OPERATING AIR PERMIT

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

Permit #: 1419-AOP-R1

IS ISSUED TO:

Mississippi River Transmission Corporation -
Tuckerman Compressor Station
3.5 miles southwest of Tuckerman, on Gracelawn Street,
Route 1, Box 328A
Tuckerman, AR 72473
Jackson County
CSN: 34-0111

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:

July 12, 2000 and July 11, 2005

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels Date Modified

SECTION I: FACILITY INFORMATION

PERMITTEE:	Mississippi River Transmission Corporation - Tuckerman Compressor Station
CSN:	34-0111
PERMIT NUMBER:	1419-AOP-R1
FACILITY ADDRESS:	3.5 miles southwest of Tuckerman, on Gracelawn Street, Route 1, Box 328A
FACILITY TELEPHONE NUMBER:	(870)349-5556
COUNTY:	Jackson
CONTACT POSITION:	Laura Armistead
MAILING ADDRESS:	P. O. Box 21734 Shreveport, LA 71151
TELEPHONE NUMBER:	318-429-3706
REVIEWING ENGINEER:	Paul Osmon
UTM North-South (X): UTM East-West (Y):	3953.6 km 660.9 km

SECTION II: INTRODUCTION

Mississippi River Transmission Corporation owns and operates a compressor station near Tuckerman, Arkansas. The Department has issued a previous Title V permit, but that permit was rescinded due to comments made by the facility to the ADPC&E Commission and subsequent Permit Appeal Resolution (PAR). This modification is rescinding the initial permit issued under the Arkansas Air Operating Program and incorporating the agreed upon PAR.

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 pipeline. This compressor station currently has four Clark HRA-8 880 HP compressor engines, one Worthington LTC-5 625 HP compressor engine, one Clark TRA-6 1,100 HP compressor engine, one Solar Taurus 5,850 HP turbine drive centrifugal compressor, one Caterpillar G-379 300 HP engine generator, and one Olympian 64 HP engine generator.

Emissions of oxides of nitrogen, carbon monoxide, and volatile organic compounds will result from the combustion of natural gas in the compressor and generator engines. This compressor station will use only natural gas as fuel for its engines. Support equipment includes several tanks and an engine oil filter incinerator which are considered to be de minimus sources for emissions.

Negligible amounts of particulate matter, sulfur dioxide, fugitives and non-routine blowdowns 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.

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 *Regulations of the Arkansas Operating Air Permit Program* (Regulation 26).

The permit includes estimations of hazardous air pollutant (HAP) emission rates based on the Gas Research Institute Topical Report GRI-96/0009.1 *Measurement of Air Toxic Emissions from Natural Gas-Fired Internal Combustion Engines at Natural Gas Transmission and Storage Facilities. Volume 1.* February, 1996. No physical modifications occurred with the issuance of this permit. A summary of facility wide emissions is provided in the table that follows. Specific emission unit information is located at the indicated cross reference page.

Limits on allowable hours of operation for the Solar Taurus turbine, its associated emergency generator, and the Caterpillar generator established for PSD netting in the last permit are maintained in this permit.

Mississippi River Transmission Corporation - Tuckerman Compressor Station
Permit #1419-AOP-R1 CSN: 34-0111

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
Total Allowable Emissions		VOC CO NO_x Benzene* Formaldehyde*	37.2 54.9 293.0 0.06 2.66	160.9 144.9 1160.1 0.36 11.63	
01	Clark HRA-8 880 HP Compressor Engine	VOC CO NO_x Benzene Formaldehyde	8.0 4.2 45.4 0.01 0.42	34.9 18.1 198.5 0.04 1.83	8
02	Clark HRA-8 880 HP Compressor Engine	VOC CO NO_x Benzene Formaldehyde	8.0 4.2 45.4 0.01 0.42	34.9 18.1 198.5 0.04 1.83	10
03	Clark HRA-8 880 HP Compressor Engine	VOC CO NO_x Benzene Formaldehyde	8.0 4.2 45.4 0.01 0.42	34.9 18.1 198.5 0.04 1.83	12
04	Clark HRA-8 880 HP Compressor Engine	VOC CO NO_x Benzene Formaldehyde	8.0 4.2 45.4 0.01 0.42	34.9 18.1 198.5 0.04 1.83	14
05	Worthington LTC-5 625 HP Compressor Engine	This Source Is No Longer In Service			

Mississippi River Transmission Corporation - Tuckerman Compressor Station
Permit #1419-AOP-R1 CSN: 34-0111

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
06	Worthington LTC-5 625 HP Compressor Engine	VOC CO NO_x Benzene Formaldehyde	0.7 2.7 28.5 0.01 0.30	2.7 11.9 124.6 0.03 1.30	16
07	Worthington LTC-5 625 HP Compressor Engine	This Source Is No Longer In Service			
08	Clark TRA-6 1,100 HP Compressor Engine	VOC CO NO_x Benzene Formaldehyde	4.0 9.0 30.6 0.01 0.52	17.5 39.5 133.7 0.05 2.29	18
09	Ingersoll-Rand PVG-6 Generator Engine	This Source Is No Longer In Service			
10	Caterpillar G-379 300 HP Generator Engine	VOC CO NO_x Formaldehyde	0.3 1.0 19.3 0.06	0.6 1.9 39.40 0.29	20
11	Solar Taurus 5850 HP Model 60 T7000 Turbine	VOC CO NO_x Formaldehyde	0.1 7.0 32.5 0.10	0.3 14.6 68.2 O.43	22
12	Olympian 64 HP Standby Generator	VOC CO NO_x	0.1 18.4 0.5	0.2 4.6 0.2	25

* - Hazardous Air Pollutant which is included in VOCs

SECTION III: PERMIT HISTORY

Mississippi River Transmission Corporation -Tuckerman Compressor Station began operation in 1950.

Permit No. 1419-A was issued to MRTC on December 14, 1992. This permit was for eight reciprocating engines, one engine driven generator, and one emergency engine driven generator. No blowdown or fugitive emissions were listed. Hourly and annual emissions were listed for each source. Facility wide annual emissions were listed. Permitted pollutants were sulfur dioxide, volatile organic compounds, carbon monoxide, and oxides of nitrogen.

Permit No. 1419-AR-1 was issued to MRTC on June 8, 1994. No modifications were done to the facility. The major permit change was that the maximum allowable fuel rate changed from a per unit maximum to an overall facility maximum.

Permit No. 1419-AR-2 was issued to MRTC on March 13, 1996. The facility was changed by removing two compressor engines from service (two Worthington LTC-5 625 HP Engine Compressors - SN-05 & SN-07) and one of the engine generators (SN-09), and adding a Solar Taurus 5,850 HP turbine driven compressor (SN-11) and its associated 64 HP Olympian standby engine generator (SN-12). Blowdown emissions and minor emissions from the station tanks were added. This permit involved a PSD netting to ensure that addition of the Solar Taurus turbine driven compressor (and its associated generator) resulted in a less than 40 tpy increase. This new compressor (and its associated generator) and the existing power generator were restricted in allowable hours of operation.

Permit No. 1419-AOP-R0 was the initial Title V permit. There were no physical changes to the facility.

SECTION IV: EMISSION UNIT INFORMATION

SN-01
Natural Gas Compressor Engine

Source Description

Source SN-01, a 880 HP Clark HRA-8 Compressor Engine, was last installed or modified in 1950. This engine is capable of running at 120% of its rated capacity, and is being permitted to do so. This engine was stack tested in January-February, 1995 to verify its emissions for Permit No. 1419-AR-2.

Specific Conditions

1. Pursuant to §19.501 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with emission rates will be demonstrated by the use of natural gas and operating at or below maximum capacity of the equipment.

Pollutant	lb/hr	tpy
VOC*	8.0	34.9
CO	4.2	18.1
NO_x	45.4	198.5

*- Formaldehyde, benzene and several other de minimus level HAPS are included in VOC totals.

2. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed the HAP emission rates set forth in the following table. Compliance with HAPs emissions will be assured through the use of natural gas and operating at or below maximum capacity of the equipment. 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.

HAP	lb/hr	tpy
Formaldehyde	0.42	1.83
Benzene	0.01	0.04

3. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity from source SN-01 as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated by burning natural gas.

SN-02
Natural Gas Compressor Engine

Source Description

Source SN-02, a 880 HP Clark HRA-8 Compressor Engine, was last installed or modified in 1950. This engine is capable of running at 120% of its rated capacity, and is being permitted to do so.

Specific Conditions

4. Pursuant to §19.501 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with emission rates will be demonstrated by the use of natural gas and operating at or below maximum capacity of the equipment.

Pollutant	lb/hr	tpy
VOC*	8.0	34.9
CO	4.2	18.1
NO_x	45.4	198.5

*- Formaldehyde, benzene and several other de minimus level HAPS are included in VOC totals.

5. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed the HAP emission rates set forth in the following table. Compliance with HAPs emissions will be assured through the use of natural gas and operating at or below maximum capacity of the equipment. 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.

HAP	lb/hr	tpy
Formaldehyde	0.42	1.83
Benzene	0.01	0.04

6. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity from source SN-02 as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated by burning natural gas.

SN-03
Natural Gas Compressor Engine

Source Description

Source SN-03, a 880 HP Clark HRA-8 Compressor Engine, was last installed or modified in 1950. This engine is capable of running at 120% of its rated capacity, and is being permitted to do so.

Specific Conditions

7. Pursuant to §19.501 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with emission rates will be demonstrated by the use of natural gas and operating at or below maximum capacity of the equipment.

Pollutant	lb/hr	tpy
VOC*	8.0	34.9
CO	4.2	18.1
NO_x	45.4	198.5

*- Formaldehyde, benzene and several other de minimus level HAPS are included in VOC totals.

8. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed the HAP emission rates set forth in the following table. Compliance with HAPs emissions will be assured through the use of natural gas and operating at or below maximum capacity of the equipment. 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.

HAP	lb/hr	tpy
Formaldehyde	0.42	1.83
Benzene	0.01	0.04

9. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity from source SN-03 as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated by burning natural gas.

SN-04
Natural Gas Compressor Engine

Source Description

Source SN-04, a 880 HP Clark HRA-8 Compressor Engine, was last installed or modified in 1950. This engine is capable of running at 120% of its rated capacity, and is being permitted to do so.

Specific Conditions

10. Pursuant to §19.501 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with emission rates will be demonstrated by the use of natural gas and operating at or below maximum capacity of the equipment.

Pollutant	lb/hr	tpy
VOC*	8.0	34.9
CO	4.2	18.1
NO_x	45.4	198.5

*- Formaldehyde, benzene and several other de minimus level HAPS are included in VOC totals.

11. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed the HAP emission rates set forth in the following table. Compliance with HAPs emissions will be assured through the use of natural gas and operating at or below maximum capacity of the equipment. 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.

HAP	lb/hr	tpy
Formaldehyde	0.42	1.83
Benzene	0.01	0.04

12. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity from source SN-04 as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated by burning natural gas.

SN-06
Natural Gas Compressor Engine

Source Description

Source SN-06, a 625 HP Worthington LTC-5 Compressor Engine, was last installed or modified in 1952. This engine is capable of running at 120% of its rated capacity, and is being permitted to do so. This engine was stack tested in January-February, 1995 to verify its emissions for Permit No. 1419-AR-2.

Specific Conditions

13. Pursuant to §19.501 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with emission rates will be demonstrated by the use of natural gas and operating at or below maximum capacity of the equipment.

Pollutant	lb/hr	tpy
VOC*	0.7	2.7
CO	2.7	11.9
NO_x	28.5	124.6

*- Formaldehyde, benzene and several other de minimus level HAPS are included in VOC totals.

14. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed the HAP emission rates set forth in the following table. Compliance with HAPs emissions will be assured through the use of natural gas and operating at or below maximum capacity of the equipment. 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.

HAP	lb/hr	tpy
Formaldehyde	0.30	1.30
Benzene	0.01	0.03

15. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity from source SN-06 as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated by burning natural gas.

SN-08
Natural Gas Compressor Engine

Source Description

Source SN-08, a 1,100 HP Clark TRA-6 Compressor Engine, was last installed or modified in 1952. This engine is capable of running at 120% of its rated capacity, and is being permitted to do so. This engine was stack tested in January-February, 1995 to verify its emissions for Permit No. 1419-AR-2.

Specific Conditions

16. Pursuant to §19.501 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with emission rates will be demonstrated by the use of natural gas and operating at or below maximum capacity of the equipment.

Pollutant	lb/hr	tpy
VOC*	4.0	17.5
CO	9.0	39.5
NO_x	30.6	133.7

*- Formaldehyde, benzene and several other de minimus level HAPS are included in VOC totals.

17. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed the HAP emission rates set forth in the following table. Compliance with HAPs emissions will be assured through the use of natural gas and operating at or below maximum capacity of the equipment. 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.

HAP	lb/hr	tpy
Formaldehyde	0.52	2.29
Benzene	0.01	0.05

18. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity from source SN-08 as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated by burning natural gas.

SN-10
Natural Gas Generator Engine

Source Description

Source SN-10, a 300 HP Caterpillar G-379 Generator Engine, was last installed or modified in 1981. This engine is being permitted to run at 100% of its rated load capacity. The unit is restricted on hours of operation(per rolling 12 months period) and therefore tons emissions per year (because of the netting done in Permit No. 1419-AR-2).

Specific Conditions

19. Pursuant to §19.501 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with emission rates will be demonstrated by the use of natural gas and a restriction on the hours of operation of the equipment.

Pollutant	lb/hr	tpy
VOC*	0.3	0.6
CO	1.0	1.9
NO_x	19.3	39.4

*- Formaldehyde, benzene and several other de minimus level HAPS are included in VOC totals.

20. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed the HAP emission rates set forth in the following table. Compliance with HAPs emissions will be assured through the use of natural gas and a restriction on the hours of operation of the equipment. 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.

HAP	lb/hr	tpy
Formaldehyde	0.06	0.29

21. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity from source SN-10 as

measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated by burning natural gas.

22. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and 40 CFR 70.6, the permittee shall not operate the Caterpillar generator engine more than 4,086 hours per rolling 12 month average.

23. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition #22 and may be used by the Department for enforcement purposes. These records shall be updated on a monthly basis, shall be kept on site or at an alternate nearby location if the facility is unmanned, and shall be provided to Department personnel upon request.

SN-11
Natural Gas Compressor Turbine Driven

Source Description

Source SN-11, a 5850 HP Solar Taurus Model 60 - T7000 natural gas fired turbine, was last installed or modified in 1996. This turbine is being permitted at its highest emission rate for each pollutant based on operating map testing by the manufacturer. The unit is restricted on hours of operation(per rolling 12 months period) and therefore tons emissions per year (because of the netting done in Permit No. 1419-AR-2). This unit is subject to 40 CFR, Subpart GG - Standards of Performance for Stationary Gas Turbines.

Specific Conditions

24. Pursuant to §19.501 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with emission rates will be demonstrated by the use of natural gas and a restriction on the hours of operation of the equipment.

Pollutant	lb/hr	tpy
VOC*	0.1	0.3
CO	7.0	14.6
NO_x	32.5	68.2

*- Formaldehyde, benzene and several other de minimus level HAPS are included in VOC totals.

25. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed the HAP emission rates set forth in the following table. Compliance with HAPs emissions will be assured through the use of natural gas and a restriction on the hours of operation of the equipment. 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.

HAP	lb/hr	tpy
Formaldehyde	0.10	0.43

26. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity from source SN-11 as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated by burning natural gas.

27. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and 40 CFR 70.6, the permittee shall not operate the Solar compressor turbine more than 4,200 hours per rolling 12 month average.

28. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition #27 and may be used by the Department for enforcement purposes. These records shall be updated on a monthly basis, shall be kept on site or at an alternate nearby location if the facility is unmanned, and shall be provided to Department personnel upon request.

29. Pursuant to 40 CFR 60.332, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not emit NO_x emissions in excess of the following equation:

$$STD = 0.0075 (14.4/Y) + F$$

where:
STD = allowable NOx emissions (percent by volume at 15% oxygen and on a dry basis.
Y = manufacturer's rated heat rate at manufacturer's rated load (kilojoules per watt hour) or, actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt hour.
F = NOx emission allowance for fuel-bound nitrogen as defined in paragraph 60.332(a)(3) of Subpart GG.

Compliance with this condition shall be demonstrated by complying with Specific Condition 18(1).

30. Pursuant to 40 CFR, Part 60, Subpart GG, SN-11 (Solar Taurus Model 60) is subject to 40 CFR, Part 60, Subpart 60, Subpart A, General Provisions and 40 CFR, Part 60, Subpart GG, Standards of Performance for Stationary Gas Turbines due to being a stationary gas turbine greater than 10.7 gigajoules per hour installed after October 3, 1977. A copy of Subpart GG is provided in Appendix A. The NSPS requirements, as listed in the November 2, 1999 letter from EPA regarding the *Request for Broad Approval of Custom Fuel Monitoring Schedule for NSPS Subpart GG,* are summarized as follows:

(1) The permittee shall conduct an initial compliance test for NO_x from all sources for which an initial performance test has not been previously performed. These test results shall be kept on site and shall be provided to Department personnel upon request.

(2) Monitoring of fuel nitrogen content shall not be required while natural gas is the only fuel fired in the gas turbine.

(3) Analysis for fuel sulfur content of the natural gas shall be conducted using one of the approved ASTM reference methods for the measurement of sulfur in gaseous fuels, or an approved alternative method. The approved reference methods are: ASTM D1072-80; ASTM D3031-81; ASTM D3246-81; and ASTM D4084-82 as referenced in 40 CFR 60.335(b)(2). The Gas Processors Association (GPA) test method entitled "Test for Hydrogen Sulfide and Carbon Dioxide in Natural Gas Using Length of Stain Tubes" (GPA Standard 2377-86) is an approved alternative method.

(4) The fuel supply shall be initially sampled daily for a period of two weeks to establish that the pipeline quality natural gas fuel supply is low in sulfur content.

(5) After the monitoring required in item 3 above, sulfur monitoring shall be conducted twice monthly for six months. If this monitoring shows little variability in the fuel sulfur content, and indicates consistent compliance with 40 CFR 60.333, then sulfur monitoring shall be conducted once per quarter for six quarters.

(6) If after the monitoring required in item 4 above, or herein, the sulfur content of the fuel shows little variability and, and calculated as sulfur dioxide, represents consistent compliance with the sulfur dioxide emission limits specified under 40 CFR 60.333, sample analysis shall be conducted twice per annum. This monitoring shall be conducted during the first and third quarters of each calender year.

(7) Should any sulfur analysis as required in items 4 or 5 above indicate noncompliance with 40 CFR 60.333, the owner or operator shall notify the Department of such excess emissions and the custom schedule shall be re-examined. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.

(8) If there is a change in fuel supply (supplier), the fuel shall be sampled daily for a period of two weeks to re-establish for the record that the fuel supply is low in

sulfur content. If the fuel supply's low sulfur content is re-established, then the custom fuel monitoring schedule can be resumed.

(9) Stationary gas turbines that use the same supply of pipeline quality natural gas to fuel multiple gas turbines may monitor the fuel sulfur content at a single common location.

(10) Records of sample analysis and fuel supply pertinent to this custom schedule shall be retained for a period of three years, and be available for inspection by Department personnel.

SN-12
Natural Gas Generator Engine

Source Description

Source SN-12, a 64 HP Olympian standby generator engine, was last installed or modified in 1996. This engine is being permitted at 100% of its rated load capacity. The unit is restricted on hours of operation(per rolling 12 months period) and therefore tons emissions per year (because of the netting done in Permit No. 1419-AR-2).

Specific Conditions

1. Pursuant to §19.501 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with emission rates will be demonstrated by the use of natural gas and a restriction on the hours of operation of the equipment.

Pollutant	lb/hr	tpy
VOC*	0.1	0.2
CO	18.4	4.6
NO_x	0.5	0.2

*- Formaldehyde, benzene and several other de minimus level HAPS are included in VOC totals.

2. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity from source SN-12 as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated by burning natural gas.

3. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and 40 CFR 70.6, the permittee shall not operate the Olympian standby generator more than 500 hours per rolling 12 month average.

4. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition #32 and may be used by the Department for enforcement purposes. These records shall be updated on a monthly basis, shall be kept on site or at an alternate nearby location if the facility is unmanned, and shall be provided to Department personnel upon request.

SECTION V: COMPLIANCE PLAN

Mississippi River Transmission Corporation - Tuckerman Compressor Station is in compliance with the applicable regulations cited in the permit application. Mississippi River Transmission Corporation - Tuckerman 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 in a timely manner.

SECTION VI: PLANTWIDE CONDITIONS

1. Pursuant to §19.704 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the Director shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.

2. Pursuant to §19.410(B) of Regulation 19, and 40 CFR Part 52, Subpart E, the Director may cancel all or part of this permit if the construction or modification authorized herein is not begun within 18 months from the date of the permit issuance if the work involved in the construction or modification is suspended for a total of 18 months or more.

3. Pursuant to §19.702(E) of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, each emission point for which an emission test method is specified in this permit shall be tested in order to determine compliance with the emission limitations contained herein within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Two copies of the compliance test results shall be submitted to the Department within thirty (30) days after the completed testing. The permittee shall provide:

   (1) Sampling ports adequate for applicable test methods
   (2) Safe sampling platforms
   (3) Safe access to sampling platforms
   (4) Utilities for sampling and testing equipment

4. Pursuant to 19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.

5. Pursuant to Regulation 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit subsumes and incorporates all previously issued air permits for this facility.

6. Pursuant to 19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and 40 CFR 70.6, pipeline quality natural gas shall be the only fuel used to fire the compressor engines at this facility.

7. Pursuant to §19.702 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall simultaneously conduct tests for CO and NO_x on one-half of each type of compressor engine in accordance with Plantwide Condition #3 and every five years thereafter. EPA Reference Method 7E shall be used to test NO_x for the reciprocating engines and Reference Method 20 shall be used to test NO_x for the turbines, 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 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 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 similar engines shall be tested for both pollutants.

8. Pursuant to 19.303 of Regulation 19 of Regulation 19 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall use good maintenance practices to control emissions from valves, fittings, flanges, seals and other associated equipment.

9. Pursuant to Regulation 19, section 19.705 and A.C.A. 8-4-203 as referenced by A.C.A. 8-4-304 and 8-4-311, the permittee may replace any existing engines on a temporary or permanent basis with engines which have the same or lower emission rates on a pound per hour basis, and have the same or lower horsepower, and which result in the same or lower actual emissions from the facility on a ton per year basis. 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 Methods 7E for NO_x and 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. 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.

10. Pursuant to Regulation 19, section 19.705 and A.C.A. 8-4-203 as referenced by A.C.A. 8-4-304 and 8-4-311, the permittee may changeout, overhaul, or replace any existing turbines with turbines which have the same or lower emission rates on a pound per hour basis, and have the same or lower horsepower, and which result in the same or lower actual emissions from the facility on a pound per hour basis. Turbine changeout, overhaul, and replacement is routine maintenance, repair or replacement, and not considered a modification. 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. 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.

11. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, any turbine changeout will remain subject to GG.

PERMIT SHIELD

12. 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 September 9, 1996.

Source No.	Regulation	Description
Facility	Arkansas Regulation 19	Compilation of Regulations of the Arkansas State Implementation Plan for Air Pollution Control
Facility	Arkansas Regulation 26	Regulations of the Arkansas Operating Air Permit Program
Facility	40 CFR 60, Subpart A	New Source Performance Standards - General Provision
SN-11	40 CFR 60, Subpart GG	New Source Performance Standards for Stationary Gas Turbines

B. The following requirements have been specifically identified as not applicable, based upon information submitted by the permittee in an application dated September 9, 1996.

Source No.	Regulation	Description	Basis for Determination
Facility	Regulation 19.8	111(d) Designated facilities	The facility is not identified in the list of regulated sources.
Facility	Regulation 26.4(g)	Applications for initial Phase II acid rain permits.	The facility is not an acid rain category source.

Source No.	Regulation	Description	Basis for Determination
Facility	Regulation 26.5(a)-(d), (f)	Action on applications	These rules apply only to state and federal agencies.
Facility	Regulation 26.6(a), (d)-(g)	Permit review	These rules apply only to state and federal agencies.
Facility	Regulation 26.12	Acid rain sources provisions	The facility is not an acid rain source.
Facility	40 CFR 62	State plans for designated facilities	This rule is administrative and jurisdictional.
Facility	40 CFR 63	National emission standards for hazardous air pollutants	The facility is not in any source category as of the effective date of the permit.
Facility	40 CFR 79	Registration of fuels and fuel additives.	The facility is not in this source category.
Facility	40 CFR 80	Registration of fuels and fuel additives.	The facility is not in this source category.
Facility	40 CFR 81.304	Non-attainment	The facility is not located in a non-attainment area.

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

13. 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 requirements pursuant to §82.110.

    d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.

14. 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.

15. 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.

16. 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.

17. 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.

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 September 9, 1996.

1. SN-13 Boiler - 0.1 MMBTU/Hr (Regulation 18, Appendix A, Group A1)
2. SN-16 Lube Oil Tank - 11,300 gallon lube oil tank
3. SN-17 Lube Oil Tank - 1,120 gallon tank with less than 0.5 psia vapor pressure liquid stored.(Regulation 18, Appendix A, Group A3)
4. SN-15 Produced Water Tank - 8,700 gallon tank with less than 0.5 psia vapor pressure liquid stored.(Regulation 18, Appendix A, Group A3)
5. SN-19 Diesel Tank - 150 gallon tank with less than 0.5 psia liquid stored (Regulation 18, Appendix A, Group A2)
6. SN-20 Diesel Tank - 150 gallon tank with less than 0.5 psia liquid stored (Regulation 18, Appendix A, Group A2)
7. SN-21 Antifreeze Mix Tank - 7,954 gallon tank with less than 0.5 psia liquid stored
8. SN-22 Antifreeze Tank - 5,500 gallon Tank with less than 0.5 psia liquid stored
9. Compressor Station Blowdowns
10. Fugitive Emissions
11. Smart Ash 100 Oil Filter Incinerator - less than 0.1 tpy emissions

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.

1. Combustion emissions from propulsion of mobile sources and emissions from refueling these sources unless regulated by Title II and required to obtain a permit under Title V of the federal Clean Air Act, as amended. This does not include emissions from any transportable units, such as temporary compressors or boilers. This does not include emissions from loading racks or fueling operations covered under any applicable federal requirements.

2. Air conditioning and heating units used for comfort that do not have applicable requirements under Title VI of the Act.

3. Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing/industrial or commercial process.

4. Non-commercial food preparation or food preparation at restaurants, cafeterias, or caterers, etc.

5. Consumer use of office equipment and products, not including commercial printers or business primarily involved in photographic reproduction.

6. Janitorial services and consumer use of janitorial products.

7. Internal combustion engines used for landscaping purposes.

8. Laundry activities, except for dry-cleaning and steam boilers.

9. Bathroom/toilet emissions.

10. Emergency (backup) electrical generators at residential locations.

11. Tobacco smoking rooms and areas.

12. Blacksmith forges.

13. Maintenance of grounds or buildings, including: lawn care, weed control, pest control, and water washing activities.

14. Repair, up-keep, maintenance, or construction activities not related to the sources' primary business activity, and not otherwise triggering a permit modification. This may include, but is not limited to such activities as general repairs, cleaning, painting, welding, woodworking, plumbing, re-tarring roofs, installing insulation, paved/paving parking lots, miscellaneous solvent use, application of refractory, or insulation, brazing, soldering, the use of adhesives, grinding, and cutting.[1]

15. Surface-coating equipment during miscellaneous maintenance and construction activities. This activity specifically does not include any facility whose primary business activity is surface-coating or includes surface-coating or products.

[1] Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must get a permit.

16. Portable electrical generators that can be "moved by hand" from one location to another.[2]

17. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning, or machining wood, metal, or plastic.

18. Brazing or soldering equipment related to manufacturing activities that do not result in emission of HAPs.[3]

19. Air compressors and pneumatically operated equipment, including hand tools.

20. Batteries and battery charging stations, except at battery manufacturing plants.

21. Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOCs or HAPs.[4]

22. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and no volatile aqueous salt solutions, provided appropriate lids and covers are used and appropriate odor control is achieved.

23. Equipment used to mix and package soaps, vegetable oil, grease, animal fat, and non-volatile aqueous salt solutions, provided appropriate lids and covers are used and appropriate odor control is achieved.

24. Drop hammers or presses for forging or metalworking.

25. Equipment used exclusively to slaughter animals, but not including other equipment at slaughter-houses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.

---

[2] "Moved by hand" means that it can be moved by one person without assistance of any motorized or non-motorized vehicle, conveyance, or device.

[3] Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals are more appropriate for treatment as insignificant activities based on size or production thresholds. Brazing, soldering, and welding equipment, and cutting torches related directly to plant maintenance and upkeep and repair or maintenance shop activities that emit HAP metals are treated as trivial and listed separately in this appendix.

[4] Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids are based on size and limits including storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.

26. Vents from continuous emissions monitors and other analyzers.

27. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.

28. Hand-held applicator equipment for hot melt adhesives with no VOCs in the adhesive.

29. Lasers used only on metals and other materials which do not emit HAPs in the process.

30. Consumer use of paper trimmers/binders.

31. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.

32. Salt baths using non-volatile salts that do not result in emissions of any air pollutant covered by this regulation.

33. Laser trimmers using dust collection to prevent fugitive emissions.

34. Bench-scale laboratory equipment used for physical or chemical analysis not including lab fume hoods or vents.

35. Routine calibration and maintenance of laboratory equipment or other analytical instruments.

36. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.

37. Hydraulic and hydrostatic testing equipment.

38. Environmental chambers not using hazardous air pollutant gases.

39. Shock chambers, humidity chambers, and solar simulators.

40. Fugitive emissions related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.

41. Process water filtration systems and demineralizers.

42. Demineralized water tanks and demineralizer vents.

43. Boiler water treatment operations, not including cooling towers.

44. Emissions from storage or use of water treatment chemicals, except for hazardous air pollutants or pollutants listed under regulations promulgated pursuant to Section 112(r) of the Act, for use in cooling towers, drinking water systems, and boiler water/feed systems.

45. Oxygen scavenging (de-aeration) of water.

46. Ozone generators.

47. Fire suppression systems.

48. Emergency road flares.

49. Steam vents and safety relief valves.

50. Steam leaks.

51. Steam cleaning operations.

52. Steam and microwave sterilizers.

53. Site assessment work to characterize waste disposal or remediation sites.

54. Miscellaneous additions or upgrades of instrumentation.

55. Emissions from combustion controllers or combustion shutoff devices but not combustion units itself.

56. Use of products for the purpose of maintaining motor vehicles operated by the facility, not including air cleaning units of such vehicles (i.e. antifreeze, fuel additives).

57. Stacks or vents to prevent escape of sanitary sewer gases through the plumbing traps.

58. Emissions from equipment lubricating systems (i.e. oil mist), not including storage tanks, unless otherwise exempt.

59. Residential wood heaters, cookstoves, or fireplaces.

60. Barbecue equipment or outdoor fireplaces used in connection with any residence or recreation.

61. Log wetting areas and log flumes.

62. Periodic use of pressurized air for cleanup.

63. Solid waste dumpsters.

64. Emissions of wet lime from lime mud tanks, lime mud washers, lime mud piles, lime mud filter and filtrate tanks, and lime mud slurry tanks.

65. Natural gas odoring activities unless the Department determines that emissions constitute air pollution.

66. Emissions from engine crankcase vents.

67. Storage tanks used for the temporary containment of materials resulting from an emergency reporting to an unanticipated release.

68. Equipment used exclusively to mill or grind coatings in roll grinding rebuilding, and molding compounds where all materials charged are in paste form.

69. Mixers, blenders, roll mills, or calendars for rubber or plastic for which no materials in powder form are added and in which no organic solvents, diluents, or thinners are used.

70. The storage , handling, and handling equipment for bark and wood residues not subject to fugitive dispersion offsite (this applies to the equipment only).

71. Maintenance dredging of pulp and paper mill surface impoundments and ditches containing cellulosic and cellulosic derived biosolids and inorganic materials such as lime, ash, or sand.

72. Tall oil soap storage, skimming, and loading.

73. Water heaters used strictly for domestic (non-process) purposes.

74. Facility roads and parking areas, unless necessary to control offsite fugitive emissions.

75. Agricultural operations, including onsite grain storage, not including IC engines or grain elevators.

Mississippi River Transmission Corporation - Tuckerman Compressor Station
Permit #1419-AOP-R1 CSN: 34-0111

76. The following natural gas and oil exploration production site equipment: separators, dehydration units, natural gas fired compressors, and pumping units. This does not include compressors located on natural gas transmission pipelines.

SECTION VIII: GENERAL PROVISIONS

1. Pursuant to 40 C.F.R. 70.6(b)(2), 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.

2. Pursuant to 40 C.F.R. 70.6(a)(2) and §26.7 of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), 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.

3. Pursuant to §26.4 of Regulation #26, it is the duty of the permittee to submit a complete application for permit renewal at least six (6) months prior to the date of permit expiration. Permit expiration terminates the permittee's right to operate unless a complete renewal application was submitted at least six (6) months prior to permit expiration, in which case the existing permit shall 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.

4. Pursuant to 40 C.F.R. 70.6(a)(1)(ii) and §26.7 of Regulation #26, 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, both provisions are incorporated into the permit and shall be enforceable by the Director or Administrator.

5. Pursuant to 40 C.F.R. 70.6(a)(3)(ii)(A) and §26.7 of Regulation #26, records of monitoring information required by this permit shall include the following:

    a. The date, place as defined in this permit, and time of sampling or measurements;
    b. The date(s) analyses were performed;
    c. The company or entity that performed 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.

6. Pursuant to 40 C.F.R. 70.6(a)(3)(ii)(B) and §26.7 of Regulation #26, records of all required monitoring data and support information shall be retained for a period of at least 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.

7. Pursuant to 40 C.F.R. 70.6(a)(3)(iii)(A) and §26.7 of Regulation #26, the permittee shall submit reports of all required monitoring every 6 months. If no other reporting period has been established, the reporting period shall end on the last day of the anniversary month of this permit. The report shall be due within 30 days of the end of the reporting period. Even though the reports are due every six months, each report shall contain a full year of data. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official as defined in §26.2 of Regulation #26 and must be sent to the address below.

   Arkansas Department of Environmental Quality
   Air Division
   ATTN: Air Enforcement
   Post Office Box 8913
   Little Rock, AR 72219

8. Pursuant to 40 C.F.R. 70.6(a)(3)(iii)(B), §26.7 of Regulation #26, and Section 19.601 and 19.602 of Regulation #19, all deviations from permit requirements, including those attributable to upset conditions as defined in the permit shall be reported to the Department. An initial report shall be made to the Department the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include:

   a. The facility name and location,
   b. The process unit or emission source which is deviating from the permit limit,
   c. The permit limit, including the identification of pollutants, from which deviation occurs,
   d. The date and time the deviation started,
   e. The duration of the deviation,
   f. The average emissions during the deviation,
   g. The probable cause of such deviations,
   h. Any corrective actions or preventive measures taken or being take to prevent such deviations in the future, and
   i. The name of the person submitting the report.

A full report shall be made in writing to the Department within five (5) business days of discovery of the occurrence and shall include in addition to the information required by initial report a schedule of actions to be taken to eliminate future occurrences and/or to minimize the amount by which the permits limits are exceeded and to reduce the length of time for which said limits are exceeded. If the permittee wishes, they may submit a full report in writing (by facsimile, overnight courier, or other means) the next business day after the discovery of the occurrence and such report will serve as both the initial report and full report.

9. Pursuant to 40 C.F.R. 70.6(a)(5) and §26.7 of Regulation #26, and A.C.A.§8-4-203, as referenced by §8-4-304 and §8-4-311, if any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity shall 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.

10. Pursuant to 40 C.F.R. 70.6(a)(6)(i) and §26.7 of Regulation #26, 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, or modification; or for denial of a permit renewal application. Any permit noncompliance with a state requirement constitutes a violation of the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.) and is also grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

11. Pursuant to 40 C.F.R. 70.6(a)(6)(ii) and §26.7 of Regulation #26, 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 in order to maintain compliance with the conditions of this permit.

12. Pursuant to 40 C.F.R. 70.6(a)(6)(iii) and §26.7 of Regulation #26, this permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

13. Pursuant to 40 C.F.R. 70.6(a)(6)(iv) and §26.7 of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.

14. Pursuant to 40 C.F.R. 70.6(a)(6)(v) and §26.7 of Regulation #26, the permittee shall 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 shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the permittee may be required to furnish such records directly to the Administrator along with a claim of confidentiality.

15. Pursuant to 40 C.F.R. 70.6(a)(7) and §26.7 of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.

16. Pursuant to 40 C.F.R. 70.6(a)(8) and §26.7 of Regulation #26, no permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for elsewhere in this permit.

17. Pursuant to 40 C.F.R. 70.6(a)(9)(i) and §26.7 of Regulation #26, if the permittee is allowed to operate under 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 scenario under which the facility or source is operating.

18. Pursuant to 40 C.F.R. 70.6(b) and §26.7 of Regulation #26, all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Act unless the Department has specifically designated as not being federally enforceable under the Act any terms and conditions included in the permit that are not required under the Act or under any of its applicable requirements.

19. Pursuant to 40 C.F.R. 70.6(c)(1) and §26.7 of Regulation #26, any document (including reports) required by this permit shall contain a certification by a responsible official as defined in §26.2 of Regulation #26.

20. Pursuant to 40 C.F.R. 70.6(c)(2) and §26.7 of Regulation #26, the permittee shall allow an authorized representative of the Department, upon presentation of credentials, to perform the following:

    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 that must be kept 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 the purpose of assuring compliance with this permit or applicable requirements.

21. Pursuant to 40 C.F.R. 70.6(c)(5) and §26.7 of Regulation #26, the permittee shall submit a compliance certification with terms and conditions contained in the permit, including emission limitations, standards, or work practices. This compliance certification shall be submitted annually and shall be submitted to the Administrator as well as to the Department. All compliance certifications required by this permit shall include the following:

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. Pursuant to §26.7 of Regulation #26, nothing in this permit shall alter or affect the following:

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. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.

Route To: **FELICIA INMAN**
Administration

AIR DIVISION

INVOICE REQUEST FORM

(9-96)

Facility Name & Address:
Mr. Wayne Ebarb
Mississippi River Transmission Corporation -
Tuckerman Compressor Station
P. O. Box 21734
Shreveport, Louisiana
71151

CSN: 34-0111 **Permit No**: 1419-AOP-R1

Permit Description:

(e.g. A = AIR CODE, S=SIP, H=NESHAP, P=PSD, N=NSPS, T5= Title V)

Initial Fee Calculations:

Title V = **3**(17.78)(TPY each pollutant, except CO) - amount of last annual air permit fee

NOTE: Do Not double count HAPs and VOCs!!!
No greater than 4000 tpy per pollutant or less than $1000

F = $17.78 (160.9 + 1160.1) - $ 20,176.00 = $23,487.38 - $20,628.00 = $2,859.

Fee Amount: $ 2,859.

Engineer: Paul Osmon
Date: June 1, 1998

Public Notice

Pursuant to the Arkansas Operating Air Permit Program (Regulation #26) Section 6(b), the Air Division of the Arkansas Department of Environmental Quality gives the following notice:

Mississippi River Transmission Corporation owns and operates a natural gas compressor station near Tuckerman, Arkansas (CSN: 34-0111). The Department issued a previous Title V permit, but that permit is being rescinded due to comments made by the facility to the ADPC&E Commission and the subsequent Permit Appeal Resolution. This notice is rescinding the initial permit issued under the Arkansas Air Operating Program and requesting comments on the draft operating permit for this facility from all interested parties.

The application has been reviewed by the staff of the Department and has received the Department's tentative approval subject to the terms of this notice.

Citizens wishing to examine the permit application and staff findings and recommendations may do so by contacting Suzanne Carswell, Information Officer. Citizens desiring technical information concerning the application or permit should contact John Bailey, Engineer. Both Suzanne Carswell and John Bailey can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, (501) 682-0744.

The draft permit and permit application are available for copying at the above address. A copy of the draft permit has also been placed at the White River Regional Library, 368 East Main, Batesville, Arkansas 72501. This information may be reviewed during normal business hours.

Interested or affected persons may also submit written comments or request a hearing on the proposal to the Department at the above address - Attention: Suzanne Carswell. In order to be considered, the comments must be submitted within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, one will be scheduled if significant comments on the permit provisions are received. If a hearing is scheduled, adequate public notice will be given in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director shall make a final decision to issue or deny this application or to impose special conditions in accordance with Section 2.1 of the Arkansas Pollution Control and Ecology Commission’s Administrative Procedures (Regulation #8) and Regulation #26.

Dated this

Randall Mathis
Director