

ADEQ MINOR SOURCE AIR PERMIT

Permit #: 1725-AR-2

IS ISSUED TO:

Centerpoint Energy - Round Mountain Compressor Station
13 miles Northeast of Morrilton
Morrilton, AR 72110
Conway County
AFIN: 15-00068

THIS PERMIT IS Centerpoint Energy - Round Mountain Compressor Station's AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DEPARTMENT'S MINOR SOURCE AIR PERMIT AND THE APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. SEC. 8-4-101 ET SEQ.) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels

Date

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Centerpoint Energy - Round Mountain Compressor Station

Permit #: 1725-AR-2

AFIN: 15-00068

Section I: FACILITY INFORMATION

PERMITTEE: Centerpoint Energy - Round Mountain Compressor Station

AFIN: 15-00068

PERMIT NUMBER: 1725-AR-2

FACILITY ADDRESS: 13 miles North East of Morrilton
Morrilton, AR 72110

COUNTY: Conway

CONTACT POSITION: Laura L. Guthrie, Senior Environmental Specialist

TELEPHONE NUMBER: (318) 429-3706

REVIEWING ENGINEER: David Triplett

UTM North-South (Y) Zone 15 529.7

UTM East-West (X): Zone 15 3910.1



Section II: INTRODUCTION

Summary

Centerpoint Energy owns and operates a natural gas compressor station which is located approximately 13 miles northeast of Morrilton, Arkansas. This will be the second modification to the Minor Source Air Permit for this facility. This modification is being issued in order to allow for the facility to operate year-round and to update the emission calculations from the natural gas turbine to incorporate test results which indicate that emissions from the unit are lower than had been previously estimated. This results in a decrease in hourly emission limitations for CO and NO_x from this engine. Centerpoint has requested that the annual emission limits for these two pollutants remain unchanged. VOC emissions have increased by 0.4 tpy due to updated calculations for year-round operation. Individual hazardous air pollutant emission limits are quantified for the first time with this modification at 0.67 tpy acetaldehyde and 0.65 tpy formaldehyde.

Process Description

The Round Mountain Compressor Station consists of one (1) 4700 horsepower (hp) Solar Centaur T-4700 natural gas-fired turbine (SN-01), two 210-bbl (8820 gal) waste product storage tanks (SN-02, SN-03), and one (1) 64 hp emergency generator (SN-06). Other emission points associated with the facility include the station blowdown vents (SN-04) and the compressor blowdown vents (SN-05). The blowdown vents associated with this facility have been determined to be insignificant activities and are listed as such in Section V of this permit.

The Round Mountain Compressor Station (RMCS) receives natural gas at a pressure of 700 psig from the main gas pipeline. This gas enters the facility's main suction piping and is sent through the filter/separators to the compressor unit's suction piping to remove moisture from the gas stream. The filtered gas is then compressed to 900 psig by the Solar turbine/compressor (SN-01) before being routed back to the main pipeline for further transport.

Regulations

This facility is subject to regulation under the *Arkansas Air Pollution Control Code* (Regulation 18) and the *Arkansas Plan of Implementation for Air Pollution Control* (Regulation 19). The 4700 hp natural gas turbine is also subject to regulation under 40 CFR Part 60, Subpart GG – *Standards of Performance for Stationary Gas Turbines*.



The following table is a summary of the facility's total emissions.

Table 1 - Total Allowable Emissions

Total Allowable Emissions		
Pollutant	Emissions Rates	
	lb/hr	tpy
VOC	1.4	4.9
CO	36.3	83.0
NO _x	22.9	98.0
Acetaldehyde	0.15	0.67
Formaldehyde	0.15	0.65

Section III: PERMIT HISTORY

Permit No. 1725-A was issued to NorAm Gas Transmission Company on December 10, 1996. This was the initial permit issued for this new facility. Permitted emission points included one (1) 4000 HP compressor engine, two 210 bbl tanks, one emergency electrical generator, and facility and compressor blowdown vents. Total annual emissions were permitted at: 7.5 tpy VOC, 26.7 tpy CO, and 66.5 tpy NO_x.

Permit No. 1725-AR-1 was issued to NorAm Gas Transmission Company on November 6, 1998. This modification was issued in order to allow for the replacement of the existing 4000 hp compressor engine with a new 4700 hp turbine compressor engine. Additionally, the blowdown vent emission sources were moved to the permit's insignificant activities list at this time. No other changes occurred at the facility with this modification. Total annual emissions were permitted at: 4.5 tpy VOC, 83.0 tpy CO, and 98.0 tpy NO_x.

Section IV: EMISSION UNIT INFORMATION

Specific Conditions

1. The permittee will not exceed the emission rates set forth in the following table. [§19.501 et seq. of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control, effective February 15, 1999 (Regulation 19) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 2 - Criteria Pollutants

SN	Description	Pollutant	lb/hr	Tpy
SN-01	4700 hp Solar Centaur Natural Gas Turbine/Compressor	VOC	1.1	4.9
		CO	17.9	78.4
		NO _x	22.4	98.0
SN-02	Entrained Liquids Storage Tank (210 bbl)	VOC	0.1	0.4
SN-03	Pigging Containment Tank (210 bbl)	VOC	0.1	0.4
SN-06	64 hp Emergency Generator	VOC	0.1	0.1
		CO	18.4	4.6
		NO _x	0.5	0.2

2. The permittee will not exceed the emission rates set forth in the following table. [§18.801 of the Arkansas Air Pollution Control Code, effective February 15, 1999 (Regulation 18) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 3 - Non-Criteria Pollutants

SN	Description	Pollutant	lb/hr	tpy
SN-01	4700 hp Solar Centaur Natural Gas Turbine/Compressor	Acetaldehyde	0.15	0.67
		Formaldehyde	0.15	0.65

3. Visible emissions will not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated by compliance with Specific Conditions #6 and #10. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 4 - Visible Emissions

SN	Limit	Regulatory Citation
SN-01	5%	§18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311
SN-06	5%	§18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311

4. The permittee will not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303. [§18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
5. The permittee will not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [§18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-01 Conditions

6. Pipeline-quality natural gas shall be the only fuel combusted in the compressor turbine (SN-01). [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
7. The permittee shall test the compressor turbine exhaust stack (SN-01) every five years for NO_x and CO emissions. NO_x emissions testing shall be performed in accordance with US EPA Reference Method 20, and CO emissions testing shall be performed in accordance with US EPA Reference Method 10. The next test shall be performed five years from the most recent test date, and every five years thereafter. These tests shall be conducted simultaneously and shall be performed with the turbine operating at or above 90% of its design capacity. [§19.702 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-06 Conditions

8. The permittee shall not operate the emergency generator (SN-06) in excess of 500 hours during any consecutive twelve-month period. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

9. The permittee shall maintain records of the hours of operation of the emergency generator (SN-06) which demonstrate compliance with Specific Condition #8. These records shall indicate the date for each occurrence where the generator is used, as well as the duration of the usage for each date. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
10. Pipeline-quality natural gas shall be the only fuel combusted in the emergency generator (SN-06). [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

NSPS Requirements

11. The compressor turbine (SN-01) is subject to and shall comply with the provisions of 40 CFR Part 60 Subpart GG – *Standards of Performance for Stationary Gas Turbines* (Appendix A).
12. Nitrogen oxide (NO_x) emissions from the compressor turbine (SN-01) shall not exceed 230 parts per million (0.0230% by volume) on a dry basis at 15% oxygen. [§19.304 of Regulation 19 and 40 CFR §60.332(a)(1)]
13. Sulfur dioxide (SO₂) emissions from the compressor turbine (SN-01) shall not exceed 0.015 percent by volume on a dry basis at 15% oxygen. [§19.304 of Regulation 19 and 40 CFR §60.333(a)]
14. No fuel shall be burned in the compressor turbine (SN-01) which contains sulfur in excess of 0.8 percent by weight. [§19.304 of Regulation 19 and 40 CFR §60.333(b)]
15. The permittee shall monitor the natural gas combusted in the compressor turbine (SN-01) daily for sulfur content in accordance with the methods outlined in 40 CFR §60.335. Records of these values shall be maintained on-site and shall be made available to Department personnel upon request. [§19.304 of Regulation 19 and 40 CFR §60.334(b)(2)]

Other Conditions

16. In lieu of General Condition #15, a copy of this permit may instead be maintained at the nearest manned facility to the Round Mountain Compressor Station. Likewise, all records required to be maintained “on-site” by this permit may also be maintained instead at the nearest manned facility. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

INSIGNIFICANT ACTIVITIES

The Department deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated April 7, 2003.

Table 5 - Insignificant Activities

Description	Category
Facility blowdown vents (former SN-04)	A-13
Turbine blowdown vents (former SN-05)	A-13

Section V: GENERAL CONDITIONS

1. Any terms or conditions included in this permit that 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 that 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. This permit does not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated under the Act. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
3. The permittee will notify the Department in writing within thirty (30) days after commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [§19.704 of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19) and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [§19.410(B) of Regulation 19 and/or §18.309(B) of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee must keep records for five years to enable the Department to determine compliance with the terms of this permit--such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Department may use the records, at the discretion of the Department, to determine compliance with the conditions of the permit. [§19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Department at the address below. [§19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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

7. The permittee will 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) newly constructed or 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) existing equipment already operating according to the time frames set forth by the Department. 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 must submit compliance test results to the Department within thirty (30) days after the completion of testing. [§19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
8. The permittee will provide: [§19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - a. Sampling ports adequate for applicable test methods
 - b. Safe sampling platforms
 - c. Safe access to sampling platforms
 - d. Utilities for sampling and testing equipment
9. The permittee will operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee will maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [§19.303 of Regulation 19 and/or §18.1104 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [§19.601 of Regulation 19 and/or §18.1101 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.

- b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
 - c. The permittee must submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, the information need not be submitted again.
11. The permittee shall allow representatives of the Department upon the presentation of credentials: [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit
 - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act
 - c. To inspect any monitoring equipment or monitoring method required in this permit
 - d. To sample any emission of pollutants
 - e. To perform an operation and maintenance inspection of the permitted source
12. The Department issued this permit in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
13. The Department may revoke or modify this permit when, in the judgment of the Department, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated the Arkansas Water and Air Pollution Control Act. [§19.410(A) of Regulation 19 and/or §18.309(A) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
14. This permit may be transferred. An applicant for a transfer must submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of

the receipt of the disclosure statement. The Department may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [§19.407(B) of Regulation 19 and/or §18.307(B) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

15. This permit shall be available for inspection on the premises where the control apparatus is located. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
16. This permit authorizes only those pollutant emitting activities addressed herein.
[A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
17. This permit supersedes and voids all previously issued air permits for this facility.
[Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Centerpoint Energy - Round Mountain Compressor Station

Permit #: 1725-AR-2

AFIN: 15-00068

APPENDIX A

Centerpoint Energy - Round Mountain Compressor Station

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APPENDIX B

Centerpoint Energy - Round Mountain Compressor Station

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APPENDIX C

Centerpoint Energy - Round Mountain Compressor Station

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APPENDIX D

Request for PDS Invoice				
Invoice Number <i>(assigned when invoice printed)</i>	PDS-			
AFIN r	15-00068			
Name <i>(for confirmation only)</i>	Centerpoint Energy - Round Mountain Compressor Station			
Invoice Type (pick one) r	Initial	Mod X	Variance	
	Annual	Renewal	Interim Authority	
Permit Number r	1725-AR-2			
Media Code r	A			
Fee Code or Pmt Type r	MS			
Fee Description <i>(for confirmation only)</i>	Minor Source			
Amount Due r <i>(whole dollar amount only)</i>	\$400			
Printed Comment <i>(600 characters maximum)</i>	No increase in emissions of predominant air pollutant, therefore minimum modification fee of \$400 applies.			
<i>Note: The information below is for use by the requesting division if desired; it will not print on the invoice.</i>				
Engineer	David Triplett			
Paid? (yes/no)				
Check number				
Comments				
r Required data (See "g:\Misc\PDS_FeeCodes.wpd" for descriptions and discussions of fee codes)				
Request submitted by:		Date:		

Public Notice

Pursuant to A.C.A. §8-4-203, and the regulations promulgated thereunder, the Air Division of the Arkansas Department of Environmental Quality gives the following notice:

Centerpoint Energy owns and operates a natural gas compressor station which is located approximately 13 miles northeast of Morrilton, Arkansas. This will be the second modification to the Minor Source Air Permit for this facility. This modification is being issued in order to allow for the facility to operate year-round, and to update the emission calculations from the natural gas turbine to incorporate test results which indicate that emissions from the unit are lower than had been previously estimated. This results in a decrease in hourly emission limitations for CO and NO_x from this engine. Centerpoint has requested that the permitted annual emission limits for these two pollutants remain unchanged. VOC emissions have increased by 0.4 tons per year (tpy) due to updated calculations for year-round operation. Individual hazardous air pollutant emission limits are quantified for the first time with this modification, at 0.67 tpy acetaldehyde and 0.65 tpy formaldehyde.

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 Doug Szenher, Public Affairs Supervisor. Citizens desiring technical information concerning the application or permit should contact David Triplett, Engineer. Both Doug Szenher and David Triplett can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, telephone: (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 Torreyson Library at the University of Central Arkansas in Conway, Faulkner County, Arkansas 72035. 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, or the proposed modification, to the Department at the above address - Attention: Doug Szenher. 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 Commission's Administrative Procedures (Regulation #8).

Dated this

Marcus C. Devine