

ADEQ OPERATING AIR PERMIT

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

Permit No. : 1419-AOP-R2

Renewal #1

IS ISSUED TO:

CenterPoint Energy – Mississippi Transmission Corporation –
Tuckerman Compressor Station

3.5 miles southwest of Tuckerman, on Gracelawn Street

Tuckerman, AR 72473

Jackson County

AFIN: 34-00111

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:

AND

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

Signed:

Michael Bonds
Chief, Air Division

Date

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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 _x	Nitrogen Oxide
PM	Particulate Matter
PM ₁₀	Particulate Matter Smaller Than Ten Microns
SNAP	Significant New Alternatives Program (SNAP)
SO ₂	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

CenterPoint Energy – Mississippi Transmission Corporation – Tuckerman Compressor Station
Permit #: 1419-AOP-R2
AFIN: 34-00111

SECTION I: FACILITY INFORMATION

PERMITTEE:	CenterPoint Energy – Mississippi River Transmission Corporation – Tuckerman Compressor Station
AFIN:	34-00111
PERMIT NUMBER:	1419-AOP-R2
FACILITY ADDRESS:	3.5 miles southwest of Tuckerman, on Gracelawn Street Tuckerman, AR 72473
MAILING ADDRESS:	P.O. Box 21734 Shreveport , LA 71151
COUNTY:	Jackson
CONTACT POSITION:	Laura Guthrie
TELEPHONE NUMBER:	(318) 429-3706
REVIEWING ENGINEER:	Siew Low
UTM North South (Y):	Zone 15: 3953.6 km
UTM East West (X):	Zone 15: 660.9 km

SECTION II: INTRODUCTION

Summary of Permit Activity

CenterPoint Energy - Mississippi River Transmission Corporation owns and operates a compressor station near Tuckerman, Arkansas. This Title V air permit renewal revises PM/PM₁₀, SO₂, VOC, and HAPs emission limits of the compressor and turbine engines by using the USEPA AP-42 and GRI-HAPCalc emission factors. NO_x emissions from SN-10 are revised using USEPA AP-42 emission factor. The stack testing schedule for the compressor engines and turbines is also being clarified. There are no physical changes or changes in the method of operation at the facility.

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 pipeline. Natural gas enters the station and is compressed, exiting the station at a higher pressure. Prior to compression, the gas passes through an inlet separator where entrained liquids are removed from the gas stream. Pipeline liquids are stored in the produced water tank and removed from the station via tanker truck when necessary.

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. Support equipment includes several tanks and an engine oil filter incinerator which are considered insignificant activities

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.

Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective February 15, 1999,
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective December 19, 2004
Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective September 26, 2002
40 CFR Part 60 Subpart GG - <i>Standards of Performance for Stationary Gas Turbines</i>

Regulations
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 thru SN-04, SN-06, and SN-08) 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).
40 CFR Part 63 Subpart YYYY - <i>National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines</i> . However, the stationary combustion turbine (SN-11) at this facility does not have to meet the requirements of this subpart, and no initial notification is necessary pursuant to 40 CFR 63.6090(b)(4).

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

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
Total Allowable Emissions		PM /PM ₁₀	1.8	4.5
		SO ₂	1.2	1.4
		VOC	9.0	37.6
		CO	44.5	151.4
		NO _x	284.8	1141.2
		<i>Acetaldehyde*</i>	0.53	2.38
		<i>Acrolein*</i>	0.32	1.92
		<i>Benzene*</i>	0.09	0.43
		<i>Formaldehyde*</i>	1.92	14.15
		<i>Methanol*</i>	0.12	0.63
		<i>Toluene*</i>	0.08	0.11
01	Clark HRA-8 compressor engine (880 HP) 2 stroke lean burn	PM/PM ₁₀	0.2	0.6
		SO ₂	0.1	0.1
		VOC	1.6	6.8
		CO	4.2	18.1
		NO _x	45.4	198.5
		<i>Acetaldehyde</i>	0.05	0.37
		<i>Acrolein</i>	0.05	0.37
		<i>Benzene</i>	0.01	0.09
		<i>Formaldehyde</i>	0.35	2.64

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
		<i>Methanol</i>	0.02	0.12
		<i>Toluene</i>	0.01	0.01
02	Clark HRA-8 compressor engine (880 HP) 2 stroke lean burn	PM/PM ₁₀	0.2	0.6
		SO ₂	0.1	0.1
		VOC	1.6	6.8
		CO	4.2	18.1
		NO _x	45.4	198.5
		<i>Acetaldehyde</i>	0.05	0.37
		<i>Acrolein</i>	0.05	0.37
		<i>Benzene</i>	0.01	0.09
		<i>Formaldehyde</i>	0.35	2.64
		<i>Methanol</i>	0.02	0.12
		<i>Toluene</i>	0.01	0.01
03	Clark HRA-8 compressor engine (880 HP) 2 stroke lean burn	PM/PM ₁₀	0.2	0.6
		SO ₂	0.1	0.1
		VOC	1.6	6.8
		CO	4.2	18.1
		NO _x	45.4	198.5
		<i>Acetaldehyde</i>	0.05	0.37
		<i>Acrolein</i>	0.05	0.37
		<i>Benzene</i>	0.01	0.09
		<i>Formaldehyde</i>	0.35	2.64
		<i>Methanol</i>	0.02	0.12
		<i>Toluene</i>	0.01	0.01
04	Clark HRA-8 compressor engine (880 HP) 2 stroke lean burn	PM/PM ₁₀	0.2	0.6
		SO ₂	0.1	0.1
		VOC	1.6	6.8
		CO	4.2	18.1
		NO _x	45.4	198.5
		<i>Acetaldehyde</i>	0.05	0.37
		<i>Acrolein</i>	0.05	0.37
		<i>Benzene</i>	0.01	0.09
		<i>Formaldehyde</i>	0.35	2.64
		<i>Methanol</i>	0.02	0.12
		<i>Toluene</i>	0.01	0.01
06	Worthington LTC-5 compressor engine (625 HP)	PM/PM ₁₀	0.1	0.4
		SO ₂	0.1	0.1
		VOC	0.9	3.9

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
	2 stroke lean burn	CO	2.8	11.9
		NO _x	28.5	124.6
		<i>Acetaldehyde</i>	0.04	0.15
		<i>Acrolein</i>	0.04	0.15
		<i>Benzene</i>	0.01	0.04
		<i>Formaldehyde</i>	0.25	1.10
		<i>Methanol</i>	0.01	0.05
		<i>Toluene</i>	0.01	0.02
08	Clark TRA compressor engine (1,100 HP) 2 stroke lean burn	PM/PM ₁₀	0.2	0.5
		SO ₂	0.1	0.1
		VOC	1.3	5.8
		CO	9.0	39.5
		NO _x	30.6	133.7
		<i>Acetaldehyde</i>	0.06	0.27
		<i>Acrolein</i>	0.06	0.27
		<i>Benzene</i>	0.02	0.07
		<i>Formaldehyde</i>	0.44	1.93
		<i>Methanol</i>	0.02	0.09
		<i>Toluene</i>	0.01	0.03
10	Caterpillar G379 generator engine (300 HP) 4 stroke rich burn	PM/PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.1	0.2
		CO	6.1	12.3
		NO _x	9.9	20.2
		<i>Acetaldehyde</i>	0.01	0.01
		<i>Acrolein</i>	0.01	0.01
		<i>Benzene</i>	0.01	0.01
		<i>Formaldehyde</i>	0.04	0.09
		<i>Methanol</i>	0.01	0.01
		<i>Toluene</i>	0.01	0.01
11	Solar Taurus Model 60 T7000 turbine engine (5,850 HP)	PM/PM ₁₀	0.5	1.0
		SO ₂	0.3	0.6
		VOC	0.2	0.4
		CO	7.0	14.6
		NO _x	32.5	68.2
		<i>Acetaldehyde</i>	0.22	0.47
		<i>Acrolein</i>	0.01	0.01
		<i>Benzene</i>	0.01	0.02
		<i>Formaldehyde</i>	0.22	0.46

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
		<i>Toluene</i>	0.01	0.01
12	Olympian Standby generator engine (64 HP) 4 stroke rich burn	PM/PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.1	0.1
		CO	2.8	0.7
		NO _x	1.7	0.5
		<i>Formaldehyde</i>	0.01	0.01

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

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.

Permit No. 1419-AOP-R1- was issued on July 12, 2000. This permit was issued as the result of an agreement upon changes in the Permit Appeal Resolution (PAR).

SECTION IV: SPECIFIC CONDITIONS

SN-01 thru SN-04, SN-06 and SN-08 Compressor Engines

Source Description

Four 880 HP Clark HRA-8 compressor engines (SN-01, SN-02, SN-03, and SN-04) were installed/last modified in 1950; a 625 HP Worthington LTC-5 compressor engine (SN-06) and a 1,100 HP Clark TRA-6 compressor engine (SN-08) were installed/last modified in 1952. The purpose of the compressor station is to compress natural gas. The gas is removed from the pipeline, sent to the compressors (SN-01 thru SN-04, SN-06 and SN-08) to be compressed, cooled, delivered to the discharge piping system, and back to the pipeline. The reciprocating engines are capable of running at 120% of capacity and are being permitted to do so.

Specific Conditions

- 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. [Regulation 19, §19.501 et seq., effective December 19, 2004 and 40 CFR Part 52, Subpart E]

SN	Pollutant	lb/hr	tpy
01	PM ₁₀	0.2	0.6
	SO ₂	0.1	0.1
	VOC	1.6	6.8
	CO	4.2	18.1
	NO _x	45.4	198.5
02	PM ₁₀	0.2	0.6
	SO ₂	0.1	0.1
	VOC	1.6	6.8
	CO	4.2	18.1
	NO _x	45.4	198.5
03	PM ₁₀	0.2	0.6
	SO ₂	0.1	0.1
	VOC	1.6	6.8
	CO	4.2	18.1
	NO _x	45.4	198.5
04	PM ₁₀	0.2	0.6
	SO ₂	0.1	0.1
	VOC	1.6	6.8
	CO	4.2	18.1
	NO _x	45.4	198.5
06	PM ₁₀	0.1	0.4
	SO ₂	0.1	0.1
	VOC	0.9	3.9

SN	Pollutant	lb/hr	tpy
08	CO	2.8	11.9
	NO _x	28.5	124.6
	PM ₁₀	0.2	0.5
	SO ₂	0.1	0.1
	VOC	1.3	5.8
	CO	9.0	39.5
	NO _x	30.6	133.7

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with the HAP emissions with the use of natural gas and operating at or below maximum capacity of the equipment. The HAP emissions listed for these sources 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 rate listed below. [Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Pollutant	lb/hr	tpy
01	PM	0.2	0.6
	<i>Acetaldehyde</i>	0.05	0.37
	<i>Acrolein</i>	0.05	0.37
	<i>Benzene</i>	0.01	0.09
	<i>Formaldehyde</i>	0.35	2.64
	<i>Methanol</i>	0.02	0.12
	<i>Toluene</i>	0.01	0.01
02	PM	0.2	0.6
	<i>Acetaldehyde</i>	0.05	0.37
	<i>Acrolein</i>	0.05	0.37
	<i>Benzene</i>	0.01	0.09
	<i>Formaldehyde</i>	0.35	2.64
	<i>Methanol</i>	0.02	0.12
	<i>Toluene</i>	0.01	0.01
03	PM	0.2	0.6
	<i>Acetaldehyde</i>	0.05	0.37
	<i>Acrolein</i>	0.05	0.37
	<i>Benzene</i>	0.01	0.09
	<i>Formaldehyde</i>	0.35	2.64
	<i>Methanol</i>	0.02	0.12
	<i>Toluene</i>	0.01	0.01
04	PM	0.2	0.6
	<i>Acetaldehyde</i>	0.05	0.37
	<i>Acrolein</i>	0.05	0.37
	<i>Benzene</i>	0.01	0.09

SN	Pollutant	lb/hr	tpy
	<i>Formaldehyde</i>	0.35	2.64
	<i>Methanol</i>	0.02	0.12
	<i>Toluene</i>	0.01	0.01
06	PM	0.1	0.4
	<i>Acetaldehyde</i>	0.04	0.15
	<i>Acrolein</i>	0.04	0.15
	<i>Benzene</i>	0.01	0.04
	<i>Formaldehyde</i>	0.25	1.10
	<i>Methanol</i>	0.01	0.05
	<i>Toluene</i>	0.01	0.02
08	PM	0.2	0.5
	<i>Acetaldehyde</i>	0.06	0.27
	<i>Acrolein</i>	0.06	0.27
	<i>Benzene</i>	0.02	0.07
	<i>Formaldehyde</i>	0.44	1.93
	<i>Methanol</i>	0.02	0.09
	<i>Toluene</i>	0.01	0.03

- The permittee shall not exceed 5% opacity from source SN-01 thru SN-04, SN-06, and SN-08 as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated by burning pipeline quality natural gas. [Regulation 18, §18.501, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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

4. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by the use of natural gas and a restriction on the hours of operation of the equipment. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.1	0.1
SO ₂	0.1	0.1
VOC	0.1	0.2
CO	6.1	12.3
NO _x	9.9	20.2

5. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by 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. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.1	0.1
<i>Acetaldehyde</i>	0.01	0.01
<i>Acrolein</i>	0.01	0.01
<i>Benzene</i>	0.01	0.01
<i>Formaldehyde</i>	0.04	0.09
<i>Methanol</i>	0.01	0.01
<i>Toluene</i>	0.01	0.01

6. 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 pipeline quality natural gas. [Regulation 18, §18.501, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
7. The permittee shall not operate SN-10 more than 4,086 hours in any consecutive twelve month period. [Regulation 19, §19.705, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
8. The permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition #7. These records may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept at the nearest manned location, and shall be provided to the Department personnel upon request. [Regulation 19, §19.705, and 40 CFR Part 52]

SN-11
 Natural Gas Compressor Turbine

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

9. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by the use of natural gas and a restriction on the hours of operation of the equipment. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.5	1.0
SO ₂	0.3	0.6
VOC	0.2	0.4
CO	7.0	14.6
NO _x	32.5	68.2

10. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by 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. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.5	1.0
<i>Acetaldehyde</i>	0.22	0.47
<i>Acrolein</i>	0.01	0.01
<i>Benzene</i>	0.01	0.02
<i>Formaldehyde</i>	0.22	0.46
<i>Toluene</i>	0.01	0.01

11. 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 pipeline quality natural gas. [Regulation 18, §18.501, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
12. The permittee shall not operate SN-11 more than 4,200 hours in any consecutive twelve month period. [Regulation 19, §19.705, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
13. The permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition #12. These records may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept at the nearest manned location, and shall be provided to the Department personnel upon request. [Regulation 19, §19.705, and 40 CFR Part 52]
14. The permittee shall not cause to be discharge into the atmosphere from SN-11, any gases which contain NO_x in excess of the following equation:

$$\text{STD} = 0.0075 (14.4/Y) + F$$

where:

STD = allowable ISO corrected (if required as given in §60.334(b)(1)) NO_x emissions concentration (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 = NO_x emission allowance for fuel-bound nitrogen as defined in paragraph 60.332(a)(3) of Subpart GG.

[Regulation 19, §19.304, 40 CFR 60.332, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

15. 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:
 - a. 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.

- b. Monitoring of fuel nitrogen content shall not be required while natural gas is the only fuel fired in the gas turbine.
- c. 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.
- d. 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.
- e. 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.
- f. If after the monitoring required in item 4 above, or herein, the sulfur content of the fuel shows little variability, 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 calendar year.
- g. 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.
- h. 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.
- i. 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.
- j. 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.

[Regulation 19, §19.304, and 40 CFR, Part 60, Subpart GG]

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

16. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by the use of natural gas and a restriction on the hours of operation of the equipment. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.1	0.1
SO ₂	0.1	0.1
VOC	0.1	0.1
CO	2.8	0.7
NO _x	1.7	0.5

17. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by the use of natural gas and a restriction on the hours of operation of the equipment. The HAP emissions listed for this source was 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 rate 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]

Pollutant	lb/hr	tpy
PM	0.1	0.1
<i>Formaldehyde</i>	0.01	0.01

18. 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 pipeline quality natural gas. [Regulation 18, §18.501, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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19. The permittee shall not operate SN-12 more than 500 hours in any consecutive twelve month period. [Regulation 19, §19.705, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
20. The permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition #19. These records may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept at the nearest manned location, and shall be provided to the Department personnel upon request. [Regulation 19, §19.705, and 40 CFR Part 52]

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SECTION V: COMPLIANCE PLAN AND SCHEDULE

CenterPoint Energy – 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 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 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: [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]
 - a. Sampling ports adequate for applicable test methods;
 - b. Safe sampling platforms;
 - c. Safe access to sampling platforms; and
 - d. Utilities for sampling and testing equipment.
5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee 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 at this facility. [Regulation 19, §19.705, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR 70.6]

8. The permittee shall simultaneously conduct tests for CO and NO_x on one-half of each type of compressor engine every 5 years in accordance with Plantwide Condition 3 and every five years thereafter. For reciprocating engines, EPA Reference Method 10 and 7E shall be used for CO and NO_x, respectively. For turbine, EPA Reference Method 10 and 20 shall be used for CO and NO_x, respectively. 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 similar (make and model) engine of equal horsepower is test once. If the tested emission rate for any pollutant is in excess of the permitted emission rate, all similar engines (make and model) shall be tested for that pollutant. [Regulation No.19 §19.702, and 40 CFR Part 52, Subpart E]
9. The permittee may replace any existing engines or turbine on a temporary or permanent basis with an engine(s) or turbine(s) that has the same or lower emission rates on a pound per hour basis; has the same or lower horsepower; and which replacement does not result in a significant emissions increase as defined and applied pursuant to 40 CFR 52.21, and as set out below:
 - The permittee shall notify ADEQ of the replacement within 30 days after the replacement is made, which notification shall identify the previous and replacement engines or turbine, and provide the reason why the replacement was necessary. If applicable, the notification shall also provide a permit application and, when required, a CAM plan under 40 CFR Part 64. [Regulation No.19 §19.705, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, §19.705 and 40 CFR Part 64]
 - 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(s) or turbine(s). The testing shall be conducted in accordance with EPA Reference Method 7E for NO_x(reciprocating engine), EPA Reference Method 20 for NO_x (turbine)and EPA Reference Method 10 for CO.
 - 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 limitations if the conditions of Regulation 26, §26.707 are met.[Regulation No. 19, §19.705, §19-304, ACA 8-4-203 as referenced by ACA 8-4-304 and 8-4-311, and 40 CFR Part 64.]
10. 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 §8-4-304 and §8-4-311]

Title VI Provisions

11. The permittee must comply with the standards for labeling of products using ozone-depleting substances. [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.
12. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]
 - 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.
13. 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.
14. 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.

15. The permittee can switch from any ozone-depleting substance to any alternative listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, "Significant New Alternatives Policy Program".

Permit Shield

16. 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 - Applicable Regulations of this condition.
 - a. The permit specifically identifies the following as applicable requirements based upon the information submitted by the permittee in an application dated December 20, 2004.

Applicable Regulations

Source No.	Regulation	Description
Facility Wide	<i>Arkansas Plan of Implementation for Air Pollution Control (Regulation 19)</i>	SIP
Facility Wide	<i>Regulations of the Arkansas Operating Air Permit Program (Regulation 26).</i>	Title V
SN-11	<i>40 CFR Part 60 Subpart GG – Standards of Performance for Stationary Gas Turbines</i>	NSPS
SN-01 thru SN-04, SN-06, and SN-08	<i>*40 CFR Part 63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.</i>	NESHAP
SN-11	<i>**40 CFR Part 63 Subpart YYYY - National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines.</i>	NESHAP

* The stationary RICEs 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).

** The stationary combustion turbine at this facility does not have to meet the requirements of this subpart, and no initial notification is necessary pursuant to 40 CFR 63.6090(b)(4).

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 December 20, 2004.

Description	Category
0.1 MMBtu/hr Boiler	Group A 1
Smart Ash Incinerator	Group A 5
Produced Water Tank (8,700 gal)	Group A 3
Lube Oil Tank (11,300 gal)	Group A 13
Lube Oil Tank (1,120 gal)	Group A 3
Two Diesel Tanks (150 gal each)	Group A 3
Antifreeze Mix Tank (7,954 gal)	Group A 3
Antifreeze Tank (5,500 gal)	Group A 3
Truck Loading	Group A 13
Station Blowdowns	Group A 13
Fugitive Emissions	Group A 13

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), effective September 26, 2002]
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. [40 CFR 70.6(a)(3)(ii)(A) and Regulation 26, §26.701(C)(2)]
 - a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses performed;
 - c. The company or entity performing the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.
6. The permittee must retain the records of all required monitoring data and support information for at least five (5) years from the date of the monitoring sample,

measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [40 CFR 70.6(a)(3)(ii)(B) and Regulation 26, §26.701(C)(2)(b)]

7. The permittee must submit reports of all required monitoring every six (6) months. If permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due within thirty (30) days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26, §26.2 must certify all required reports. The permittee will send the reports to the address below: [40 C.F.R. 70.6(a)(3)(iii)(A) and Regulation 26, §26.701(C)(3)(a)]

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

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)]
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;
 - e. and 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]

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Appendix A
40 CFR Part 60 Subpart GG - Standards of Performance for Stationary Gas Turbines