

ADEQ OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation No. 26:

Permit No. : 1433-AOP-R2

Renewal #1

IS ISSUED TO:

**CenterPoint Energy
Mississippi River Transmission Corporation
Fountain Hill Compressor Station
409 Ashley 8 Road
Hamburg, AR 71646-8859
Ashley County
AFIN: 02-00065**

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

IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Michael Bonds
Chief, Air Division

Date

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Table 1 - List of Acronyms

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
HP	Horsepower
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	Ton per year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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Section I: FACILITY INFORMATION

PERMITTEE: Mississippi River Transmission Corporation- Fountain Hill
Compressor Station

AFIN: 02-00065

PERMIT NUMBER: 1433-AOP-R2

FACILITY ADDRESS: 409 Ashley 88 Road
Hamburg, Ashley County Arkansas 71646-8859

MAILING ADDRESS: CenterPoint Energy-Mississippi River Transmission Corp.
P.O. Box 21734
Shreveport LA, 71151

COUNTY: Ashley

CONTACT POSITION: Ms. Laura L. Guthrie, Sr. Environmental Specialist

TELEPHONE NUMBER: 318-429-3706

REVIEWING ENGINEER: James G. Siganos. P.E.

UTM North - South (Y): Zone 3688.661 km

UTM East - West (X): Zone 599.317 km



Section II: INTRODUCTION

Summary of Permit Activity

CenterPoint Energy - Mississippi River Transmission Corporation owns and operates the Fountain Hill Natural Gas Compressor Station which is located in Hamburg, Ashley County, Arkansas.

This permit is being issued as a renewal for the Title V Operating Permit 1433-AOP-R1, which has an expiration date of September 12, 2004. This is an existing operation; no new construction or major modification is being proposed. The facility is a major source of criteria pollutants and is therefore subject to Title V requirements. Significant emissions of nitrogen oxides, carbon monoxide and volatile organic compounds are a result of the combustion of natural gas in the compressor engines. Routine blowdowns and piping components are a source of fugitive emissions. Small amounts (less than 3.0 tpy) of particulate matter and sulfur dioxide may be emitted from this facility.

Updated emission factors for the compressor engines were sourced from AP-42, Section 3.2, table 3.2.3, Natural Gas-fired Reciprocating Engines, July 2000 edition. The use of this updated uncontrolled engine emission data resulted in small plantwide permitted emission changes.

Process Description

The Fountain Hill Compressor Station consists of eight (8) 880 HP Ingersol Rand KVG-8 compressor engines (SN-01 through SN-08), one (1) 275 HP Ingersol Rand PVG-8 electrical generator (SN-09), and one (1) 300 HP Caterpillar G-379 emergency electrical generator (SN-10).


Low pressure pipeline gas is pulled off line into the compressor station, and the pressure is increased by compressors which are driven by natural gas fired reciprocating engines, then placed back into the transmission system. This compressor station will use only pipeline-quality natural gas in the firing of the reciprocating compressor engines.

Support equipment includes five (5) entrained liquids (slop) tanks, one (1) used oil storage tank, one (1) lube oil tank, one (1) diesel tank, one (1) gasoline tank, one (1) glycol tank, one (1) used solvent tank, one (1) kerosene tank, one (1) antifreeze mix tank, one (1) wastewater tank, and one (1) Smart Ash incinerator. These units are all insignificant based on Arkansas regulations. Pipeline quality natural gas is the only fuel used by the compressor engines and generators. Oil is used for lubricating purposes only, kerosene is used to clean engine parts, and diesel is used only for mobile equipment.

Regulations

The following table contains the regulations applicable to this permit.

Table 2 – Regulations



Source No.	Regulation Citations
Facility	Arkansas Air Pollution Control Code (Regulation 18)
Facility	Regulations of the Arkansas Plan of implementation for Air Pollution Control (Regulation 19)
Facility	Regulations of the Arkansas Operating Air Permit Program (Regulation 26)

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The following table is a summary of emissions from the facility. The following table contains cross-references to the pages containing specific conditions and emissions for each source. This table, in itself, is not an enforceable condition of the permit.

Table 3 – Emission Summary

Source No.	Description	Pollutant	Emission Rates	
			lb/hr	tpy
Total Allowable Emissions		PM	<1.0	3.0
		PM ₁₀	<1.0	3.0
		SO ₂	<1.0	<1.0
		VOC	2.7	9.0
		CO	306.8	1307.1
		NO _x	257.7	1105.9
		*Formaldehyde	1.12	4.76
		*Methanol	0.18	0.79
		*Acetaldehyde	0.18	0.79
		*Benzene	0.08	0.40
		*Toluene	0.08	0.40
		*Acrolein	0.18	0.79

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

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
01	Gas Compressor Engine, 4 Cycle Rich-Burn, Ingersol-Rand KVG-8	PM	<0.1	0.3	14
		PM ₁₀	<0.1	0.3	
		SO ₂	<0.1	<0.1	
		VOC	0.3	1.0	
		CO	36.2	158.4	
		NO _x	30.9	135.2	
		*Formaldehyde	0.13	0.57	
		*Methanol	0.02	0.09	
		*Acetaldehyde	0.02	0.08	
		*Benzene	0.01	0.04	
		*Toluene	< 0.01	0.02	
		*Acrolein	0.02	0.07	
02	Gas Compressor Engine, 4 Cycle Rich-Burn, Ingersol-Rand KVG-8	PM	<0.1	0.3	14
		PM ₁₀	<0.1	0.3	
		SO ₂	<0.1	<0.1	
		VOC	0.3	1.0	
		CO	36.2	158.4	
		NO _x	30.9	135.2	
		*Formaldehyde	0.13	0.57	
		*Methanol	0.02	0.09	
		*Acetaldehyde	0.02	0.08	
		*Benzene	0.01	0.04	
		*Toluene	< 0.01	0.02	
		*Acrolein	0.02	0.07	
03	Gas Compressor Engine, 4 Cycle Rich-Burn, Ingersol-Rand KVG-8	PM	<0.1	0.3	14
		PM ₁₀	<0.1	0.3	
		SO ₂	<0.1	<0.1	
		VOC	0.3	1.0	
		CO	36.2	158.4	
		NO _x	30.9	135.2	
		*Formaldehyde	0.13	0.57	
		*Methanol	0.02	0.09	
		*Acetaldehyde	0.02	0.08	
		*Benzene	0.01	0.04	
		*Toluene	< 0.01	0.02	
		*Acrolein	0.02	0.07	

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	Tpy	
04	Gas Compressor Engine, 4 Cycle Rich-Burn, Ingersol-Rand KVG-8	PM	<0.1	0.3	14
		PM ₁₀	<0.1	0.3	
		SO ₂	<0.1	<0.1	
		VOC	0.3	1.0	
		CO	36.2	158.4	
		NO _x	30.9	135.2	
		*Formaldehyde	0.13	0.57	
		*Methanol	0.02	0.09	
		*Acetaldehyde	0.02	0.08	
		*Benzene	0.01	0.04	
		*Toluene	< 0.01	0.02	
		*Acrolein	0.02	0.07	
05	Gas Compressor Engine, 4 Cycle Rich-Burn, Ingersol-Rand KVG-8	PM	<0.1	0.3	14
		PM ₁₀	<0.1	0.3	
		SO ₂	<0.1	<0.1	
		VOC	0.3	1.0	
		CO	36.2	158.4	
		NO _x	30.9	135.2	
		*Formaldehyde	0.13	0.57	
		*Methanol	0.02	0.09	
		*Acetaldehyde	0.02	0.08	
		*Benzene	0.01	0.04	
		*Toluene	< 0.01	0.02	
		*Acrolein	0.02	0.07	
06	Gas Compressor Engine, 4 Cycle Rich-Burn, Ingersol-Rand KVG-8	PM	<0.1	0.3	14
		PM ₁₀	<0.1	0.3	
		SO ₂	<0.1	<0.1	
		VOC	0.3	1.0	
		CO	36.2	158.4	
		NO _x	30.9	135.2	
		*Formaldehyde	0.13	0.57	
		*Methanol	0.02	0.09	
		*Acetaldehyde	0.02	0.08	
		*Benzene	0.01	0.04	
		*Toluene	< 0.01	0.02	
		*Acrolein	0.02	0.07	

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	Tpy	
07	Gas Compressor Engine, 4 Cycle Rich-Burn, Ingersol-Rand KVG-8	PM	<0.1	0.3	14
		PM ₁₀	<0.1	0.3	
		SO ₂	<0.1	<0.1	
		VOC	0.3	1.0	
		CO	36.2	158.4	
		NO _x	30.9	135.2	
		*Formaldehyde	0.13	0.57	
		*Methanol	0.02	0.09	
		*Acetaldehyde	0.02	0.08	
		*Benzene	0.01	0.04	
		*Toluene	< 0.01	0.02	
		*Acrolein	0.02	0.07	
08	Gas Compressor Engine, 4 Cycle Rich-Burn, Ingersol-Rand KVG-8	PM	<0.1	0.3	14
		PM ₁₀	<0.1	0.3	
		SO ₂	<0.1	<0.1	
		VOC	0.3	1.0	
		CO	36.2	158.4	
		NO _x	30.9	135.2	
		*Formaldehyde	0.13	0.57	
		*Methanol	0.02	0.09	
		*Acetaldehyde	0.02	0.08	
		*Benzene	0.01	0.04	
		*Toluene	< 0.01	0.02	
		*Acrolein	0.02	0.07	
09	Electric Generator, Ingersol rand PVG	PM	<0.1	0.3	21
		PM ₁₀	<0.1	0.3	
		SO ₂	<0.1	<0.1	
		VOC	0.3	1.0	
		CO	8.2	35.9	
		NO _x	5.0	21.9	
		*Formaldehyde	0.04	0.18	
		*Methanol	0.01	<0.03	
		*Acetaldehyde	0.01	0.02	
		*Benzene	<0.01	<0.01	
		*Toluene	<0.01	<0.01	
		*Acrolein	0.01	0.02	

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	Tpy	
10	Backup Electrical Generator, Caterpillar G379	PM	<0.1	<0.1	23
		PM ₁₀	<0.1	<0.1	
		SO ₂	<0.1	<0.1	
		VOC	<0.1	<0.1	
		CO	9.0	4.0	
		NO _x	5.5	2.4	
		*Formaldehyde	0.04	0.02	
		*Methanol	0.01	<0.01	
		*Acetaldehyde	0.01	<0.01	
		*Benzene	<0.01	<0.01	
		*Toluene	<0.01	<0.01	
		*Acrolein	0.01	<0.01	

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

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Section III:PERMIT HISTORY

Fountain Hill Compressor Station began operation in 1949.

Permit 1433-A is the initial air permit for the compressor station.

Permit 1433-AR-1 was issued on August 18, 1994 to Mississippi River Transmission Corporation. This permit was issued to add one lube oil tank and one condensate tank to the permit.

Permit 1433-AOP-R0 was the initial Title V permit issued on December 10, 1998. There were no physical changes to the facility.

Permit 1433-AOP-R1 was issued on September 13, 1999. This permit was issued in order to avoid confusion with the initial Title V permit issued on December 10, 1998, and agreed upon changes in the Permit Appeal Resolution (PAR). The permit No. was changed from R0 to R1. There were no physical changes to the facility.

Section IV: SPECIFIC CONDITIONS

SN-01 through SN-08

Gas Compressor Engine, Ingersoll-Rand KVG-8

Source Description

Source SN-01 through SN-08 are 880 HP Ingersoll-Rand KVG-8 four stroke rich-burn engines used to drive compressors which pressurize natural gas. The engines were last installed or modified in 1949 and are powered by pipeline quality natural gas. They are capable of running at 120% rated capacity.



Specific Conditions

The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by using natural gas to fire the engines and operating at or below the maximum capacity of the equipment. [Regulation No. 19 §19.501 *et seq.* effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Table 4 – Maximum Criteria Emission Rates

SN	Pollutant	lb/hr	Tpy
01	PM ₁₀	<0.1	0.3
	SO ₂	<0.1	<0.1
	VOC	0.3	1.0
	CO	36.2	158.4
	NO _x	30.9	135.2
02	PM ₁₀	<0.1	0.3
	SO ₂	<0.1	<0.1
	VOC	0.3	1.0
	CO	36.2	158.4
	NO _x	30.9	135.2

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SN	Pollutant	lb/hr	Tpy
03	PM ₁₀	<0.1	0.3
	SO ₂	<0.1	<0.1
	VOC	0.3	1.0
	CO	36.2	158.4
	NO _x	30.9	135.2
04	PM ₁₀	<0.1	0.3
	SO ₂	<0.1	<0.1
	VOC	0.3	1.0
	CO	36.2	158.4
	NO _x	30.9	135.2
05	PM ₁₀	<0.1	0.3
	SO ₂	<0.1	<0.1
	VOC	0.3	1.0
	CO	36.2	158.4
	NO _x	30.9	135.2
06	PM ₁₀	<0.1	0.3
	SO ₂	<0.1	<0.1
	VOC	0.3	1.0
	CO	36.2	158.4
	NO _x	30.9	135.2

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SN	Pollutant	lb/hr	Tpy
07	PM ₁₀	<0.1	0.3
	SO ₂	<0.1	<0.1
	VOC	0.3	1.0
	CO	36.2	158.4
	NO _x	30.9	135.2
08	PM ₁₀	<0.1	0.3
	SO ₂	<0.1	<0.1
	VOC	0.3	1.0
	CO	36.2	158.4
	NO _x	30.9	135.2

The permittee shall not exceed the HAP emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by using natural gas to fire the engines and by operating at or below maximum capacity 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 No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-

Table 5 – Maximum Non-Criteria Emission Rates

SN	Pollutant	lb/hr	tpy
01	PM	<0.1	0.3
	Formaldehyde	0.13	0.57
	Methanol	0.02	0.09
	Acetaldehyde	0.02	0.08
	Benzene	0.01	0.04
	Toluene	<0.01	0.02
	Acrolein	0.02	0.07
02	PM	<0.1	0.3
	Formaldehyde	0.13	0.57
	Methanol	0.02	0.09
	Acetaldehyde	0.02	0.08
	Benzene	0.01	0.04
	Toluene	<0.01	0.02
	Acrolein	0.02	0.07

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SN	Pollutant	lb/hr	tpy
03	PM	<0.1	0.3
	Formaldehyde	0.13	0.57
	Methanol	0.02	0.09
	Acetaldehyde	0.02	0.08
	Benzene	0.01	0.04
	Toluene	<0.01	0.02
	Acrolein	0.02	0.07
04	PM	<0.1	0.3
	Formaldehyde	0.13	0.57
	Methanol	0.02	0.09
	Acetaldehyde	0.02	0.08
	Benzene	0.01	0.04
	Toluene	<0.01	0.02
	Acrolein	0.02	0.07
05	PM	<0.1	0.3
	Formaldehyde	0.13	0.57
	Methanol	0.02	0.09
	Acetaldehyde	0.02	0.08
	Benzene	0.01	0.04
	Toluene	<0.01	0.02
	Acrolein	0.02	0.07

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SN	Pollutant	lb/hr	tpy
06	PM	<0.1	0.3
	Formaldehyde	0.13	0.57
	Methanol	0.02	0.09
	Acetaldehyde	0.02	0.08
	Benzene	0.01	0.04
	Toluene	<0.01	0.02
	Acrolein	0.02	0.07
07	PM	<0.1	0.3
	Formaldehyde	0.13	0.57
	Methanol	0.02	0.09
	Acetaldehyde	0.02	0.08
	Benzene	0.01	0.04
	Toluene	<0.01	0.02
	Acrolein	0.02	0.07
08	PM	<0.1	0.3
	Formaldehyde	0.13	0.57
	Methanol	0.02	0.09
	Acetaldehyde	0.02	0.08
	Benzene	0.01	0.04
	Toluene	<0.01	0.02
	Acrolein	0.02	0.07

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The permittee shall not exceed 5% opacity from sources SN-01 through SN-08 as measured by EPA Reference Method 9. Compliance with this specific condition shall be demonstrated through compliance with Plantwide Condition 7.

SN-09

Electric Generator Engine, Ingersoll-Rand PVG

Source Description

Source SN-09, is a 275 HP Ingersoll-Rand PVG-8 electrical generator. It was last installed or modified in 1949. The engine is capable of running at 100% rated capacity.

Specific Conditions

The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by using natural gas to fire the engine and operating at or below the maximum capacity of the equipment. [Regulation No. 19 §19.501 *et seq.* effective February 15, 1999, and 40 CFR Part 52, Subpart E]

SN	Pollutant	lb/hr	Tpy
09	PM ₁₀	<0.1	0.1
	SO ₂	<0.1	<0.1
	VOC	0.07	0.3
	CO	8.2	35.9
	NO _x	5.0	21.9

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The permittee shall not exceed the HAP emission rates set forth in the following table. Compliance with HAPs emissions will be assured through the use of natural gas and operating at or below maximum capacity 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 No. 18 §18.801 *et seq.* 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
09	PM	<0.1	0.1
	Formaldehyde	0.04	0.18
	Methanol	0.01	0.03
	Acetaldehyde	0.01	0.02
	Benzene	<0.01	0.01
	Toluene	<0.01	<0.01
	Acrolein	0.01	0.02

The permittee shall not exceed 5% opacity from source SN-09 as measured by EPA Reference Method 9. Compliance with this specific condition shall be demonstrated through compliance with Plantwide Condition 7.

SN-10

Backup Electrical Generator, Caterpillar G379

Source Description

Source SN-10, a 300 hp Caterpillar G-379 electrical generator, was last installed or modified in 1987. The generator supplies power to the station in the event of a short time electrical grid outage. The engine is capable of running at 100% rated capacity.

Specific Conditions

The permittee shall not exceed the emission rates set forth in the following table. Compliance with emission rates will be demonstrated by the use of natural gas and a restriction on the hours of operation of the equipment. [Regulation No. 19 §19.501 *et seq.* effective February 15, 1999, and 40 CFR Part 52, Subpart E]

SN	Pollutant	lb/hr	Tpy
10	PM ₁₀	<0.1	<0.1
	SO ₂	<0.1	<0.1
	VOC	<0.1	0.1
	CO	9.0	4.0
	NO _x	5.5	2.4

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The permittee shall not exceed the HAP emission rates set forth in the following table. Compliance with HAPs emissions will be assured through 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]

SN	Pollutant	lb/hr	Tpy
10	PM	<0.1	<0.1
	Formaldehyde	0.04	0.02
	Methanol	0.01	<0.01
	Acetaldehyde	<0.01	<0.01
	Benzene	<0.01	<0.01
	Toluene	<0.01	<0.01
	Acrolein	0.01	<0.01

The permittee shall not exceed 5% opacity from source SN-10 as measured by EPA Reference Method 9. Compliance with this specific condition shall be demonstrated through compliance with Plantwide Condition 7.

The permittee shall not operate the backup electrical generator (SN-10) more than 876 hours during any consecutive twelve month period. [Regulation 19, 19.705 *et seq.* A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR 70.6]

The permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition 10 and may be used by the Department for enforcement purposes. These records shall be updated on a monthly basis, shall be kept at the nearest manned office, and shall be provided to Department personnel upon request. An annual total and each individual month's data shall be submitted in accordance with General Provision 7. [Regulation 19, §19.705 and 40 CFR Part 52, Subpart E]

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Section V: COMPLIANCE PLAN AND SCHEDULE

CenterPoint Energy - Mississippi River Transmission Corporation - Fountain Hill Compressor Station is in compliance with the applicable regulations cited in the permit application. Mississippi River Transmission Corporation - Fountain Hill 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 will 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 No. 19 §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §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 No.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 will submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation No.19 §19.702 and/or Regulation No. 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 No.19 §19.702 and/or Regulation No.18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Sampling ports adequate for applicable test methods;

Safe sampling platforms;

Safe access to sampling platforms; and

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 will maintain the equipment in good condition at all times. [Regulation No.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 No. 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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7. The permittee shall only use pipeline quality natural gas to fire the compressor engines located at this facility. Pipeline quality natural gas is defined as gas which contains less than 0.3 grains/100 scf of H₂S and that H₂S constitutes greater than 50% by weight of the sulfur by weight in the natural gas. [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 NO_x and CO on one-half of each type of compressor engine(s), same model and HP, in accordance with Plantwide Condition 3, as shown in the table below. Testing shall be conducted every five years. EPA Reference Method 7E shall be used to determine NO_x and EPA Reference Method 10 shall be used to determine CO. 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 engine is tested once. If the tested emission rate for any pollutant is in excess of the permitted emission rate, all engines shall be tested for that pollutant. [Regulation No. 19 §19.702, and 40 CFR Part 52, Subpart E.

SN	Description	Testing Requirement
01, 02, 03, & 08	880 HP Ingersol-Rand KVG-8, 4 cycle rich burn compressor engines.	Test by January 2009.
04, 05, 06 & 07	880 HP Ingersol-Rand KVG-8, 4 cycle rich burn compressor engines.	Tested on January 28, and 29, 2004.
09	275 HP Ingersol-Rand PVG	Test one time to determine compliance.

* In order to determine compliance, the permittee shall conduct tests for NO_x and CO on the Electric Generator Engine (SN-09) in accordance with Plantwide Condition 3, only if the operating time exceeds 2160 hours in any consecutive twelve month period, during a five year permit term.

9. Pursuant to 19.303 of Regulation 19 of Regulation 19 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall use good maintenance practices to control emissions from valves, fittings, flanges, seals and other associated equipment.

10. The permittee may replace any existing engines (SN-01 through SN-08) on a temporary or permanent basis with an engine(s) that:

- Has the same or lower emission rates on a pound per hour basis;
- Has the same or lower horsepower; and
- Has a potential to emit less than 40 tpy of NO_x and 100 tpy of CO, and whose other pollutants are emitted at a rate equal to or lower than the current allowable emissions on a ton per year basis.
- Does not utilize an air pollution control device (i.e. subject to 40 CFR 64 Compliance Assurance Monitoring).

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. This testing shall be conducted in accordance with EPA Reference Method 7E for NO_x and EPA Reference Method 10 for CO. The permittee shall notify ADEQ of the replacement within 30 days of startup. This does not apply to modifications which must go through a PSD review as defined in 40 CFR 52.21. A replacement engine with the potential to emit 40 or more tons per year NO_x will require PSD review. 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 emission limitations if the conditions of Regulation 26, §26.707 are met. [Regulation No.19 §19.705, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, §19.304 and 40 CFR Part 64]

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]

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.

The placement of the required warning statement must comply with the requirements pursuant to §82.108.

The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.

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]

Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.

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.

Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.

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.)

Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.

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 Table 6 - Applicable Regulations of this condition. The permit specifically identifies the following as applicable requirements based upon the information submitted by the permittee in an application dated March 2004.

Table 6 - Applicable Regulations

Source No.	Regulation	Description
Facility	Arkansas regulation 19	Compilation of Regulations of the Arkansas State Implementation Plan for Air Pollution Control
Facility	Arkansas Regulation 26	Regulations of the Arkansas Operating Air Permit Program

The permit specifically identifies the following as inapplicable based upon information submitted by the permittee in an application dated March, 2004.

Table 7 - Inapplicable Regulations

Source No.	Regulation	Description	Basis for determination
Facility	Regulation 19.8	Regulations for 111(d) designated facility	This facility is not identified in the list of designated facilities.
Facility	Regulation 19.9	Prevention of Significant Deterioration	Facility is not a PSD source.
Facility	Regulation 19.10	Regulations for the control of volatile organic compounds	This facility is not located in an ozone maintenance area (Pulaski County)
Facility	Regulation 26.304	Emission units subject to permitting	This rule applies only to state and federal agencies
Facility	Regulation 26.402	Standard application form and required information	This rule applies only to state and federal agencies
Facility	Regulation 26.501-504	Actions on applications	This rule applies only to state and federal agencies
Facility	Regulation 26.6	Permit review	This rule applies only to state and federal agencies

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Facility	Regulation 26.12	Regulations for acid rain source	This facility is not in this source category
Facility	40 CFR 51	Requirements for implementation plans	This rule only applies to state and federal agencies.
Facility	40 CFR 53	Ambient air monitoring method	This rule is administrative and procedural
Facility	40 CFR 54	Prior notice of citizen suites	This rule is administrative and procedural
Facility	40 CFR 55	Outer continental shelf regulations.	This facility is not in this source category
Facility	40 CFR 56	Regional consistency	This rule is administrative and procedural
Facility	40 CFR 57	Primary nonferrous smelter orders	This facility is not in this source category
Facility	40 CFR 58	Ambient air quality surveillance	This rule is administrative and procedural
Facility	40 CFR 60 subpart GG	NSPS-Stationary gas turbines	No turbines are located at this facility
Facility	40 CFR 60 subpart KKK	NSPS – onshore natural gas processing plants	This facility is not a natural gas processing plant.
Facility	40 CFR 60 subpart K	NSPS – storage vessels for petroleum liquids	This facility does not have any storage tanks with a capacity greater than 40000 gallons.
Facility	40 CFR 60 subpart Ka	NSPS – storage vessels for petroleum liquids	This facility does not have any storage tanks with a capacity greater than 40000 gallons.
Facility	40 CFR 60 subpart Kb	NSPS – volatile organic liquid storage vessels	This facility does not have any storage tanks with a capacity greater than 75m ³ .
Facility	40 CFR 62	State plan for designated facilities	This rule is administrative and procedural
Facility	40CFR 63	NESHAPS	This facility is not major source of HAPs
Facility	40 CFR 64	Compliance assurance monitoring	There are no sources with controls
Facility	40 CFR 65	Delayed compliance orders	This rule is administrative and jurisdictional
Facility	40 CFR 66	Assessment and collection of non-compliance penalties	This rule is administrative and jurisdictional
Facility	40CFR 67	Federal approval of state non-compliance penalty programs	This rule is administrative and jurisdictional
Facility	40 CFR 68	Accidental release program	Section 112(r) does not apply to this facility. Portions of the piping system at this facility are subject to DOT 49 CFR Part 192 regulations.
Facility	40 CFR 69	Special exemptions from requirements of the Clean Air Act	The facility is not in this source category
Facility	40CFR 70	Operating Permit	This rule is administrative and jurisdictional
Facility	40 CFR 72	Acid rain permits	The facility is not in this source category
Facility	40 CFR 73	Sulfur dioxide allowance system	The facility is not in this source category
Facility	40 CFR 75	Continuous emission monitoring for acid rain units	The facility is not in this source category
Facility	40CFR 76	Acid rain nitrogen oxides emission reduction program	The facility is not in this source category

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Facility	40 CFR 77	Excess emissions from acid rain units	The facility is not in this source category
Facility	40 CFR 78	Appeals procedure for acid rain sources	The facility is not in this source category
Facility	40 CFR 79	Registration of fuels and fuel additives	This facility is not in this source category
Facility	40 CFR 80	Registration of fuels and fuel additives	This facility is not in this source category
Facility	40 CFR 80.304	Non-Attainment	This facility is not in a non-attainment area
Facility	40 CFR 85	Control of air pollution from motor vehicles and motor vehicle engines	This facility is not in this source category
Facility	40 CFR 86	Certification and test procedures for new and in-use motor vehicles and motor vehicle engines	This facility is not in this source category
Facility	40 CFR 87	Control of air pollution from aircraft and aircraft engines	This facility is not in this source category
Facility	40 CFR 88	Clean-fuel vehicles	This facility is not in this source category

Section VI: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement is a significant activity even if this activity meets the criteria of §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 March, 2004.

Table 8 - Insignificant Activities

Description	Category
Two (2) Slop tanks, 4200 gallons	A-3
Slop tank, 8820 gallons	A-3
Used oil tank, 1008 gallons	A-3
Used solvent tank, 1008 gallons	A-3
Diesel tank., 105 gallons	A-3
Kerosene tank, 105 gallons	A-3
Glycol tank, 42-00 gallons	A-3
Slop tank, 3990 gallons	A-3
Antifreeze mix tank, 8820 gallons	A-3
Wastewater tank, 4200 gallons	A-3
Gasoline tank, 105 gallons	A-13
Slop Tank, 10038 gallons.	A-13
Lube oil tank, 11298 gallons	A-13
Blowdown vent	A-13
Smart ash incinerator	A-13
Piping components fugitive emissions	A-13
Condensate truck loading	A-13

Pursuant to §26.304 of Regulation 26, the Department determined the emission units, operations, or activities contained in Regulation 19, Appendix A, Group B, to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.

Section VII: GENERAL PROVISIONS

- Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation No. 18 or the Arkansas Water and Air Pollution Control

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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 August 10, 2000]
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 No. 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 No. 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 No. 26 §26.701(C)(2)]

The date, place as defined in this permit, and time of sampling or measurements;

The date(s) analyses performed;

The company or entity performing the analyses;

The analytical techniques or methods used;

The results of such analyses; and

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 No. 26 §26.701(C)(2)(b)]

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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 §26.701(C)(3)(a) of Regulation #26]

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

8. The permittee will report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit. 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: [40 CFR 70.6(a)(3)(iii)(B), Regulation #26 §26.701(C)(3)(b), and Regulation #19 §19.601 and §19.602]

The facility name and location,

The process unit or emission source deviating from the permit limit,

The permit limit, including the identification of pollutants, from which deviation occurs,

The date and time the deviation started,

The duration of the deviation,

The average emissions during the deviation,

The probable cause of such deviations,

Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and

The name of the person submitting the report.

The permittee will 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. [40 CFR 70.6(a)(3)(iii)(B), Regulation No. 26 §26.701(C)(3)(b), Regulation No. 19 §19.601 and §19.602]

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), §26.701(E) of Regulation No. 26, and A.C.A. §8-4-203, as referenced by §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 No. 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 No. 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 No. 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 No. 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 No. 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 No. 26 §26.701(F)(5)]

15. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [40 CFR 70.6(a)(7) and Regulation No. 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 No. 26 §26.701(H)]
17. If the permit allows different operating scenarios, the permittee will, 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 No. 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 No. 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 No. 26 §26.2. [40 CFR 70.6(c)(1) and Regulation No. 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 No. 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 will 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 No. 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; and
 - e. 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 No. 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.

This permit authorizes only those pollutant-emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]