

RESPONSE TO COMMENTS

**Arkansas Western Gas Company
Davis Compressor Station
8521 Fairhaven Road
Altus, AR 72821
Permit No.: 1310-AOP-R2
AFIN: 24-00090**

On February 12, 2009 the Director of the Arkansas Department of Environmental Quality gave notice of a draft permitting decision for the above referenced facility. During the comment period, the facility submitted written comments, data, views, or arguments on the draft permitting decision. The Department's response to these issues is as follows:

Comments were received via email on February 26, 2009 from Mr. Steven Liddell, Arkansas Western Gas Co., Environmental, Health and Safety Manager.

Comment #1

Revised calculations and Emission Rate Tables for SN-01 and SN-02 are being presented. The new calculations include a 15% safety factor. CO was the only pollutant that changed emission rates.

Response #1

The revised CO emissions for SN-01 and SN-02 were included in the final permit.

PC
04/03/09

ADEQ

ARKANSAS
Department of Environmental Quality

April 15, 2009

Steven Liddell
EH&S Manager
Arkansas Western Gas Co. - Davis Compressor Station
P.O. Box 13288
Fayetteville, AR 72703-1002

Dear Mr. Liddell:

The enclosed Permit No. 1310-AOP-R2 is issued pursuant to the Arkansas Operating Permit Program, Regulation # 26.

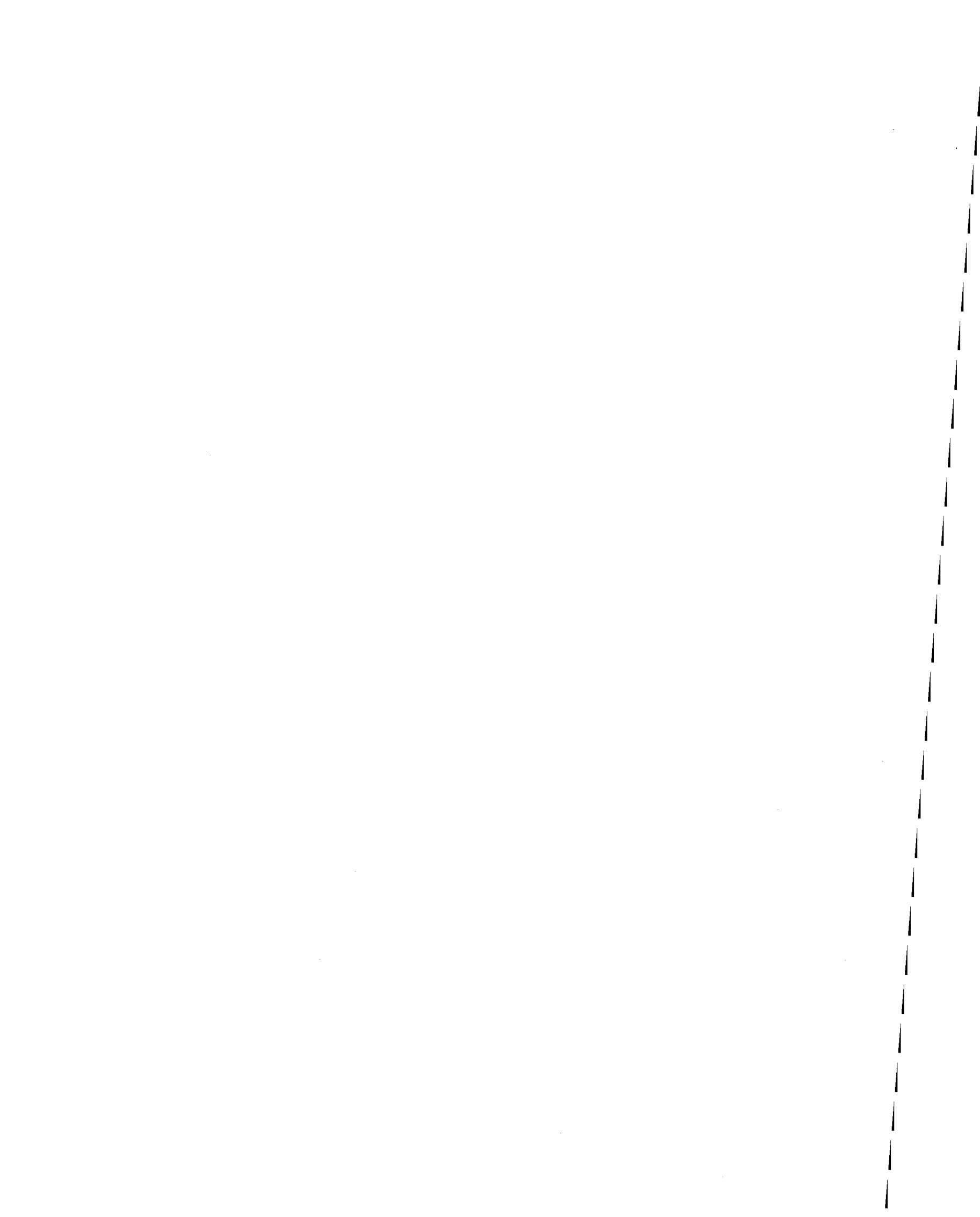
After considering the facts and requirements of A.C.A. §8-4-101 et seq., and implementing regulations, I have determined that Permit No. 1310-AOP-R2 for the construction, operation and maintenance of an air pollution control system for Arkansas Western Gas Co. - Davis Compressor Station to be issued and effective on the date specified in the permit, unless a Commission review has been properly requested under §2.1.14 of Regulation No. 8, Arkansas Department of Pollution Control & Ecology Commission's Administrative Procedures, within thirty (30) days after service of this decision.

All persons submitting written comments during this thirty (30) day period, 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 §2.1.14 of Regulation No. 8.

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.: 1310-AOP-R2
Renewal #2

IS ISSUED TO:

Arkansas Western Gas Co. - Davis Compressor Station
8521 Fairhaven Road
Altus, AR 72821
Franklin County
AFIN: 24-00090

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:


April 15, 2009

AND

April 14, 2014

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

Signed:



Mike Bates
Chief, Air Division

April 15, 2009

Date

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List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
b-hp	brake horsepower
BTU	British Thermal Unit
CFR	Code of Federal Regulations
CO	Carbon Monoxide
g/bhp-hr	grams/break horsepower-hour
HAP	Hazardous Air Pollutant
HP	Horsepower
lb/hr	Pound Per Hour
MM	million
MVAC	Motor Vehicle Air Conditioner
NSPS	New Standards of Performance Standards
NESHAP	National Emission Standards for Hazardous Air Pollutants
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM ₁₀	Particulate Matter Smaller Than Ten Microns (µm) in Diameter
psi	pounds per square inch
RICE	Reciprocating Engine
SN	Source Number
SNAP	Significant New Alternatives Program (SNAP)
SO ₂	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction Plan
tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

Arkansas Western Gas Company - Davis Compressor Station
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AFIN: 24-00090

SECTION I: FACILITY INFORMATION

PERMITTEE: Arkansas Western Gas Co. –
Davis Compressor Station

AFIN: 24-00090

PERMIT NUMBER: 1310-AOP-R2

FACILITY ADDRESS: 8521 Fairhaven Road
Altus, AR 72821

MAILING ADDRESS: PO Box 13288
Fayetteville, AR 72703-1002

COUNTY: Franklin County

CONTACT NAME: Steven Liddell

CONTACT POSITION: EH&S Manager

TELEPHONE NUMBER: 479-582-8635

REVIEWING ENGINEER: Patty Campbell, PE

UTM North South (Y): Zone 15: 3925161.35 m

UTM East West (X): Zone 15: 433408.52 m

SECTION II: INTRODUCTION

Summary of Permit Activity

Arkansas Western Gas Company (AWG) owns and operates a natural gas transmission station (NAICS 486210), known as Davis Compressor Station, located at 8521 Fairhaven Road Altus, Franklin County, Arkansas 72821. This is the second Title V renewal for the facility. There are no changes in the operation of the facility from the previous permit. PM, PM₁₀, and SO₂ emissions, which were considered negligible in the past, are being added to the permit with this renewal, reflecting updated Department guidance. The facility consists of four 4-stroke, rich-burn compressor engines and a natural gas fueled dehydrator. Items on the Insignificant Activities list have been combined and/or removed. Potential annual emissions are permitted at: 0.8 tpy PM/PM₁₀, 0.4 tpy SO₂, 24.0 tpy VOC, 19.0 tpy CO, 193.8 tpy NO_x, 1.22 tpy Formaldehyde, and 0.16 tpy Acrolein.

Process Description

Davis Compressor Station utilizes four natural gas fueled compressors (SN-01, SN-02, SN-03 and SN-04) and one natural gas dehydrator. The function of Davis Compressor Station is to provide compression and dehydration services to area natural gas producers. The station processes gas from a range of wellhead pressures to distribution pipeline requirements. The station also serves to compress system gas, which can be delivered to area transmission pipelines. Furthermore, the station is capable of receiving transmission line gas which can be made available for storage or system requirements.

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	0.4	0.8
		PM ₁₀	0.4	0.8
		SO ₂	0.4	0.4
		VOC	5.6	24.0
		CO	4.4	19.0
		NO _x	44.4	193.8
HAPs		Formaldehyde*	0.3	1.22
		Acrolein*	0.06	0.16
Air Contaminants **		N/A	N/A	N/A
01	Ajax DPC 360 natural gas-fired reciprocating engine (345 HP, 4-stroke rich burn, installed 1983)	PM	0.1	0.2
		PM ₁₀	0.1	0.2
		SO ₂	0.1	0.1
		VOC	1.2	5.0
		CO	0.9	3.9
		NO _x	3.1	13.4
		Formaldehyde*	0.06	0.23
		Acrolein*	0.01	0.03
02	Ajax DPC 360 natural gas-fired reciprocating engine (345 HP, 4-stroke rich burn, installed 1983)	PM	0.1	0.2
		PM ₁₀	0.1	0.2
		SO ₂	0.1	0.1
		VOC	1.2	5.0
		CO	0.9	3.9
		NO _x	3.1	13.4
		Formaldehyde*	0.06	0.23
		Acrolein*	0.01	0.03

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EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
03	Ajax DPC 600 natural gas-fired reciprocating engine (576 HP, 4-stroke rich burn, installed 1983)	PM	0.1	0.2
		PM ₁₀	0.1	0.2
		SO ₂	0.1	0.1
		VOC	1.6	7.0
		CO	1.3	5.6
		NO _x	19.1	83.5
		Formaldehyde*	0.06	0.38
		Acrolein*	0.02	0.05
04	Ajax DPC 600 natural gas-fired reciprocating engine (576 HP, 4-stroke rich burn, installed 1983)	PM	0.1	0.2
		PM ₁₀	0.1	0.2
		SO ₂	0.1	0.1
		VOC	1.6	7.0
		CO	1.3	5.6
		NO _x	19.1	83.5
		Formaldehyde*	0.06	0.38
		Acrolein*	0.02	0.05

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

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

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SECTION III: PERMIT HISTORY

Davis Compressor Station was constructed in 1983. It was permitted in May, 1992, permit #1310-A. Sources SN-01 through SN-22 were included in the permit. Two Ajax DPC 600 compressor engines (SN-03 and SN-04) were limited to 7000 hours of operation per year.

Permit # 1310-AOP- R0 was issued on March 20, 1999. The permit allowed the permittee to operate the Ajax DPC 600 compressor engines (SN-03 and SN-04) 8760 hours annually. This permit includes estimation of hazardous air pollutant (HAP) emission rates from compressor engines based on the Gas Research Institute publications and HAPCalc™ software program. This permit also includes previously not permitted natural gas glycol dehydrator reboiler water vent (SN-23).

Permit #1310-AOP-R1 was the first renewal with modification issued to Arkansas Western Gas – Davis Compressor Station on May 3, 2004. There were no physical changes, and no new construction or major modifications. However, there was a substantial decrease in the permitted VOC emission rate, which was a result of the reclassification of the Natural Gas Dehydrator Reboiler Water Vent (SN-23) to an insignificant activity and the correction of a math miscalculation of SN-23. In the previous permit, SN-23 emission rate was 15.1 tpy VOC. That emission rate did not represent the composition of the sweet dry coal seam gas being compressed for pipeline transport. The recalculated emission rate for SN-23 was 0.38 tpy VOC.

SECTION IV: SPECIFIC CONDITIONS

SN-01 – 04

Ajax DPC 360 & 600 Natural Gas Reciprocating Engines

Source Description

The purpose of the compressor station is to compress and dehydrated natural gas. The dehydrated gas is sent to the compressors (SN-01 through SN-04) to be compressed, cooled, and delivered to the discharge piping system and natural gas pipeline. The compressors are driven by Ajax manufactured reciprocating engines (RICE), which run on natural gas as a fuel and produce exhaust gases.

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by using natural gas fuel and operating at or less than maximum capacity. [Regulation 19, §19.501 et seq., and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
01	Ajax DPC 360, 345 HP gas engine (rich burn)	PM ₁₀	0.1	0.2
		SO ₂	0.1	0.1
		VOC	1.2	5.0
		CO	0.9	3.9
		NO _x	3.1	13.4
02	Ajax DPC 360, 345 HP gas engine (rich burn)	PM ₁₀	0.1	0.2
		SO ₂	0.1	0.1
		VOC	1.2	5.0
		CO	0.9	3.9
		NO _x	3.1	13.4
03	Ajax DPC 600, 576 HP gas engine (rich burn)	PM ₁₀	0.1	0.2
		SO ₂	0.1	0.1
		VOC	1.6	7.0
		CO	1.3	5.6
		NO _x	19.1	83.5
04	Ajax DPC 600, 576 HP gas engine (rich burn)	PM ₁₀	0.1	0.2
		SO ₂	0.1	0.1
		VOC	1.6	7.0
		CO	1.3	5.6
		NO _x	19.1	83.5

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2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by using natural gas fuel and operating at or less than maximum capacity. [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	Ajax DPC 360, 345 HP gas engine (rich burn)	PM	0.1	0.2
		Formaldehyde*	0.06	0.23
		Acrolein*	0.01	0.03
02	Ajax DPC 360, 345 HP gas engine (rich burn)	PM	0.1	0.2
		Formaldehyde*	0.06	0.23
		Acrolein*	0.01	0.03
03	Ajax DPC 600, 576 HP gas engine (rich burn)	PM	0.1	0.2
		Formaldehyde*	0.09	0.38
		Acrolein*	0.02	0.05
04	Ajax DPC 600, 576 HP gas engine (rich burn)	PM	0.1	0.2
		Formaldehyde*	0.09	0.38
		Acrolein*	0.02	0.05

* HAPs included in the VOC totals.

3. Visible emissions may not exceed 5% as measured by EPA Reference Method 9 for SN-01 through SN-04. Compliance with this specific condition shall be demonstrated by burning only pipeline quality natural gas as fuel, as defined in Plantwide Condition #8. [Regulation 18, §18.501, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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SECTION V: COMPLIANCE PLAN AND SCHEDULE

Arkansas Western Gas Company - Davis 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. 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]
7. The permittee shall simultaneously conduct tests for CO and NO_x on one of each of the two model engines (SN-01 or SN-02 and SN-03 or SN-04) operating in the station in accordance with Plantwide Condition #3 and every five years thereafter. AWG conducted compliance testing on SN-02 and SN-04 on February 12, 2004. AWG conducted compliance testing on SN-01 and SN-03 in 1999. EPA Reference Method 7E shall be used to determine NO_x and EPA Reference Method 10 shall be used to determine CO. The permittee shall test the engines within 90% of their rated capacity. If the tests are not performed within this range, the permittee shall be limited to operating

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within 10% above the tested rate. The Department reserves the right to select the engine to be tested. The engines tested shall be rotated so that no engine is tested twice before an engine of equal HP is tested once. If the tested emission rate for any pollutant is in excess of the permitted emission rate, all engines shall be tested for that pollutant.

[Regulation 19, §19.702 and 40 CFR Part 52, Subpart E]

8. The permittee shall only use pipeline quality natural gas to fire the compressor engines (SN-01, 02, 03, and 04) located at this facility. Pipeline quality natural gas is defined as gas which contains less than 0.5 grains or less of total sulfur per 100 standard cubic feet (SCF) of natural gas. Additionally, pipeline natural gas must either be composed of at least 70 percent methane by volume or have a gross calorific value between 950 and 1100 BTU per standard cubic foot. Compliance with the specifications for grains of H₂S must be documented through one of five identified sources of information. These sources are: a valid gas tariff; fuel purchase or pipeline transportation contract; vendor certification based on fuel sampling and analysis or other appropriate documentation; or periodic testing. [Regulation 19, §19.702 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and 40 CFR 70.6 and 40 CFR 72.2]

Title VI Provisions

9. 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.
10. 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.
11. 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.
 12. 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.
 13. 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

14. 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 October 28, 2008.

Applicable Regulations

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

The permit specifically identifies the following as inapplicable based upon information submitted by the permittee in an application dated October 28, 2008.

Arkansas Western Gas Company - Davis Compressor Station

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Inapplicable Regulations

Source No.	Regulation	Description
Facility	Regulation 19.801	111(d) Designated Facilities
Facility	Regulation 26.1201	Acid rain provisions
Facility	40 CFR 60	NSPS
Facility	40 CFR 62	State Plans for Designated Facilities.
Facility	40 CFR 63, Subpart HH	NESHAP From Oil and Natural gas Production Facilities
Facility	40 CFR 63, Subpart HHH	NESHAP From Natural Gas Transmission and Storage Facilities
Facility	40 CFR 68	Chemical Accidental Release Program
Facility	40 CFR 79	Registration of Fuels and Fuel Additives
Facility	40 CFR 80	Regulation of Fuels and Fuel Additives
Facility	40 CFR 81.304	Attainment Status of Designations (Non-attainment)

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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 October 28, 2008.

Description	Category
One Dehydrator Reboiler	A-1
One Lube Oil Tank, 550 gallon capacity	A-3
Blowdown and Equipment Leaks	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)]

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.

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Permit #: 1310-AOP-R2

AFIN: 24-00090

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)]

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.

[Regulation 18, §18.102(C-D), Regulation 19, §19.103(D), 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, §18.102(C-D), Regulation 19, §19.103(D), 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, §18.102(C-D), Regulation 19, §19.103(D), 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
Arkansas Western Gas Co. - Davis Compressor Station, P.O. Box 13288, Fayetteville, AR,
72703-1002, on this 15th day of April, 2009.

Pam Owen
Pam Owen, AAIL, Air Division

