

DRAFT OPERATING AIR PERMIT

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

Permit #: 1217-AOP-R0

IS ISSUED TO:

Reliant Energy Gas Transmission Company -
Helena Compressor Station
4 miles Southwest of West Helena near State Route 20
Helena, AR 72342
Phillips County
CSN: 540120

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:

and

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels

Date

SECTION I: FACILITY INFORMATION

PERMITTEE: Reliant Energy Gas Transmission Company -
Helena Compressor Station
CSN: 540120
PERMIT NUMBER: 1217-AOP-R0

FACILITY ADDRESS: 4 miles Southwest of West Helena near State Route
20. Helena, Arkansas 72342

COUNTY: Phillips

CONTACT POSITION: Laura Armistead
TELEPHONE NUMBER: (318) 429-3706
CONTACT ADDRESS: P.O. Box 21734
Shreveport, LA 71151

REVIEWING ENGINEER: John Bailey

UTM North-South (X): 3815.500 Km
UTM East-West (Y): 719.600 Km

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SECTION II: INTRODUCTION

Reliant Energy Gas Transmission Company currently operates a natural gas compressor station near Helena, Arkansas in Phillips County.

Friction losses cause a pressure drop in natural gas pipelines. To maintain flow, gas must be removed from the pipeline, repressurized, and returned to the pipe. The Helena Compressor Station currently utilizes two (2) 600 hp Ajax DPC-600 compressor engines (SN-01 and SN-02) and one (1) 800 hp White-Superior 8G825NA compressor engine (SN-03) to provide necessary compression capability.

Nitrogen oxides (NO_x), carbon monoxide (CO), and volatile organic compounds (VOC) emissions at this facility will result primarily from the combustion of pipeline quality natural gas in the existing compressor engines (SN-01 through SN-03). The Helena Compressor Station will use only natural gas for fuel at the facility. Support equipment includes a Smart Ash incinerator, one (1) entrained liquids (slop) tank, one (1) used oil tank, two (2) lube oil tanks, and one (1) antifreeze mix tank.

Negligible amounts of particulate matter, sulfur dioxide, fugitives and non-routine blowdowns 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.

Permit 1217-AOP-R0 is the first operating permit issued to Reliant Energy Gas Transmission Company-Helena Compressor Station under Regulation 26. Reliant Energy Gas Transmission Company is not modifying the current permitted operation.

The facility is subject to Title V requirements for CO and NO_x emissions. A summary of facility wide emissions is provided in the table below. Specific emission unit information is located at the indicated cross reference page.

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
Total Allowable Emissions		VOC	4.0	17.6	
		CO	72.2	315.7	
		NO _x	94.0	411.9	
		Acetaldehyde	0.04	0.18	
		Benzene	0.02	0.10	
		Formaldehyde	0.79	3.46	
		Methanol	0.09	0.40	
01	600 hp Ajax DPC - 600 Compressor Engine	VOC	1.2	5.3	7
		CO	9.2	40.0	
		NO _x	26.7	117.0	
		Acetaldehyde	0.02	0.09	
		Benzene	0.01	0.05	
		Formaldehyde	0.29	1.27	
		Methanol	0.02	0.09	
02	600 hp Ajax DPC - 600 Compressor Engine	VOC	1.2	5.3	9
		CO	9.2	40.0	
		NO _x	26.7	117.0	
		Acetaldehyde	0.02	0.09	
		Benzene	0.01	0.05	
		Formaldehyde	0.29	1.27	
		Methanol	0.02	0.09	
03	800 hp White - Superior 8G825A Compressor Engine	VOC	1.6	7.0	11
		CO	40.6	235.7	
		NO _x	40.6	177.9	
		Formaldehyde	0.21	0.92	
		Methanol	0.05	0.22	

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SECTION III: PERMIT HISTORY

Permit #1217-A was issued to Arkla, Inc.-Helena Compressor Station on November 19, 1991. This permit included three compressor engines, one slop tank, and a waste oil tank. Hourly and annual emission rates were established for the facility. The pollutants listed were nitrogen oxides, carbon monoxide, volatile organic compounds, and sulfur dioxide.

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SECTION IV: EMISSION UNIT INFORMATION

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SN-# 1

Ajax DPC - 600 Compressor Engine

Source Description

Source SN-01, a 600 hp Ajax DPC - 600 Compressor Engine, was last installed or modified in 1984. The engine is capable of running at 120% rated capacity and is being permitted to do so.

Specific Conditions

1. Pursuant to §19.501 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (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 emission rates will be demonstrated by the use of natural gas and operating at or below maximum capacity of the equipment.

Pollutant	lb/hr	tpy
VOC*	1.2	5.3
CO	9.2	40.0
NO _x	26.7	117.0

* Acetaldehyde, Benzene, Formaldehyde, and Methanol are included in the VOC totals

2. 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 HAP emission rates set forth in the following table. Compliance with HAPs emissions will be assured through the use of natural gas and operating at or below maximum capacity of the equipment. The HAP emissions listed for this source were based upon published emission factors at the time of permit issuance. Any change in these emission factors will not constitute a violation of the HAP emission rates listed below.

HAP	lb/hr	tpy
Acetaldehyde	0.02	0.09
Benzene	0.01	0.05
Formaldehyde	0.29	1.27
Methanol	0.02	0.09

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3. 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, the permittee shall not exceed 5% opacity from source SN-01 as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated by burning natural gas.

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SN-# 2

Ajax DPC - 600 Compressor Engine

Source Description

Source SN-02, a 600 hp Ajax DPC - 600 Compressor Engine, was last installed or modified in 1984. The engine is capable of running at 120% rated capacity and is being permitted to do so.

Specific Conditions

4. Pursuant to §19.501 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (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 emission rates will be demonstrated by the use of natural gas and operating at or below maximum capacity of the equipment.

Pollutant	lb/hr	tpy
VOC*	1.2	5.3
CO	9.2	40.0
NO _x	26.7	117.0

* Acetaldehyde, Benzene, Formaldehyde, and Methanol are included in the VOC totals

5. 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 HAP emission rates set forth in the following table. Compliance with HAPs emissions will be assured through the use of natural gas and operating at or below maximum capacity of the equipment. The HAP emissions listed for this source were based upon published emission factors at the time of permit issuance. Any change in these emission factors will not constitute a violation of the HAP emission rates listed below.

HAP	lb/hr	tpy
Acetaldehyde	0.02	0.09
Benzene	0.01	0.05
Formaldehyde	0.29	1.27
Methanol	0.02	0.09

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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, the permittee shall not exceed 5% opacity from source SN-02 as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated by burning natural gas.

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SN-#3

White - Superior 8G825A Compressor Engine

Source Description

Source SN-03, a 800 hp White - Superior 8G825A Compressor Engine, was last installed or modified in 1984. The engine is capable of running at 120% rated capacity and is being permitted to do so.

Specific Conditions

7. Pursuant to §19.501 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (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 emission rates will be demonstrated by the use of natural gas and operating at or below maximum capacity of the equipment.

Pollutant	lb/hr	tpy
VOC*	1.6	7
CO	53.8	235.7
NO _x	40.6	177.9

* Formaldehyde and Methanol are included in the VOC totals

8. 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 HAP emission rates set forth in the following table. Compliance with HAPs emissions will be assured through the use of natural gas and operating at or below maximum capacity of the equipment. The HAP emissions listed for this source were based upon published emission factors at the time of permit issuance. Any change in these emission factors will not constitute a violation of the HAP emission rates listed below.

HAP	lb/hr	tpy
Formaldehyde	0.21	0.92
Methanol	0.05	0.22

9. 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, the permittee shall not exceed 5% opacity from source SN-03 as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated by burning natural gas.

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SECTION V: COMPLIANCE PLAN AND SCHEDULE

Reliant Energy Gas Transmission Company - Helena Compressor Station is in compliance with the applicable regulations cited in the permit application. Reliant Energy Gas Transmission Company - Helena 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, and 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 if the work involved in the construction or modification is suspended for a total of 18 months or more.
3. Pursuant to §19.702(E) 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, each emission point for which an emission test method is specified in this permit shall be tested in order to determine compliance with the emission limitations contained herein 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. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Two copies of the compliance test results shall be submitted to the Department within thirty (30) days after the completed testing. The permittee shall provide:
 - (1) Sampling ports adequate for applicable test methods
 - (2) Safe sampling platforms
 - (3) Safe access to sampling platforms
 - (4) Utilities for sampling and testing equipment
4. 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.
5. 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.
6. 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 the compressor engines at 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 one-half of each type of compressor engine in accordance with Plantwide Condition #3 and every five years thereafter. EPA

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Reference Method 7E shall be used to test NO_x for the reciprocating engines and Reference Method 20 shall be used to test NO_x for the turbines, and EPA reference Method 10 shall be used to determine CO. The permittee shall test the engines within 90% of their rated capacity. If the tests are not performed within this range, the permittee shall be limited to operating within 10% above the tested rate. The Department reserves the right to select the engine(s) to be tested. The engine(s) tested shall be rotated so that no engine(s) 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 similar engines shall be tested for both pollutants.

8. Pursuant to 19.303 of Regulation 19 of Regulation 19 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall use good maintenance practices to control emissions from valves, fittings, flanges, seals and other associated equipment.
9. Pursuant to 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, 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 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, Sec. 7(f) are met.

Permit Shield

10. 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 July 7, 1997.

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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 July 7, 1997.

Description or Regulation	Regulatory Citation	Affected Source	Basis for Determination
111(d) Designated facilities	Regulation 19.8	Facility	The facility is not identified in the list of regulated sources.
Applications for initial Phase II acid rain permits.	Regulation 26.4(g)	Facility	The facility is not an acid rain category source.
Action on applications	Regulation 26.5(a)-(d), (f)	Facility	These rules apply only to state and federal agencies.
Permit review	Regulation 26.6(a), (d)-(g)	Facility	These rules apply only to state and federal agencies.
Acid rain sources provisions	Regulation 26.12	Facility	The facility is not an acid rain source.
New source performance standards	40 CFR 60	Facility	Source categories do not apply to any units at the facility as of the effective date of the permit.
State plans for designated facilities	40 CFR 62	Facility	This rule is administrative and jurisdictional.
National emission standards for hazardous air pollutants	40 CFR 63	Facility	The facility is not in any source category as of the effective date of the permit.
Registration of fuels and fuel additives.	40 CFR 79	Facility	The facility is not in this source category.
Registration of fuels and fuel additives.	40 CFR 80	Facility	The facility is not in this source category.
Non-attainment	40 CFR 81.304	Facility	The facility is not located in a non-attainment area.

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C. Nothing shall alter or affect the following:

Provisions of Section 303 of the Clean Air Act;

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

11. The permittee shall comply with the standards for labeling of products using ozone depleting substances pursuant to 40 CFR Part 82, 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 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.

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- 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 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 §26.3(d) of Regulation 26, the following sources are insignificant activities. Insignificant and trivial activities will be allowable after approval and federal register notice publication of a final list as part of the operating air permit program. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §3(d) of Regulation 26 or is listed below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated July 7, 1997.

- Entrained liquids tank with a capacity of 8,820 gallons .
- Used oil tank with a capacity of 8,820 gallons (0.009 psia).
- Lube oil tank with a capacity of 5,000 gallons (0.009 psia).
- Lube oil tank with a capacity of 500 gallons (0.03 psia).
- Antifreeze tank with a capacity of 700 gallons (0.005 psia).
- Smart Ash incinerator.
- The aggregate VOC emissions from gas compressor engine blowdowns.
- The aggregate VOC emissions from fugitive equipment leaks.

Pursuant to §26.3(d) of Regulation 26, the following emission units, operations, or activities 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.

1. Combustion emissions from propulsion of mobile sources and emissions from refueling these sources unless regulated by Title II and required to obtain a permit under Title V of the federal Clean Air Act, as amended. This does not include emissions from any transportable units, such as temporary compressors or boilers. This does not include emissions from loading racks or fueling operations covered under any applicable federal requirements.
2. Air conditioning and heating units used for comfort that do not have applicable requirements under Title VI of the Act.
3. Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing/industrial or commercial process.

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4. Non-commercial food preparation or food preparation at restaurants, cafeterias, or caterers, etc.
5. Consumer use of office equipment and products, not including commercial printers or business primarily involved in photographic reproduction.
6. Janitorial services and consumer use of janitorial products.
7. Internal combustion engines used for landscaping purposes.
8. Laundry activities, except for dry-cleaning and steam boilers.
9. Bathroom/toilet emissions.
10. Emergency (backup) electrical generators at residential locations.
11. Tobacco smoking rooms and areas.
12. Blacksmith forges.
13. Maintenance of grounds or buildings, including: lawn care, weed control, pest control, and water washing activities.
14. Repair, up-keep, maintenance, or construction activities not related to the sources' primary business activity, and not otherwise triggering a permit modification. This may include, but is not limited to such activities as general repairs, cleaning, painting, welding, woodworking, plumbing, re-tarring roofs, installing insulation, paved/paving parking lots, miscellaneous solvent use, application of refractory, or insulation, brazing, soldering, the use of adhesives, grinding, and cutting.¹
15. Surface-coating equipment during miscellaneous maintenance and construction activities. This activity specifically does not include any facility whose primary business activity is surface-coating or includes surface-coating or products.
16. Portable electrical generators that can be "moved by hand" from one location to another.²

¹ Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must get a permit.

² "Moved by hand" means that it can be moved by one person without assistance of any motorized or non-motorized vehicle, conveyance, or device.

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17. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning, or machining wood, metal, or plastic.
18. Brazing or soldering equipment related to manufacturing activities that do not result in emission of HAPs.³
19. Air compressors and pneumatically operated equipment, including hand tools.
20. Batteries and battery charging stations, except at battery manufacturing plants.
21. Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOCs or HAPs.⁴
22. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and no volatile aqueous salt solutions, provided appropriate lids and covers are used and appropriate odor control is achieved.
23. Equipment used to mix and package soaps, vegetable oil, grease, animal fat, and non-volatile aqueous salt solutions, provided appropriate lids and covers are used and appropriate odor control is achieved.
24. Drop hammers or presses for forging or metalworking.
25. Equipment used exclusively to slaughter animals, but not including other equipment at slaughter-houses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
26. Vents from continuous emissions monitors and other analyzers.
27. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
28. Hand-held applicator equipment for hot melt adhesives with no VOCs in the adhesive.

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Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals are more appropriate for treatment as insignificant activities based on size or production thresholds. Brazing, soldering, and welding equipment, and cutting torches related directly to plant maintenance and upkeep and repair or maintenance shop activities that emit HAP metals are treated as trivial and listed separately in this appendix.

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Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids are based on size and limits including storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.

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29. Lasers used only on metals and other materials which do not emit HAPs in the process.
30. Consumer use of paper trimmers/binders.
31. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.
32. Salt baths using non-volatile salts that do not result in emissions of any air pollutant covered by this regulation.
33. Laser trimmers using dust collection to prevent fugitive emissions.
34. Bench-scale laboratory equipment used for physical or chemical analysis not including lab fume hoods or vents.
35. Routine calibration and maintenance of laboratory equipment or other analytical instruments.
36. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
37. Hydraulic and hydrostatic testing equipment.
38. Environmental chambers not using hazardous air pollutant gases.
39. Shock chambers, humidity chambers, and solar simulators.
40. Fugitive emissions related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
41. Process water filtration systems and demineralizers.
42. Demineralized water tanks and demineralizer vents.
43. Boiler water treatment operations, not including cooling towers.
44. Emissions from storage or use of water treatment chemicals, except for hazardous air pollutants or pollutants listed under regulations promulgated pursuant to Section 112(r) of the Act, for use in cooling towers, drinking water systems, and boiler water/feed systems.
45. Oxygen scavenging (de-aeration) of water.

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46. Ozone generators.
47. Fire suppression systems.
48. Emergency road flares.
49. Steam vents and safety relief valves.
50. Steam leaks.
51. Steam cleaning operations.
52. Steam and microwave sterilizers.
53. Site assessment work to characterize waste disposal or remediation sites.
54. Miscellaneous additions or upgrades of instrumentation.
55. Emissions from combustion controllers or combustion shutoff devices but not combustion units itself.
56. Use of products for the purpose of maintaining motor vehicles operated by the facility, not including air cleaning units of such vehicles (i.e. antifreeze, fuel additives).
57. Stacks or vents to prevent escape of sanitary sewer gases through the plumbing traps.
58. Emissions from equipment lubricating systems (i.e. oil mist), not including storage tanks, unless otherwise exempt.
59. Residential wood heaters, cookstoves, or fireplaces.
60. Barbecue equipment or outdoor fireplaces used in connection with any residence or recreation.
61. Log wetting areas and log flumes.
62. Periodic use of pressurized air for cleanup.
63. Solid waste dumpsters.
64. Emissions of wet lime from lime mud tanks, lime mud washers, lime mud piles, lime mud filter and filtrate tanks, and lime mud slurry tanks.

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65. Natural gas odoring activities unless the Department determines that emissions constitute air pollution.
66. Emissions from engine crankcase vents.
67. Storage tanks used for the temporary containment of materials resulting from an emergency reporting to an unanticipated release.
68. Equipment used exclusively to mill or grind coatings in roll grinding rebuilding, and molding compounds where all materials charged are in paste form.
69. Mixers, blenders, roll mills, or calendars for rubber or plastic for which no materials in powder form are added and in which no organic solvents, diluents, or thinners are used.
70. The storage , handling, and handling equipment for bark and wood residues not subject to fugitive dispersion offsite (this applies to the equipment only).
71. Maintenance dredging of pulp and paper mill surface impoundments and ditches containing cellulosic and cellulosic derived biosolids and inorganic materials such as lime, ash, or sand.
72. Tall oil soap storage, skimming, and loading.
73. Water heaters used strictly for domestic (non-process) purposes.
74. Facility roads and parking areas, unless necessary to control offsite fugitive emissions.
75. Agricultural operations, including onsite grain storage, not including IC engines or grain elevators.
76. The following natural gas and oil exploration production site equipment: separators, dehydration units, natural gas fired compressors, and pumping units. This does not include compressors located on natural gas transmission pipelines.

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SECTION VIII: GENERAL PROVISIONS

1. Pursuant to 40 C.F.R. 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 C.F.R. 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 C.F.R. 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 C.F.R. 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 C.F.R. 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 C.F.R. 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 Pollution Control and Ecology
Air Division
ATTN: Air Enforcement
Post Office Box 8913
Little Rock, AR 72219

8. Pursuant to 40 C.F.R. 70.6(a)(3)(iii)(B), §26.7 of Regulation #26, and Section 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 the next business day after the discovery of 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 take 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 discovery of the occurrence and shall include in addition to the information required by

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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) the next business day after the discovery of the occurrence and such report will serve as both the initial report and full report.

9. Pursuant to 40 C.F.R. 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 C.F.R. 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 C.F.R. 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.
12. Pursuant to 40 C.F.R. 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 C.F.R. 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 C.F.R. 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

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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 C.F.R. 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 C.F.R. 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 C.F.R. 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 C.F.R. 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.
19. Pursuant to 40 C.F.R. 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 C.F.R. 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

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- 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 C.F.R. 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 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.

AIR DIVISION

INVOICE REQUEST FORM

(9-96)

Facility Name & Address:

Reliant Energy - Helena Compressor Station
PO Box 21734, Rm 1205
Shreveport, LA
71151

CSN: 540120

Permit No: 1217-AOP-R0

Permit Description: T5

(e.g. A = AIR CODE, S=SIP, H=NESHAP, P=PSD, N=NSPS, T5= Title V)

Mod Fee Calculations:

Title V = 3 (\$18.08)(TPY increase of each pollutant, except CO)

NOTE: Do Not double count HAPs and VOCs!!!
No greater than 4,000 tpy for each contaminant but not less than \$1,000

$F = (18.08)(68.5) = 1238.48$

Fee Amount: \$1239

Engineer: John Bailey

Date:

Public Notice

Pursuant to the Arkansas Operating Air Permit Program (Regulation #26) Section 6(b), the Air Division of the Arkansas Department of Pollution Control and Ecology gives the following notice:

Reliant Energy Gas Transmission Company currently operates a natural gas compressor station located 4 miles Southwest of West Helena near State Route 20, Helena, Arkansas 72342 in Philips County (CSN: 54-0120). The Department issued a previous Title V permit, but that permit is being rescinded due to comments made by the facility to the ADPC&E Commission and the subsequent Permit Appeal Resolution. During the comment period of the 2nd draft permit the facility requested to increase NO_x and CO emissions which resulted in a modification of the permit. The increased emissions do not represent a change in operation, only a change in the emission factor used.

The application has been reviewed by the staff of the Department and has received the Department's tentative approval subject to the terms of this notice.

Citizens wishing to examine the permit application and staff findings and recommendations may do so by contacting Rhonda Sharp, Information Officer. Citizens desiring technical information concerning the application or permit should contact John Bailey, Engineer. Both Rhonda Sharp and John Bailey can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, telephone: (501) 682-0744.

The draft permit and permit application are available for copying at the above address. A copy of the draft permit has also been placed at the Helena Public Library, which is located at 623 Pecan, Helena, Arkansas 72342. This information may be reviewed during normal business hours.

Interested or affected persons may also submit written comments or request a hearing on the proposal to the Department at the above address - Attention: Rhonda Sharp. In order to be considered, the comments must be submitted within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, one will be scheduled if significant comments on the permit provisions are received. If a hearing is scheduled, adequate public notice will be given in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director shall make a final decision to issue or deny this application or to impose special conditions in accordance with Section 2.1 of the Arkansas Pollution Control and Ecology's Commission Administrative Procedures (Regulation #8) and Regulation #26.

Dated this

Randall Mathis
Director