

# ADEQ

ARKANSAS  
Department of Environmental Quality

March 18, 2009

Dale Kardash  
SEECO, Inc. - Stockton Compressor Station  
P.O. Box 13408  
Fayetteville, AR 72703

Dear Mr. Kardash:

The enclosed Permit No. 1362-AOP-R4 is issued pursuant to the Arkansas Operating Permit Program, Regulation # 26.

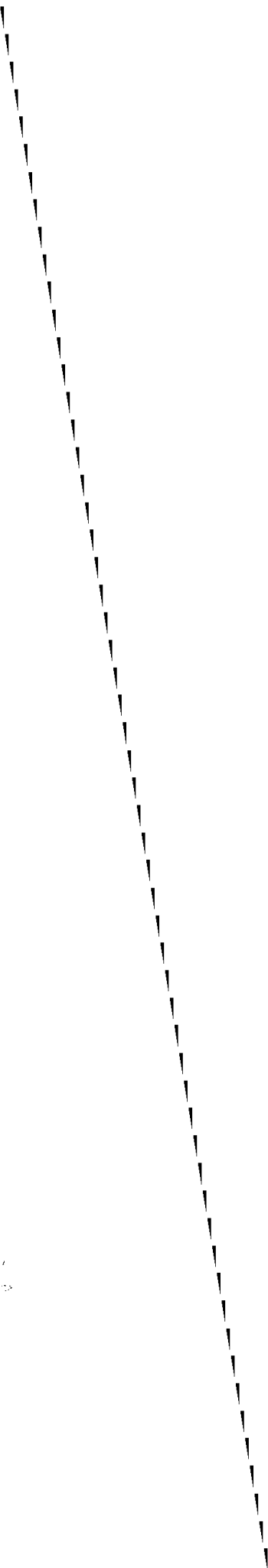
After considering the facts and requirements of A.C.A. §8-4-101 et seq., and implementing regulations, I have determined that Permit No. 1362-AOP-R4 for the construction, operation and maintenance of an air pollution control system for SEECO, Inc. - Stockton Compressor Station to be issued and effective 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. : 1362-AOP-R4

IS ISSUED TO:

SEECO, Inc. - Stockton Compressor Station  
South of I-40, West of CR 64, North of Hwy 64  
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:

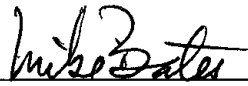
March 18, 2009

AND

March 17, 2014

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

Signed:

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

March 18, 2009

\_\_\_\_\_  
Date

SEECO, Inc. - Stockton Compressor Station  
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#### List of Acronyms and Abbreviations

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

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**SECTION I: FACILITY INFORMATION**

PERMITTEE: SEECO, Inc. - Stockton Compressor Station

AFIN: 24-00092

PERMIT NUMBER: 1362-AOP-R4

FACILITY ADDRESS: South of I-40, West of CR 64, North of Hwy 64  
Ozark, AR 72949

MAILING ADDRESS: PO Box 13408  
Fayetteville, AR 72702

COUNTY: Franklin County

CONTACT NAME: Dale Kardash

TELEPHONE NUMBER: 479-582-8518

REVIEWING ENGINEER: Siew Low

UTM North South (Y): Zone 15: 3931648.43 m

UTM East West (X): Zone 15: 411140.36 m

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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. There is no physical change in this Title V renewal. Permitted emissions of formaldehyde are revised using most updated AP-42 emission factors. Permitted emission changes include increase of formaldehyde by 3.5 tpy; decreases of VOC, CO, NO<sub>x</sub>, and acrolein by 1.7 tpy, 6.4 tpy, 0.4 tpy, and 0.02 respectively.

### 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 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
40 CFR Part 63 Subpart ZZZZ - <i>National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines</i> . However, the stationary RICEs (SN-01, SN-02, SN-03, and SN-04) at this facility do not have to meet the requirements of this subpart, and no initial notification is necessary pursuant to 40 CFR 63.6590(b)(3).

### 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	0.8	0.8
		PM <sub>10</sub>	0.8	0.8
		VOC	10.9	38.0
		CO	77.0	199.7
		NO <sub>x</sub>	24.1	74.1
HAPs		<i>Acrolein</i>	0.1284	0.52
		<i>Formaldehyde</i>	1.27	5.29
		<i>n-Hexane</i>	0.04	0.12
01	#1 Waukesha (F3521 GSI) Natural Gas Reciprocating Engine, 587 HP	PM/PM <sub>10</sub>	0.2	0.4
		VOC	2.6	9.4
		CO	36.3	123.9
		NO <sub>x</sub>	9.1	31.1
		<i>Acrolein*</i>	0.0112	0.04
		<i>Formaldehyde*</i>	0.0873	0.29
02	#2 Waukesha (F3521 LRZ) Natural Gas Reciprocating Engine, 330 HP	PM/PM <sub>10</sub>	0.2	
		VOC	1.7	
		CO	23.3	
		NO <sub>x</sub>	5.2	
		<i>Acrolein*</i>	0.0064	
		<i>Formaldehyde*</i>	0.0496	
03	#3 Waukesha (7042 GL) Natural Gas Reciprocating Engine, 1478 HP	PM/PM <sub>10</sub>	0.2	0.2
		VOC	3.3	14.3
		CO	8.7	37.9
		NO <sub>x</sub>	4.9	21.5
		<i>Acrolein*</i>	0.0554	0.24
		<i>Formaldehyde*</i>	0.567	2.5
04	#4 Waukesha (7042 GL) Natural Gas Reciprocating Engine, 1478 HP	<i>n-Hexane*</i>	0.02	0.06
		PM/PM <sub>10</sub>	0.2	0.2
		VOC	3.3	14.3
		CO	8.7	37.9
		NO <sub>x</sub>	4.9	21.5



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EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
		<i>Acrolein*</i>	0.0554	0.24
		<i>Formaldehyde*</i>	0.567	2.5
		<i>n-Hexane*</i>	0.02	0.06

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

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### **SECTION III: PERMIT HISTORY**

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.

Permit 1362-AOP-R3 was issued on September 28, 2004. This modification revised the permitted emission rates of SN-02 by using more representative emission factors for NO<sub>x</sub>, CO, and VOC. The updated factors were from engine manufacturer data.

**SECTION IV: SPECIFIC CONDITIONS**

SN-01 and SN-02  
 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

- The permittee shall not exceed the emission rates set forth in the following table. The pound per hour emission rates are based on maximum capacity. The permittee shall demonstrate compliance with this condition by Plantwide Condition 7. 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 19, §19.501 et seq., and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
01	Natural gas reciprocating engine (Waukesha Model #F3521 GSI, four-stroke rich-burn)	PM <sub>10</sub>	0.2	0.4
		VOC	2.6	9.4
		CO	36.3	123.9
		NO <sub>x</sub>	9.1	31.1
02	Natural gas reciprocating engine (Waukesha Model #F3521 LRZ, four-stroke rich-burn)	PM <sub>10</sub>	0.2	
		VOC	1.7	
		CO	23.3	
		NO <sub>x</sub>	5.2	

- The permittee shall not exceed the emission rates set forth in the following table. 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 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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SN	Description	Pollutant	lb/hr	tpy
01	Natural gas reciprocating engine (Waukesha Model #F3521 GSI, four-stroke rich-burn)	PM	0.2	0.4
		Acrolein	0.0112	0.04
		Formaldehyde	0.0873	0.29
02	Natural gas reciprocating engine (Waukesha Model #F3521 LRZ, four-stroke rich-burn)	PM	0.2	
		Acrolein	0.0064	
		Formaldehyde	0.0496	

3. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated by burning pipeline quality natural gas.

SN	Limit	Regulatory Citation
01 and 02	5%	§18.501

4. Operation of SN-01 and SN-02 shall not exceed 8760 total combined hours per twelve consecutive months. [Regulation 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]
5. The permittee shall maintain records to demonstrate compliance with Specific Condition 4. 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]

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SN-03  
 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.

Specific Conditions

6. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Plantwide Condition 7. 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 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
03	Natural gas reciprocating engine (Waukesha Model #L7042 GL, four-cycle lean burn)	PM <sub>10</sub>	0.2	0.2
		VOC	3.3	14.3
		CO	8.7	37.9
		NO <sub>x</sub>	4.9	21.5

7. The permittee shall not exceed the emission rates set forth in the following table. The pound per hour and ton per year rates are based on maximum capacity. The 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 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	Natural gas reciprocating engine (Waukesha Model #L7042 GL, four-cycle lean burn)	PM	0.2	0.2
		Acrolein	0.0554	0.24
		Formaldehyde	0.567	2.5
		n-Hexane	0.02	0.06

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8. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated by burning pipeline quality natural gas.

SN	Limit	Regulatory Citation
03	5	§18.501

SN-04  
 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.

Specific Conditions

9. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Plantwide Condition 7. 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 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
04	Natural gas reciprocating engine (Waukesha Model #L7042 GL, four-cycle lean-burn)	PM <sub>10</sub>	0.2	0.2
		VOC	3.3	14.3
		CO	8.7	37.9
		NO <sub>x</sub>	4.9	21.5

10. The permittee shall not exceed the emission rates set forth in the following table. The pound per hour and ton per year rates are based on maximum capacity. The 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 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
04	Natural gas reciprocating engine (Waukesha Model #L7042 GL, four-cycle lean-burn)	PM	0.2	0.2
		Acrolein	0.0554	0.24
		Formaldehyde	0.567	2.5
		n-Hexane	0.02	0.06

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11. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated by burning pipeline quality natural gas.

SN	Limit	Regulatory Citation
04	5	§18.501



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

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.

## 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. 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 H<sub>2</sub>S and that H<sub>2</sub>S constitutes greater than 50% by weight of the sulfur

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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<sub>x</sub> 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<sub>x</sub> 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]

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Permit Shield

10. 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 September 11, 2008.

Applicable Regulations

Source No.	Regulation	Description
Facility	18	Arkansas Air Pollution Control Code, Regulation 18, effective February 15, 1999
Facility	19	Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective October 15, 2007
Facility	26	Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective September 26, 2002
SN-01, SN-02, SN-03, and SN-04	40 CFR Part 63 Subpart ZZZZ	40 CFR Part 63 Subpart ZZZZ - <i>National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.</i>

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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 September 11, 2008.

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 water tank	Group B21
Eight (8) lube oil tanks (less than 55 gallons each)	Group A2
Blowdown and fugitive emissions	Group A13

### 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.

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)]



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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.

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[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]

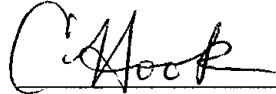
26. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion under the following 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, Cynthia Hook, hereby certify that a copy of this permit has been mailed by first class mail to SEECO, Inc. - Stockton Compressor Station, P.O. Box 13408, Fayetteville, AR, 72703, on this 18<sup>th</sup> day of March, 2009.



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Cynthia Hook, AAI, Air Division

