

STATEMENT OF BASIS

For the issuance of Air Permit # 1424-AOP-R9 AFIN: 40-00041

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Enable Mississippi River Transmission, LLC - Glendale Compressor Station
997 State Hwy 54 West
Star City, Arkansas 71667-8702

3. PERMIT WRITER:

Jimmy Do

4. NAICS DESCRIPTION AND CODE:

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

5. ALL SUBMITTALS:

The following is a list of ALL permit applications included in this permit revision.

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
8/15/2023	Modification	Update conditions for a NSCR on SN-01 through SN-06

6. REVIEWER'S NOTES:

This modification is to update conditions for a NSCR on SN-01 through SN-06. Permitted NO_x emissions will be lowered by 693.6 tpy.

7. COMPLIANCE STATUS:

The facility was last inspected on April 4, 2023. ECHO revealed no violations in the last 12 quarters.

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N
 If yes, were GHG emission increases significant? N

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

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

If yes for 8(b), explain why this permit modification is not PSD.

The modification to this permit does not meet any PSD thresholds.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-01 through SN-06 and SN-08	HAPs	NESHAP ZZZZ

10. UNCONSTRUCTED SOURCES:

Unconstructed Source	Permit Approval Date	Extension Requested Date	Extension Approval Date	If Greater than 18 Months without Approval, List Reason for Continued Inclusion in Permit
N/A				

11. PERMIT SHIELD – TITLE V PERMITS ONLY:

Did the facility request a permit shield in this application? N

(Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any Rule 18 requirement.)

If yes, are applicable requirements included and specifically identified in the permit? N/A

If not, explain why.

12. COMPLIANCE ASSURANCE MONITORING (CAM) – TITLE V PERMITS ONLY:

List sources potentially subject to CAM because they use a control device to achieve compliance and have pre-control emissions of at least 100 percent of the major source level. List the pollutant of concern and a brief summary of the CAM plan (temperature monitoring, CEMs, opacity monitoring, etc.) and frequency requirements of § 64.

Source	Pollutant Controlled	Cite Exemption or CAM Plan Monitoring and Frequency
SN-01 through SN-06 and SN-08	NO _x	Temperature reading between 750 °F and below 1,250 °F every 24 hours

13. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

14. AMBIENT AIR EVALUATIONS:

The following are results for ambient air evaluations or modeling.

a) NAAQS

A NAAQS evaluation is not required under the Arkansas State Implementation Plan, National Ambient Air Quality Standards, Infrastructure SIPs and NAAQS SIP per Ark. Code Ann. § 8-4-318, dated March 2017 and the DEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

1st Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Department has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m³), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m ³)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Acetaldehyde	45.04	4.95	0.14	Yes
Acrolein	0.115	0.01265	0.14	No
Benzene	1.60	0.18	0.08	Yes
Formaldehyde	0.37	0.0407	1.04	No
Methanol	262.09	28.83	0.14	Yes
Toluene	75.36	8.29	0.08	Yes

2nd Tier Screening (PAIL)

AERMOD air dispersion modeling was performed on the estimated hourly emissions from the following sources, in order to predict ambient concentrations beyond the property boundary. The Presumptively Acceptable Impact Level (PAIL) for each compound has been deemed by the Department to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

Pollutant	PAIL ($\mu\text{g}/\text{m}^3$) = 1/100 of Threshold Limit Value	Modeled Concentration ($\mu\text{g}/\text{m}^3$)	Pass?
Acrolein	2.3	0.34	Y
Formaldehyde	3.7	2.54*	Y

*From 1424-AOP-R4. Modeling after installation of NSCR is $1.41 \mu\text{g}/\text{m}^3$

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 Y

If exempt, explain: No H₂S emissions

15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01 through 06	Testing – NO _x and CO PM/PM ₁₀ , SO ₂ , and VOC HAPs	Stack Test Result AP-42 (Table 3.2-3)	NSCR	76% for formaldehyde 75% for CO 75% for NO _x	CO emission limits are carried over from previous permit.
08	PM/PM ₁₀ , and SO ₂ NO _x , CO, and VOC HAPs	AP-42 (Table 3.2-3) Manufacturer Data	-	-	Tpy emissions are calculated based on 500 hours per year.

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		GRI-HAPCalc (V3.01)			

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
01 through 06	CO NO _x	10 7E	One-half (3) of six compressor engines every five years	See Plantwide Condition # 7 in permit.
01 through 06	Formaldehyde CO	Method 320 or 323 or others as specified by regulation	Initial and every 8,760 hours or 3 years, whichever comes first	NESHAP

17. 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)
SN-01 – SN-06	NO _x (Exhaust Gas Temperature at inlet of catalyst)	Temperature	Once every 24 hours	Y

18. 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)
SN-01 – SN-06	Exhaust Gas Temperature at inlet of catalyst	Above 750 °F and below 1,250 °F	Once every 24 hours	Y

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01 through 06 and 08	5%	Natural Gas Fired	Use of Natural Gas

20. DELETED CONDITIONS:

Former SC	Justification for removal
	N/A

21. GROUP A INSIGNIFICANT ACTIVITIES:

The following is a list of Insignificant Activities including revisions by this permit.

Source Name	Group A Category	Emissions (tpy)							
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs		
							Single	Total	
9,500 gal Used Engine Oil Tank	A-3			.00002					
(2) 8,820 gal Produced Water Storage Tank	A-3			1.92					
4,200 gal Antifreeze Tank	A-3			0.00002					
8,820 gal Antifreeze mix Tank	A-3			0.0001					
16,002 gal Engine Oil Storage Tank	A-3			0.00004					
12,600 gal Produced Water Storage Tank	A-13			1.38					
100 gal waste	A-13			0.003					

Solvent Tank								
2,047 gal Methanol Tank	A-13			0.04				
Compressors blowdowns	A-13			0.11				
Process Piping Fugitives	A-13			0.19				
Truck Loading	A-13			0.01				

22. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
1424-AOP-R8

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-11-16

Enable Mississippi River Transmission, LLC - Glendale
 Compressor Station
 Permit #: 1424-AOP-R9
 AFIN: 40-00041

\$/ton factor	28.14	Annual Chargeable Emissions (tpy)	256.7
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)	-693.6
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		7.3	7.3	0		
PM ₁₀		7.3	7.3	0	0	7.3
PM _{2.5}		0	0	0		
SO ₂		5.5	5.5	0	0	5.5
VOC		10.4	10.4	0	0	10.4
CO		249.1	249.1	0		
NO _x		927.1	233.5	-693.6	-693.6	233.5

