

ADEQ OPERATING AIR PERMIT

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

Permit #: 1185-AOP-R1

IS ISSUED TO:

Arkansas Western Gas Company - Drake Compressor Station
County Road 302
(2204 Westview Road)
Ozark, AR 72949
Franklin County
CSN: 24-0071

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:

November 13, 1998 and November 12, 2003

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels

Date Modified

SECTION I: FACILITY INFORMATION

PERMITTEE: Arkansas Western Gas Company -
Drake Compressor Station

CSN: 24-0071

PERMIT NUMBER: 1185-AOP-R1

FACILITY ADDRESS: County Road 302
(2204 Westview Road)
Ozark, AR 72949

MAILING ADDRESS: P.O. Box 1288
Fayetteville, AR 72702-1288

COUNTY: Franklin

CONTACT POSITION: Environmental Technician - Steven Liddell

TELEPHONE NUMBER: (501)582-8635

REVIEWING ENGINEER: Paul Osmon

UTM North-South (Y): 3939.5 km N

UTM East-West (X): 424.5 km E

Zone 15

Arkansas Western Gas Company - Drake Compressor Station
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SECTION II: INTRODUCTION

Summary of Permit Activity

Permit No. 1185-AOP-R1 is issued to allow Arkansas Western Gas Company to replace the Waukesha L-1905G 4-cycle rich burn engine (also known as Model NKR) which powers the gas compressor designated SN-16 with a Waukesha F817G 4-cycle rich burn engine. Emission limits for the replacement engine are: oxides of nitrogen - 14.6 tons per year, carbon monoxide - 45.2 tons per year, and volatile organic compounds - 2.7 tons per year. The emission limits for the replacement engine are below the significant emission rate representing a major modification under PSD. The emission limits for HAPs for all sources have been recalculated based on AP-42 Sections 3.1 and 3.2.

Process Description

Arkansas Western Gas Company (AWG) owns and operates a natural gas compressor station located near Ozark, Arkansas. The function of the Drake Compressor Station (Drake) is to compress sweet dry natural gas from a gas gathering system into a gas transmission system for delivery to customers in Northwest Arkansas. The Rock Creek compressor and dehydrator are also located at the Drake station site. Gas from the Rock Creek field passes through the dehydrator absorber which, utilizing glycol as a desiccant, removes water vapor from the gas. A natural gas-fired reboiler is used to reconcentrate the glycol. After dehydration, the gas is compressed and sent into the main Drake station suction lines.

Regulations

This facility is subject to regulation under the *Clean Air Act* as amended, the *Arkansas Water and Air Pollution Control Act*, the *Arkansas Air Pollution Control Code* (Regulation 18), the *Regulations of the Arkansas Plan of Implementation for Air Pollution Control* (Regulation 19), and the *Regulation of the Arkansas Operating Air Permit Program* (Regulation 26). None of the units are subject to NSPS 40 CFR 60, Subpart GG - *Standards of Performance for Stationary Gas Turbines* since all units except SN-09 through SN-14 use reciprocating engines. SN-09 through SN-14 are gas fired turbines that were constructed prior to October 3, 1977.

The following table is a summary of emissions from the facility. Specific conditions and emissions for each source can be found starting on the page cross referenced in the table. This table, in itself, is not an enforceable condition of the permit.

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
Total Allowable Emissions		VOC	34.0	154.3	
		CO	199.9	759.5	
		NO _x	71.7	309.0	
HAPs*		formaldehyde*	2.17	9.32	
01	Waukesha Model LRZB engine (330 HP) 4 cycle rich burn	VOC CO NO _x formaldehyde	1.5 20.4 5.1 0.06	6.4 89.2 22.3 0.25	10
02	Waukesha Model LRZB engine (330 HP) 4 cycle rich burn	VOC CO NO _x formaldehyde	1.5 20.4 5.1 0.06	6.4 89.2 22.3 0.25	10
03	Waukesha Model LRZB engine (330 HP) 4 cycle rich burn	VOC CO NO _x formaldehyde	1.5 20.4 5.1 0.06	6.4 89.2 22.3 0.25	10
04	Waukesha Model LRZB engine (330 HP) 4 cycle rich burn	VOC CO NO _x formaldehyde	1.5 20.4 5.1 0.06	6.4 89.2 22.3 0.25	10
05	Source removed - 1998				
06	Source removed - 1998				
07	Source removed - 1996				

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
08	Waukesha Model LRZB engine (351 HP) 4 cycle rich burn	VOC	1.5	6.4	10
		CO	20.4	89.2	
		NO _x	5.1	22.3	
		formaldehyde	0.06	0.25	
09	Solar Model Saturn engine (1200 HP) turbine	VOC	2.6	12.8	13
		CO	6.0	26.0	
		NO _x	4.0	17.4	
10	Solar Model Saturn engine (1200 HP) turbine	VOC	2.6	12.8	13
		CO	6.0	26.0	
		NO _x	4.0	17.4	
11	Solar Model Saturn engine (1200 HP) turbine	VOC	2.6	12.8	13
		CO	6.0	26.0	
		NO _x	4.0	17.4	
12	Solar Model Saturn engine (1200 HP) turbine	VOC	2.6	12.8	13
		CO	6.0	26.0	
		NO _x	4.0	17.4	
13	Solar Model Saturn engine (1200 HP) turbine	VOC	2.6	12.8	13
		CO	6.0	26.0	
		NO _x	4.0	17.4	
14	Solar Model Saturn engine (1200 HP) turbine	VOC	2.6	12.8	13
		CO	6.0	26.0	
		NO _x	4.0	17.4	

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
15	Waukesha Model L7042 GL engine (1478 HP) 4 cycle clean burn	VOC	3.3	14.3	15
		CO	8.2	35.7	
		NO _x	6.6	28.6	
		formaldehyde	0.66	2.89	
16	Waukesha Model F817G engine (125 HP) 4 cycle rich burn	VOC	0.7	2.7	15
		CO	10.4	45.2	
		NO _x	3.4	14.6	
		formaldehyde	0.02	0.09	
17	Dehydrator Reboiler - Insignificant Activity				
18	General Motors 305 in ³ engine (92 HP) 4 cycle rich burn	VOC	0.3	0.1	17
		CO	26.4	2.9	
		NO _x	0.7	0.1	
19	Waukesha Model L5108 GL engine (1122 HP) 4 cycle clean burn	VOC	3.3	14.1	15
		CO	8.7	38.0	
		NO _x	4.9	21.2	
		formaldehyde	0.50	2.20	
20-81	The last SIP permit listed 61 very small vents and relief valve vents which have very small tpy emissions of natural gas. Since Arkoma Basin natural gas is coal seam gas there are negligible heavier hydrocarbons (it contains no criteria pollutants). - All are Insignificant Activities				
82	Fugitive Emissions - Insignificant Activity				
83	Safety Kleen Parts Washer - Insignificant Activity				
84	Lube Oil Storage Tank - Insignificant Activity				

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
85	ESD Blowdown - Insignificant Activity				
86	Fluids Collection Tank - Insignificant Activity				
87	Waukesha Model L7042 GL engine (1478 HP) 4 cycle clean burn	VOC	3.3	14.3	15
		CO	8.2	35.7	
		NO _x	6.6	28.6	
		formaldehyde	0.66	2.89	

* HAPs included in the VOC totals are indicated by an *.

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SECTION III: PERMIT HISTORY

Air Permit No. 1185-A was issued to Arkansas Western Gas Company - Drake Compressor Station on August 26, 1991. Arkansas Western Gas Company requested that all existing sources at the facility be permitted. These sources included nine natural gas-fired reciprocating engines, six gas turbines, and a dehydrator reboiler burner. These sources were purchased between 1958 and 1974. Air Permit No. 1185-A also allowed the installation and operation of a new 1478 horsepower natural gas-fired reciprocating engine (SN-15). The emission limits for the new engine were below the significant emission rate representing a major modification under PSD. The permit outlined natural gas usage limits and required performance testing for each engine.

Air Permit No. 1185-AR-1 was issued to Arkansas Western Gas Company - Drake Compressor Station on October 4, 1993. The modification allowed the installation of a natural gas-fired emergency electric generator. Operation of the generator occurred only when public electric power failed and during one 30 minute test each week.

Air Permit No. 1185-AR-2 was issued to Arkansas Western Gas Company - Drake Compressor Station on March 26, 1996. The modification involved the addition of a natural gas reciprocating engine (SN-19) and the removal of one 330 HP engine (SN-07). The emission limits for the new engine were below the significant emission rate representing a major modification under PSD. The emissions from existing sources which were not addressed in the previous permit were also quantified, specifically, SN-20 thru SN-81. The sources are associated with start-up, shut-down, safety, and auxiliary systems.

Permit No. 1185-AOP-R0 was issued to Arkansas Western Gas Company - Drake Compressor Station on November 13, 1998. This was the first permit issued to the facility under Regulation 26. The removal of two sources (SN-05 and SN-06) was authorized along with the addition of a new 1478 HP compressor unit (SN-87). The emission limits for the new engine were below the significant emission rate representing a major modification under PSD. Criteria pollutant emission limits listed in the permit were: VOC - 156.0 tpy, CO - 774.8 tpy, and NO_x - 309.1 tpy.

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SECTION IV: EMISSION UNIT INFORMATION

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**SN-01 thru SN-08
 LRZB Waukesha Natural Gas Reciprocating Engines**

Source Description

The purpose of the compressor station is to compress and dehydrate sweet natural gas. The dehydrated gas is sent to the compressors (SN-01 thru SN-08) to be compressed, cooled, and delivered to the discharge piping system. The compressors are driven by Waukesha manufactured engines, which run on natural gas as a fuel and produce exhaust gases.

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

Specific Conditions

- Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control, effective February 15, 1999 (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this Specific Condition shall be demonstrated by using natural gas fuel and operating at or less than maximum capacity.

Source No.	Description	Pollutant	lb/hr	tpy
01	Waukesha LRZB gas engine	VOC	1.5	6.4
		CO	20.4	89.2
		NO _x	5.1	22.3
02	Waukesha LRZB gas engine	VOC	1.5	6.4
		CO	20.4	89.2
		NO _x	5.1	22.3
03	Waukesha LRZB gas engine	VOC	1.5	6.4
		CO	20.4	89.2
		NO _x	5.1	22.3
04	Waukesha LRZB gas engine	VOC	1.5	6.4
		CO	20.4	89.2
		NO _x	5.1	22.3

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Source No.	Description	Pollutant	lb/hr	tpy
05	Source removed - 1998			
06	Source removed - 1998			
07	Source removed - 1996			
08	Waukesha LRZB gas engine	VOC	1.5	6.4
		CO	20.4	89.2
		NO _x	5.1	22.3

2. Pursuant to §18.801 of the Arkansas Air Pollution Control Code, effective February 15, 1999 (Regulation 18), the permittee shall not exceed the emission rates set forth in the following table. Compliance with this Specific Condition shall be demonstrated by using natural gas as fuel and operating at or less than capacity.

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

Source No.	Description	HAP	lb/hr	tpy
01	Waukesha LRZB gas engine	Formaldehyde	0.06	0.25
02	Waukesha LRZB gas engine	Formaldehyde	0.06	0.25
03	Waukesha LRZB gas engine	Formaldehyde	0.06	0.25
04	Waukesha LRZB gas engine	Formaldehyde	0.06	0.25
05	Source removed - 1998			
06	Source removed - 1998			
07	Source removed - 1996			
08	Waukesha LRZB gas engine	Formaldehyde	0.06	0.25

3. Pursuant to §18.501 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not

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exceed 5% opacity from SN-01 thru SN-08 as measured by EPA Reference Method 9. Compliance with this Specific Condition shall be demonstrated by compliance with Specific Condition No. 4.

4. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and 40 CFR 70.6, pipeline quality natural gas shall be the only fuel used to fire these compressor engines. Pipeline quality natural gas is defined as gas which contains less than 0.3 grains/100 scf of H₂S and that H₂S constitutes greater than 50% by weight of the sulfur by weight in the natural gas.

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**SN-09 thru SN-14
 Solar Saturn Turbine Engines**

Source Description

The purpose of the compressor station is to compress and dehydrate sweet natural gas. The dehydrated gas is sent to the compressors (SN-09 thru SN-14) to be compressed, cooled, and delivered to the discharge piping system. The compressors are driven by Solar turbine engines, which run on natural gas as a fuel and produce exhaust gases. These engines were installed between 1964 and 1974. These units are not subject to 40 CFR 60, Subpart GG - Standards of Performance for Stationary Gas Turbines because they were constructed prior to October 3, 1977.

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

Specific Conditions

5. Pursuant to §19.501 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this Specific Condition shall be demonstrated by using natural gas fuel and operating at or less than maximum capacity.

SN-#	Description	Pollutant	lb/hr	tpy
09	Solar Saturn Turbine	VOC	2.6	12.8
		CO	6.0	26.0
		NO _x	4.0	17.4
10	Solar Saturn Turbine	VOC	2.6	12.8
		CO	6.0	26.0
		NO _x	4.0	17.4
11	Solar Saturn Turbine	VOC	2.6	12.8
		CO	6.0	26.0
		NO _x	4.0	17.4
12	Solar Saturn Turbine	VOC	2.6	12.8
		CO	6.0	26.0
		NO _x	4.0	17.4

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SN-#	Description	Pollutant	lb/hr	tpy
13	Solar Saturn Turbine	VOC	2.6	12.8
		CO	6.0	26.0
		NO _x	4.0	17.4
14	Solar Saturn Turbine	VOC	2.6	12.8
		CO	6.0	26.0
		NO _x	4.0	17.4

6. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, Subpart E, the permittee shall not exceed 5% opacity from SN-09 thru SN-14 as measured by EPA Reference Method 9. Compliance with this Specific Condition shall be demonstrated by compliance with Specific Condition No. 7.

7. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and 40 CFR 70.6, pipeline quality natural gas shall be the only fuel used to fire these compressor engines. Pipeline quality natural gas is defined as gas which contains less than 0.3 grains/100 scf of H₂S and that H₂S constitutes greater than 50% by weight of the sulfur by weight in the natural gas.

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SN-15, SN-16, SN-19, and SN-87
Waukesha Reciprocating Engines

Source Description

SN-15, SN-16, SN-19 and SN-87 are natural gas-fired reciprocating engines. These engines are used to compress sweet, dry natural gas from a gas gathering system into a gas transmission system for delivery to customers in Northwest Arkansas.

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

Specific Conditions

8. Pursuant to §19.501 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this Specific Condition shall be demonstrated by using natural gas fuel and by operating at or below the maximum operating capacity.

SN-#	Description	Pollutant	lb/hr	tpy
15	Waukesha Model L7042GL Engine	VOC	3.3	14.3
		CO	8.2	35.7
		NO _x	6.6	28.6
16	Waukesha Model F817G Engine	VOC	0.7	2.7
		CO	10.4	45.2
		NO _x	3.4	14.6
19	Waukesha Model L5108GL Engine	VOC	3.3	14.1
		CO	8.7	38.0
		NO _x	4.9	21.2
87	Waukesha Model L7042GL Engine	VOC	3.3	14.3
		CO	8.2	35.7
		NO _x	6.6	28.6

9. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the

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following table. Compliance with this Specific Condition shall be demonstrated by using natural gas fuel and operating at or less than the maximum operating capacity.

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

SN-#	Description	Pollutant	lb/hr	tpy
15	Waukesha Model L7042GL engine	formaldehyde	0.66	2.89
16	Waukesha Model L1905G Engine	formaldehyde	0.02	0.09
19	Waukesha Model L5108GL Engine	formaldehyde	0.50	2.20
87	Waukesha Model L7042GL engine	formaldehyde	0.66	2.89

10. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, Subpart E, the permittee shall not exceed 5% opacity from SN-09 thru SN-14 as measured by EPA Reference Method 9. Compliance with this Specific Condition shall be demonstrated by compliance with Specific Condition No. 11.
11. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and 40 CFR 70.6, pipeline quality natural gas shall be the only fuel used to fire these compressor engines. Pipeline quality natural gas is defined as gas which contains less than 0.3 grains/100 scf of H₂S and that H₂S constitutes greater than 50% by weight of the sulfur by weight in the natural gas.

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SN-18
Emergency Electric Generator

Source Description

An emergency electric generator (SN-18) is also at this facility. This generator only operates during periods of power failure and for weekly testing for 30 minutes.

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

Specific Conditions

12. Pursuant to §19.501 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with the lb/hr limits is based on maximum unit loading and natural gas fuel. Compliance with the ton per year limit is based on maintaining the operational limits set forth in Specific Condition 15.

SN-#	Description	Pollutant	lb/hr	tpy
18	Electric Generator	VOC	0.3	0.1
		CO	26.4	2.9
		NO _x	0.7	0.1

13. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, Subpart E, the permittee shall not exceed 5% opacity from SN-09 thru SN-14 as measured by EPA Reference Method 9. Compliance with this Specific Condition shall be demonstrated by compliance with Specific Condition No. 14.
14. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and 40 CFR 70.6, pipeline quality natural gas shall be the only fuel used to fire these compressor engines. Pipeline quality natural gas is defined as gas which contains less than 0.3 grains/100 scf of H₂S and that H₂S constitutes greater than 50% by weight of the sulfur by weight in the natural gas.
15. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and 40 CFR 70.6, the permittee shall not operate the emergency generator (SN-18) in excess of 218 hours per consecutive twelve month period.

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16. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition No. 15. These records may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept at the nearest manned location, and shall be provided to Department personnel upon request.

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SECTION V: COMPLIANCE PLAN AND SCHEDULE

Arkansas Western Gas Company - Drake Compressor Station is in compliance with the applicable regulations cited in the permit application. Arkansas Western Gas Company - Drake 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.

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SECTION VI: PLANTWIDE CONDITIONS

1. Pursuant to §19.704 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the Director shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
2. Pursuant to §19.410(B) of Regulation 19, 40 CFR Part 52, Subpart E, the Director may cancel all or part of this permit if the construction or modification authorized herein is not begun within 18 months from the date of the permit issuance or if the work involved in the construction or modification is suspended for a total of 18 months or more.
3. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.
4. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall provide:
 - a. Sampling ports adequate for applicable test methods
 - b. Safe sampling platforms
 - c. Safe access to sampling platforms
 - d. Utilities for sampling and testing equipment
5. Pursuant to §19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.

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6. Pursuant to Regulation 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit subsumes and incorporates all previously issued air permits for this facility.
7. Pursuant to §19.702 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall simultaneously conduct tests for CO and NO_x on SN-16 in accordance with Plantwide Condition #3 and every five years thereafter. The permittee shall also simultaneously conduct tests for CO and NO_x on one of each the other model engines operating in the station when the renewal Title V permit is issued in accordance with Plantwide Condition #3 and every five years thereafter. EPA Reference Method 7E shall be used to determine NO_x and EPA Reference Method 10 shall be used to determine CO. The permittee shall test the engines within 90% of their rated capacity. If the tests are not performed within this range, the permittee shall be limited to operating within 10% above the tested rate. The Department reserves the right to select the engine to be tested. The engines tested shall be rotated so that no engine is tested twice before an engine of equal HP is tested once. If the tested emission rate for any pollutant is in excess of the permitted emission rate, all engines shall be tested for that pollutant.

Permit Shield

8. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements, as of the date of permit issuance, included in and specifically identified in item A of this condition:
 - A. The following have been specifically identified as applicable requirements based upon information submitted by the permittee in an application dated April 29, 1998.

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

- B. The following requirements have been specifically identified as not applicable, based upon information submitted by the permittee in an application dated April 29, 1998.

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Source No.	Regulation	Description	Basis for Determination
Facility	Regulation 19.8	111(d) Designated facilities	The facility is not identified in the list of regulated sources.
Facility	Regulation 26.4(g)	Applications for initial Phase II acid rain permits.	The facility is not an acid rain category source.
Facility	Regulation 26.5(a)-(d), (f)	Action on applications	These rules apply only to state and federal agencies.
Facility	Regulation 26.6(a), (d)-(g)	Permit review	These rules apply only to state and federal agencies.
Facility	Regulation 26.12	Acid rain sources provisions	The facility is not an acid rain source.
Facility	40 CFR 60	New source performance standards	Source categories do not apply to any units at the facility as of the effective date of the permit.
Facility	40 CFR 62	State plans for designated facilities	This rule is administrative and jurisdictional.
Facility	40 CFR 63	National emission standards for hazardous air pollutants	The facility is not in any source category as of the effective date of the permit.
Facility	40 CFR 79	Registration of fuels and fuel additives.	The facility is not in this source category.
Facility	40 CFR 80	Registration of fuels and fuel additives.	The facility is not in this source category.
Facility	40 CFR 81.304	Non-attainment	The facility is not located in a non-attainment area as of the effective date of the permit.

9. Nothing shall alter or affect the following:

Provisions of Section 303 of the Clean Air Act;

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

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

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

Title VI Provisions

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

11. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
 - 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

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must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

12. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
13. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant.

14. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program.

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SECTION VII: INSIGNIFICANT ACTIVITIES

Pursuant to §26.304 of Regulation 26, the following sources are insignificant activities. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §304 of Regulation 26 or is listed below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated April 29, 1998.

Source	Description	Reason
17	Dehydrator Reboiler Vent	Group C 5
20 thru 81	Miscellaneous Small Emissions of Natural Gas with negligible VOC fractions	Group C 5
82	Fugitive Emissions	Group C 5
83	Safety Kleen parts washer	Group C 5
84	Lube Oil Storage Tank	Group A 3
85	ESD Blowdowns	Group C 5
86	Fluids Collection Tank	Group A 3
	Dehydration Unit: Reboiler	Group A 13

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

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SECTION VIII: GENERAL PROVISIONS

1. Pursuant to 40 CFR 70.6(b)(2), 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.
2. Pursuant to 40 CFR 70.6(a)(2) and §26.7 of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), this permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later.
3. Pursuant to §26.4 of Regulation #26, it is the duty of the permittee to submit a complete application for permit renewal at least six (6) months prior to the date of permit expiration. Permit expiration terminates the permittee's right to operate unless a complete renewal application was submitted at least six (6) months prior to permit expiration, in which case the existing permit shall remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due.
4. Pursuant to 40 CFR 70.6(a)(1)(ii) and §26.7 of Regulation #26, where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions are incorporated into the permit and shall be enforceable by the Director or Administrator.
5. Pursuant to 40 CFR 70.6(a)(3)(ii)(A) and §26.7 of Regulation #26, records of monitoring information required by this permit shall include the following:
 - a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.

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6. Pursuant to 40 CFR 70.6(a)(3)(ii)(B) and §26.7 of Regulation #26, records of all required monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.
7. Pursuant to 40 CFR 70.6(a)(3)(iii)(A) and §26.7 of Regulation #26, the permittee shall submit reports of all required monitoring every 6 months. If no other reporting period has been established, the reporting period shall end on the last day of the anniversary month of this permit. The report shall be due within 30 days of the end of the reporting period. Even though the reports are due every six months, each report shall contain a full year of data. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official as defined in §26.2 of Regulation #26 and must be sent to the address below.

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

8. Pursuant to 40 CFR 70.6(a)(3)(iii)(B), §26.7 of Regulation #26, and §19.601 and 19.602 of Regulation #19, all deviations from permit requirements, including those attributable to upset conditions as defined in the permit shall be reported to the Department. An initial report shall be made to the Department by the next business day after the occurrence. The initial report may be made by telephone and shall include:
 - a. The facility name and location,
 - b. The process unit or emission source which is deviating from the permit limit,
 - c. The permit limit, including the identification of pollutants, from which deviation occurs,
 - d. The date and time the deviation started,
 - e. The duration of the deviation,
 - f. The average emissions during the deviation,
 - g. The probable cause of such deviations,
 - h. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
 - i. The name of the person submitting the report.

A full report shall be made in writing to the Department within five (5) business days of

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discovery of the occurrence and shall include in addition to the information required by initial report a schedule of actions to be taken to eliminate future occurrences and/or to minimize the amount by which the permits limits are exceeded and to reduce the length of time for which said limits are exceeded. If the permittee wishes, they 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 such report will serve as both the initial report and full report.

9. Pursuant to 40 CFR 70.6(a)(5) and §26.7 of Regulation #26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311, if any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable.
10. Pursuant to 40 CFR 70.6(a)(6)(i) and §26.7 of Regulation #26, the permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance 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, or modification; or for denial of a permit renewal application. Any permit noncompliance with a state requirement constitutes a violation of the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) and is also grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
11. Pursuant to 40 CFR 70.6(a)(6)(ii) and §26.7 of Regulation #26, it shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

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12. Pursuant to 40 CFR 70.6(a)(6)(iii) and §26.7 of Regulation #26, this permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
13. Pursuant to 40 CFR 70.6(a)(6)(iv) and §26.7 of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.
14. Pursuant to 40 CFR 70.6(a)(6)(v) and §26.7 of Regulation #26, the permittee shall furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the permittee may be required to furnish such records directly to the Administrator along with a claim of confidentiality.
15. Pursuant to 40 CFR 70.6(a)(7) and §26.7 of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.
16. Pursuant to 40 CFR 70.6(a)(8) and §26.7 of Regulation #26, no permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for elsewhere in this permit.
17. Pursuant to 40 CFR 70.6(a)(9)(i) and §26.7 of Regulation #26, if the permittee is allowed to operate under different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the scenario under which the facility or source is operating.
18. Pursuant to 40 CFR 70.6(b) and §26.7 of Regulation #26, all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Act unless the Department has specifically designated as not being federally enforceable under the Act any terms and conditions included in the permit that are not required under the Act or under any of its applicable requirements.

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19. Pursuant to 40 CFR 70.6(c)(1) and §26.7 of Regulation #26, any document (including reports) required by this permit shall contain a certification by a responsible official as defined in §26.2 of Regulation #26.
20. Pursuant to 40 CFR 70.6(c)(2) and §26.7 of Regulation #26, the permittee shall allow an authorized representative of the Department, upon presentation of credentials, to perform the following:
 - a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements.
21. Pursuant to 40 CFR 70.6(c)(5) and §26.7 of Regulation #26, the permittee shall submit a compliance certification with terms and conditions contained in the permit, including emission limitations, standards, or work practices. This compliance certification shall be submitted annually and shall be submitted to the Administrator as well as to the Department. All compliance certifications required by this permit shall include the following:
 - a. The identification of each term or condition of the permit that is the basis of the certification;
 - b. The compliance status;
 - c. Whether compliance was continuous or intermittent;
 - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
 - e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and 504(b) of the Act.
22. Pursuant to §26.7 of Regulation #26, nothing in this permit shall alter or affect the following:
 - a. The provisions of Section 303 of the Act (emergency orders), including the

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- 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. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.