

## STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1433-AOP-R10 AFIN: 02-00065

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Enable Mississippi River Transmission, LLC—Fountain Hill Compressor Station  
409 Ashley 8 Road  
Hamburg, Arkansas 71646

3. PERMIT WRITER:

Jesse Smith

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
6/11/2020	Renewal	Minor changes to engine emissions due to rounding and emission factor changes

6. REVIEWER'S NOTES:

Enable Mississippi River Transmission, LLC (EMRT), formerly CenterPoint Energy – Mississippi River Transmission, LLC, owns and operates the Fountain Hill Natural Gas Compressor Station located in Ashley County, Arkansas. This permitting action was taken to renew the facility's Title V permit as well update the emissions from the compressor engine sources. The permitted emission changes are as follows: an increase of 0.8 tpy PM/PM<sub>10</sub>, an increase of 0.8 tpy SO<sub>2</sub>, and increase of 0.7 tpy VOC, an increase of 0.2 tpy CO, an increase of 0.2 tpy NO<sub>x</sub> and an increase of 1.32 tpy Total HAPs.

## 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 was last inspected October 11, 2019. There were no areas of concern noted at this time.

## 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? Y

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

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

No changes in emissions that would indicate a PSD analysis is necessary.

## 9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-01 through SN-10	-	NESHAP ZZZZ
SN-05	VOC CO NO <sub>x</sub>	NSPS JJJJ
SN-05	-	NSPS OOOOa

## 10. PERMIT SHIELD – TITLE V PERMITS ONLY:

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

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

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

If not, explain why.

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
N/A		

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. 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 ADEQ 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.

1<sup>st</sup> 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 ( $\text{mg}/\text{m}^3$ ), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV ( $\text{mg}/\text{m}^3$ )	PAER (lb/hr) = $0.11 \times \text{TLV}$	Proposed lb/hr	Pass?
Acetaldehyde	45	4.95	0.17	Yes
Acrolein	0.229	0.025	0.17	No
Benzene	1.59	0.175	0.09	Yes
Formaldehyde	1.5 <sup>a</sup>	0.165	1.41	No
Methanol	262	28.8	0.25	Yes
Toluene	75	8.28	0.09	Yes

a. Based on the ADEQ approved alternate PAIL

2<sup>nd</sup> 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	2.29	1.00569	Yes
Formaldehyde	15.0 <sup>a</sup>	8.37727	Yes

a. ADEQ approved alternate PAIL.

c) H<sub>2</sub>S 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 H<sub>2</sub>S Standards Y

If exempt, explain: The facility does not emit H<sub>2</sub>S

13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01 thru 04 and 08	NO <sub>x</sub> & CO: Stack test data. VOC, PM <sub>10</sub> , SO <sub>2</sub> (AP-42, 7/00, table 3.2-3)	g/hp-hr NO <sub>x</sub> -15.9 CO -18.64 lb/MMBtu PM/PM <sub>10</sub> – 1.941E-2 SO <sub>2</sub> – 1.47E-2 VOC – 2.96E-2	None	These sources shall be tested for CO & NO <sub>x</sub> emissions. Uncontrolled	
05	NSPS JJJJ  AP-42 Table 3.2-3	g/hp-hr: 1.0 VOC 4.0 CO 3.0 NO <sub>x</sub>  lb/MMBtu: 1.941E-2 PM/PM <sub>10</sub> 1.47E-2 SO <sub>2</sub>	NSCR		

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
06 and 07	NO <sub>x</sub> & CO: Stack test data. VOC, PM <sub>10</sub> , SO <sub>2</sub> (AP-42, 7/00, table 3.2-3)	g/hp-hr NO <sub>x</sub> -1.59 CO -1.864 lb/MMBtu PM/PM <sub>10</sub> – 1.941E-2 SO <sub>2</sub> – 1.47E-2 VOC – 2.96E-2	NSCR/AFRC	90% - NO <sub>x</sub> 90% - CO	
01 thru 08	HAPs: AP-42 Table 3.2-3	<u>lb/MMBtu</u> Total HAP: 0.0326	None	Uncontrolled	
10	NO <sub>x</sub> , CO, VOC, PM <sub>10</sub> & SO <sub>2</sub> : (AP-42, 7/00, table 3.2-3)	lb/MMBtu PM/PM <sub>10</sub> - 1.941E-2 NO <sub>x</sub> – 2.27 CO – 3.72 SO <sub>2</sub> - 1.47E-2 VOC – 2.96E-2	None	Test SN-09 one time to determine compliance for CO & NO <sub>x</sub> .	
10	HAPs: AP-42 Table 3.2-3	<u>lb/MMBtu</u> Total HAP: 0.0326	None	Uncontrolled	

## 14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
01 thru 04 and 06 thru 08	NO <sub>x</sub> and CO	7E and 10	Every 60 months	Compressor stations are required to test one half of each type of engine every five years.
05	VOC CO NO <sub>x</sub>	25A 10 7E	Initial test and every 8,760 hours or 3 years, whichever comes first	NSPS JJJJ 40 C.F.R. §60.4243(b)(2)(ii)
Plantwide	Total Sulfur (SO <sub>2</sub> )	Sorbent tubes supplied by National	Every 60 months	Department Guidance

SN	Pollutants	Test Method	Test Interval	Justification
		Draeger, Incorporated or equivalent, or other test method upon the Department's approval		

## 15. 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)
06-07	Catalyst inlet temperature	in-line thermocouple	Continuously	N
10	Hours of operation	non-resettable hour meter	When in operation	Y

## 16. 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)
06-07	Catalyst inlet temperature	750°F - 1250°F	Daily	N
06-07	CO and NO <sub>x</sub> concentration at the end of the exhaust stack	3.7 lb/hr CO 3.1 lb/hr NO <sub>x</sub>	Quarterly, but at least annually if not running full time (see Specific Condition #6)	N
05	Maintenance conducted	--	As needed	N
05	Hours of operation or months since last rod packing replacement	Every 26,000 hours of operation or every 36 months	As needed	Y
10	Hours of	500 hours	Monthly	Y

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	operation	(emergency and non-emergency) per calendar year each. Emergency operation in excess of these hours may be allowable but shall be reported		
01 thru 04, 06, 07, & 08	Records required to maintain remote status	40 CFR §63.6675	Every 12 months	N
01 thru 04, 06, 07, 08, & 10	Maintenance Conducted	-	See Plantwide Conditions #22 and #23	N

## 17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01 thru 08 & 10	5%	Department Guidance	Natural Gas Fuel Only

## 18. DELETED CONDITIONS:

Former SC	Justification for removal
25-28	No longer subject to NSPS Subpart OOOOa

## 19. 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 <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							Single	Total
Three (3) Produced Water Storage Tanks – 8,820 gal each	A-3	-	-	5.76	-	-	-	-

Antifreeze Mix Tank – 8,820 gal	A-3	-	-	0.0001	-	-	-	-
Diesel Storage Tank – 105 gal	A-3	-	-	0.0001	-	-	-	-
Engine Oil Storage Tank – 11,760 gal	A-3	-	-	0.51	-	-	-	-
Glycol Storage Tank – 4,620 gal	A-3	-	-	0.0001	-	-	-	-
Kerosene Storage Tank – 105 gal	A-3	-	-	0.0001	-	-	-	-
Used Oil Storage Tank – 4,620 gal	A-3	-	-	0.66	-	-	-	-
<b>Total A-3</b>	-	-	<b>6.93</b>	-	-	-	-	
Compressor & Facility Blowdowns	A-13	-	-	1.52	-	-	-	-
Process Piping Fugitives	A-13	-	-	0.62	-	-	-	-
Truck Loading	A-13	-	-	0.01	-	-	-	-
<b>Total A-13</b>	-	-	<b>2.15</b>	-	-	-	-	

## 20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
1433-AOP-R9



## APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

## Fee Calculation for Major Source

Revised 03-11-16

Facility Name: Enable Mississippi River Transmission,  
LLC - Fountain Hill Compressor Station  
Permit Number: 1433-AOP-R10  
AFIN: 02-00065

\$/ton factor	23.93	Annual Chargeable Emissions (tpy)	757.2
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)	2.5
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		4.9	5.7	0.8		
PM <sub>10</sub>		4.9	5.7	0.8	0.8	5.7
PM <sub>2.5</sub>		0	0	0		
SO <sub>2</sub>		4.1	4.9	0.8	0.8	4.9
VOC		15.6	16.3	0.7	0.7	16.3
CO		860.1	860.3	0.2		
NO <sub>x</sub>		730.1	730.3	0.2	0.2	730.3

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Total HAPs	<input type="checkbox"/>	7.74	10.17	2.43		