

# ADEQ

ARKANSAS  
Department of Environmental Quality

January 27, 2010

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

Dear Ms. Ivey:

The enclosed Permit No. 1217-AOP-R5 is issued pursuant to the Arkansas Operating Permit Program, Regulation # 26.

After considering the facts and requirements of A.C.A. §8-4-101 et seq., and implementing regulations, I have determined that Permit No. 1217-AOP-R5 for the construction, operation and maintenance of an air pollution control system for CenterPoint Energy Gas Transmission Co. - Helena Compressor Station to be issued and effective on the date specified in the permit, unless a Commission review has been properly requested under Arkansas Department of Pollution Control & Ecology Commission's Administrative Procedures, Regulation 8.603, within thirty (30) days after service of this decision.

All persons submitting written comments during the thirty (30) day, and all other persons entitled to do so, may request an adjudicatory hearing and Commission review on whether the decision of the Director should be reversed or modified. Such a request shall be in the form and manner required by Regulation 8.603, including filing a written Request for Hearing with the APC&E Commission Secretary at 101 E. Capitol Ave., Suite 205, Little Rock, Arkansas 72201. If you have any questions about filing the request, please call the Commission at 501-682-7890.

Sincerely,



Mike Bates  
Chief, Air Division

# ADEQ OPERATING AIR PERMIT

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

Permit No. : 1217-AOP-R5

IS ISSUED TO:

CenterPoint Energy Gas Transmission Co. - Helena Compressor Station  
4mi. Sw of West Helena near S.R. 20  
Helena-West 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:

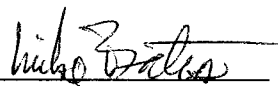
January 27, 2010

AND

January 26, 2015

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

Signed:

  
\_\_\_\_\_  
Mike Bates  
Chief, Air Division

January 27, 2010  
\_\_\_\_\_  
Date

CenterPoint Energy Gas Transmission Co. - Helena Compressor Station  
Permit #: 1217-AOP-R5  
AFIN: 54-00120

Table of Contents

<b>SECTION I: FACILITY INFORMATION</b> .....	4
<b>SECTION II: INTRODUCTION</b> .....	5
<b>Summary of Permit Activity</b> .....	5
<b>Process Description</b> .....	5
<b>Regulations</b> .....	5
<b>Emission Summary</b> .....	6
<b>SECTION III: PERMIT HISTORY</b> .....	8
<b>SECTION IV: SPECIFIC CONDITIONS</b> .....	9
<b>SECTION V: COMPLIANCE PLAN AND SCHEDULE</b> .....	15
<b>SECTION VI: PLANTWIDE CONDITIONS</b> .....	16
<b>SECTION VII: INSIGNIFICANT ACTIVITIES</b> .....	20
<b>SECTION VIII: GENERAL PROVISIONS</b> .....	21

CenterPoint Energy Gas Transmission Co. - Helena Compressor Station  
Permit #: 1217-AOP-R5  
AFIN: 54-00120

#### 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

CenterPoint Energy Gas Transmission Co. - Helena Compressor Station  
Permit #: 1217-AOP-R5  
AFIN: 54-00120

**SECTION I: FACILITY INFORMATION**

PERMITTEE: CenterPoint Energy Gas Transmission Co. - Helena  
Compressor Station

AFIN: 54-00120

PERMIT NUMBER: 1217-AOP-R5

FACILITY ADDRESS: 4mi. Sw of West Helena near S.R. 20  
Helena-West Helena, AR 72342

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

COUNTY: Phillips County

CONTACT NAME: Lacey Ivey

CONTACT POSITION: Environmental Specialist

TELEPHONE NUMBER: 318-429-3297

REVIEWING ENGINEER: Siew Low

UTM North South (Y): Zone 15: 3815697.76 m

UTM East West (X): Zone 15: 719892.38 m

## 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. In this Title V renewal, the facility requests to remove a permitted but not installed 1680-hp Waukesha L7044GSI natural gas compressor engine (SN-11). Also, SN-03 is actually a rich burn unit instead of lean burn unit as described in the existing air permit. As the result of this modification, permitted emissions decrease are 0.6 tons/year (tpy) of PM/PM<sub>10</sub>, 0.1 tpy of SO<sub>2</sub>, 0.5 tpy of VOC, 2.2 tpy of CO, 3.4 tpy of NO<sub>x</sub>, and decreases of (miscellaneous HAPs) 0.66 tpy of acetaldehyde, 0.4 tpy of acrolein, 1.3 tpy of formaldehyde, and 0.66 tpy of methanol, and increase of benzene by 0.01 tpy.

### 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 three compressor engines (SN-01, SN-02, and SN-03), 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.

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

### Emission Summary

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

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
Total Allowable Emissions		PM	0.3	1.2
		PM <sub>10</sub>	0.3	1.2
		SO <sub>2</sub>	0.3	0.3
		VOC	3.2	13.1
		CO	90.6	320.3
		NO <sub>x</sub>	94.5	412.1
HAPs		<i>Acetaldehyde*</i>	0.16	0.69
		<i>Acrolein*</i>	0.1	0.46
		<i>Benzene*</i>	0.03	0.1
		<i>Formaldehyde*</i>	1.03	4.5
		<i>Methanol*</i>	0.07	0.3
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

CenterPoint Energy Gas Transmission Co. - Helena Compressor Station  
 Permit #: 1217-AOP-R5  
 AFIN: 54-00120

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
03	800 hp White - Superior 8G825NA Compressor Engine (four stroke rich 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>	0.02	0.11
		<i>Acrolein*</i>	0.02	0.10
		<i>Benzene*</i>	0.01	0.06
		<i>Formaldehyde*</i>	0.18	0.79
		<i>Methanol*</i>	0.03	0.12
12	Olympian 60 Hz Generator Engine (64 HP four stroke rich burn)	VOC	0.1	0.1
		CO	18.4	4.6
		NO <sub>x</sub>	0.5	0.2
		<i>Formaldehyde*</i>	0.01	0.01

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

CenterPoint Energy Gas Transmission Co. - Helena Compressor Station  
Permit #: 1217-AOP-R5  
AFIN: 54-00120

### **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.

Permit 1217-AOP-R2 was issued on August 13, 2004. This Title V air permit renewal authorized 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).

Permit 1217-AOP-R3 was issued on August 18, 2005. This permit was issued in order to revise the language of engine replacement flexibility in the permit issued on August 13, 2004 and the agreed upon changes in the Permit Appeal Resolution (PAR). There were no physical or operational changes with this permitting action.

Permit 1217-AOP-R4 was issued on December 30, 2006. This permit authorized the removal of the permitted but not installed 70 HP Olympian emergency generator (SN-12), and replacement of it with a new 64 HP Olympian emergency generator. Permitted emissions decrease were 0.6 tons/year (tpy) of VOC, 12.6 tpy of CO, and 6.7 tpy of NO<sub>x</sub>.

**SECTION IV: SPECIFIC CONDITIONS**

SN-01 and SN-02  
 Ajax DPC – 600 HP Compressor Engine

Source Description

SN-01 and SN-02 are both 600 hp Ajax DPC, four stroke lean burn compressor engines. SN-01 and SN-02 were last installed or modified in 1984. Both engines are capable of running at 120% rated capacity and are 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 shall demonstrate compliance with this condition by Plantwide Condition No. 6. [Regulation 19, §19.501 et seq., and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
01	600 hp Ajax DPC - 600 Compressor Engine (four stroke lean burn)	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
02	600 hp Ajax DPC - 600 Compressor Engine (four stroke lean burn)	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 emission rates set forth in the following table. 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.

CenterPoint Energy Gas Transmission Co. - Helena Compressor Station  
 Permit #: 1217-AOP-R5  
 AFIN: 54-00120

[Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	600 hp Ajax DPC - 600 Compressor Engine (four stroke lean burn)	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
02	600 hp Ajax DPC - 600 Compressor Engine (four stroke lean burn)	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

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 and 02	5%	§18.501

SN-03  
 White Superior 8G825NA Compressor Engine

Source SN-03, an 800 hp White – Superior 8G825NA four stroke rich 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.

Source Description

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 shall demonstrate compliance with this condition by Plantwide Condition No. 6. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
03	800 hp White Superior 8G825NA Compressor Engine (four stroke rich burn)	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

5. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by . [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
03	800 hp White Superior 8G825NA Compressor Engine (four stroke rich burn)	PM	0.1	0.4
		<i>Acetaldehyde*</i>	0.02	0.11
		<i>Acrolein*</i>	0.02	0.10
		<i>Benzene*</i>	0.01	0.06
		<i>Formaldehyde*</i>	0.18	0.79
		<i>Methanol*</i>	0.03	0.12

CenterPoint Energy Gas Transmission Co. - Helena Compressor Station  
Permit #: 1217-AOP-R5  
AFIN: 54-00120

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
03	5%	§18.501

SN-12  
 Olympian 60 Hz Generator Engine

Source Description

SN-12, a 64 HP four stroke rich burn 40 kW natural gas fired generator engine. 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

7. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition No. 9 and Plantwide Condition No. 6. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
12	Olympian 60 Hz Generator Engine	VOC	0.1	0.1
		CO	18.4	4.6
		NO <sub>x</sub>	0.5	0.2

8. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition No. 9 and Plantwide Condition No. 6. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
12	Olympian 60 Hz Generator Engine	<i>Formaldehyde</i>	0.01	0.01

9. The permittee shall not operate the emergency generator (SN-12) in excess of 500 hours per consecutive twelve month period. [Regulation 19, §19.705, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and 40 CFR 70.6]

CenterPoint Energy Gas Transmission Co. - Helena Compressor Station

Permit #: 1217-AOP-R5

AFIN: 54-00120

10. The permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition 9. These records may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept at the nearest manned location, and shall be provided to Department personnel upon request. A twelve month rolling total and each individual month's data shall be submitted in accordance with General Provision No. 7. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]

CenterPoint Energy Gas Transmission Co. - Helena Compressor Station  
Permit #: 1217-AOP-R5  
AFIN: 54-00120

## **SECTION V: COMPLIANCE PLAN AND SCHEDULE**

CenterPoint Energy Gas Transmission Co. - 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.

## SECTION VI: PLANTWIDE CONDITIONS

1. The permittee shall notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation 19, §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation 19, §19.410(B) and 40 CFR Part 52, Subpart E]
3. The permittee must test any equipment scheduled for testing, unless otherwise stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) new equipment or newly modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee shall submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation 19, §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. The permittee must provide:
  - a. Sampling ports adequate for applicable test methods;
  - b. Safe sampling platforms;
  - c. Safe access to sampling platforms; and
  - d. Utilities for sampling and testing equipment.

[Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee shall maintain the equipment in good condition at all times. [Regulation 19, §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. Pipeline quality natural gas shall be the only fuel used to fire the compressor engines and generator engine 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 such engine(s) is tested twice before another similar (make and model) engine of equal horsepower is tested once. If the tested emission rate for any pollutant is in excess of the permitted emission rate, all similar (make and model) 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

8. The permittee may replace any existing engines on a temporary or permanent basis with an engine(s) that has the same or lower emission rates on a pound per hour basis; has the same or lower horsepower; and which result in the same or lower actual emissions from the engine(s) on a pound per hour basis, and which do not exceed permitted emissions on a ton per year basis. The replacement shall not result in a significant emissions increase as defined and applied pursuant to 40 CFR 52.21, and as set out below:
- a. The permittee shall notify ADEQ of the replacement within 30 days after the replacement is made, which notification shall identify the previous and replacement engines, and provide the reason why the replacement was necessary. If applicable, the notification shall also provide a permit application and, when required, a CAM plan under 40 CFR Part 64.
  - b. 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(s). The testing shall be conducted in accordance with EPA Reference Method 7E for NO<sub>x</sub> and EPA Reference Method 10 for CO.
  - c. 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 limitations if the conditions of Regulation 26, §26.707 are met.

[Regulation No.19 §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, §19.304 and 40 CFR Part 64.]

9. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation 26 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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.

CenterPoint Energy Gas Transmission Co. - Helena Compressor Station  
Permit #: 1217-AOP-R5  
AFIN: 54-00120

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.

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 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 19, 2009.

Applicable Regulations

<b>Source No.</b>	<b>Regulation</b>	<b>Description</b>
Facility	Regulation 18, 19, 26	SIP and Title V

CenterPoint Energy Gas Transmission Co. - Helena Compressor Station  
 Permit #: 1217-AOP-R5  
 AFIN: 54-00120

**SECTION VII: INSIGNIFICANT ACTIVITIES**

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §26.304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated February 19, 2009.

Description	Category
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
Piping Component 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 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute. [40 CFR 70.6(b)(2)]
2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26)]
3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due. [Regulation 26, §26.406]
4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, et seq. (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation 26, §26.701(A)(2)]
5. The permittee must maintain the following records of monitoring information as required by this permit.
  - a. The date, place as defined in this permit, and time of sampling or measurements;
  - b. The date(s) analyses performed;
  - c. The company or entity performing the analyses;
  - d. The analytical techniques or methods used;
  - e. The results of such analyses; and
  - f. The operating conditions existing at the time of sampling or measurement.

[40 CFR 70.6(a)(3)(ii)(A) and Regulation 26, §26.701(C)(2)]

CenterPoint Energy Gas Transmission Co. - Helena Compressor Station  
Permit #: 1217-AOP-R5  
AFIN: 54-00120

6. The permittee must retain the records of all required monitoring data and support information for at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [40 CFR 70.6(a)(3)(ii)(B) and Regulation 26, §26.701(C)(2)(b)]
7. The permittee must submit reports of all required monitoring every six (6) months. If permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due within thirty (30) days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26, §26.2 must certify all required reports. The permittee will send the reports to the address below:

Arkansas Department of Environmental Quality  
Air Division  
ATTN: Compliance Inspector Supervisor  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

[40 C.F.R. 70.6(a)(3)(iii)(A) and Regulation 26, §26.701(C)(3)(a)]

8. The permittee shall report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.
  - a. For all upset conditions (as defined in Regulation 19, § 19.601), the permittee will make an initial report to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include:
    - i. The facility name and location;
    - ii. The process unit or emission source deviating from the permit limit;
    - iii. The permit limit, including the identification of pollutants, from which deviation occurs;
    - iv. The date and time the deviation started;
    - v. The duration of the deviation;
    - vi. The average emissions during the deviation;
    - vii. The probable cause of such deviations;
    - viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future; and
    - ix. The name of the person submitting the report.

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

- b. For all deviations, the permittee shall report such events in semi-annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 8a above. The semi-annual report must include all the information as required by the initial and full reports required in 8a.

[Regulation 19, §19.601 and §19.602, Regulation 26, §26.701(C)(3)(b), and 40 CFR 70.6(a)(3)(iii)(B)]

9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable. [40 CFR 70.6(a)(5), Regulation 26, §26.701(E), and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation 26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. §7401, et seq. and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation 26, §26.701(F)(1)]
11. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation 26, §26.701(F)(2)]
12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation 26, §26.701(F)(3)]
13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation 26, §26.701(F)(4)]

CenterPoint Energy Gas Transmission Co. - Helena Compressor Station  
Permit #: 1217-AOP-R5  
AFIN: 54-00120

14. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation 26, §26.701(F)(5)]
15. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [40 CFR 70.6(a)(7) and Regulation 26, §26.701(G)]
16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation 26, §26.701(H)]
17. If the permit allows different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation 26, §26.701(I)(1)]
18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation 26, §26.702(A) and (B)]
19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation 26, §26.2. [40 CFR 70.6(c)(1) and Regulation 26, §26.703(A)]
20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation 26, §26.703(B)]
  - a. Enter upon the permittee's premises where the permitted source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

- d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.
21. The permittee shall submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation 26, §26.703(E)(3)]
    - a. The identification of each term or condition of the permit that is the basis of the certification;
    - b. The compliance status;
    - c. Whether compliance was continuous or intermittent;
    - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
    - e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.
  22. Nothing in this permit will alter or affect the following: [Regulation 26, §26.704(C)]
    - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
    - b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
    - c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
    - d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
  23. This permit authorizes only those pollutant emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
  24. The permittee may request in writing and at least 15 days in advance of the deadline, an extension to any testing, compliance or other dates in this permit. No such extensions are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion in the following circumstances:
    - a. Such an extension does not violate a federal requirement;
    - b. The permittee demonstrates the need for the extension; and
    - c. The permittee documents that all reasonable measures have been taken to meet the current deadline and documents reasons it cannot be met.

CenterPoint Energy Gas Transmission Co. - Helena Compressor Station  
Permit #: 1217-AOP-R5  
AFIN: 54-00120

[Regulation 18, §18.314(A), Regulation 19, §19.416(A), Regulation 26, §26.1013(A), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

25. The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Department approval. Any such emissions shall be included in the facility's total emissions and reported as such. The Department may grant such a request, at its discretion under the following conditions:
- a. Such a request does not violate a federal requirement;
  - b. Such a request is temporary in nature;
  - c. Such a request will not result in a condition of air pollution;
  - d. The request contains such information necessary for the Department to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
  - e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
  - f. The permittee maintains records of the dates and results of such temporary emissions/testing.

[Regulation 18, §18.314(B), Regulation 19, §19.416(B), Regulation 26, §26.1013(B), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

26. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion under the following conditions:
- a. The request does not violate a federal requirement;
  - b. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
  - c. Any such request, if approved, is incorporated in the next permit modification application by the permittee.

[Regulation 18, §18.314(C), Regulation 19, §19.416(C), Regulation 26, §26.1013(C), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

**CERTIFICATE OF SERVICE**

I, Pam Owen, hereby certify that a copy of this permit has been mailed by first class mail to CenterPoint Energy Gas Transmission Co. - Helena Compressor Station, P.O. Box 21734, Shreveport, LA, 71151, on this 27<sup>th</sup> day of January, 2010.

Pam Owen

Pam Owen, AAIL, Air Division