

STATEMENT OF BASIS

for the issuance of Draft Air Permit # 1419-AOP-R1

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality
8001 National Drive
Post Office Box 8913
Little Rock, Arkansas 72219-8913

2. APPLICANT:

Mississippi River Transmission Corporation - Tuckerman Compressor Station
Gracelawn Street
Tuckerman, Arkansas 72473

3. PERMIT WRITER:

John Bailey

4. PROCESS DESCRIPTION AND SIC CODE:

SIC Description: Natural gas compressor station
SIC Code: 4922

5. SUBMITTALS:

6. REVIEWER'S NOTES:

The permit is being revised according to the Permit Appeal Resolution (PAR), there were no physical changes in the operation of the facility. New NSPS GG conditions were added according to EPA requirements.

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

8. APPLICABLE REGULATIONS:

A. Applicability

Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, et cetera) (Y/N) N
Has this facility underwent PSD review in the past (Y/N) N Permit # _____
Is this facility categorized as a major source for PSD? (Y/N) Y

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\$ 100 tpy and on the list of 28 (100 tpy)? (Y/N) N
\$ 250 tpy all other (Y/N) Y

B. PSD Netting

Netting was not performed.

C. Source and Pollutant Specific Regulatory Applicability

Source	Pollutant	Regulation [NSPS, NESHAP (Part 61 & Part 63), or PSD only]
SN-11	SO ₂ NO _x	NSPS Subpart GG

9. EMISSION CHANGES:

There were no emission changes from the previous permit.

10. MODELING:

A. Criteria Pollutants

Examination of the source type, location, plot plan, land use, emission parameters, and other available information indicate that modeling is not warranted at this time for PM₁₀, SO₂, and VOC.

Pollutant	Emission Rate (lb/hr)	NAAQS Standard (µg/m ³)	Averaging Time	Highest Concentration (µg/m ³)	% of NAAQS
NO _x	293.0	100	Annual	41.64	42%
CO	144.9	10,000	8-hour	850	9%
		40,000	1-hour	1214	3%

11. 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/m³), 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?
Formaldehyde	1.5	0.165	2.66	No
Benzene	1.6	0.176	0.06	Yes

2nd Tier Screening (PAIL)

SCREEN3 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.

Pollutant	(PAIL, µg/m ³) = 1/100 of Threshold Limit Value	Modeled Concentration (µg/m ³)	Pass?
Formaldehyde	15	3.62	Yes

12. 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, 02, 03, 04	Testing	Test Results			120% Load

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)
6	AGA factors and AP-42	NOx and CO used AGA			Permittee took the higher of stack tests, AGA factors, or AP-42 factors times 1.2 for criteria pollutants; permit engineer using GRI factors and 1.2 times full load
08 and 10	AGA AP-42 GRI	NOx used AGA; CO and MWVOC used AP-42 and GRI for HAPs			Permittee took the higher of stack tests, AGA factors, or AP-42 factors times 1.2 for criteria pollutants; permit engineer using GRI factors and 1.2 times full load
11 and 12	Testing	Manufacturers data			Permittee took the highest reading off of the equipment operating map for each pollutant including HAPs.

13. TESTING REQUIREMENTS:

This permit requires stack testing of the following sources.

SN(s)	Pollutant	Test Method	Test Interval	Justification For Test Requirement
1-10	CO NOx	7E 10	one half of every engine every 5 years	19.702

14. MONITORING OR CEMS

There are no CEMS at the facility.

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)**
10, 11, and 12	Hours of operation	4086, 4200, and 500 hrs respectively	12 month rolling sum	Y

* 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)
All	5	18.501	Burn natural gas

17. DELETED CONDITIONS:

There are no deleted conditions.

18. VOIDED, SUPERSEDED OR SUBSUMED PERMITS

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

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19. CONCURRENCE BY:

The following supervisor concurs with the permitting decision:

Tom Rheaume, P.E.