### STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2205-AOP-R5 AFIN: 73-01084

### 1. PERMITTING AUTHORITY:

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

### 2. APPLICANT:

Fayetteville Express Pipeline LLC - Russell Compressor Station 310 Curtis Davis Road Bald Knob, Arkansas 72010

#### 3. PERMIT WRITER:

Jesse Smith

### 4. NAICS DESCRIPTION AND CODE:

NAICS Description:Pipeline Transportation of Natural GasNAICS Code:486210

### 5. ALL SUBMITTALS:

The following is a list of ALL permit applications included in this permit revision.

Date of Application	Type of Application (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
12/18/2019	Renewal	None

### 6. **REVIEWER'S NOTES**:

Fayetteville Express Pipeline LLC (FEP) – Russell Compressor Station operates a natural gas transmission facility. The facility is located at 310 Curtis Davis Road, Bald Knob AR 72010. FEP is a joint-venture company between Energy Transfer Partners, L.P. and Kinder Morgan Energy Partners, L.P. This permitting action is necessary to renew the permittee's Title V permit. Plantwide Condition #7 was updated to increase the acceptable minimum heating value of natural gas to 975 Btu/scf. There were no emission changes as a result of this permitting action.

### 7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

The last inspection noted an area of concern that the pressure drop exceeded  $\pm 2$  inches of water across the catalyst at sources SN - 01, SN - 02 and SN - 03 during the last compliance test.

### 8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N If yes, were GHG emission increases significant? N

- b) Is the facility categorized as a major source for PSD? N
- Single pollutant  $\geq$  100 tpy and on the list of 28 or single pollutant  $\geq$  250 tpy and not on list

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

### 9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
01 through 11	VOC, CO & NO <sub>X</sub>	NSPS JJJJ
01 through 10	CO or Formaldehyde	NESHAP ZZZZ
11	Compliance achieved by complying with NSPS JJJJ	NESHAP ZZZZ

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

Did the facility request a permit shield in this application? N (Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any Regulation 18 requirement.)

### 11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

### 12. AMBIENT AIR EVALUATIONS:

The following are results for ambient air evaluations or modeling.

### a) NAAQS

A NAAQS evaluation is not required under the Arkansas State Implementation Plan, National Ambient Air Quality Standards, Infrastructure SIPs and NAAQS SIP per Ark. Code Ann. § 8-4-318, dated March 2017 and the ADEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

As there were no changes to emissions, the below is taken from the previous permit revision.

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

1<sup>st</sup> Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Department has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m<sup>3</sup>), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m <sup>3</sup> )	$PAER (lb/hr) = 0.11 \times TLV$	Proposed lb/hr	Pass?
Acrolein [107-02-8]	0.2293	0.025	0.65	Fail
Formaldehyde [50-00-0]	1.5	0.165	7.33	Fail
Ammonia [7664-41-7]	17.41	1.915	2.16	Fail

2<sup>nd</sup> Tier Screening (PAIL)

AERMOD air dispersion modeling was performed on the estimated hourly emissions from the following sources, in order to predict ambient concentrations beyond the property boundary. The Presumptively Acceptable Impact Level (PAIL) for each compound has been deemed by the Department to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

Pollutant $PAIL (\mu g/m^3) = 1/100 \text{ of}$ Threshold Limit Value		Modeled Concentration $(\mu g/m^3)$	Pass?
Acrolein	2.293	0.448*	Pass
Formaldehyde	15.0	5.2166*	Pass

Pollutant	PAIL $(\mu g/m^3) = 1/100$ of Threshold Limit Value	Modeled Concentration $(\mu g/m^3)$	Pass?
Ammonia	174.1	1.51970*	Pass

\*Modeled concentrations are the H1H value, 2008 run, 1-year met, no background. Modeling for Permit #2205-AOP-R0, initial T5 issued on March 30, 2010

c) H<sub>2</sub>S Modeling:

A.C.A. §8-3-103 requires hydrogen sulfide emissions to meet specific ambient standards. Many sources are exempt from this regulation, refer to the Arkansas Code for details.

Is the facility exempt from the H<sub>2</sub>S Standards Y If exempt, explain: No H<sub>2</sub>S emissions

### 13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01- 03	$\begin{tabular}{ c c c c c } \hline & & & & & & & & & & & & & & & & & & $	$\frac{\text{Lb/MMBtu}}{^{1}\text{PM: }7.71\text{E-5}}$ $^{1}\text{SO}_{2}: 5.88\text{E-4}$ $\frac{\text{grams/hp-hr}}{^{2}\text{VOC: }0.19}$ $^{2}\text{CO: }0.19$ $^{2}\text{CO: }0.19$ $^{2}\text{NO}_{x}: 0.50$ $^{2}\text{Fmldh: }1.00\text{E-1}$ $\frac{\text{Lb/MMBtu}}{^{3}\text{ 1,3-Butadiene:}}$ $6.68\text{E-5} (2.67\text{E-4})$ $x 25\%)$ $^{3}\text{Acrolein: }1.29\text{E-3} (5.14\text{E-3} x 25\%)$	Oxidizing Catalyst Miratech model SP-PTCIT- 72S3624x41- 2x18/30	<u>%</u> <u>Reduction</u> VOC: 70% CO: 93% <sup>3</sup> HAPs: 75%	Caterpillar G3616 RICE 4SLB 4,735 bhp Fuel heating value = 1005 @8760 hrs/yr
04- 07	<sup>1</sup> <u>AP-42 Table 3.2-2</u> (08/00) (uncontrolled 4SLB) for PM, SO <sub>2</sub> <sup>2</sup> <u>Manuf. Spec.</u> Cat Spec 229036-M- HTB-201 (rev 04) for VOC, CO, NO <sub>x</sub> <sup>1</sup> & Formaldehyde <sup>3</sup> 1/19/2009 Email from David Zenthoefer (Miratech SCR expert)	$\frac{\text{Lb/MMBtu}}{^{1}\text{PM: }7.71\text{ E-05}}$ $^{1}\text{SO}_{2}: 5.88\text{ E-04}$ $\frac{\text{grams/hp-hr}}{^{2}\text{VOC: }0.12}$ $^{2}\text{CO: }0.24$ $^{2}\text{NO}_{X}: 0.50$ $^{2}\text{Fmldh: }3.50\text{ E-2}$ $\frac{\text{Lb/MMBtu}}{^{3}\text{ 1,3-Butadiene:}}$ $6.68\text{E-5} (2.67\text{E-4})$	<u>Oxidizing</u> <u>Catalyst</u> Miratech model SP-RESIGA- 90S3624x61-42-H4	<u>%</u> <u>Reduction</u> VOC: 70% CO: 93% <sup>3</sup> HAPs: 75%	Caterpillar G16CM34 RICE 4SLB 8180 hp Fuel heating value = 1005 @8760 hrs/yr

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SN	Emission Factor Source (AP-42 testing etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
08-10	to Lee (ETC) to Lee (ETC) 75% reduction of AP-42 Table 3.2-2 HAPs $^{1}$ <u>AP-42 Table 3.2-2</u> (08/00) (uncontrolled 4SLB) for PM, SO <sub>2</sub> $^{2}$ <u>Manuf. Spec.</u> Cat Spec 229036-M- HTB-201 (rev 04), $^{4}$ Miratech spec DZ-09- 4147 Rev (9) Post sys (01/25/10) & $^{2}$ Miratech spec sheet 3/05/09 for VOC <sup>2</sup> , CO <sup>2</sup> & NO <sub>x</sub> <sup>4</sup> & Formaldehyde <sup>2</sup> $^{3}$ 1/19/2009 Email from David Zenthoefer (Miratech SCR expert) to Lee (ETC) 75% reduction of AP-42	$\frac{\text{ctc.})}{\text{x } 25\%)}$ <sup>3</sup> Acrolein: 1.29E-3 (5.14E-03 x 25%) $\frac{\text{Lb/MMBtu}}{^{1}\text{PM}: 7.71 \text{ E-05}}$ <sup>1</sup> SO <sub>2</sub> : 5.88 E-04 $\frac{\text{grams/hp-hr}}{^{2}\text{NMNEHC}}$ (VOC): 0.12 <sup>2</sup> CO: 0.24 <sup>2</sup> NO <sub>X</sub> : 0.10 <sup>2</sup> Fmldh: 0.0350 $\frac{\text{Lb/MMBtu}}{^{3}\text{1,3-Butadiene:}}$ 6.68E-5 (2.67E-04 x 25%) <sup>3</sup> Acrolein: 1.29E- 3 (5.14E-03 x 25%)	<u>Oxidizing</u> <u>Catalyst</u> Miratech model SP-RESIGA- 90S3624x61-42-H4 for VOC, CO & HAPs <u>SCR</u> Miratech SP-CBL169-48/42 for NO <sub>X</sub>	<u>%</u> <u>Reduction</u> VOC: 70% CO: 93% <sup>3</sup> HAPs: 75% NO <sub>x</sub> : 81%	Caterpillar G16CM34 RICE 4SLB 8180 hp Fuel heating value = 1005 SCR reduces NO <sub>X</sub> @8760 hrs/yr
11	$^{1} \underline{\text{AP-42 Table 3.2-3}}_{(08/00) (uncontrolled}_{4SRB) (for PM, SO_{2}}_{\& \text{ HAPs})}_{^{2} \underline{\text{Manuf. Spec.}}}_{(for VOC, CO, NO_{X}}_{\& \text{ Fmldh})}$	$\begin{array}{r} \underline{\text{Lb/MMBtu}} \\ {}^{1}\text{PM: 9.50E-3} \\ {}^{1}\text{SO}_{2}\text{: }5.88\text{E-4} \\ {}^{1}\text{Acrolein: }2.63\text{ E-} \\ {}^{3} \\ {}^{1}\text{Formaldehyde:} \\ {}^{2}\text{.05E-2} \\ {}^{2}\text{VOC: }7.11\text{E-2} \\ {}^{2}\text{CO: }1.14\text{E+00} \\ {}^{2}\text{NO}_{x}\text{: }5.69\text{E-1} \end{array}$	NSCR Miratech model IQ-12-04-C1	<u>%</u> <u>Reduction</u> CO: 73.3% NO <sub>X</sub> : 88.9% HAPs: 0%	RICE 4SRB @500 hrs/yr 250 hp = 8.4 MMBtu/hr

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### 14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
		EPA Methods	Every 3 years or	
	VOC	25A & 18 for	every 8,760	NGDG 40 CED
01.10		VOC, Method	operating hours	NSFS - 40 CFK Dort 60 Subport
01-10		7E for $NO_X$ and	per engine,	
	NOX	Method 10 for	whichever comes	1111
		CO	first	
		EPA Methods		
	Formaldehyde or	320 or 323 for		NESHAP – 40
01-03 & 04-10		Formaldehyde or	Annual	CFR Part 63,
	CO	Method 10 for		Subpart ZZZZ
		CO		
Replacement		EPA Methods 7E		
Engine(s) on	NO- and CO	for $NO_X$ and	Annual, see	§19.705, A.C.A.
temporary or	NO <sub>X</sub> and CO	Method 10 for	PWC #8	and 40 CFR 70.6
permanent basis		CO		
Change of		EPA Methods 7E	No later than 180	
Catalyst on any	NO and CO	for $NO_X$ and	days after initial	§19.304 and
PICE SC #29	NO <sub>X</sub> and CO	Method 10 for	startup of the	§63.6640(b)
KICE SC #20		CO	permitted source	

### 15. MONITORING OR CEMS:

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
08- 10	NO <sub>x</sub> & NO	Electrochemical NO cell	Every 15 min.	No
1-11	Operating Hours	Non-resettable Hour Meter	On-going	No
1-10	Catalyst Temperature	Thermocouple	Continuous	No
1-10	Pressure Differential	Pressure Gauge	Continuous	No
1-10	Engine Load per AMP, specifics in SC #27c	Load Meter	Continuous	Yes

### 16. RECORDKEEPING REQUIREMENTS:

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The following are items (such as throughput, fuel usage, VOC content, etc.) that must be tracked and recorded.

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
01-10	Operating Hours	Record on non- resettable hour meters	On-going	Yes
01-03	VOC, CO & NO <sub>x</sub> Performance Tests, Notifications & documents that engine meets SIP and NSPS JJJJ emission limits. Follow test procedures. Submit entire report and op hours.	$\frac{\text{SIP Emission}}{\text{Limits}}$ $\text{VOC} = 0.19 \text{ g/hp-hr}$ $\text{CO} = 0.19 \text{ g/hp-hr}$ $\text{NO}_{X} = 0.50 \text{ g/hp-hr}$ $\text{hr}$ $\frac{\text{NSPS JJJJ \text{Limits}}}{\text{VOC} = 1.0 \text{ g/hp-hr}}$ $\text{CO} = 4.0 \text{ g/hp-hr}$ $\text{NO}_{X} = 2.0 \text{ g/hp-hr}$	Test every 3 years or every 8760 op hrs whichever comes first	Yes
04-07	VOC, CO & NO <sub>X</sub> Performance Tests, Notifications & documents that engine meets SIP and NSPS JJJJ emission limits. Follow test procedures. Submit entire report and op hours.	$\frac{\text{SIP Emission}}{\text{Limits}}$ $\text{VOC} = 0.12 \text{ g/hp-hr}$ $\text{hr}$ $\text{CO} = 0.24 \text{ g/hp-hr}$ $\text{NO}_{X} = 0.50 \text{ g/hp-hr}$ $\text{hr}$ $\frac{\text{NSPS JJJJ \text{Limits}}}{\text{VOC} = 1.0 \text{ g/hp-hr}}$ $\text{CO} = 4.0 \text{ g/hp-hr}$ $\text{NO}_{X} = 2.0 \text{ g/hp-hr}$	Test every 3 years or every 8760 op hrs, whichever comes first	Yes
08-10	VOC, CO & NO <sub>X</sub> Performance Tests, Notifications & documents that engine meets SIP and NSPS JJJJ emission limits. Follow test procedures. Submit entire report and op hours.	$\frac{\text{SIP Emission}}{\text{Limits}}$ $\text{VOC} = 0.12 \text{ g/hp-hr}$ $\text{CO} = 0.24 \text{ g/hp-hr}$ $\text{NO}_{X} = 0.10 \text{ g/hp-hr}$ $\text{hr}$ $\frac{\text{NSPS JJJJ \text{Limits}}}{\text{VOC} = 1.0 \text{ g/hp-hr}}$ $\text{CO} = 4.0 \text{ g/hp-hr}$ $\text{NO}_{X} = 2.0 \text{ g/hp-hr}$	Test every 3 years or every 8760 op hrs, whichever comes first	Yes
08-10	When SCR not operating, account for uncontrolled NO <sub>X</sub> emissions in annual totals, include in SAMs.	$\label{eq:constraint} \begin{array}{c} \underline{Raw \ OEM} \\ \underline{Emission \ Data} \\ \underline{(Uncontrolled} \\ \underline{Startup \ Event})} \\ NO_X = 0.50 \ g/hp-hr \end{array}$	Every startup events/times SCR is not operating & account for raw NO <sub>X</sub>	Yes

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	Maintain SSM Plan. Identify NO monitor malfunctions. + corrective actions taken			
01-10	Maintain a rolling 12-month total of NO <sub>x</sub> emissions. Report in SAMs.	$\frac{\text{Not-to-exceed}}{\text{NO}_{X}}$ SN-01–03: 22.9 tpy each SN-04–07: 39.5 tpy each SN-08–10: 7.5 tpy each SN-11: 0.3 tpy Total 249.5 tpy NO <sub>X</sub>	Monthly	Yes
01-10	Submit SAMs.	SC #19	Semiannually	Yes
01-10	Post and maintain clearly visible labels at the engines	Identify each engine	On-going	No
01-10	O&M Plan	Records for each engine of conducted maintenance and maintain and operate in a manner consistent with good air pollution control practice for minimizing emissions.	As occurs	No
01-10	Initial Notification	Keep copy on site.	Complete	No
08-10	Excursions or Exceedances + SSM Plan requirements	For each engine with an SCR: Submit information pertaining to exceedances or excursions from permitted values in semi-annual reports in	Keep current up- to-date log as EE occurs	Yes, semi-annual

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
		accordance with		
		General Provision		
		#7 and SC #16a		
		through #16e.		
	$CO \text{ or } CH_2O$			
	Performance	Reduce CO		
	Test: NESHAP	emissions by 93%		
	ZZZZ Emission	or more or limit		
	Limits for New	concentration of		
01-10	and	formaldenyde in	Annual	Yes
	ACL D. Stationar	the stationary		
	4SLB Stationary	RICE exhaust to		
	RICE $\geq 250$ HP	14 ppmvd or less		
	Localed at a	than at 15% $O_2$ dry		
	Major Source of	Dasis		
	nar eillissiolis	Maintain actaluat		
		prossure drop to		
		not change by		
		more then 2" U O		
	Operating Limitations for	$11010 \text{ than } 2 \text{ H}_2 \text{O}$		
		at 100 $\frac{1}{10}$ load $\pm 10$		
		dron across		
		catalyst measured		
01-10	Catalyst when	during initial or	On-going	Ves
01-10	operating at at	subsequent test.	Oll-going	105
	$100 \% \text{ load} \pm 10$	and		
	%	b Maintain RICE		
		exhaust temp so		
		catalyst inlet		
		temperature is $\geq$		
		450 °F and <1350		
		°F.		
		See SC #27 for		
		more details.		
		a. Document		
		periods when		
		engine is not		
		running and record		
		pressure drop		
01-10	AMP	immediately upon	As occurs	Yes
		next startup.		
		b. Record pressure		
		drop immediately		
		once the engine		
		load increases to		
		100% (±10%). If		
		100% (±10%) load		

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SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
		not achieved		
		during entire 30-		
		day period, then		
		monthly pressure		
		drop must be		
		measured at the		
		max load during		
		that 30-day period.		
		c. FEP's semi-		
		annual report		
		required in shall		
		identify all		
		calendar months		
		or periods of a		
		calendar month		
		during which an		
		engine operates		
		at less than a		
		100% (±10%)		
		load and SAR		
		must summarize		
		the maximum		
		load achieved		
		and the load		
		percentage where		
		percentage where		
		pressure drop		
		cataryst was		
		actually		
		measured during		
		each 30-day		
		period.		
11	Operating Hours	500 hours per	NG (11	
11	on non-resettable	calendar 12	Monthly	Yes
	meter	100 hours non		
		100 nours per		
	Non amarganov	maintananca and		
11	Hours	testing includes	Monthly	Yes
	110015	50 hours of non-		
		emergency usage		
		No time limit but		
	During Extended	must record hours		
11	Emergency Use	of duration and	Monthly	Yes
	in excess of 500	notify ADEO of		
	hours	exceedance, etc.		

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
11	O&M Plan Log of Maintenance	Follow Manufacturer's Operating Instructions and keep log	As occurs	Yes
11	AFR Controller	Maintained and operated appropriately	Monthly	No
Facility	Valid gas tariff, purchase contract, fuel analysis, or other appropriate doc, or periodic testing.	Pipeline Quality Natural Gas as only fuel	Keep current document onsite	No
Facility	Submit Permit Renewal application at least 6 months prior to permit expiration.	Permit is valid for 5 years, beginning on date permit becomes effective and ends five (5) years later, GP #3	Every 5 years,	Yes
Facility	Submit Annual Compliance Certificate (ACC)	General Provision #21	Annually, postmarked no later than April 30 <sup>th</sup> every year	Yes

## 17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
Facility	5%	Reg.18.501 and Ark. Code Ann. § 8-4-203 as referenced by §§ 8- 4-304 and 8-4-311	Natural gas only fuel

## 18. DELETED CONDITIONS:

Former SC	Justification for removal
PW # 14	Permit shield condition

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## 19. GROUP A INSIGNIFICANT ACTIVITIES:

G		Emissions (tpy)						
Source	Group A		50	VOC	CO	NO	HAPs	
Iname	Category	$PM/PM_{10}$	$50_{2}$	VUC	0	NO <sub>x</sub>	Single	Total
Tank 4,200 gal Cooling Water	3	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Tank 4,200 gal Used Cooling Water	3	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Tank 4,200 gal Used Lube Oil	3	0.0	0.0	0.21	0.0	0.0	0.0	0.0
3 Tanks 5,000 gal Urea	13	0.0	0.0	0.0	0.0	0.0	0.0	.0009 AC
Tank 12,600 gal Loadout Em Pipeline Fluids - Gasoline	13	0.0	0.0	1.63	0.0	0.0	0.0	0.0
Tank 12,600 gal Lube Oil (Crude Oil RVP 5)	13	0.0	0.0	0.53	0.0	0.0	0.0	0.0
Tank 12,600 gal Waste Water w/oil traces	13	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Fugitive Emissions & Truck Loadout	13	0.0	0.0	1.63	0.0	0.0	0.0	0.0
Equipment Leaks – Fugitive 1	13	0.0	0.0	0.0189	0.0	0.0	0.0	0.0
Engine Blowdowns – Fugitive 2	13	0.0	0.0	0.48	0.0	0.0	0.0	0.0

The following is a list of Insignificant Activities including revisions by this permit.

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# 20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #	
2205-AOP-R4	

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

### Fee Calculation for Major Source

Fayetteville Express Pipeline LLC - Russell Compressor Station Permit #: 2205-AOP-R5 AFIN: 73-01084

\$/ton factor Permit Type	23.93 Renewal No Changes	Annual Chargeable Emissions (tpy) Permit Fee \$	<u>354.58</u> 0
Minor Modification Fee \$	500		
Minimum Modification Fee \$	1000		
Renewal with Minor Modification \$	500		
Check if Facility Holds an Active Minor Source or Min Source General Permit	lor		
If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$	0		
Total Permit Fee Chargeable Emissions (tpy) Initial Title V Permit Fee Chargeable Emissions (tpy)	0		

HAPs not included in VOC or PM:

Chlorine, Hydrazine, HCl, HF, Methyl Chloroform, Methylene Chloride, Phosphine, Tetrachloroethylene, Titanium Tetrachloride

Air Contaminants:

All air contaminants are chargeable unless they are included in other totals (e.g., H2SO4 in condensible PM, H2S in TRS, etc.)

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
РМ		1.1	1.1	0		
PM <sub>10</sub>		1.1	1.1	0	0	1.1
PM <sub>2.5</sub>		0	0	0		
SO <sub>2</sub>		1.8	1.8	0	0	1.8
VOC		92.7	92.7	0	0	92.7
со		158.6	158.6	0		
NO <sub>X</sub>		249.5	249.5	0	0	249.5
Formaldehyde		33.03	33.09	0.06		

Revised 03-11-16

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Total HAPs		42.32	42.32	0		
Ammonia	<b>v</b>	9.48	9.48	0	0	9.48