

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1202-AOP-R6 AFIN: 14-00186

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Enable Gas Transmission, LLC (Taylor Compressor Station)
13000 Hwy 160, 4 miles east of Taylor, Arkansas
Taylor, Arkansas 71861

3. PERMIT WRITER:

John Mazurkiewicz

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Pipeline Transportation of Natural Gas
NAICS Code: 486210

5. ALL SUBMITTALS:

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

Date of Application	Type of Application (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
5/22/2018	Renewal/Minor Modification	A Clark HLA-6 Compressor Engine (SN-05) and the Communications Tower Generator (SN-18) have been removed. The limit on fuel sulfur content increased from 0.2 grains to 5.0 grains of total sulfur per 100 standard cubic feet of natural gas.

6. REVIEWER'S NOTES:

In addition to changes requested in the application, the following revisions were made:

- Plantwide Conditions have been updated and include appropriate test dates.
- Regulatory citations have been updated.

7. COMPLIANCE STATUS:

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

There are no current enforcement actions against the facility.

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? No.
If yes, were GHG emission increases significant? N/A.

b) Is the facility categorized as a major source for PSD? Yes

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

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

This revision does not constitute a Major Modification as defined in 40 C.F.R. § 52.21.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
N/A		

10. PERMIT SHIELD – TITLE V PERMITS ONLY:

Did the facility request a permit shield in this application? No.

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. AMBIENT AIR EVALUATIONS:

The following are results for ambient air evaluations or modeling.

a) NAAQS

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

b) Non-Criteria Pollutants:

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

1st 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^3), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m^3)	PAER (lb/hr) = $0.11 \times \text{TLV}$	Proposed lb/hr	Pass?
Acrolein	0.22*	0.0242	0.5404	No
Formaldehyde	0.36*	0.0396	3.8340	No
PAH	0.20	0.0220	0.0069	Yes

*STEL value.

2nd Tier Screening (PAIL)

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

Pollutant	PAIL ($\mu\text{g}/\text{m}^3$) = 1/100 of Threshold Limit Value	Modeled Concentration ($\mu\text{g}/\text{m}^3$)	Pass?
Acrolein	2.0	1.2595	Yes
Formaldehyde	15.0*	8.9366	Yes

*Department approved alternate PAIL value.

c) H₂S Modeling:

N/A.

13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
02 through 04 and 06	Stack tests	lb/hr: 89.1 NO _x (26.93 g/hp-hr) 10.0 CO (3.01 g/hp-hr)	None	NA	Emission factors based on performance test data and include 20% S.F.
02 through 04 and 06	AP-42 Table 3.2-1 (7/00)	lb/MMBtu: 0.12 VOC 0.0147 SO ₂ 0.04831 PM/PM ₁₀	None	NA	Emission rates include 20% S.F. Emission factor for SO ₂ adjusted to 5 grains of total sulfur per 100 SCF of natural gas

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
02 through 04 and 06	NO _x CO	7E 10	5 years	All compressors test half of the engines every 5 years
Plantwide	Total Sulfur (SO ₂)	Methods outlined in section 2.3.5 or 2.3.3.1.2 of 40 CFR Part 75, Appendix D*	every 5 years (Initial test completed on 4/8/08)	Department Guidance

*In a letter dated January 24, 2018, the Department approved the use of sorbent tubes supplied by National Draeger, Inc. (or equivalent) when conducting the required testing.

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)
N/A				

16. RECORDKEEPING REQUIREMENTS:

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

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
Facility	Fuel used	Natural gas only	Continuously	No

17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
02 through 04 and 06	5 %	§18.501	Natural gas combustion

18. DELETED CONDITIONS:

Former SC	Justification for removal
4 - 18	Conditions applied to the Communications Tower Generator (SN-18) which is no longer a permitted source of emissions.

19. GROUP A INSIGNIFICANT ACTIVITIES:

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

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
Produced Water Storage Tank (8,820 gallon capacity)	A-3			3.42			0.342	0.342
Lube Oil Storage Tank (7,000 gallon capacity)	A-3			0.005			0.0005	0.0005
Used Oil Storage Tank (8,820 gallon capacity)	A-3			0.003			0.0003	0.0003
Facility and Compressor	A-13			4.43			0.04	0.04

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Source Name	Group A Category	Emissions (tpy)						
		PM/ PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
Blowdowns								
Process Piping Fugitives	A-13			0.41			0.004	0.004
Truck Loading	A-13			0.006			0.0006	0.0006
Glycol Mix Storage Tank (16,800 gallon capacity)	A-13			0.0004			0.0004	0.0004
Total	A-13			4.84			0.045	0.045

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 #
1202-AOP-R5

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-11-16

Facility Name: Enable Gas Transmission, LLC (Taylor
Compressor Station)
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\$/ton factor	23.93	Annual Chargeable Emissions (tpy)	1616.8
Permit Type	Minor Mod	Permit Fee \$	500

Minor Modification Fee \$	500
Minimum Modification Fee \$	1000
Renewal with Minor Modification \$	500

Check if Facility Holds an Active Minor Source or Minor Source General Permit

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If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$	0
Total Permit Fee Chargeable Emissions (tpy)	-400.3
Initial Title V Permit Fee Chargeable Emissions (tpy)	

HAPs not included in VOC or PM:

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

Air Contaminants:

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

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
PM		18.6	14.8	-3.8		
PM ₁₀		15.1	14.8	-0.3	-3.8	14.8
PM _{2.5}		0	0	0		
SO ₂		0.6	4.8	4.2	4.2	4.8
VOC		46.2	36.8	-9.4	-9.4	36.8
CO		226.7	174.8	-51.9		
NO _x		1951.7	1560.4	-391.3	-391.3	1560.4
Acetaldehyde	<input type="checkbox"/>	1.86	0	-1.86		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Acrolein	<input type="checkbox"/>	1.86	0	-1.86		
Benzene	<input type="checkbox"/>	0.46	0	-0.46		
Formaldehyde	<input type="checkbox"/>	13.24	16.8	3.56		
Methanol	<input type="checkbox"/>	0.61	0	-0.61		
Toluene	<input type="checkbox"/>	0.26	0	-0.26		
Total Other HAPs	<input type="checkbox"/>	0	7.4	7.4		