

# ADEQ OPERATING AIR PERMIT

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

Permit #: 1217-AOP-R2  
[Renewal #1]  
IS ISSUED TO:

CenterPoint Energy Gas Transmission Company -  
Helena Compressor Station  
4 miles Southwest of West Helena near State Route 20  
Helena, AR 72342  
Phillips County  
AFIN: 54-00120

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:

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Michael Bonds  
Chief, Air Division

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Date

**Facility: CenterPoint Energy Gas Transmission Company - Helena Compressor Station**  
**Permit No.: 1217-AOP-R2**  
**AFIN: 54-00120**

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List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO <sub>x</sub>	Nitrogen Oxide
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter Smaller Than Ten Microns
SNAP	Significant New Alternatives Program (SNAP)
SO <sub>2</sub>	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

**Facility: CenterPoint Energy Gas Transmission Company - Helena Compressor Station**  
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**SECTION I: FACILITY INFORMATION**

PERMITTEE: CenterPoint Energy Gas Transmission Company -  
Helena Compressor Station

AFIN: 54-00120

PERMIT NUMBER: 1217-AOP-R2

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

COUNTY: Phillips

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

CONTACT POSITION: Chuck Hudspeth, Team Leader

TELEPHONE NUMBER: (870) 238-3681

REVIEWING ENGINEER: Siew C. Low

UTM North-South (X): 3815.500 Km [Zone 15]

UTM East-West (Y): 719.600 Km [Zone 15]

**Facility: CenterPoint Energy Gas Transmission Company - Helena Compressor Station**  
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## **SECTION II: INTRODUCTION**

### **Summary of Permit Activity**

CenterPoint Energy Gas Transmission Company currently operates a natural gas compressor station near Helena, Arkansas in Phillips County. This Title V air permit renewal authorizes the installation of a new 1,680 HP Waukesha L7044GSI compressor engine (SN-11), a 50 kW Olympian generator engine (SN-12), and a 341 gallon lube oil tank (insignificant activity).

### **Process Description**

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<sub>x</sub>), 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 four compressor engines (SN-01 through SN-03, and SN-11), and the generator engine (SN-12). 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, three (3) lube oil tanks, and one (1) antifreeze mix tank.

### **Regulations**

The following table contains the regulations applicable to this permit.

<b>Source No.</b>	<b>Regulation Citations</b>
Facility	This facility is subject to regulation under the <i>Arkansas Air Pollution Control Code</i> (Regulation 18), the <i>Arkansas Plan of Implementation for Air Pollution Control</i> (Regulation 19), and the <i>Regulations of the Arkansas Operating Air Permit Program</i> (Regulation 26).

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

### **Emission Summary**

**Facility: CenterPoint Energy Gas Transmission Company - Helena Compressor Station**  
**Permit No.: 1217-AOP-R2**  
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Source No.	Description	Pollutant	Emission Rates	
			lb/hr	tpy
Total Allowable Emissions		PM/PM <sub>10</sub>	0.5	1.8
		SO <sub>2</sub>	0.4	0.4
		VOC	3.5	14.2
		CO	76.7	335.1
		NO <sub>x</sub>	96.4	422.2
		<i>Acetaldehyde*</i>	0.32	1.35
		<i>Acrolein*</i>	0.14	0.86
		<i>Benzene*</i>	0.04	0.09
		<i>Formaldehyde*</i>	1.33	5.81
		<i>Methanol*</i>	0.09	0.42
01	600 hp Ajax DPC - 600 Compressor Engine (four stroke lean burn)	PM/PM <sub>10</sub>	0.1	0.4
		SO <sub>2</sub>	0.1	0.1
		VOC	1.0	4.2
		CO	9.2	40.0
		NO <sub>x</sub>	26.7	117.0
		<i>Acetaldehyde*</i>	0.07	0.29
		<i>Acrolein*</i>	0.04	0.18
		<i>Benzene*</i>	0.01	0.02
		<i>Formaldehyde*</i>	0.42	1.85
		<i>Methanol*</i>	0.02	0.09
02	600 hp Ajax DPC - 600 Compressor Engine (four stroke lean burn)	PM/PM <sub>10</sub>	0.1	0.4
		SO <sub>2</sub>	0.1	0.1
		VOC	1.0	4.2
		CO	9.2	40.0
		NO <sub>x</sub>	26.7	117.0
		<i>Acetaldehyde*</i>	0.07	0.29
		<i>Acrolein*</i>	0.04	0.18
		<i>Benzene*</i>	0.01	0.02
		<i>Formaldehyde*</i>	0.42	1.85
		<i>Methanol*</i>	0.02	0.09
03	800 hp White - Superior 8G825A Compressor Engine (four stroke lean burn)	PM/PM <sub>10</sub>	0.1	0.4
		SO <sub>2</sub>	0.1	0.1
		VOC	1.1	4.6
		CO	53.8	235.7
		NO <sub>x</sub>	40.6	177.9
		<i>Acetaldehyde*</i>	0.07	0.29
		<i>Acrolein*</i>	0.05	0.20

**Facility: CenterPoint Energy Gas Transmission Company - Helena Compressor Station**  
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Source No.	Description	Pollutant	Emission Rates	
			lb/hr	tpy
		<i>Benzene*</i>	0.01	0.02
		<i>Formaldehyde*</i>	0.47	2.04
		<i>Methanol*</i>	0.02	0.10
11	Waukesha L7044GSI (1,680 HP, four stroke rich burn with catalytic converter)	PM/PM <sub>10</sub>	0.2	0.6
		SO <sub>2</sub>	0.1	0.1
		VOC	0.2	0.5
		CO	0.5	2.2
		NO <sub>x</sub>	0.8	3.4
		<i>Acetaldehyde*</i>	0.11	0.48
		<i>Acrolein*</i>	0.01	0.30
		<i>Benzene*</i>	0.01	0.03
		<i>Formaldehyde*</i>	0.01	0.03
		<i>Methanol*</i>	0.03	0.14
12	Olympian 60 Hz Generator Engine (70 HP four stroke rich burn)	VOC	0.2	0.7
		CO	4.0	17.2
		NO <sub>x</sub>	1.6	6.9
		<i>Formaldehyde*</i>	0.01	0.05

\*HAPs included in the VOC totals. Italic indicates Hazardous Air Pollutant.

**Facility: CenterPoint Energy Gas Transmission Company - Helena Compressor Station**  
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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.

Permit 1217-AOP-R0 was the initial Title V permit. There were no physical changes to the facility.

Permit 1217-AOP-R1 was issued on March 9, 2000. This permit was issued in order to resolve confusion with the final permit issued on November 13, 1998, and to incorporate agreed upon changes in the Permit Appeal Resolution (PAR). As the result, the permit number was changed from 1217-AOP-R0 to 1217-AOP-R1.

**Facility: CenterPoint Energy Gas Transmission Company - Helena Compressor Station**  
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**SECTION IV: SPECIFIC CONDITIONS**  
 SN-01 Ajax DPC - 600 Compressor Engine

Source SN-01, a 600 hp Ajax DPC, four stroke lean burn 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**

- The permittee shall not exceed the emission rates set forth in the following table. The pound per hour and ton per year rates are based on maximum capacity. The permittee will demonstrate compliance with this condition by Plantwide Condition No. 6. [Regulation No. 19 §19.501 et seq. effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM <sub>10</sub>	0.1	0.4
SO <sub>2</sub>	0.1	0.1
VOC	1.0	4.2
CO	9.2	40.0
NO <sub>x</sub>	26.7	117.0

- The permittee shall not exceed the non-criteria emission rates set forth in the following table at SN-01. The pound per hour and ton per year rates are based on maximum capacity. Therefore, compliance with these emission rates will be demonstrated through compliance with Plantwide Condition 6. The HAP emissions listed for this source were based upon published emission factors at the time of permit issuance. Any change in these emission factors will not constitute a violation of the HAP emission rates listed below. [Regulation 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]

Pollutant	lb/hr	tpy
PM	0.1	0.4
<i>Acetaldehyde</i>	0.07	0.29
<i>Acrolein</i>	0.04	0.18
<i>Benzene</i>	0.01	0.02
<i>Formaldehyde</i>	0.42	1.85
<i>Methanol</i>	0.02	0.09

**Facility: CenterPoint Energy Gas Transmission Company - Helena Compressor Station**  
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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 Plantwide Condition No. 6.

SN	Limit	Regulatory Citation
01	5%	§18.501

**Facility: CenterPoint Energy Gas Transmission Company - Helena Compressor Station**  
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**AFIN: 54-00120**

SN-02 Ajax DPC - 600 Compressor Engine

Source SN-02, a 600 hp Ajax DPC, four stroke lean burn 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. The permittee shall not exceed the emission rates set forth in the following table. The pound per hour and ton per year rates are based on maximum capacity. The permittee will demonstrate compliance with this condition by Plantwide Condition No. 6. [Regulation No. 19 §19.501 et seq. effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM <sub>10</sub>	0.1	0.4
SO <sub>2</sub>	0.1	0.1
VOC	1.0	4.2
CO	9.2	40.0
NO <sub>x</sub>	26.7	117.0

5. The permittee shall not exceed the non-criteria emission rates set forth in the following table at SN-02. The pound per hour and ton per year rates are based on maximum capacity. Therefore, compliance with these emission rates will be demonstrated through compliance with Plantwide Condition 6. The HAP emissions listed for this source were based upon published emission factors at the time of permit issuance. Any change in these emission factors will not constitute a violation of the HAP emission rates listed below. [Regulation 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]

Pollutant	lb/hr	tpy
PM	0.1	0.4
<i>Acetaldehyde</i>	0.07	0.29
<i>Acrolein</i>	0.04	0.18
<i>Benzene</i>	0.01	0.02
<i>Formaldehyde</i>	0.42	1.85
<i>Methanol</i>	0.02	0.09

**Facility: CenterPoint Energy Gas Transmission Company - Helena Compressor Station**  
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6. 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 Plantwide Condition No. 6.

SN	Limit	Regulatory Citation
02	5%	§18.501

**Facility: CenterPoint Energy Gas Transmission Company - Helena Compressor Station**  
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SN-03 White – Superior 8G825A Compressor Engine

Source SN-03, a 800 hp White – Superior 8G825A four stroke lean burn 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. The permittee shall not exceed the emission rates set forth in the following table. The pound per hour and ton per year rates are based on maximum capacity. The permittee will demonstrate compliance with this condition by Plantwide Condition No. 6. [Regulation No. 19 §19.501 et seq. effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM <sub>10</sub>	0.1	0.4
SO <sub>2</sub>	0.1	0.1
VOC	1.1	4.6
CO	53.8	235.7
NO <sub>x</sub>	40.6	177.9

8. The permittee shall not exceed the non-criteria emission rates set forth in the following table at SN-03. The pound per hour and ton per year rates are based on maximum capacity. Therefore, compliance with these emission rates will be demonstrated through compliance with Plantwide Condition 6. The HAP emissions listed for this source were based upon published emission factors at the time of permit issuance. Any change in these emission factors will not constitute a violation of the HAP emission rates listed below. [Regulation 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]

Pollutant	lb/hr	tpy
PM	0.1	0.4
<i>Acetaldehyde</i>	0.07	0.29
<i>Acrolein</i>	0.05	0.20
<i>Benzene</i>	0.01	0.02
<i>Formaldehyde</i>	0.47	2.04
<i>Methanol</i>	0.02	0.10

**Facility: CenterPoint Energy Gas Transmission Company - Helena Compressor Station**  
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9. 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 Plantwide Condition No. 6.

SN	Limit	Regulatory Citation
03	5%	§18.501

**Facility: CenterPoint Energy Gas Transmission Company - Helena Compressor Station**  
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SN-11 Waukesha L7044GSI Compressor Engine

SN-11, a 1,680 HP four stroke rich burn compressor engine, was installed in 2004. The engine is equipped with a catalytic converter to control NO<sub>x</sub>, CO, and VOC emissions. The engine is capable of running at 120% rated capacity and is being permitted to do so.

**Specific Conditions**

10. The permittee shall not exceed the emission rates set forth in the following table. The pound per hour and ton per year rates are based on maximum capacity. The permittee will demonstrate compliance with this condition by Plantwide Condition No. 6. [Regulation No. 19 §19.501 et seq. effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM <sub>10</sub>	0.2	0.6
SO <sub>2</sub>	0.1	0.1
VOC	0.2	0.5
CO	0.5	2.2
NO <sub>x</sub>	0.8	3.4

11. The permittee shall not exceed the non-criteria emission rates set forth in the following table at SN-11. The pound per hour and ton per year rates are based on maximum capacity. Therefore, compliance with these emission rates will be demonstrated through compliance with Plantwide Condition 6. The HAP emissions listed for this source were based upon published emission factors at the time of permit issuance. Any change in these emission factors will not constitute a violation of the HAP emission rates listed below. [Regulation 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]

Pollutant	lb/hr	tpy
PM	0.2	0.6
<i>Acetaldehyde</i>	0.11	0.48
<i>Acrolein</i>	0.01	0.30
<i>Benzene</i>	0.01	0.03
<i>Formaldehyde</i>	0.01	0.03
<i>Methanol</i>	0.03	0.14

**Facility: CenterPoint Energy Gas Transmission Company - Helena Compressor Station**  
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12. 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 Plantwide Condition No. 6.

SN	Limit	Regulatory Citation
11	5%	§18.501

13. The Natural Gas Compressor Engine (SN-11) is subject to the Compliance Assurance Monitoring (CAM) Rule and shall comply with all applicable provisions, including but not limited to:

- a. When the compressor engine (SN-11) is operating, the permittee shall continuously monitor the compressor exhaust gas temperature into and out of the catalyst converter using an in-line thermocouple. The inlet exhaust gas temperature shall be greater than 750 °F but less than 1250 °F.
- b. The minimum accuracy of the in-line thermocouple shall be  $\pm 5$  °F.
- c. The permittee shall maintain daily records, updated on a monthly basis, to demonstrate compliance with Specific Condition 4(a) and (b). These records shall be kept on site or at the nearest manned facility, and shall be made available to Department personnel upon request.

[Regulation No. 19 §19.304 and 40 CFR Part 64]

14. The permittee shall ensure that the catalytic converter is maintained and operated in serviceable condition during operation of the compressor engine. Weekly inspections and preventative maintenance shall be performed on the catalytic converter. The permittee shall maintain a log of weekly inspections, results, and any repair or replacements regarding the catalytic converter (SN-11) on site or at the nearest manned facility, and shall make the logs available to Department personnel upon request. [Regulation No. 19 §19.304 and 40 CFR Part 64]

**Facility: CenterPoint Energy Gas Transmission Company - Helena Compressor Station**  
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SN-12 Olympian 60 Hz Generator Engine

SN-12, a 70 HP four stroke rich burn 50 kW generator engine, was installed in 2004. The engine is capable of running at 120% rated capacity and is being permitted to do so. Negligible amounts of particulate and sulfur dioxide may be emitted by this source. Due to extremely low calculated potential emissions of these pollutants, numerical emission limits have not been included, but such emissions are not prohibited.

**Specific Conditions**

15. The permittee shall not exceed the emission rates set forth in the following table. The pound per hour and ton per year rates are based on maximum capacity. The permittee will demonstrate compliance with this condition by Plantwide Condition No. 6. [Regulation No. 19 §19.501 et seq. effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
VOC	0.2	0.7
CO	4.0	17.2
NO <sub>x</sub>	1.6	6.9

16. The permittee shall not exceed the non-criteria emission rates set forth in the following table at SN-12. The pound per hour and ton per year rates are based on maximum capacity. Therefore, compliance with these emission rates will be demonstrated through compliance with Plantwide Condition 6. The HAP emissions listed for this source were based upon published emission factors at the time of permit issuance. Any change in these emission factors will not constitute a violation of the HAP emission rates listed below. [Regulation 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]

Pollutant	lb/hr	tpy
<i>Formaldehyde</i>	0.01	0.05

17. 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 Plantwide Condition No. 6.

SN	Limit	Regulatory Citation
12	5%	§18.501

**Facility: CenterPoint Energy Gas Transmission Company - Helena Compressor Station**  
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**SECTION V: COMPLIANCE PLAN AND SCHEDULE**

CenterPoint Energy Gas Transmission Company - Helena Compressor Station is in compliance with the applicable regulations cited in the permit application. CenterPoint 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.

**Facility: CenterPoint Energy Gas Transmission Company - Helena Compressor Station**  
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## **SECTION VI: PLANTWIDE 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. Pipeline quality natural gas shall be the only fuel used to fire the compressor engines at this facility. [Regulation No.19 §19.705 and/or Regulation No. 18 §18.1004, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR 70.6]
7. The permittee shall simultaneously conduct tests for CO and NO<sub>x</sub> on the compressor engines every 5 years in accordance with Plantwide Condition 3 and the schedule set forth in the following table. EPA Reference Method 10 and 7E shall be used for CO and NO<sub>x</sub>, respectively. 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 similar engines shall be tested for that pollutant. [Regulation No.19 §19.702, and 40 CFR Part 52, Subpart E]

**Testing**

SN	Description	Testing Requirement
01 and 02	600 HP Ajax DPC – 600 Compressor Engine	One of two (2) every five years
03	800 HP White-Superior 8G825A Compressor Engine	Every five years
11	2,370 HP Caterpillar Model 3608 TALE	Every five years

8. The permittee may replace any existing engine on a temporary or permanent basis with engine that:

- Has the same or lower emission rates on a pound per hour basis;
- Has the same or lower horsepower; and
- Has a potential to emit of less than 40 tpy of NO<sub>x</sub> and 100 tpy of CO, and whose other pollutants are emitted at a rate equal to or lower than the current allowable emissions on a ton per year basis.
- Does not utilize an air pollution control device (i.e. subject to 40 CFR 64 Compliance Assurance Monitoring).

The permittee shall conduct NO<sub>x</sub> and CO emission testing within 90 days of the date of replacement to verify the emissions from the newly installed engine. This testing shall be conducted in accordance with EPA Reference Method 7E for NO<sub>x</sub> and EPA Reference Method 10 for CO. The permittee shall notify ADEQ of the replacement within 30 days of startup. This does not apply to modifications which must go through a PSD review as defined in 40 CFR 52.21. A replacement engine with the potential to emit 40 or more tons per year NO<sub>x</sub> or 100 or more tons per year of CO will require PSD review.

Notwithstanding the above, as provided by Regulation 26, in the event an emergency occurs, the permittee shall have an affirmative defense of emergency to an action brought for non-compliance with technology-based emission limitations if the conditions of Regulation 26, Sec.7(f) are met. [Regulation No.19 §19.705, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, §19.705 and 40 CFR Part 64]

9. 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]

**Title VI Provisions**

10. 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.
11. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. (“MVAC-like appliance” as defined at §82.152.)
  - e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
  - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
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 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**

15. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements, as of the date of permit issuance, included in and specifically identified in the following table - 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 February 20, 2004.

**Applicable Regulations**

<b>Source No.</b>	<b>Regulation</b>	<b>Description</b>
Facility Wide	<i>Arkansas Plan of Implementation for Air Pollution Control</i> (Regulation 19)	SIP
Facility Wide	<i>Regulations of the Arkansas Operating Air Permit Program</i> (Regulation 26).	Title V

### 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 February 20, 2004.

<b>Description</b>	<b>Category</b>
8,820-gallon Entrained Liquids (Slop) Storage Tank (TK-SLOP)	A-3
8,820-gallon Used Oil Storage Tank (TK-UO)	A-3
6,000-gallon Lube Oil Storage Tank(TK-LO1)	A-3
700-gallon Antifreeze Mix Storage Tank (TK-ANTI)	A-3
500-gallon Lube Oil Storage Tank (TK-LO2)	A-3
Smart Ash incinerator	A-13
341-gallon Lube Oil Tank ((TK-LO3)	A-3
Blowdown Vent	A-13
Fugitive Emissions	A-13
Truck Loading	A-13

## SECTION VIII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 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 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  
Post Office Box 8913  
Little Rock, AR 72219

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 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. 9. [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 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;
- 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 §8-4-31]