

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1432-AOP-R7 AFIN: 73-00127

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Enable Mississippi River Transmission, LLC - West Point Compressor Station
800 Highway 36 East
Searcy, Arkansas 72143-9736

3. PERMIT WRITER:

Andrea Sandage

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
9/3/2020	Renewal	Revised Calculations

6. REVIEWER'S NOTES:

Enable Mississippi River Transmission, LLC owns and operates the West Point Compressor Station (West Point) which is located in White County, Arkansas. The facility is in Section 25, Township 7 North, and Range 6 West. This is a Title V renewal for this permit. There were no operational changes and no modifications to existing sources. Certain emission limits were changed based on revised calculations, a revised Insignificant Activities List and updated Subpart ZZZZ conditions.

The permitted annual emissions decreased by 1.5 tpy VOC, 40.8 tpy CO, 24.8 tpy NOx and 0.6 tpy Total HAPs. Annual emissions increased by 3.5 tpy PM/PM10 and 4.8 tpy SO2.

Note: SN-08 Emergency Generator emissions were based on 500 hrs/yr. The previous permit calculations were based on 8760 hr/yr. SN-01 – SN-06 emissions based on 13.1 MMBtu/hr engine. Previous emissions based on 13.93 MMBtu/hr.

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 permit No. 1432-AOP-R4 was last inspected on February 4, 2020 and was found to be in compliance.

8. PSD/GHG 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 for 8(b), explain why this permit modification is not PSD. – Renewal with no changes.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-01-SN-06, SN-08	HAP	40 C.F.R. § 63 Subpart 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
none				

11. PERMIT SHIELD – TITLE V PERMITS ONLY:

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

If yes, are applicable requirements included and specifically identified in the permit? Y

For any requested inapplicable regulation in the permit shield, explain the reason why it is not applicable in the table below.

Source	Inapplicable Regulation	Reason
Facility	Reg.19.8	The facility is not identified in the list of regulated sources.
Facility	Reg.26.302(E)	The facility is not an acid rain category source.
Facility	40 C.F.R. § 60	Source categories do not apply to any units at the facility as of the effective date of the permit.
Facility	40 CFR Part 63 Subpart HH	This is not a production facility
Facility	40 CFR Part 63 Subpart HHH	This facility does not have any glycol dehydrators at this site
Facility	40 CFR Part 60 Subpart OOOO	No affected sources
Facility	40 CFR Part 60 Subpart OOOOa	No affected sources
Facility	40 CFR Part 60 Subpart JJJJ	All engines were installed prior to 2006
Facility	40 CFR Part 64	There are no emissions controls at the facility
Facility	40 CFR Part 68	Enable Mississippi River Transmission, LLC does not store ammonia at this site
Facility	40 C.F.R. § 79	The facility is not in this source category.
Facility	40 C.F.R. § 80	The facility is not in this source category.
Facility	40 C.F.R. § 81.304	The facility is not located in a non-attainment area of the effective date of the permit.

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
none		

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:

The non-criteria pollutants listed below were evaluated. Based on Department procedures for review of non-criteria pollutants, emissions of all other non-criteria pollutants are below thresholds of concern.

The facility emits HAPs related to incomplete combustion.

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?
Acrolein	0.23	0.0253	0.207	No
PAH	0.02	0.022	0.012	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 (µg/m ³) = 1/100 of Threshold Limit Value	Modeled Concentration (µg/m ³)	Pass?
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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	0.4183	Yes

15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01-06	AP-42 Chapter 3.2 Table 3.2-3 Emission rates for CO and NO _x are based on stack testing values from 1993 with a 20% contingency	<u>lb/MMBtu</u> PM/PM ₁₀ =1.941E-2 SO ₂ =1.47E-2 VOC = 2.96E-2 <u>lb/hr</u> NO _x SN-01 – 38.77 SN-02 – 40.31 SN-03 – 38.65 SN-04 – 40.15 SN-05 – 36.38 SN-06 – 38.11 CO SN-01 – 51.85 SN-02 – 76.52 SN-03 – 44.03 SN-04 – 108.48 SN-05 – 65.86 SN-06 – 60.16 1,3-Butadiene= 6.63e-4 Acetaldehyde =2.79e-3 Acrolein =2.63e-3 Benzene =1.58e-3 Formaldehyde =2.05e-2 Methanol=3.06e-3 PAH= 1.41e-4	N/A	N/A	1100-HP Ingersoll-Rand KVG-103 13.10 MMBtu/hr SO ₂ based on 0.2 g/100 scf - site-specific based on 5.0 g/100 scf
08	AP-42 Chapter 3.2 Table 3.2-3	<u>lb/MMBtu</u> PM/PM ₁₀ =1.941E-2 SO ₂ =1.47E-2 CO = 3.72 NO _x = 2.27 VOC = 2.96E-2	N/A	N/A	300 HP Caterpillar G379 (Emergency Engine) 2.65 MMBtu/hr

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		1,3-Butadiene=6.63e-4 Acetaldehyde=2.79e-3 Acrolein =2.63e-3 Benzene =1.58e-3 Formaldehyde=2.05e-2 Methanol=3.06e-3 PAH= 1.41e-4			500 hrs/yr SO ₂ based on 0.2 g/100 scf - site-specific based on 5.0 g/100 scf

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
01-06	CO NO _x	10 7E	One-half of each type of compressor every five years	See Plantwide Condition #9 in Permit

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)
N/A				

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)
01-06, 08	Maintenance/Malfunction	N/A	Monthly	N
08	Hours of Operation	500 hrs/yr	Monthly	Y

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01-06, 08	5%	Regulation No. 18 §18.501	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
Diesel Storage Tank (105 gallon)	A-2			0.00003				
Produced Water Storage Tank (1,000 gallon)	A-3			0.16				
Waste Water Storage Tank (1,700 gallon)	A-3			0.27				
AntiFreeze Mix Tank (8,820 gallon)	A-3			0.00003				
AntiFreeze Storage Tank (4,200 gallon)	A-3			0.00001				
Engine Oil Storage Tank (7,900 gallon)	A-3			0.36				
Used Oil Storage Tank (5,000 gallon)	A-3			0.25				
Blowdown Vents	A-13			0.10				
Compressor Blowdown Vents	A-13			0.23				
Produced Water Truck Loading	A-13			0.001				
Process Piping Fugitives	A-13			0.14				

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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 #
1432-AOP-R6

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-11-16

Facility Name: Enable Mississippi River Transmission,
 LLC (West Point Compressor Station)
 Permit Number: 1432-AOP-R7
 AFIN: 73-00127

\$/ton factor	23.93	Annual Chargeable Emissions (tpy)	1042.8
Permit Type	Renewal No Changes	Permit Fee \$	0

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)	-18
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 condensible 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		3.8	7.3	3.5		
PM ₁₀		3.8	7.3	3.5	3.5	7.3
PM _{2.5}		0	0	0		
SO ₂		0.7	5.5	4.8	4.8	5.5
VOC		11.8	10.3	-1.5	-1.5	10.3
CO		1825.8	1785	-40.8		
NO _x		1044.5	1019.7	-24.8	-24.8	1019.7
Total HAPS	<input type="checkbox"/>	11.85	11.25	-0.6		