

ADEQ OPERATING AIR PERMIT

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

Permit #: 1362-AOP-R3
Renewal #1
IS ISSUED TO:

SEECO, Inc.
Stockton Compressor Station
South of Interstate 40, West of County Road 64,
North of State Highway 164
Ozark, AR 72949
Franklin County
AFIN: 24-00092

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:

March 16, 2004 and March 15, 2009

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Michael Bonds
Chief, Air Division

Date Modified

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A.C.A. Arkansas Code Annotated
CFR Code of Federal Regulations
CO Carbon Monoxide
AFIN Arkansas Facility Identification Number
HAP Hazardous Air Pollutant
lb/hr Pound per hour
MVAC Motor Vehicle Air Conditioner
NO_x Nitrogen Oxide
PM Particulate matter
PM₁₀ Particulate matter smaller than ten microns
SNAP Significant New Alternatives Program
SO₂ Sulfur dioxide
Tpy Ton per year
UTM Universal Transverse Mercator
VOC Volatile Organic Compound

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SECTION I: FACILITY INFORMATION

PERMITTEE:	SEECO, Inc. - Stockton Compressor Station
AFIN:	24-00092
PERMIT NUMBER:	1362-AOP-R3
FACILITY ADDRESS:	South of Interstate 40, West of County Road 64, North of State Highway 164 Ozark, AR 72949
COUNTY:	Franklin
CONTACT PERSON:	Dale Kardash
TELEPHONE NUMBER:	(479) 582-8518
REVIEWING ENGINEER:	Siew Low
UTM North-South (X):	3932.0 km
UTM East-West (Y):	411.25 km

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SECTION II: INTRODUCTION

Summary of Permit Activity

SEECO, Inc. owns and operates a natural gas transmission pipeline compressor station near Ozark, Arkansas, known as the Stockton Compressor Station. This modification revises the permitted emission rates of SN-02 by using more representative emission factors for NO_x, CO, and VOC. The updated factors are from engine manufacturer data.

Process Description

Friction losses cause a drop in pressure in natural gas pipelines. To maintain flow, gas must be removed from the pipeline, compressed, and returned to the pipe. This compressor station currently uses four Waukesha compressor engines (SN-01, SN-02, SN-03, and SN-04).

Emissions of nitrogen oxides, carbon monoxide, and volatile organic compounds will result from the combustion of natural gas in the compressor engines. This compressor station will use only pipeline-quality natural gas in the firing of the engines. Support equipment includes several tanks which are considered to be de minimis sources of emissions.

Regulations

The facility is subject to regulation under the *Clean Air Act* as amended, the *Arkansas Water and Air Pollution Control Act*, the *Arkansas Air Pollution Control Code* (Regulation 18), the *Regulations of the Arkansas Plan of Implementation for Air Pollution Control* (Regulation 19), and the *Regulation of the Arkansas Operating Air Permit Program* (Regulation 26).

The following table is a summary of emissions from the facility. The following table contains cross-references to the pages containing specific conditions and emissions for each source. This table, in itself, is not an enforceable condition of the permit.

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
Total Allowable Emissions		PM/PM ₁₀	0.7	0.8	N/A
		VOC *	10.9	39.7	
		CO	77.0	206.1	
		NO _x	25.1	74.5	
		<i>Acrolein</i>	0.15	0.54	
		<i>Formaldehyde</i>	0.48	1.79	
		<i>n-Hexane</i>	0.04	0.12	
01	#1 Waukesha (F3521 GSI) Natural Gas Reciprocating Engine, 587 HP	PM/PM ₁₀	0.2	0.4	8
		VOC	2.6	9.4	
		CO	36.3	130.4	
		NO _x	9.1	33.4	
		<i>Acrolein</i>	0.02	0.06	
		<i>Formaldehyde</i>	0.09	0.29	
02	#2 Waukesha (F3521 LRZ) Natural Gas Reciprocating Engine, 330 HP	PM/PM ₁₀	0.2		
		VOC	1.7		
		CO	23.3		
		NO _x	6.2		
		<i>Acrolein</i>	0.01		
		<i>Formaldehyde</i>	0.05		
03	#3 Waukesha (7042 GL) Natural Gas Reciprocating Engine, 1478 HP	PM/PM ₁₀	0.2	0.2	10
		VOC	3.3	14.3	
		CO	8.7	37.9	
		NO _x	4.9	21.5	
		<i>Acrolein</i>	0.06	0.24	
		<i>Formaldehyde</i>	0.17	0.75	
04	#4 Waukesha (7042 GL) Natural Gas Reciprocating Engine	PM/PM ₁₀	0.2	0.2	12
		VOC	3.3	14.3	
		CO	8.7	37.9	
		NO _x	4.9	21.5	
		<i>Acrolein</i>	0.06	0.24	
		<i>Formaldehyde</i>	0.17	0.75	
		<i>n-Hexane</i>	0.02	0.06	

* VOC emissions include HAPs. Italic indicates HAP.

SECTION III: PERMIT HISTORY

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Arkansas Western Gas Company was issued its first permit, Permit #1362-A, for the Stockton Compressor Station on September 17, 1992.

On November 25, 1992, the Department issued Permit #1362-AR-1 to Arkansas Western Gas Company for the Stockton Compressor Station. This permit allowed the facility to add three natural gas compressors and a dehydrator reboiler.

Arkansas Western Gas Company was issued its third permit, Permit #1362-AR-2, for the Stockton Compressor Station on August 16, 1993. This modification also dealt with the installation of three natural gas compressors.

On October 1, 1995, the Department issued Permit #1362-AR-3 to Arkansas Western Gas Company for the Stockton Compressor Station. This modification covered the replacement of one dehydrator reboiler, the delineation of one natural gas compressor and one dehydrator reboiler, and the replacement of onsite equipment and the associated systems.

On May 5, 1999, the Department issued Permit #1362-AOP-R0 to Arkansas Western Gas Company for the Stockton Compressor Station. This permit was the first Title V operating permit issued to the facility under Regulation 26. No physical modifications occurred with the issuance of the permit.

On March 16, 2001, the Department issued Permit #1362-AOP-R1 to SEECO, Inc. – Stockton Compressor Station. This was the first modification to the Title V operating permit. No physical modifications occurred with the issuance of this permit. The permit was changed to allow the combined total operating hours limit for SN-01 and SN-02 to be 8,760 hours, instead of SN-01 and SN-02 each being limited to 4,380 hours.

On March 16, 2004, the Department issued Permit #1362-AOP-R2 to SEECO, Inc. – Stockton Compressor Station. This Title V renewal air permit revised emission limits of the four compressor engines by using updated USEPA emission factors and vendor data. The n-hexane emissions were included based on the findings of the natural gas analysis report.

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Section IV: SPECIFIC CONDITIONS

**SN-01 Waukesha Model #F3521 GSI, SN-02 Waukesha Model #F3521 LRZ
 Natural Gas Reciprocating Engines**

Source Description

The #1 Waukesha Model #F3521 GSI, four-stroke rich-burn natural gas reciprocating engine (SN-01) is rated at 587 HP, and 4.02 MM Btu/hr heat input, and the #2 Waukesha Model #F3521 LRZ, four-stroke rich-burn natural gas reciprocating engine (SN-02) is rated at 330 HP, and 2.26 MM Btu/hr heat input. Both compressor engines were last installed or modified in 1984.

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table at SN-01 and SN-02. The pound per hour emission rates are based on maximum capacity. The ton per year rates will be limited by the hours of operation limit. Negligible amounts of sulfur dioxide may be emitted by this source. Due to the extremely low calculated potential emissions of this pollutant, numerical limits have not been included in the permit for this source, but such emissions are not prohibited. [Regulation No. 19 §19.501 et seq. effective February 15, 1999, and 40 CFR Part 52, Subpart E]

SN	Pollutant	lb/hr	tpy
01	PM ₁₀	0.2	0.4 9.4 130.4 33.4
	VOC	2.6	
	CO	36.3	
	NO _x	9.1	
02	PM ₁₀	0.2	
	VOC	1.7	
	CO	23.3	
	NO _x	6.2	

2. The permittee shall not exceed the HAP emission rates set forth in the following table at SN-01 and SN-02. The pound per hour emission rates are based on maximum capacity. The ton per year rates will be limited by the hours of operation limit. 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

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A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Pollutant	lb/hr	tpy
01	PM	0.2	0.4
	Acrolein	0.01	0.04
	Formaldehyde	0.09	0.29
02	PM	0.2	
	Acrolein	0.01	
	Formaldehyde	0.05	

3. Operation of SN-01 and SN-02 shall not exceed 8760 total combined hours per twelve consecutive months. [Regulation No. 19 §19.705 et seq., A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR §70.6]
4. The permittee shall maintain records to demonstrate compliance with Specific Condition 3. These records shall be updated on a daily basis. These records shall be kept on site, provided to Department personnel upon request, and may be used by the Department for enforcement purposes. This report shall be submitted to the Department in accordance with General Provision #7. [Regulation 19 §19.705 et seq., 40 CFR Part 52 Subpart E, §18.1004 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
5. The permittee shall not exceed 5% opacity from source SN-01 and SN-02 as measured by EPA Reference Method 9. Compliance with this emission rate will be demonstrated through compliance with Plantwide Condition 7. [Regulation No. 18 §18.501, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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SN-03
#3 Waukesha Model # L7042 GL Natural Gas Reciprocating Engine

Source Description

The #3 Waukesha Model #L7042 GL, four-cycle lean burn natural gas reciprocating engine (SN-03) was last installed or modified in 1992. The compressor engine is rated at 1478 horsepower (hp), and 10.58 MM Btu/hr heat input. This engine is capable of running at 120% of its rated capacity and is being permitted to do so.

Specific Conditions

6. The permittee shall not exceed the 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. Negligible amounts of sulfur dioxide may be emitted by this source. Due to the extremely low calculated potential emissions of these pollutants, numerical limits have not been included in the permit for this source, but such emissions are not prohibited. [Regulation No. 19 §19.501 et seq. effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.2	0.2
VOC	3.3	14.3
CO	8.7	37.9
NO _x	4.9	21.5

7. The permittee shall not exceed the HAP 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. 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	0.2
Acrolein	0.06	0.24
Formaldehyde	0.17	0.75
n-Hexane	0.02	0.06

8. The permittee shall not exceed 5% opacity from source SN-03 as measured by EPA

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Reference Method 9. Compliance with this emission rate will be demonstrated through compliance with Plantwide Condition 7. [Regulation No. 18 §18.501, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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SN-04
#4 Waukesha Model #L7042 GL Natural Gas Reciprocating Engine

Source Description

The #4 Waukesha Model #L7042 GL, four-cycle lean-burn natural gas reciprocating engine (SN-04) was last installed or modified in 1992. The compressor engine is rated at 1478 horsepower (hp) and 10.58 MM Btu/hr heat input. This engine is capable of running at 120% of its rated capacity and is being permitted to do so.

Specific Conditions

9. The permittee shall not exceed the emission rates set forth in the following table at SN-04. The pound per hour and ton per year rates are based on maximum capacity. Negligible amounts of sulfur dioxide may be emitted by this source. Due to the extremely low calculated potential emissions of these pollutants, numerical limits have not been included in the permit for this source, but such emissions are not prohibited. [Regulation No. 19 §19.501 et seq. effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.2	0.2
VOC	3.3	14.3
CO	8.7	37.9
NO _x	4.9	21.5

10. The permittee shall not exceed the HAP emission rates set forth in the following table at SN-04. The pound per hour and ton per year rates are based on maximum capacity. 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	0.2
Acrolein	0.06	0.24
Formaldehyde	0.17	0.75
n-Hexane	0.02	0.06

11. The permittee shall not exceed 5% opacity from source SN-04 as measured by EPA

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Reference Method 9. Compliance with this emission rate will be demonstrated through compliance with Plantwide Condition 7. [Regulation No. 18 §18.501, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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SECTION V: COMPLIANCE PLAN AND SCHEDULE

SEECO, Inc. - Stockton Compressor Station is in compliance with the applicable regulations cited in the permit application. SEECO, Inc. - Stockton Compressor Station will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

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SECTION VI: PLANTWIDE CONDITIONS

1. 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; and
 - 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. 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]

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7. Pipeline quality natural gas shall be the only fuel used to fire the compressor engines at this facility. Pipeline quality natural gas is defined as gas which contains less than 0.3 grains/100 scf of H₂S and that H₂S constitutes greater than 50% by weight of the sulfur by weight in the natural gas. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and 40 CFR 70.6]
8. The permittee shall simultaneously conduct tests for CO and NO_x on one half of each type of the four compressor engines every 5 years in accordance with Plantwide Condition 3. 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 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 both pollutants. [Regulation 19 §19.702, and 40 CFR Part 52, Subpart E]
9. The permittee shall use good maintenance practices to control emissions from valves, fittings, flanges, seals and other associated equipment. [Regulation 19 §19.303, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. 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_x 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_x and CO emission testing within 90 days of the date of replacement to verify the emissions from the newly installed engine. This testing shall be conducted in accordance with EPA Reference Method 7E for NO_x 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

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per year NO_x 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 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 64]

Permit Shield

11. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements, as of the date of permit issuance, included in and specifically identified in item A of this condition:

- a. The following have been specifically identified as applicable requirements based upon information submitted by the permittee in an application dated November 7, 2003.

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

- b. The following requirements have been specifically identified as not applicable, based upon information submitted by the permittee in an application dated November 7, 2003.

Description of Regulation	Regulatory Citation	Affected Source	Basis for Determination
New Source Performance Standards for Storage Vessels for Petroleum Liquids	40 CFR 60, Subpart K	Facility	No storage tanks have a capacity greater than 40,000 gallons.
New Source Performance Standards for Storage Vessels for Petroleum Liquids	40 CFR 60, Subpart Ka	Facility	No storage tanks have a capacity greater than 40,000 gallons.

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Description of Regulation	Regulatory Citation	Affected Source	Basis for Determination
New Source Performance Standards for Volatile Organic Liquid Storage Vessels	40 CFR 60, Subpart Kb	Facility	No storage tanks have a capacity greater than 75 m ³ .
New Source Performance Standards for Stationary Gas Turbines	40 CFR 60, Subpart GG	Facility	This facility does not have any stationary gas turbines.
Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants	40 CFR Subpart KKK	Facility	This facility is not a natural gas processing plant.

c. Nothing shall alter or affect the following:

Provisions of Section 303 of the Clean Air Act;

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

The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; or

The ability of the EPA to obtain information under Section 114 of the Clean Air Act.

Title VI Provisions

12. The permittee shall comply with the standards for labeling of products using ozone depleting substances pursuant to 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

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- requirements pursuant to §82.110.
- d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
13. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - 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.
14. 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.
15. 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.
16. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program.

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SECTION VII: INSIGNIFICANT ACTIVITIES

Pursuant to §26.3(d) of Regulation 26, the following sources are insignificant activities. Insignificant and trivial activities will be allowable after approval and federal register notice publication of a final list as part of the operating air permit program. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §3(d) of Regulation 26 or is listed below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated April 21, 2004.

Description	Category
natural gas dehydrator reboiler (1.0 MMBTU/hr)	Group A1
natural gas dehydrator reboiler (2.5 MMBTU/hr)	Group A1
natural gas dehydrator reboiler (0.45 MMBTU/hr)	Group A1
200 barrel fiberglass tank (scrubber water)	Group B21
steel tank #1 and #2	Group A3
two (2) lube oil tanks	Group A2
Compressor skid drain tank	Group A3
Three (3) glycol dehydrator reservoir tanks	Group A3
Blowdown and fugitive emissions	Group A13

Pursuant to §26.3(d) of Regulation 26, the following emission units, operations, or activities have been determined by the Department to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.

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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;

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- 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 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 No. 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: [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.
- a. For all upset conditions (as defined in Regulation 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,

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- 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 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.

- b. For all deviations, the permittee will 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 in the initial and full report required in 8a. [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)]

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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)]

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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.

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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]