

OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation #26:

Permit #: 1450-AOP-R0

IS ISSUED TO:

Lone Elm Compressor/Dehydration Station
County Road 73
Ozark, AR 72949
Franklin County
CSN: 24-0104

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:

November 16, 1998

and

November 15, 2003

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels

Date Amended

SECTION I: FACILITY INFORMATION

PERMITTEE: Lone Elm Compressor/Dehydration Station

CSN: 24-0104

PERMIT NUMBER: 1450-AOP-R0

FACILITY ADDRESS: County Road 73

COUNTY: Franklin

CONTACT POSITION: Ron Carver
MAILING ADDRESS: P.O. Box 1288
Fayetteville, AR 72702-1288

TELEPHONE NUMBER: (501) 521-5400

REVIEWING ENGINEER: Glenn Proffitt

UTM North-South (X): 3933.0 km
UTM East-West (Y): 414.0 km

**Lone Elm Compressor/Dehydration Station
1450-AOP-R0
24-0104**

SECTION II: INTRODUCTION

The Lone Elm Compressor Station function is to dehydrate and compress sweet natural gas, which is currently moved into the Arkansas Western pipeline system for subsequent delivery to customers in Northwest and Northeast Arkansas. This gas may be moved to intrastate or interstate pipelines as needed.

Natural gas enters the station at wellhead pressure and various bypass valves allow the gas to bypass the station entirely or to bypass either the dehydration or compression systems as needed. First, any free liquids are removed and collected. Then the gas enters one of the two dehydrator absorber which reduces the water vapor to the seven pounds/mcf level. Absorption occurs in a triethylene glycol medium, and the glycol is reconcentrated by a reboiler where water vapor is boiled off and released to the atmosphere. The glycol is recirculated by gas pumps. These pumps are driven by natural gas using the pressure drop from wellhead to fuel pressure. The reboiler is fueled with natural gas, and the exhaust gases are released to the atmosphere through two vents (SN-11 and SN-13).

Once dehydrated, the gas is sent to the compressor to be compressed, cooled, and delivered to the discharge piping system. The compressor engine is fired by natural gas and emissions are designated as SN-01.

Other releases associated with the station are involved with start-up, shut-down, safety, and auxiliary systems. From time to time, natural gas may be vented to the atmosphere due to overpressure.

Arkansas operating permit #1450-AOP-R0 is the first operating permit issued to Arkansas Western Gas Company under Regulation 26. This permit covers permitting all equipment, fugitive emissions, and hazardous air pollutants and will be quantified in this permit. The increase in potential emissions due to permitting the above mentioned equipment does not trigger a PSD review, because no physical modifications have been made to the sources since the issuance of Air Permit 1450-AR-3. Methane and ethane emissions are not quantified in this permit as a result of the Department's new policy for these air contaminants. The facility is classified under SIC code 4922. Total facility wide emissions are summarized below.

**Lone Elm Compressor/Dehydration Station
1450-AOP-R0
24-0104**

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
Total Allowable Emissions		Criteria			
		VOC*	4.4	19.3	
		CO	44.1	193.2	
		NO _x	39.7	173.9	
		HAPs			
		Formaldehyde	0.31	1.35	
01	L7042 GSI Waukesha 1,000 HP Engine	VOC*	4.4	19.3	8
		CO	44.1	193.2	
		NO _x	39.7	173.9	
		HAPs			
		Formaldehyde	0.31	1.35	

* - Formaldehyde is included in the VOC totals.

**Lone Elm Compressor/Dehydration Station
1450-AOP-R0
24-0104**

SECTION III: PERMIT HISTORY

The first permit, #1450-A, was issued under Arkansas Regulation 19 on May 11, 1993.

Permit #1450-AR-1, which was issued on February 1, 1995, allow the installation of a natural gas dehydrator reboiler.

Permit #1450-AR-2 was issued on June 27, 1995. This permitting action covered increasing the gas usage for the two natural gas dehydrator reboilers (SN-11 and SN-13).

Permit #1450-AR-3 was issued on January 29, 1996. This permitting action covered changing the permitted emissions for two natural gas dehydrator reboilers (SN-13 and SN-15).

Lone Elm Compressor/Dehydration Station
1450-AOP-R0
24-0104

SECTION IV: EMISSION UNIT INFORMATION

**Lone Elm Compressor/Dehydration Station
1450-AOP-R0
24-0104**

SN-01
Natural Gas Compressor Engine

Source Description

Compressor engine was installed in 1981. The engine is a 1000 BHP, Waukesha, Model L7042 GSI reciprocating engine.

Specific Conditions

1. Pursuant to §19.5 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control, effective July 1, 1997 (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed at SN-01 the emission rates set forth in the following table. The pound per hour and ton per year emission rates are based on maximum capacity.

Pollutant	lb/hr	tpy
VOC*	4.4	19.3
CO	44.1	193.2
NO _x	39.7	173.9

* - Formaldehyde is included in the VOC totals.

2. Pursuant to §18.8 of the Arkansas Air Pollution Control Code (Regulation 18), the permittee shall not exceed at SN-01 the hazardous air pollutant (HAP) emission rates set forth in the following table. The pound per hour and ton per year emission rates are based on maximum capacity.

HAP	lb/hr	tpy
Formaldehyde	0.5	2.2

3. Pursuant to §18.5 of the Arkansas Air Pollution Control Code (Regulation 18) and 40 CFR Part 52, Subpart E, the permittee shall not exceed 5% opacity from SN-01 as measured by EPA Reference Method 9. The permittee will show compliance by burning natural gas.

**Lone Elm Compressor/Dehydration Station
1450-AOP-R0
24-0104**

SECTION V: PLANTWIDE CONDITIONS

1. Pursuant to §19.4(o) of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the Director shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
2. Pursuant to §19.4(q) of Regulation 19, and 40 CFR Part 52, Subpart E, the Director may cancel all or part of this permit if the construction or modification authorized herein is not begun within 18 months from the date of the permit issuance or if the work involved in the construction or modification is suspended for a total of 18 months
3. Pursuant to §19.7 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall simultaneously conduct tests for CO and NO_x on the compressor engine (SN-01) in accordance with plantwide condition #4 and every five years thereafter. 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 engines within 90% of their rated capacity. If the tests are not performed within this range, the permittee shall be limited to operating within 10% above the tested rate.
4. Pursuant to §19.7 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, each emission point for which an emission test method is specified in this permit shall be tested in order to determine compliance with the emission limitations contained herein within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing. The permittee shall provide:
 - (1) Sampling ports adequate for applicable test methods
 - (2) Safe sampling platforms
 - (3) Safe access to sampling platforms
 - (4) Utilities for sampling and testing equipment

**Lone Elm Compressor/Dehydration Station
1450-AOP-R0
24-0104**

5. Pursuant to A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.
6. Pursuant to Regulation 26 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall subsume and incorporate all previously issued air permits for this facility.

PERMIT SHIELD

7. 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 item A of this condition:

- A. The following have been specifically identified as applicable requirements based upon information submitted by the permittee in an application dated May, 1996.

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

- B. The following requirements have been specifically identified as not applicable, based upon information submitted by the permittee in an application dated July, 1996.

Description of Regulation	Regulatory Citation	Affected Source	Basis for Determination
New Source Performance Standards for Storage Vessels for Petroleum Liquids	40 CFR 60, Subpart K	Facility	No storage tanks have a capacity greater than 40,000 gallons.
New Source Performance Standards for Storage Vessels for Petroleum Liquids	40 CFR 60, Subpart Ka	Facility	No storage tanks have a capacity greater than 40,000 gallons.

**Lone Elm Compressor/Dehydration Station
1450-AOP-R0
24-0104**

Description of Regulation	Regulatory Citation	Affected Source	Basis for Determination
New Source Performance Standards for Volatile Organic Liquid Storage Vessels	40 CFR 60, Subpart Kb	Facility	No storage tanks have a capacity greater than 40 m ³ .
New Source Performance Standards for Stationary Gas Turbines	40 CFR 60, Subpart GG	Facility	This facility does not have any stationary gas turbines.
Accidental Release Program	40 CFR 68	Facility	Section 112(r) does not apply to this facility. The rule states that “the term stationary source does not apply to transportation, including the storage incident to transportation, of any regulated substance or any other extremely hazardous substance under the provisions of this part, provided that such transportation is regulated under 49 CFR Parts 192, 193, or 195.” Portions of the piping systems at this facility are subject to DOT 49 CFR Part 192 regulations.

C. Nothing shall alter or affect the following:

Provisions of Section 303 of the Clean Air Act;

The liability of an owner or operator for any violation of applicable requirements prior to or at the time of permit issuance;

The applicable requirements of the acid rain program, consistent with section 408(a) of the Clean Air Act; or

The ability of the EPA to obtain information under Section 114 of the Clean Air Act.

**Lone Elm Compressor/Dehydration Station
1450-AOP-R0
24-0104**

SECTION VI: *DE MINIMIS* EMISSION SOURCES

Pursuant to §26.3(d) of Regulation 26, the following sources are below the *de minimis* emission levels. Insignificant and trivial activities will be allowable after approval and federal register notice publication of a final list as part of the operating air permit program. Any activity for which a state or federal applicable requirement applies is not *de minimis*, even if this activity meets the criteria of §3(d) of Regulation 26 or is listed below. *De minimis* emission determinations rely upon the information submitted by the permittee in an application dated March 3, 1997.

1. Dehydration unit still column overhead
2. Lube oil storage tank
3. Fluids collection tank
4. Fugitive emissions
5. Safety Kleen parts washer
6. Blowdown emissions

Pursuant to §26.3(d) of Regulation 26, the following emission units, operations, or activities have been determined by the Department to be below the *deminimis* emission levels. Activities included in this list are allowable under this permit and need not be specifically identified.

1. Natural gas-burning equipment with a design rate less than 1 million BTU per hour.
2. Combustion emissions from propulsion of mobile sources and emissions from refueling these sources unless regulated by Title II and required to obtain a permit under Title V of the federal Clean Air Act, as amended. This does not include emissions from any transportable units, such as temporary compressors or boilers. This does not include emissions from loading racks or fueling operations covered under any applicable federal requirements.
3. Air conditioning and heating units used for comfort that do not have applicable requirements under Title VI of the Act.
4. Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing/industrial or commercial process.

Date Amended: August 25, 2000

**Lone Elm Compressor/Dehydration Station
1450-AOP-R0
24-0104**

5. Non-commercial food preparation or food preparation at restaurants, cafeterias, or caterers, etc.
6. Consumer use of office equipment and products, not including commercial printers or businesses primarily involved in photographic reproduction.
7. Janitorial services and consumer use of janitorial products.
8. Internal combustion engines used for landscaping purposes.
9. Laundry activities, except for dry-cleaning and steam boilers.
10. Bathroom/toilet emissions.
11. Emergency (backup) electrical generators at residential locations.
12. Tobacco smoking rooms and areas.
13. Blacksmith forges.
14. Maintenance of grounds or buildings, including: lawn care, weed control, pest control, and water washing activities.
15. Repair, up-keep, maintenance, or construction activities not related to the sources' primary business activity, and not otherwise triggering a permit modification. This may include, but is not limited to such activities as general repairs, cleaning, painting, welding, woodworking, plumbing, re-tarring roofs, installing insulation, paved/paving parking lots, miscellaneous solvent use, application of refractory, or insulation, brazing, soldering, the use of adhesives, grinding, and cutting.¹
16. Surface-coating equipment during miscellaneous maintenance and construction activities. This activity specifically does not include any facility whose primary business activity is surface-coating or includes surface coating or products.

¹ Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must get a permit.

**Lone Elm Compressor/Dehydration Station
1450-AOP-R0
24-0104**

17. Portable electrical generators that can be “moved by hand” from one location to another.²
18. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning, or machining wood, metal, or plastic.
19. Brazing or soldering equipment related to manufacturing activities that do not result in emission of HAPs.³
20. Air compressors and pneumatically operated equipment, including hand tools.
21. Batteries and battery charging stations, except at battery manufacturing plants.
22. Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOCs or HAPs.⁴
23. Containers of less than or equal to 5 gallons in capacity that do not emit any detectable VOCs or HAPs when closed. This includes filling, blending, or mixing of the contents of such containers by a retailer.
24. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and non-volatile aqueous salt solutions, provided appropriate lids and covers are used and appropriate odor control is achieved.
25. Equipment used to mix and package soaps, vegetable oil, grease, animal fat, and non-volatile aqueous salt solution, provided appropriate lids and covers are used and appropriate odor control is achieved.
26. Drop hammers or presses for forging or metalworking.

²“Moved by hand” means that it can be moved by one person without assistance of any motorized or non-motorized vehicle, conveyance, or device.

³Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals are more appropriate for treatment as insignificant activities based on size or production thresholds. Brazing, soldering, and welding equipment, and cutting torches related directly to plant maintenance and upkeep and repair or maintenance shop activities that emit HAP metals are treated as trivial and listed separately.

⁴Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids are based on size and limits including storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.

**Lone Elm Compressor/Dehydration Station
1450-AOP-R0
24-0104**

27. Equipment used exclusively to slaughter animals, but not including other equipment at slaughter-houses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
28. Vents from continuous emission monitors and other analyzers.
29. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
30. Hand-held applicator equipment for hot melt adhesives with no VOCs in the adhesive.
31. Equipment used for surface coating, painting, dipping, or spraying operations, containing less than 0.4 lb/gal VOCs, has no hexavalent chromium, and emits no more than 0.1 tpy of all other HAPs.
32. Lasers used only on metals and other materials which do not emit HAPs in the process.
33. Consumer use of paper trimmers/binders.
34. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boiler delivering the steam.
35. Salt baths using non-volatile salts that do not result in emissions of any air pollutant covered by this regulation.
36. Laser trimmers using dust collection to prevent fugitive emissions.
37. Bench-scale laboratory equipment used for physical or chemical analysis.
38. Routine calibration and maintenance of laboratory equipment or other analytical instruments.
39. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
40. Hydraulic and hydrostatic testing equipment.
41. Environmental chambers not using hazardous air pollutant gases.

**Lone Elm Compressor/Dehydration Station
1450-AOP-R0
24-0104**

42. Shock chambers, humidity chambers and solar simulators.
43. Fugitive emissions related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
44. Process water filtration systems and demineralizers.
45. Demineralized water tanks and demineralizer vents.
46. Boiler water treatment operations, not including cooling towers.
47. Emissions from storage or use of water treatment chemicals, except for hazardous air pollutants or pollutants listed under regulations promulgated pursuant to Section 112(r) of the Act, for use in cooling towers, drinking water systems, and boiler water/feed systems.
48. Oxygen scavenging (de-aeration) of water.
49. Ozone generators.
50. Fire suppression systems.
51. Emergency road flares.
52. Steam vents and safety relief valves.
53. Steam leaks.
54. Steam cleaning operations.
55. Steam and microwave sterilizers.
56. Site assessment work to characterize waste disposal or remediation sites.
57. Miscellaneous additions or upgrades of instrumentation.
58. Emissions from combustion controllers or combustion shutoff devices.

**Lone Elm Compressor/Dehydration Station
1450-AOP-R0
24-0104**

59. Use of products for the purpose of maintaining motor vehicles operated by the facility, not including air cleaning units or such vehicles (i.e. antifreeze, fuel additives).
60. Stacks or vents to prevent escape of sanitary sewer gases through the plumbing traps.
61. Emissions from equipment lubricating systems (i.e. oil mist), not including storage tanks, unless otherwise exempt.
62. Residential wood heaters, cookstoves, or fireplaces.
63. Barbecue equipment or outdoor fireplaces used in conjunction with any residential or recreational use.
64. Log wetting areas and log flumes.
65. Periodic use of pressurized air for cleanup.
66. Solid waste dumpsters.
67. Emissions of wet lime from lime mud tanks, lime mud washers, lime mud piles, lime mud filter and filtrate tanks, and lime mud slurry tanks.
68. Natural gas odoring activities unless the Department determines that a nuisance may occur.
69. Emissions from engine crankcase vents.
70. Storage tanks used for the temporary containment of materials resulting from an emergency reporting of an unanticipated release.
71. Equipment used exclusively to mill or grind coatings in roll grinding rebuilding, and molding compounds where all materials charged are in paste form.
72. Mixers, blenders, roll mills, or calenders for rubber or plastic for which no materials in powder form are added and in which no organic solvents, diluents, or thinners are used.
73. The storage, handling, and handling equipment for bark and wood residues not subject to fugitive dispersion offsite (this applies to equipment only).

Lone Elm Compressor/Dehydration Station
1450-AOP-R0
24-0104

74. Maintenance dredging of pulp and paper mill surface impoundments and ditches containing cellulosic and cellulosic derived biosolids and inorganic materials such as lime, ash, or sand.
75. Tall oil soap storage, skimming, and loading.
76. Water heaters used strictly for domestic (non-process) purposes.
77. Facility roads and parking areas, unless necessary to control offsite fugitive emissions.
78. Agricultural operations, including onsite grain storage.

SECTION VII: GENERAL PROVISIONS

1. Pursuant to 40 C.F.R. 70.6(b)(2), 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 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.
2. Pursuant to 40 C.F.R. 70.6(a)(2) and §26.7 of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), 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.
3. Pursuant to §26.4 of Regulation #26, it is the duty of the permittee to submit a complete application for permit renewal at least six (6) months prior to the date of permit expiration. Permit expiration terminates the permittee's right to operate unless a complete renewal application was submitted at least six (6) months prior to permit expiration, in which case the existing permit shall 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.
4. Pursuant to 40 C.F.R. 70.6(a) (1) (ii) and §26.7 of Regulation #26, 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, both provisions are incorporated into the permit and shall be enforceable by the Director or Administrator.

**Lone Elm Compressor/Dehydration Station
1450-AOP-R0
24-0104**

5. Pursuant to 40 C.F.R. 70.6(a) (3) (ii) (A) and §26.7 of Regulation #26, records of monitoring information required by this permit shall include the following:
 - a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.

6. Pursuant to 40 C.F.R. 70.6(a) (3) (ii) (B) and §26.7 of Regulation #26, records of all required monitoring data and support information shall be retained for a period of at least 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.

7. Pursuant to 40 C.F.R. 70.6(a) (3) (iii) (A) and §26.7 of Regulation #26, the permittee shall submit reports of all required monitoring every 6 months. If no other reporting period has been established, the reporting period shall end on the last day of the anniversary month of this permit. The report shall be due within 30 days of the end of the reporting period. Even though the reports are due every six months, each report shall contain a full year of data. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official as defined in §26.2 of Regulation #26 and must be sent to the address below.

Arkansas Department of Pollution Control and Ecology
Air Division

**Lone Elm Compressor/Dehydration Station
1450-AOP-R0
24-0104**

ATTN: Air Enforcement Branch
Post Office Box 8913
Little Rock, AR 72219

8. Pursuant to 40 C.F.R. 70.6(a) (3) (iii) (B), §26.7 of Regulation #26, and §19.6 of Regulation #19, all deviations from permit requirements, including those attributable to upset conditions as defined in the permit shall be reported to the Department. An initial report shall be made to the Department within 24 hours of discovery of the occurrence. The initial report may be made by telephone and shall include:
- a. The facility name and location,
 - b. The process unit or emission source which is deviating from the permit limit,
 - c. The permit limit, including the identification of pollutants, from which deviation occurs,
 - d. The date and time the deviation started,
 - e. The duration of the deviation,
 - f. The average emissions during the deviation,
 - g. The probable cause of such deviations,
 - h. Any corrective actions or preventive measures taken or being take to prevent such deviations in the future, and
 - i. The name of the person submitting the report.

A full report shall be made in writing to the Department within five (5) business days of discovery of the occurrence and shall include in addition to the information required by initial report a schedule of actions to be taken to eliminate future occurrences and/or to minimize the amount by which the permits limits are exceeded and to reduce the length of time for which said limits are exceeded. If the permittee wishes, they may submit a full report in writing (by facsimile, overnight courier, or other means) within 24 hours of discovery of the occurrence and such report will serve as both the initial report and full report.

**Lone Elm Compressor/Dehydration Station
1450-AOP-R0
24-0104**

9. Pursuant to 40 C.F.R. 70.6(a) (5) and §26.7 of Regulation #26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311, if any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity shall 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.
10. Pursuant to 40 C.F.R. 70.6(a)(6)(i) and §26.7 of Regulation #26, the permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation #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, or modification; or for denial of a permit renewal application. Any permit noncompliance with a state requirement constitutes a violation of the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) and is also grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Pursuant to 40 C.F.R. 70.6(a) (6) (i) and §26.7 of Regulation #26, the permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance 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, or modification; or for denial of a permit renewal application.
11. Pursuant to 40 C.F.R. 70.6(a) (6) (ii) and §26.7 of Regulation #26, 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 in order to maintain compliance with the conditions of this permit.
12. Pursuant to 40 C.F.R. 70.6(a) (6) (iii) and §26.7 of Regulation #26, this permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

**Lone Elm Compressor/Dehydration Station
1450-AOP-R0
24-0104**

13. Pursuant to 40 C.F.R. 70.6(a) (6) (iv) and §26.7 of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.
14. Pursuant to 40 C.F.R. 70.6(a) (6) (v) and §26.7 of Regulation #26, the permittee shall 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 shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the permittee may be required to furnish such records directly to the Administrator along with a claim of confidentiality.
15. Pursuant to 40 C.F.R. 70.6(a) (7) and §26.7 of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.
16. Pursuant to 40 C.F.R. 70.6(a) (8) and §26.7 of Regulation #26, no permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for elsewhere in this permit.
17. Pursuant to 40 C.F.R. 70.6(a) (9) (i) and §26.7 of Regulation #26, if the permittee is allowed to operate under different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the scenario under which the facility or source is operating.
18. Pursuant to 40 C.F.R. 70.6(b) and §26.7 of Regulation #26, all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Act unless the Department has specifically designated as not being federally enforceable under the Act any terms and conditions

**Lone Elm Compressor/Dehydration Station
1450-AOP-R0
24-0104**

included in the permit that are not required under the Act or under any of its applicable requirements.

19. Pursuant to 40 C.F.R. 70.6(c) (1) and §26.7 of Regulation #26, any document (including reports) required by this permit shall contain a certification by a responsible official as defined in §26.2 of Regulation #26.
20. Pursuant to 40 C.F.R. 70.6(c) (2) and §26.7 of Regulation #26, the permittee shall allow an authorized representative of the Department, upon presentation of credentials, to perform the following:
 - 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 that must be kept 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 the purpose of assuring compliance with this permit or applicable requirements.
21. Pursuant to 40 C.F.R. 70.6(c) (5) and §26.7 of Regulation #26, the permittee shall submit a compliance certification with terms and conditions contained in the permit, including emission limitations, standards, or work practices. This compliance certification shall be submitted annually and shall be submitted to the Administrator as well as to the Department. All compliance certifications required by this permit shall include the following:
 - a. The identification of each term or condition of the permit that is the basis of the certification;
 - b. The compliance status;

**Lone Elm Compressor/Dehydration Station
1450-AOP-R0
24-0104**

- 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. Pursuant to §26.7 of Regulation #26, nothing in this permit shall alter or affect the following:
- 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.
23. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.

Route To: **FELICIA INMAN**
Administration

AIR DIVISION
INVOICE REQUEST FORM

(9-97)

Facility Name & Address:

Lone Elm Compressor/Dehydration Station
P.O. Box 1288
Fayetteville, Arkansas
72702-1288

CSN: 24-0104

Permit No: 1450-AOP-R0

Permit Description: T5

(e.g. A = AIR CODE, S=SIP, H=NESHAP, P=PSD, N=NSPS, T5= Title V)

Initial Fee Calculations:

Title V = $3(17.78)(\text{TPY each pollutant, except CO})$ - amount of last annual air permit fee

NOTE: Do Not double count HAPs and VOCs!!!
No greater than 4000 tpy per pollutant or less than \$1000

F = $3(17.78)(192.20) - (2,695) = \$ 723$

Fee Amount: \$1,000.

Engineer: Glenn Proffitt

Date: May 26, 1998

Public Notice

Pursuant to the Arkansas Operating Air Permit Program (Regulation #26) Section 6(b), the Air Division of the Arkansas Department of Pollution Control and Ecology gives the following notice:

Arkansas Western Gas Company - Lone Elm Compressor Station operates a dehydrator and compressor station at County Road 73, Ozark, Arkansas 72949. This is the first operating permit issued for this facility. The facility is classified under SIC code 4922. The facility is subject to regulation under the *Arkansas Air Pollution Control Code* (Air Code), the regulations of the *Arkansas Plan of Implementation for Air Pollution Control* (SIP), and the regulations of the *Operating Air Permit Program* (Title V).

The application has been reviewed by the staff of the Department and has received the Department's tentative approval subject to the terms of this notice.

Citizens wishing to examine the permit application and staff findings and recommendations may do so by contacting Rhonda Sharp, Information Officer. Citizens desiring technical information concerning the application or permit should contact Glenn Proffitt, Engineer. Both Rhonda Sharp and Glenn Proffitt can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, (501) 682-0744.

The draft permit and permit application are available for copying at the above address. A copy of the draft permit has also been placed at the Fort Smith Public Library, 61 South Eighth, Fort Smith, Arkansas, 72901. This information may be reviewed during normal business hours.

Interested or affected persons may also submit written comments or request a hearing on the proposal to the Department at the above address - Attention: Rhonda Sharp. In order to be considered, the comments must be submitted within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, one will be scheduled if significant comments on the permit provisions are received. If a hearing is scheduled, adequate public notice will be given in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director shall make a final decision to issue or deny this application or to impose special conditions in accordance with Section 2.1 of the Arkansas Pollution Control and Ecology's Commission Administrative Procedures (Regulation #8) and Regulation #26.

Dated this

Randall Mathis
Director