwide Condition #8 clarifying that the testing was conducted in 2008 and is scheduled to be repeated in 2013.

ADEQ

ARKANSAS
Department of Environmental Quality

February 3, 2010

Lacey Ivey, Environmental Specialist
CenterPoint Energy Gas Transmission Company - Piney Compressor Station
P.O. Box 21734
Shreveport, LA 71151

Dear Ms. Ivey:

The enclosed Permit No. 1178-AOP-R3 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. 1178-AOP-R3 for the construction, operation and maintenance of an air pollution control system for CenterPoint Energy Gas Transmission Company - Piney Compressor Station to be issued and effective on the date specified in the permit, unless a Commission review has been properly requested under Arkansas Department of Pollution Control & Ecology Commission's Administrative Procedures, Regulation 8.603, within thirty (30) days after service of this decision.

All persons submitting written comments during the thirty (30) day, 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 Regulation 8.603, including filing a written Request for Hearing with the APC&E Commission Secretary at 101 E. Capitol Ave., Suite 205, Little Rock, Arkansas 72201. If you have any questions about filing the request, please call the Commission at 501-682-7890.

Sincerely,



Mike Bates
Chief, Air Division

ADEQ OPERATING AIR PERMIT

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

Permit No. : 1178-AOP-R3

IS ISSUED TO:

CenterPoint Energy Gas Transmission Company - Piney Compressor
Station

2 miles West of London near Highway 64

London, AR 72847

Pope County


AFIN: 58-00224

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:

February 3, 2010 AND February 2, 2015

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

Signed:



Mike Bates
Chief, Air Division

February 3, 2010

Date

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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 _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	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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SECTION I: FACILITY INFORMATION

PERMITTEE: CenterPoint Energy Gas Transmission Company - Piney
Compressor Station

AFIN: 58-00224

PERMIT NUMBER: 1178-AOP-R3

FACILITY ADDRESS: 2 miles West of London near Highway 64
London, AR 72847

MAILING ADDRESS: P.O. Box 21734
Shreveport, LA 71151

COUNTY: Pope County

CONTACT NAME: Lacey Ivey

CONTACT POSITION: Environmental Specialist

TELEPHONE NUMBER: 318-429-3297

REVIEWING ENGINEER: Charles Hurt, P.E.

UTM North South (Y): Zone 15: 3910340.76 m

UTM East West (X): Zone 15: 472008.86 m

SECTION II: INTRODUCTION

Summary of Permit Activity

CenterPoint Energy Gas Transmission Company owns and operates a natural gas transmission pipeline compressor station (AFIN: 58-00224) near London, Arkansas, Pope County, known as the Piney Compressor Station. CenterPoint submitted an application to renew the Title V Operating Air Permit and install CO and NO_x control devices on SN-01, SN-02, and SN-03. Once the control devices are installed by February 28, 2011, the permitted CO and NO_x emission limits will decrease by 194.0 tpy and 146.4 tpy, respectively.

Process Description

Friction losses cause a drop in pressure in natural gas pipelines. To maintain flow, gas must be removed from the pipeline, compressed, and returned to the pipeline at a higher pressure. Natural gas from the transmission pipeline enters the station where it is dehydrated and then compressed, exiting the station at a higher pressure. Prior to compression the gas will pass through an inlet separator where entrained liquids are removed from the gas stream. Condensate/pipeline liquids are stored in the produced water storage tank and removed from the station via tanker truck when necessary. This compressor station currently uses two Waukesha L5790G compressor engines (SN-01 and SN-02), and one Waukesha F3521L compressor engine (SN-03).

Emissions of nitrogen oxides, carbon monoxide, and volatile organic compounds will result from the combustion of natural gas in the compressor engines. This compressor station will use only pipeline-quality natural gas in the firing of the engines. Support equipment includes several tanks which are considered to be *De Minimis* sources of emissions.

Combustion gases from the natural gas fired reciprocating engines are vented as atmospheric emissions. The compressor station also has other atmospheric fugitive releases, which are part of start-up, shutdown, and safety.

Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective January 25, 2009
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective July 18, 2009
Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective January 25, 2009

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	0.3	1.2
		PM ₁₀	0.3	1.2
		SO ₂	0.3	0.3
		VOC	0.9	3.5
		CO	49.4	215.6
		NO _x	45.2	197.1
HAPs*		Acetaldehyde	0.08	0.31
		Acrolein	0.07	0.25
		Benzene	0.03	0.09
		Formaldehyde	0.46	2.00
		Methanol	0.05	0.21
01	Waukesha L5709G 550 hp	PM	0.1	0.5
		PM ₁₀	0.1	0.5
		SO ₂	0.1	0.1
		VOC	0.2	0.7
		CO	22.9	99.9
		NO _x	20.3	88.5
		Acetaldehyde	0.02	0.07
		Acrolein	0.02	0.07
		Benzene	0.01	0.04
		Formaldehyde	0.08	0.35
		Methanol	0.02	0.08
02	Waukesha L5709G 550 hp	PM	0.1	0.5
		PM ₁₀	0.1	0.5
		SO ₂	0.1	0.1
		VOC	0.2	0.7
		CO	22.9	99.9
		NO _x	20.3	88.5
		Acetaldehyde	0.02	0.07
		Acrolein	0.02	0.07
		Benzene	0.01	0.04
		Formaldehyde	0.08	0.35
		Methanol	0.02	0.08

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EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
03	Waukesha F3521GL	PM	0.1	0.2
		PM ₁₀	0.1	0.2
		SO ₂	0.1	0.1
		VOC	0.5	2.1
		CO	3.6	15.8
		NO _x	4.6	20.1
		Acetaldehyde	0.04	0.17
		Acrolein	0.03	0.11
		Benzene	0.01	0.01
		Formaldehyde	0.03	1.30
		Methanol	0.01	0.05

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

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SECTION III: PERMIT HISTORY

This facility began operation in 1968.

Permit #1178-A was issued to ARKLA, Inc. – Piney Compressor Station on October 1, 1991. This permit included three compressor engines, one blow stack, one dehydrator, and two waste oil tanks. This was the first permit for the facility. This permit allowed the permittee to install and operate the Waukesha F3521GL Compressor Engine (SN-03).

Permit #1178-AOP-R0 was issued to Reliant Energy Gas Transmission Company – Piney Compressor Station on May 5, 1999. This was the first Title V permit for the facility. No physical modifications occurred with the issuance of this permit.

Permit #1178-AOP-R1 was issued as a modification on October 18, 1999. It was the second operating permit issued to Reliant Energy Gas Transmission Company -- Piney Compressor Station, under Regulation #26. No physical modifications occurred with the issuance of this permit. The permit was modified as a part of a Permit Appeal Resolution.

Permit #1178-AOP-R2 was issued on May 17, 2004 as a Title V renewal. The emission estimates based on updated emission factors for compressor engines were revised.

SECTION IV: SPECIFIC CONDITIONS

SN-01 and SN-02

Waukesha L5970G Compressor Engines #1 and #2

Source Description

The engines and compressors were installed in 1968. There are two (2) 550 HP Waukesha Model L5790G, four (4)-cycle rich burn, natural gas fired, reciprocating internal combustion engines. The purpose of each engine is to drive a compressor which re-pressurizes natural gas for pipeline transmission. Prior to being compressed the natural gas passes through a glycol dehydrator. The compressors may be operated at 120% of rated capacity.

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall comply with these limits until Specific Condition #3 becomes effective. The permittee will demonstrate compliance with this condition by the use of natural gas fuel and operating at or below maximum operating capacity. [Regulation No. 19 §19.501 *et seq.* and 40 CFR Part 52, Subpart E]

SN	Pollutant	lb/hr	tpy
01	PM ₁₀	0.1	0.5
	SO ₂	0.1	0.1
	VOC	0.2	0.7
	CO	22.9	99.9
	NO _x	20.3	88.5
02	PM ₁₀	0.1	0.5
	SO ₂	0.1	0.1
	VOC	0.2	0.7
	CO	22.9	99.9
	NO _x	20.3	88.5

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall comply with these limits until Specific Condition #4 becomes effective. The pound per hour and ton per year rates are based on maximum capacity. 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. Compliance with these emission rates will be demonstrated through compliance with Plantwide Condition #7. [Regulation No. 18 §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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SN	Pollutant	lb/hr	tpy
01	PM	0.1	0.5
	Acetaldehyde	0.02	0.07
	Acrolein	0.02	0.07
	Benzene	0.01	0.04
	Formaldehyde	0.08	0.35
	Methanol	0.02	0.08
02	PM	0.1	0.5
	Acetaldehyde	0.02	0.07
	Acrolein	0.02	0.07
	Benzene	0.01	0.04
	Formaldehyde	0.08	0.35
	Methanol	0.02	0.08

3. The permittee shall not exceed the emission rates set forth in the following table upon completion of installation of the non-selective catalyst reduction control device or February 28, 2011 which ever comes first. The permittee will demonstrate compliance with this condition by the use of natural gas fuel and operating at or below maximum operating capacity. [Regulation No. 19 §19.501 *et seq.* and 40 CFR Part 52, Subpart E]

SN	Pollutant	lb/hr	tpy
01	PM ₁₀	0.1	0.5
	SO ₂	0.1	0.1
	VOC	0.2	0.7
	CO	2.3	10.0
	NO _x	3.5	15.3
02	PM ₁₀	0.1	0.5
	SO ₂	0.1	0.1
	VOC	0.2	0.7
	CO	2.3	10.0
	NO _x	3.5	15.3

4. The permittee shall not exceed the emission rates set forth in the following table upon completion of installation of the non-selective catalyst reduction control device or February 11, 2011 which ever comes first. The pound per hour and ton per year rates are based on maximum capacity. 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. Compliance with these emission rates will be demonstrated through compliance with Plantwide Condition #7. [Regulation No. 18 §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Pollutant	lb/hr	tpy
01	PM	0.1	0.5
	Acetaldehyde	0.02	0.07
	Acrolein	0.02	0.07
	Benzene	0.01	0.04
	Formaldehyde	0.08	0.35
	Methanol	0.02	0.08
02	PM	0.1	0.5
	Acetaldehyde	0.02	0.07
	Acrolein	0.02	0.07
	Benzene	0.01	0.04
	Formaldehyde	0.08	0.35
	Methanol	0.02	0.08

5. The permittee shall not exceed 5% opacity as measured by EPA Reference Method.9. Compliance with the opacity limit set forth in this specific condition will be shown by compliance with Plantwide Condition #7. [Regulation No. 18 §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
6. The permittee shall within 180 days of installing controls at SN-01 and SN-02 conduct a performance test simultaneously for CO and NO_x in accordance with Plantwide Condition #3. The permittee shall measure and record the pressure drop across the catalyst during the test. The permittee shall measure and record the temperature of the catalyst during the test. The pressure drop and the average temperature shall be documented by including the results of the measurements on the summary page of the test report. Upon compliance with this condition the permittee shall resume testing in accordance with Plantwide Condition #9. [Regulation No. 19 §19.702 and 40 CFR Part 52, Subpart E]
7. The permittee shall maintain catalyst temperature for SN-01 and SN-02 between 750 °F to 1250 °F. Compliance with this condition shall be demonstrated by installing a thermocouple and continuously recording catalyst temperature. These records shall be kept onsite and be made available to Department personnel upon request. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]
8. The permittee shall measure the pressure drop across the catalyst at least once monthly while operating. The pressure drop across the catalyst shall not exceed two inches of water. A log of these measurements shall be maintained onsite and be made available to Department personnel upon request. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]

SN-03

Waukesha F3521GL Compressor Engine

Source Description

The engine and compressor was installed or modified in 1991. The engine is a 773 HP Waukesha F3521 four (4)-cycle lean burn, natural gas fired reciprocating internal combustion engines. The purpose of each engine is to drive a compressor which re-pressurizes natural gas for pipeline transmission. Prior to being compressed the natural gas passes through a glycol dehydrator. The compressors may be operated at 120% of rated capacity.

Specific Conditions

9. The permittee shall not exceed the emission rates set forth in the following table until Specific Condition #11 becomes effective. The permittee will demonstrate compliance with this condition by the use of natural gas fuel and operating at or below maximum operating capacity. [Regulation No. 19 §19.501 *et seq.* and 40 CFR Part 52, Subpart E]

SN	Pollutant	lb/hr	tpy
03	PM ₁₀	0.1	0.2
	SO ₂	0.1	0.1
	VOC	0.5	2.1
	CO	3.6	15.8
	NO _x	4.6	20.1

10. The permittee shall not exceed the emission rates set forth in the following table until Specific Condition #12 becomes effective. The pound per hour and ton per year rates are based on maximum capacity. 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. Compliance with these emission rates will be demonstrated through compliance with Plantwide Condition #7. [Regulation No. 18 §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Pollutant	lb/hr	tpy
03	PM	0.1	0.2
	Acetaldehyde	0.04	0.17
	Acrolein	0.03	0.11
	Benzene	0.01	0.01
	Formaldehyde	0.30	1.30
	Methanol	0.01	0.05

11. The permittee shall not exceed the emission rates set forth in the following table upon completion of installation of the oxidation catalyst or February 28, 2011 which ever comes first. The permittee will demonstrate compliance with this condition by the use of natural gas fuel and operating at or below maximum operating capacity. [Regulation No. 19 §19.501 *et seq.* and 40 CFR Part 52, Subpart E]

SN	Pollutant	lb/hr	tpy
03	PM ₁₀	0.1	0.2
	SO ₂	0.1	0.1
	VOC	0.5	2.1
	CO	0.4	1.6
	NO _x	4.6	20.1

12. The permittee shall not exceed the emission rates set forth in the following table upon completion of installation of the oxidation catalyst or February 28, 2011 which ever comes first. The pound per hour and ton per year rates are based on maximum capacity. 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. Compliance with these emission rates will be demonstrated through compliance with Plantwide Condition #7. [Regulation No. 18 §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Pollutant	lb/hr	tpy
03	PM	0.1	0.2
	Acetaldehyde	0.04	0.17
	Acrolein	0.03	0.11
	Benzene	0.01	0.01
	Formaldehyde	0.21	0.91
	Methanol	0.01	0.05

13. The permittee shall not exceed 5% opacity as measured by EPA Reference Method.9. Compliance with the opacity limit set forth in this specific condition will be shown by compliance with Plantwide Condition #7. [Regulation No. 18 §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
14. The permittee shall within 180 days of installing controls at SN-03 conduct a performance test simultaneously for CO and NO_x in accordance with Plantwide Condition #3. The permittee shall measure and record the pressure drop across the catalyst during the test. The permittee shall measure and record the temperature of the catalyst during the test. The pressure drop and the average temperature shall be documented by including the results of the measurements on the summary page of the test report. Upon compliance with this condition the permittee shall resume testing in accordance with Plantwide Condition #9. [Regulation No. 19 §19.702 and 40 CFR Part 52, Subpart E]

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15. The permittee shall maintain catalyst temperature for SN-03 between 450 °F to 1350 °F. Compliance with this condition shall be demonstrated by installing a thermocouple and continuously recording catalyst temperature. These records shall be kept onsite and be made available to Department personnel upon request. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]

16. The permittee shall measure the pressure drop across the catalyst at least once monthly when operating. The pressure drop across the catalyst shall not exceed two inches of water. A log of these measurements shall be maintained onsite and be made available to Department personnel upon request. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]

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SECTION V: COMPLIANCE PLAN AND SCHEDULE

CenterPoint Energy Gas Transmission Company - Piney 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 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 1178-AOP-R2 to show compliance with SO₂ 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]

Note: Fuel testing was conducted in 2008 and is scheduled to be repeated in 2013.

9. The permittee shall simultaneously conduct tests for NO_x and CO, on one half of each type of the compressor engine, in accordance with Plantwide Condition No. 3. Testing shall be conducted every five years thereafter, as shown in the table below. EPA Reference Method 7E shall be used to determine NO_x. EPA Reference Method 10 shall be used to determine CO. The permittee shall test the engine within 90% of its permitted capacity. If the engine is not tested 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 engine(s) tested shall be rotated so that no engine(s) is tested twice before another engine 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. [Regulation No. 19 §19.702, and 40 CFR Part 52, Subpart E]

SN	Description	Testing Requirements
01 & 02	550 HP Waukesha Model L45790	One of two every five years
03	773 HP Waukesha Model F3521L	Every five years

10. The permittee may replace any existing engines on a temporary or permanent basis with engines which have the same or lower emission rates on a pound per hour basis, and have the same or lower horsepower, and which result in the same or lower actual emissions from the facility on a ton per year basis. The permittee shall conduct NO_x and CO emission testing within 90 days of the date of replacement to verify the emissions from the newly installed engine. This testing shall be conducted in accordance with EPA Reference Method 7E for NO_x and Reference Method 10 for CO. The permittee shall notify ADEQ of the replacement within 30 days of startup. This does not apply to

modifications which must go through a PSD review as defined in 40 CFR 52.21. 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 emission limitations if the conditions of Regulation 26, Sec. 7(f) are met. [Regulation 19, section 19.705 and A.C.A. 8-4-203 as referenced by A.C.A. 8-4-304 and 8-4-311]

Title VI Provisions

11. 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.

12. 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.

13. 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.

14. 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.

15. 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.

Permit Shield

16. 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 August 12, 2008.

Applicable Regulations

SN	Regulation	Description
Facility	Arkansas Regulation #19	Compilation of Regulations of the Arkansas State Implementation Plan for Air Pollution Control
Facility	Arkansas Regulation #26	Regulations of the Arkansas Operating Air Permits Program

The permit specifically identifies the following as inapplicable based upon information submitted by the permittee in an application dated August 12, 2008.

Inapplicable Regulations

Source No.	Regulation	Description	Basis for determination
Facility	Regulation 19.8	Regulations for 111(d) designated facility	This facility is not identified in the list of designated facilities.
Facility	Regulation 19.9	Prevention of	Facility is not a PSD source.

CenterPoint Energy Gas Transmission Company - Piney Compressor Station

Permit #: 1178-AOP-R3

AFIN: 58-00224

Source No.	Regulation	Description	Basis for determination
		Significant Deterioration	
Facility	Regulation 19.10	Regulations for the control of volatile organic compounds	This facility is not located in an ozone maintenance area (Pulaski County)
Facility	Regulation 26.304	Emission units subject to permitting	This rule applies only to state and federal agencies
Facility	Regulation 26.402	Standard application form and required information	This rule applies only to state and federal agencies
Facility	Regulation 26.501-504	Actions on applications	This rule applies only to state and federal agencies
Facility	Regulation 26.601	Permit review	This rule applies only to state and federal agencies
Facility	Regulation 26.1201	Regulations for acid rain sources	This facility is not in this source category.
Facility	40 CFR 60	New Source Performance Standards	Source categories do not apply to any units at the facility as of the effective date of this permit.
Facility	40 CFR 62	State plans for designate facilities	This rule is administrative and procedural
Facility	40 CFR 63	National Emission standards for hazardous air pollutants.	This facility is not in any source category as of the effective date of this permit.
Facility	40 CFR 72	Acid rain Permits	This facility is not in this source category
Facility	40 CFR 79	Registration of fuels and fuel additives	This facility is not in this source category
Facility	40 CFR 80	Registration of fuels and fuel additives	This facility is not in this source category
Facility	40 CFR 80.304	Non - Attainment	This facility is not in a non-attainment area.

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 August 12, 2008.

Description	Category
Glycol dehydrator reboiler (natural gas fired), 1.25 MM Btu/hr reboiler	A-1 < 10MMBtu/hr
Glycol dehydrator still column vent	A-13
Blowdown vent	A-13
(1)-8,820 gallon waste oil storage tank	A-3 TVP<0.5psia
(1) 550 gallon waste oil storage tank	A-3 TVP<0.5psia
(1) 881 gallon Glycol storage tank	A-3 TVP<0.5psia
(1) 1692 gallon antifreeze storage tank	A-3 TVP<0.5psia
(1) Used Glycol tank (500-gal capacity)	A-3 TVP<0.5psia
(1)-8,820 gallon produced water storage tank	A-13
(1) 550 gallon freshwater storage tank	A-13
Smart Ash Incinerator	A-13
Condensate truck loading	A-13
Piping component 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)]
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)]

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.

[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.

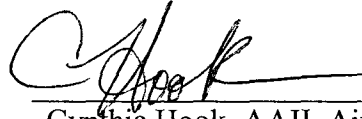
[Regulation 18, §18.102(C-D), Regulation 19, §19.103(D), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and CFR Part 52, Subpart E]

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 CenterPoint Energy Gas Transmission Company - Piney Compressor Station, P.O. Box 21734, Shreveport, LA, 71151, on this 3rd day of February, 2010.

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

Cynthia Hook, AAI, Air Division