

STATEMENT OF BASIS

for the issuance of Draft Air Permit # 1362-AOP-R2

1. PERMITTING AUTHORITY:

Arkansas Department of Pollution Control and Ecology
8001 National Drive
Post Office Box 8913
Little Rock, Arkansas 72219-8913

2. APPLICANT:

Seeco, Inc. - Stockton Compressor Station
South of Interstate 40, West of County Road 64, North of State Highway 164
Ozark, Arkansas 72949

3. PERMIT WRITER:

Siew Low

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description: Natural Gas Pipeline Compressor Station
NAICS Code: 486210

5. SUBMITTALS: November 7, 2003 and December 4, 2003.

6. REVIEWER'S NOTES:

This Title V renewal air permit revises emission limits of the four compressor engines by using updated USEPA emission factors and vendor data. The n-hexane emissions are included based on the finding of the natural gas analysis report.

7. COMPLIANCE STATUS: The following summarizes the current compliance status of the facility including active/pending enforcement actions and recent compliance activities and issues:

There are no active/pending enforcement actions or recent compliance activities regarding this facility.

8. APPLICABLE REGULATIONS:

NSPS (Y/N) N If yes, subpart
 NESHAP (Y/N) N If yes, subpart
 PSD applicability (Y/N) N
 Is facility on 28 list (100 tpy)? (Y/N) N
 Was netting performed to avoid PSD review (Y/N) N

Indicate increases and decreases used in netting for PSD purposes only.

Subject to 112 (g) requirements (Y/N) N
 Subject to CAM requirements (Y/N) N

9. EMISSION CHANGES:

The following table summarizes plantwide emission changes associated with this permitting action.

Plantwide Permitted Emissions (ton/yr)			
Pollutant	Air Permit 1362-AOP-R1	Air Permit 1362-AOP-R2	Change
PM/PM ₁₀	0	0.8	+0.8
SO ₂	0	0	0
VOC	37.2	37.4	+0.2
CO	201.0	199.8	-1.2
NO _x	73.6	74.0	+0.4
Acrolein	0.72	0.54	-0.18
Formaldehyde	7.56	1.79	-5.77
n-Hexane	0	0.12	+0.12

10. MODELING:

A. Criteria Pollutants

Pollutant	Emission Rate (lb/hr)	NAAQS Standard ($\mu\text{g}/\text{m}^3$)	Averaging Time	Highest Concentration ($\mu\text{g}/\text{m}^3$)	% of NAAQS
NO _x	not required, emissions are < 100 tons per year				
VOC	not applicable, emissions are < 500 tons per year				
CO	74.1	10,000	8-hour	203.4	2.03%
		40,000	1-hour	299.7	0.75%

B. Non-Criteria Pollutants

1st Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The PAER was deemed by the Department to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m^3), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m^3)	PAER (lb/hr) = 0.11*TLV	Proposed lb/hr	Pass?
Acrolein	0.23	0.0253	0.15	No
Formaldehyde	0.37	0.0407	0.48	No
n-Hexane	176	19.38	0.04	Yes

2nd Tier Screening (PAIL)

ISCST3 air dispersion modeling was performed on the estimated hourly emissions from the following sources, in order to predict ambient concentrations beyond the property boundary. The Presumptively Acceptable Impact Level (PAIL) for each compound was deemed by the Department to be one one-hundredth of the Threshold Limit Value, as listed by the ACGIH.

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Pollutant	(PAIL, $\mu\text{g}/\text{m}^3$) = 1/100 of Threshold Limit Value	Modeled Concentration ($\mu\text{g}/\text{m}^3$)	Pass?
Acrolein	2.3	0.47	Yes
Formaldehyde	15.0*	1.89	Yes

* Surrogate screening value adopted by ADEQ (see Steve Patrick memo of October 19, 1998).

11. CALCULATIONS:

SN	Emission Factor Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type (if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc)
01 and 02	manufacturer's data VOC CO NO _x HAPs – AP-42, Table 3.2-2 and 3.2-3	2 g/hp-hr 28 g/hp-hr 7 g/hp-hr	none	-	-
03 and 04	manufacturer's data VOC CO NO _x HAPs – AP-42, Table 3.2-2 and 3.2-3	1 g/hp-hr 2.65 g/hp-hr 1.5 g/hp-hr	none	-	-

13. TESTING REQUIREMENTS:

This permit requires stack testing of the following sources.

SN(s)	Pollutant	Test Method	Test Interval	Justification For Test Requirement
01, 02, 03, 04	CO	10	One-half of each engine type every five years.	Standard for compressor stations. See Plantwide Condition #8 for details.
	NO _x	7E		

14. MONITORING OR CEMS

There are no CEMS or monitoring requirements in this permit.

15. RECORD KEEPING REQUIREMENTS

The following are items (such as throughput, fuel usage, VOC content of coating, etc) that must be tracked and recorded, frequency of recording and whether records are needed to be included in any annual, semiannual or other reports.

SN	Recorded Item	Limit (as established in permit)	Frequency*	Report (Y/N)**
01, 02	hours of operation - total both units	8760 hours per 12 consecutive months	update daily	Yes

* Indicate frequency of recording required for the item (Continuously, hourly, daily, etc.)

** Indicates whether the item needs to be included in reports

16. OPACITY

SN	Opacity %	Justification (NSPS limit, Dept. Guidance, etc)	Compliance Mechanism (daily observation, weekly, control equipment operation, etc)
01, 02, 03, 04	5	natural gas fired	use of natural gas

17. DELETED CONDITIONS:

The following Specific Conditions were included in the previous permit, but deleted for the

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current permitting action.

Former SC	Justification for removal
None	

18. VOIDED, SUPERSEDED OR SUBSUMED PERMITS

List all active permits for this facility which are voided/superseded/subsumed by issuance of this permit.

Permit #
1362-AOP-R1

19. CONCURRENCE BY:

The following supervisor concurs with the permitting decision:

Lyndon Poole, P.E.