

ADEQ

ARKANSAS
Department of Environmental Quality

OCT 11 2007

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

Re: Title V Administrative Amendment
CenterPoint Energy – Taylor Compressor Station
AFIN: 14-00186 - Permit No.: 1202-AOP-R2

Dear Ms. Ivey:

Enclosed are the following amendment to Permit 1202-AOP-R2 completed in accordance with the provisions of §19.407 of Regulation No. 19, Regulations of the Arkansas Plan of Implementation for Air Pollution Control.

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

Please place the revised permit in your files.

Sincerely,



Mike Bates
Chief, Air Division

JH
Enclosure
cc: Central Records

OCT 1 1965

ADEQ

OPERATING

AIR PERMIT

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

Permit No. : 1202-AOP-R2

IS ISSUED TO:

**CenterPoint Energy Gas Transmission Company – Taylor Compressor Station
13000 Highway 160 East
Taylor, AR 71861
Columbia County
AFIN: 14-00186**

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:

September 29, 2003 AND September 28, 2008

IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:



Mike Bates
Chief, Air Division

OCT 11 2007

Date Amended

CenterPoint Energy Gas Transmission Company – Taylor Compressor Station

AFIN: 14-00186

Permit No. 1202-AOP-R2

Table of Contents

SECTION I: FACILITY INFORMATION	5
SECTION II: INTRODUCTION	6
SUMMARY OF PERMIT ACTIVITY	6
PROCESS DESCRIPTION	6
REGULATIONS	6
SECTION III: PERMIT HISTORY	10
SECTION IV: SPECIFIC CONDITIONS	11
SOURCE NO. SN- 1 THROUGH SN-06 DESCRIPTION	11
SPECIFIC CONDITIONS	11
SECTION V: COMPLIANCE PLAN AND SCHEDULE	16
SECTION VI: PLANT WIDE CONDITIONS	17
TITLE VI PROVISIONS	19
PERMIT SHIELD	20
SECTION VII: INSIGNIFICANT ACTIVITIES	22
SECTION VIII: GENERAL PROVISIONS	23

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CenterPoint Energy Gas Transmission Company – Taylor Compressor Station

AFIN: 14-00186

Permit No. 1202-AOP-R2

Table of Tables

Table 1 – List of Acronyms.....	4
Table 2 – Regulations	6
Table 3 – Emission Summary	6
Table 4 – Maximum Criteria Emission Rates – SN-02 through SN-06.....	10
Table 5 – Maximum Non-Criteria Emission Rates – SN-02 through SN-06.....	11
Table 6 – Visible Emissions – SN-02 through SN-06	13
Table 7 – Applicable Regulations.....	20
Table 8 – Inapplicable Regulations	20
Table 9 – Insignificant Activities	21

Table 1 - List of Acronyms

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

Section I: FACILITY INFORMATION

PERMITTEE: CenterPoint Energy Gas Transmission Company –
Taylor Compressor Station

AFIN: 14-00186

PERMIT NUMBER: 1202-AOP-R2

FACILITY ADDRESS: 13000 Highway 160, 4 miles East of town
Taylor, AR 71861

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

COUNTY: Columbia

FIELD CONTACT POSITION: Jeff Ellis – Team Leader

TELEPHONE NUMBER: (870)694-3952

FAX NUMBER: (870)694-3971

OFFICE CONTACT POSITION: Laura Guthrie

TELEPHONE NUMBER: (318)429-3706

REVIEWING ENGINEER: Paul Osmon

UTM North - South (Y): Zone 15 3661.7 km N

UTM East - West (X): Zone 15 463.8 km E

Section II: INTRODUCTION

Summary of Permit Activity

CenterPoint Energy Gas Transmission Company owns and operates a natural gas compressor station located about 4 miles east of the town of Taylor, Arkansas. This permit renewal is issued to permit the facility for an additional 5 years. There are no changes in the operation of the facility from the previous permit. Some emission factors are changed based on changes in AP-42 emission factors since the issuance of the initial Title V permit.

Process Description

The Taylor Compressor Station is a natural gas compressor station located in Columbia County, Arkansas. Natural gas enters the station where it is compressed and then exits the station at a higher pressure. Prior to compression, the gas passes through an inlet separator where entrained liquids are removed from the gas stream. The slop oil is stored in the slop oil tank and removed from the station via tanker truck when necessary. Piping components are a source of non-point source emissions.

Regulations

The following table contains the regulations applicable to this permit.

Table 2 - Regulations

Source No.	Regulation Citations
Facility	Regulation 18 – Arkansas Air Pollution Control Code
Facility	Regulation 19 – Regulations of the Arkansas Plan of Implementation for Air Pollution Control
Facility	Regulation 26 – Regulation of the Arkansas Operating Air Permit Program

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

Table 3 – Emission Summary

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
TOTAL ALLOWABLE EMISSIONS		NOx	454.7	1958.3†	
		CO	65.5	224.0 †	
		VOC	10.7	46.1 †	
		Benzene*	0.10	0.45	
		Formaldehyde*	3.08	13.56	
		Acetaldehyde*	0.40	1.85	
SN-01	Clark HLA-6 1,500 BHP Compressor Engine – 2-cycle lean burn	This equipment permanently disabled – removed from service			
SN-02	Clark HLA-6 1,500 BHP Compressor Engine – 2-cycle lean burn	NOx	89.1	390.1	10
		CO	10.0	43.6	
		VOC	2.1	9.2	
		Benzene*	0.02	0.09	
		Formaldehyde*	0.60	2.64	
		Acetaldehyde*	0.08	0.37	
SN-03	Clark HLA-6 1,500 BHP Compressor Engine – 2-cycle lean burn	NOx	89.1	390.1	10
		CO	10.0	43.6	
		VOC	2.1	9.2	
		Benzene*	0.02	0.09	
		Formaldehyde*	0.60	2.64	
		Acetaldehyde*	0.08	0.37	

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
SN-04	Clark HLA-6 1,500 BHP Compressor Engine – 2-cycle lean burn	NOx CO VOC Benzene* Formaldehyde* Acetaldehyde*	89.1 10.0 2.1 0.02 0.60 0.08	390.1 43.6 9.2 0.09 2.64 0.37	10
SN-05	Clark HLA-6 1,500 BHP Compressor Engine – 2-cycle lean burn	NOx CO VOC Benzene* Formaldehyde* Acetaldehyde*	89.1 10.0 2.1 0.02 0.60 0.08	390.1 43.6 9.2 0.09 2.64 0.37	10
SN-06	Clark HLA-6 1,500 BHP Compressor Engine – 2-cycle lean burn	NOx CO VOC Benzene* Formaldehyde* Acetaldehyde*	89.1 10.0 2.1 0.02 0.60 0.08	390.1 43.6 9.2 0.09 2.64 0.37	10
SN-07	Clark HLA-6 1,500 BHP Compressor Engine – 2-cycle lean burn	This equipment permanently disabled – not operated			
SN-08	Ingersoll-Rand PSVG-8 Emergency Generator Engine – 4-cycle rich burn	NOx CO VOC Benzene*	9.2 15.5 0.2 0.08	7.8 6.0 0.1 0.36	14

CenterPoint Energy Gas Transmission Company – Taylor Compressor Station

AFIN: 14-00186

Permit No. 1202-AOP-R2

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
SN-09	Ingersoll-Rand PSVG-8 1,500 BHP Generator Engine – 4-cycle rich burn	This equipment permanently disabled – not operated			

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

**Air Contaminants such as ammonia, acetone, and certain halogenated solvents are not VOCs or HAPs.

† - total amended to reflect the changes made in the administrative amendment to SN-08 emission limits

Section III:PERMIT HISTORY

ARKLA, Inc. - Taylor Compressor Station began operation in 1954.

Permit #1202-A was issued to ARKLA, Inc. - Taylor Compressor Station on November 13, 1991. This permit included 7 compressor engines, two emergency generators, blowdown emissions, and a dump storage tank. Hourly emissions were listed for each source. Facility wide annual emissions were listed. However, no annual emissions were listed for any specific piece of equipment. Emissions were listed for sulfur dioxide, volatile organic compounds, carbon monoxide, and oxides of nitrogen.

Permit #1202-AR-1 was issued on September 9, 1992 to ARKLA, Inc. - Taylor Compressor Station. This permit was issued to adjust oxides of nitrogen emission rates. The rates were raised to reflect the results obtained by the testing required in Permit #1202-A. This permit was also issued to remove one compressor engine and one emergency generator from service.

Permit No. 1202-AOP-R0 was issued on October 12, 1998 to NorAm Gas Transmission Company - Taylor Compressor Station as the first permit issued to the facility under Regulation 26. No facility changes occurred with the issuance of this permit but hazardous air pollutant limits were included for the first time in this permit. Emission limits were: VOC - 40.1 tpy, CO - 267.5 tpy, NO_x - 2348.4 tpy, Acetaldehyde - 1.08 tpy, Benzene - 0.42 tpy, and Formaldehyde - 18.74 tpy.

Permit No. 1202-AOP-R1 was issued on May 29, 2001 to Reliant Energy Gas Transmission – Taylor Compressor Station. This modification was issued primarily to include a replacement engine Specific Condition. Emission limits were: VOC - 40.1 tpy, CO - 267.5 tpy, NO_x - 2348.4 tpy, Acetaldehyde – 2.88 tpy, Benzene - 0.72 tpy, and Formaldehyde - 18.74 tpy.

Section IV: SPECIFIC CONDITIONS

**Source No. SN- 02 through SN-06
 Description**

Sources SN-02 through SN-06 are 1500 hp Clark HLA-6 Compressor Engines which were last installed or modified in 1954. These engines are capable of running at 120% of their rated capacity and are being permitted to do so.

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 the permit for these sources, but such emissions are not prohibited.

Specific Conditions

- The permit allows the following maximum emission rates for the compressor engines (SN-02 through SN-06). The permittee will demonstrate compliance with this condition by burning natural gas for fuel and operating at or below maximum capacity (120% rated) of the equipment.
 [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 4 – Maximum Criteria Emission Rates – Compressor Engines

SN	Description	Pollutant	lb/hr	tpy
SN-02	Clark HLA-6 1,500 BHP Compressor Engine – 2-cycle lean burn	VOC	2.1	9.2
		CO	10.0	43.6
		NO _x	89.1	390.1
SN-03	Clark HLA-6 1,500 BHP Compressor Engine – 2-cycle lean burn	VOC	2.1	9.2
		CO	10.0	43.6
		NO _x	89.1	390.1
SN-04	Clark HLA-6 1,500 BHP Compressor Engine – 2-cycle lean burn	VOC	2.1	9.2
		CO	10.0	43.6
		NO _x	89.1	390.1
SN-05	Clark HLA-6 1,500 BHP Compressor Engine – 2-cycle lean burn	VOC	2.1	9.2
		CO	10.0	43.6
		NO _x	89.1	390.1
SN-06	Clark HLA-6 1,500 BHP Compressor Engine – 2-cycle lean burn	VOC	2.1	9.2
		CO	10.0	43.6
		NO _x	89.1	390.1

CenterPoint Energy Gas Transmission Company – Taylor Compressor Station

AFIN: 14-00186

Permit No. 1202-AOP-R2

2. The permittee shall not exceed the emission rates set forth in the following table for the compressor engines (SN-02 through SN-06). The permittee will demonstrate compliance with this condition by burning natural gas for fuel and operating at or below maximum capacity (120% rated) of the equipment. The pound per hour and ton per year limits are based on maximum capacity. The HAP emissions listed for these sources are based upon published emission factors at the time of permit issuance. Any change in these emission factors will not constitute a violation of the HAP emission rates listed below. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 5 – Maximum Non-Criteria Emission Rates – Compressor Engines

SN	Description	Pollutant	lb/hr	tpy
SN-02	Clark HLA-6 1,500 BHP Compressor Engine – 2-cycle lean burn	Benzene	0.02	0.09
		Formaldehyde	0.60	2.64
		Acetaldehyde	0.08	0.37
SN-03	Clark HLA-6 1,500 BHP Compressor Engine – 2-cycle lean burn	Benzene	0.02	0.09
		Formaldehyde	0.60	2.64
		Acetaldehyde	0.08	0.37
SN-04	Clark HLA-6 1,500 BHP Compressor Engine – 2-cycle lean burn	Benzene	0.02	0.09
		Formaldehyde	0.60	2.64
		Acetaldehyde	0.08	0.37
SN-05	Clark HLA-6 1,500 BHP Compressor Engine – 2-cycle lean burn	Benzene	0.02	0.09
		Formaldehyde	0.60	2.64
		Acetaldehyde	0.08	0.37
SN-06	Clark HLA-6 1,500 BHP Compressor Engine – 2-cycle lean burn	Benzene	0.02	0.09
		Formaldehyde	0.60	2.64
		Acetaldehyde	0.08	0.37

CenterPoint Energy Gas Transmission Company – Taylor Compressor Station

AFIN: 14-00186

Permit No. 1202-AOP-R2

3. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. The permittee will demonstrate compliance with this condition by burning natural gas for fuel.

Table 6 – Visible Emissions

SN	Limit	Regulatory Citation
SN-02 Through SN-06	5%	§18.501 of Regulation 18 and A.C.A. §8-4- 203 as referenced by §8-4-404 and §8-4- 311

SN-08

Ingersoll-Rand PSVG-8 Emergency Electrical Generator

Source Description

Source SN-08, an Ingersoll-Rand PSVG-8 4-Cycle Rich Burn Emergency Electrical Generator Engine, was installed or last modified in 1954. This source provides power to the station in the event of a power failure.

Specific Conditions

4. The permittee shall not exceed the emission rates set forth in the following table at SN-08. The pound per hour rates are based on maximum capacity and compliance with the ton per year limits will be verified by Specific Condition #7 and burning natural gas as fuel. Negligible amounts of particulate matter and sulfur dioxide may be emitted by this source. Due to the extremely low calculated potential emissions of these pollutants, numerical limits have not been included in the permit for this source, but such emissions are not prohibited. [§19.501 of Regulation 19 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
NO _x	9.2	7.8
CO	15.4	6.0
VOC	0.2	0.1

5. The permittee shall not exceed 5% opacity from source SN-08 as measured by EPA Reference Method 9. Compliance with this limit will be demonstrated through compliance with Plantwide Condition No. 7. [§18.501 of Regulation 18 and A.C.A §8-4-203 as referenced by §8-4-304 and §8-4-311]
6. The permittee shall not exceed the HAP rates set forth in the following table at SN-08. The pound per hour rates are based on maximum capacity and compliance with the ton per year limits will be verified by Specific Condition No. 7. Compliance with these emission rates will also be demonstrated through compliance with Plantwide Condition No. 7. 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. [§18.801 of Regulation 18 and A.C.A §8-4-203 as referenced by §8-4-304 and §8-4-311]

HAP	lb/hr	tpy
Formaldehyde	0.08	0.02

CenterPoint Energy Gas Transmission Company – Taylor Compressor Station

AFIN: 14-00186

Permit No. 1202-AOP-R2

7. The permittee shall not operate the emergency generator more than 500 hours per year in any consecutive twelve month period. [§19.705 of Regulation 19, and A.C.A §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

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

Section V: COMPLIANCE PLAN AND SCHEDULE

Centerpoint Energy Gas Transmission Company – Taylor Compressor Station does not currently have an enforcement action. Centerpoint Energy Gas Transmission Company – Taylor 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: PLANT WIDE CONDITIONS

1. The permittee will notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation No. 19 §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation No.19 §19.410(B) and 40 CFR Part 52, Subpart E]
3. The permittee must test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) New Equipment or newly modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start-up of the permitted source or (2) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee will submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation No.19 §19.702 and/or Regulation No. 18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. The permittee must provide: [Regulation No.19 §19.702 and/or Regulation No.18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - 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. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee will maintain the equipment in good condition at all times. [Regulation No.19 §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation No. 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
7. The permittee shall only use pipeline quality natural gas to fire the compressor engines and/or turbines located at this facility. Pipeline quality natural gas is defined as gas which contains less than 20 grains total sulfur per 100 standard cubic feet of natural gas. Additionally, pipeline natural gas must either be composed of at least 70 percent methane by volume or have a gross calorific value between 950 and 1100 BTU per standard cubic foot. Compliance with this condition may be demonstrated by a valid gas tariff, purchase contract, fuel analysis or other appropriate

- documentation, or periodic testing. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and 40 CFR 70.6]
8. The permittee shall test the fuel combusted in the compressor engines and/or turbines for Total Sulfur within 180 days of issuance of the amendment to permit 1202-AOP-R2 to show compliance with 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]
 9. The permittee shall simultaneously conduct tests for CO and NO_x on half of the six compressor engines every 5 years. The initial test was completed within 180 days of the issuance of the first Regulation 26 permit. The three engines not previously tested shall be tested in accordance with the time frame set in Plantwide Condition No. 3. 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 engine within 90% of its rated 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. [§19.702 of Regulation 19 and 40 CFR Part 52, Subpart E]
 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 pound per hour basis and which do not exceed permitted emissions on a ton per year basis. The permittee shall conduct NO_x and CO emission testing with 90 days of the date of replacement to verify the emissions from the newly installed engine. The testing shall be conducted in accordance with EPA Reference methods 7E for NO_x and 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, Section 7(f) are met. [§19.705 of Regulation 19 and A.C.A § 8-4-203 as referenced by A.C.A. §8-4-304 and A.C.A. §8-4-311]

Acid Rain (Title IV)

11. The Director prohibits the permittee to cause any emissions exceeding any allowances the source lawfully holds under Title IV of the Act or the regulations promulgated under the Act. No permit revision is required for increases in emissions allowed by allowances acquired pursuant to the acid rain program, if such increases do not require a permit revision under any other applicable requirement. This permit establishes no limit on the number of allowances held by the permittee.

CenterPoint Energy Gas Transmission Company – Taylor Compressor Station

AFIN: 14-00186

Permit No. 1202-AOP-R2

However, the source may not use allowances as a defense for noncompliance with any other applicable requirement of this permit or the Act. The permittee will account for any such allowance according to the procedures established in regulations promulgated under Title IV of the Act. [Regulation No. 26 §26.701 and 40 CFR 70.6(a)(4)]

Title VI Provisions

12. 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.
 - e. 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]
13. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - a. 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.
 - b. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - c. 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.)
 - d. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
14. 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.
15. 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.

16. The permittee can switch from any ozone-depleting substance to any alternative listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, "Significant New Alternatives Policy Program".

Permit Shield

17. 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 Table 7 - Applicable Regulations of this condition. The permit specifically identifies the following as applicable requirements based upon the information submitted by the permittee in an application dated March, 2003.

Table 7 - Applicable Regulations

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

The permit specifically identifies the following as inapplicable based upon information submitted by the permittee in an application dated March, 2003.

Table 8 - Inapplicable Regulations

Source No.	Regulation	Description
Facility	40 CFR 60, Subpart K	New Source Performance Standards for Storage Vessels for Petroleum Liquids
Facility	40 CFR 60, Subpart Ka	New Source Performance Standards for Storage Vessels for Petroleum Liquids
Facility	40 CFR 60, Subpart Kb	New Source Performance Standards for Volatile Organic Liquid Storage Vessels

CenterPoint Energy Gas Transmission Company – Taylor Compressor Station

AFIN: 14-00186

Permit No. 1202-AOP-R2

Source No.	Regulation	Description
Facility	40 CFR 60, Subpart GG	New Source Performance Standards for Stationary Gas Turbines
Facility	40 CFR 63, Subpart HH	National Emission Standards for Hazardous Air Pollutants from Oil and Gas Production Facilities

Section VII: INSIGNIFICANT ACTIVITIES

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

Table 9 - Insignificant Activities

Description	Category
SN-10 – Station and Engine Emergency Blowdown Vent	Group A, No. 13
SN-11 – 8,820 gallon Slop Oil Storage Tank	Group A, No. 3
SN-12 – 7,000 gallon Lube Oil Storage Tank	Group A, No. 3
SN-13 – 8,820 gallon Used Lube Oil Storage Tank	Group A, No. 3
SN-14 – 8,820 gallon Glycol/Water Storage Tank	Group A, No. 3
SN-15 – Piping Components Non-Point Source Emissions	Group A, No. 13
SN-16 – Smart Ash 100 Incinerator	Group A, No. 13
SN-17 – VOL Loading/Unloading Point	Group A, No. 13

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

Section VIII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation No. 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute. [40 CFR 70.6(b)(2)]
2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective August 10, 2000]
3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due. [Regulation No. 26 §26.406]
4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation No. 26 §26.701(A)(2)]
5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and Regulation No. 26 §26.701(C)(2)]
 - 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.
6. The permittee must retain the records of all required monitoring data and support information for at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings

CenterPoint Energy Gas Transmission Company – Taylor Compressor Station

AFIN: 14-00186

Permit No. 1202-AOP-R2

for continuous monitoring instrumentation, and copies of all reports required by this permit. [40 CFR 70.6(a)(3)(ii)(B) and Regulation No. 26 §26.701(C)(2)(b)]

7. The permittee must submit reports of all required monitoring every 6 months. If permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due within 30 days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26 §26.2 must certify all required reports. The permittee will send the reports to the address below: [40 C.F.R. 70.6(a)(3)(iii)(A) and §26.701(C)(3)(a) of Regulation #26]

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

8. The permittee will report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit. The permittee will make an initial report to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include: [40 CFR 70.6(a)(3)(iii)(B), Regulation #26 §26.701(C)(3)(b), and Regulation #19 §19.601 and §19.602]
- a. The facility name and location
 - b. The process unit or emission source 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.

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

CenterPoint Energy Gas Transmission Company – Taylor Compressor Station

AFIN: 14-00186

Permit No. 1202-AOP-R2

both the initial report and full report. [40 CFR 70.6(a)(3)(iii)(B), Regulation No. 26 §26.701(C)(3)(b), Regulation No. 19 §19.601 and §19.602]

9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable. [40 CFR 70.6(a)(5), §26.701(E) of Regulation No. 26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311]
10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation No. 26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. §7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation No. 26 §26.701(F)(1)]
11. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation No. 26 §26.701(F)(2)]
12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation No. 26 §26.701(F)(3)]
13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation No. 26 §26.701(F)(4)]
14. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation No. 26 §26.701(F)(5)]
15. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 19. [40 CFR 70.6(a)(7) and Regulation No. 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 No. 26 §26.701(H)]
17. If the permit allows different operating scenarios, the permittee will, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation No. 26 §26.701(I)(1)]
18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department

CenterPoint Energy Gas Transmission Company – Taylor Compressor Station

AFIN: 14-00186

Permit No. 1202-AOP-R2

specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation No. 26 §26.702(A) and (B)]

19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation No. 26 §26.2. [40 CFR 70.6(c)(1) and Regulation No. 26 §26.703(A)]
20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation No. 26 §26.703(B)]
 - a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.
21. The permittee will submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation No. 26 §26.703(E)(3)]
 - a. The identification of each term or condition of the permit that is the basis of the certification;
 - b. The compliance status;
 - c. Whether compliance was continuous or intermittent;
 - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
 - e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.
22. Nothing in this permit will alter or affect the following: [Regulation No. 26 §26.704(C)]
 - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
 - b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;

CenterPoint Energy Gas Transmission Company – Taylor Compressor Station

AFIN: 14-00186

Permit No. 1202-AOP-R2

- 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 §8-4-304 and §8-4-311]

