

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1419-AOP-R5 AFIN: 34-00111

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

2. APPLICANT:

Enable Mississippi River Transmission, LLC (Tuckerman Compressor Station)
210 Jackson 62
Tuckerman, Arkansas 72473

3. PERMIT WRITER:

Franck Houenou

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Pipeline Transportation of Natural Gas
NAICS Code: 486210

5. SUBMITTALS:

Date of Application	Type of Application (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
1/16/2014	Renewal	Operating hours for non-emergency use for SN-10 and SN-12 are reduced to 100 hours per year per generator.

6. REVIEWER'S NOTES:

Enable Mississippi River Transmission (MRT), LLC owns and operates a natural gas transmission station in Tuckerman, Arkansas.

This permitting action is necessary to renew the Title V permit (1419-AOP-R4). With the renewal, the facility requested the incorporation of change associated with the January 30, 2013 amendments to 40 C.F.R. Pt. 63 subpart ZZZZ for the engines at SN-10 and SN-12. The change is to reduce the operating hours for non-emergency use for the two engines to 100 hours per year per engine. Otherwise, all emissions and point sources will remain the same as currently

permitted. The total permitted emission rate limit changes associated with this activity includes +11.5 tpy PM/PM₁₀, -0.6 tpy VOC, -0.7 tpy SO₂, -17.8 tpy CO and -11.10 NO_x.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

The facility has no outstanding/pending enforcement action.

8. PSD APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? **N**

b) Is the facility categorized as a major source for PSD? **Y**

- *Single pollutant ≥ 100 tpy and on the list of 28 or single pollutant ≥ 250 tpy and not on list*

If yes, explain why this permit modification is not PSD.

Title 5 Renewal only – no construction, reconstruction, or modification of equipment.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN01 through SN-04, SN-06, SN-08, SN-10 and SN-12	HAPs	40 C.F.R. Pt. 63 Subpart <i>ZZZZ</i>
SN-11	NO _x and SO ₂	40 C.F.R. Pt. 60 Subpart GG

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. AMBIENT AIR EVALUATIONS:

a) Reserved.

b) Non-Criteria Pollutants:

Based on Department procedures for review of non-criteria pollutants, emissions are below thresholds of concern.

c) H₂S Modeling:

A.C.A. §8-3-103 requires hydrogen sulfide emissions to meet specific ambient standards. Many sources are exempt from this regulation, refer to the Arkansas Code for details.

Is the facility exempt from the H₂S Standards

N

If exempt, explain: No H₂S emission

12. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Comments
01 thru 04 (880 HP)	Stack Testing	NO _x - 45.31 lb/hr* (maximum emission from testing)	None	<ul style="list-style-type: none"> • 120% Load/safety factor included (for NO_x) • 8760 operating hours • 12.842 MMBtu/hr
	AGA Data	CO - 2.13 gm/hp-hr*		
	AP-42 Table 3.2-1	VOC - 1.20E-01 lb/MMBtu* PM ₁₀ - 4.83E-02 lb/MMBtu** SO ₂ - 5.88E-04 lb/MMBtu*		
06 (625 HP)	AGA Data	NO _x - 20.64 gm/hp-hr* CO - 1.96 gm/hp-hr*	none	<ul style="list-style-type: none"> • 8760 operating hours • 7.348 MMBtu/hr
	AP-42 Table 3.2-1	VOC - 1.20E-01 lb/MMBtu* PM ₁₀ - 4.83E-02 lb/MMBtu** SO ₂ - 5.88E-04 lb/MMBtu*		
08 (1100 HP)	AGA Data	NO _x - 12.58 gm/hp-hr* CO - 3.71 gm/hp-hr*	none	<ul style="list-style-type: none"> • 8760 operating hours • 10.861 MMBtu/hr
	AP-42 Table 3.2-1	VOC - 1.20E-01 lb/MMBtu* PM ₁₀ - 4.83E-02 lb/MMBtu** SO ₂ - 5.88E-04 lb/MMBtu*		

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Comments
10 (300 HP)	AP-42 Table 3.2-3	NO _x – 2.27 lb/MMBtu* CO – 3.72 lb/MMBtu* VOC – 2.96E-02 lb/MMBtu* PM ₁₀ – 1.94E-02 lb/MMBtu** SO ₂ – 5.88E-04 lb/MMBtu*	none	<ul style="list-style-type: none"> • 500 operating hours • 2.653 MMBtu/hr
11 (5850 HP)	Manufacturer's Data	NO _x – 32.5 lbs/hr* (maximum emission) CO – 7.0 lbs/hr* (maximum emission)	none	<ul style="list-style-type: none"> • NO_x - Based on 142.2 tpy @ 8760 hrs/yr • CO - Based on 30.27 tpy @ 8760 hrs/yr • 4200 operating hours • 70.86 MMBtu/hr
	AP-42 Table 3.2-2a	VOC – 2.10E-03 lb/MMBtu* PM ₁₀ – 6.60E-03 lb/MMBtu* SO ₂ – 3.40E-03 lb/MMBtu*		
12 (64 HP)	AP-42 Table 3.2-3	NO _x – 2.27 lb/MMBtu* CO – 3.72 lb/MMBtu* VOC – 2.96E-02 lb/MMBtu* PM ₁₀ – 1.94E-02 lb/MMBtu** SO ₂ – 5.88E-04 lb/MMBtu*	none	<ul style="list-style-type: none"> • 500 operating hours • 0.732 MMBtu/hr
<p>*: same as in previous permit. **: different from previous permit, PM emissions include both filterable and condensable particulate matter.</p>				

13. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
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SN	Pollutants	Test Method	Test Interval	Justification
01, 02, 03, and 04	CO NO _x	10 7E	One-half of each type of compressor engines every five years	See Plantwide Condition # 7 in permit.
06	CO NO _x	10 7E	Every five years	See Plantwide Condition # 7 in permit.
08	CO NO _x	10 7E	Every five years	See Plantwide Condition # 7 in permit.
11	CO NO _x	10 20	Every five years	See Plantwide Condition # 7 in permit.

14. MONITORING OR CEMS:

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
None				

15. RECORDKEEPING REQUIREMENTS:

The following are items (such as throughput, fuel usage, VOC content, etc.) that must be tracked and recorded.

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
10, 12	Operation time	100 hours per year	Monthly	N
11	Operation time	4,200 hours per year	Monthly	N
11	Valid purchase contract, tariff sheet or transportation contract	Meets definition of natural gas	Yearly	N
01, 02, 03,04, 06, 08, 10, 12	Occurrence and duration of malfunction, performance tests and evaluations, actions taken during malfunction, maintenance performed	None	Monthly	N

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
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SN	Opacity	Justification for limit	Compliance Mechanism
01 thru 04, 06, 08, 10, 11, and 12	5	natural gas fired	use of natural gas

17. DELETED CONDITIONS:

Former SC	Justification for removal
None	N/A

18. GROUP A INSIGNIFICANT ACTIVITIES:

Description	Category
0.10 MMBtu/hr Boiler	A-1
One Produced Water Tank (T-1), 8,700 gallon capacity	A-3
One Lube Oil Tank (T-3). 1,120 gallon capacity	A-3
One Antifreeze Mix Tank (T-4), 7,954 gallon capacity	A-3
One Antifreeze Tank (T-5), 5,500 gallon capacity	A-3
One Diesel Tank (T-6), 500 gallon capacity	A-3
One Lube Oil Tank (T-2), 11,300 gallon capacity	A-13
Blowdowns and Venting	A-13
Fugitive Emissions from Equipment Leaks	A-13

19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

List all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
1419-AOP-R4

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 08-26-15

Facility Name: Enable Mississippi River, LLC
 (Tuckerman Compressor Station)
 Permit Number: 1419-AOP-R5
 AFIN: 34-00111

\$/ton factor	23.93	Annual Chargeable Emissions (tpy)	1177.5
Permit Type	Modification	Permit Fee \$	1000

Minor Modification Fee \$	500
Minimum Modification Fee \$	1000
Renewal with Minor Modification \$	500
Check if Facility Holds an Active Minor Source or Minor Source General Permit	<input type="checkbox"/>
If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$	0
Total Permit Fee Chargeable Emissions (tpy)	0.6
Initial Title V Permit Fee Chargeable Emissions (tpy)	

HAPs not included in VOC or PM:

Chlorine, Hydrazine, HCl, HF, Methyl Chloroform, Methylene Chloride, Phosphine, Tetrachloroethylene, Titanium Tetrachloride

Air Contaminants:

All air contaminants are chargeable unless they are included in other totals (e.g., H2SO4 in condensable PM, H2S in TRS, etc.)

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
PM		4.5	16.3	11.8		
PM ₁₀		4.5	16.3	11.8	11.8	16.3
SO ₂		1.4	1.4	0	0	1.4
VOC		37.6	37.5	-0.1	-0.1	37.5
CO		159.3	141.5	-17.8		
NO _x		1133.4	1122.3	-11.1	-11.1	1122.3