

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1217-AOP-R8 AFIN: 54-00120

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Enable Gas Transmission, LLC - Helena Compressor Station
2875 Highway 20
Helena-West Helena, Arkansas 72342-8997

3. PERMIT WRITER:

Jae Jung

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
2/1/2026	Renewal	No Changes

6. REVIEWER'S NOTES:

In this Title V renewal, there are no physical changes, no changes in the operation of the facility, and no changes in permitted annual emissions. The SOB is updated to include the non-criteria pollutants table, updates PAIL table, and includes benzene modeling.

7. COMPLIANCE STATUS:

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

Enable Gas Helena was last inspected on 10/21/2025 with no compliance issues.

<https://echo.epa.gov/detailed-facility-report?fid=110039082701>.

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/A

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

- *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.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-01, SN-02, SN-03, SN-12	Formaldehyde	NESHAP ZZZZ

10. UNCONSTRUCTED SOURCES:

Unconstructed Source	Permit Approval Date	Extension Requested Date	Extension Approval Date	If Greater than 18 Months without Approval, List Reason for Continued Inclusion in Permit
N/A				

11. PERMIT SHIELD – TITLE V PERMITS ONLY:

Did the facility request a permit shield in this application? Y

(Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any 8 CAR pt. 40 requirement.)

If yes, are applicable requirements included and specifically identified in the permit? Y

If not, explain why.

For any requested inapplicable regulation in the permit shield, explain the reason why it is not applicable in the table below.

Source	Inapplicable Regulation	Reason
Facility	40 CFR Part 63 Subpart HH— National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities	Compressors are exempt.

Source	Inapplicable Regulation	Reason
Facility	40 CFR Part 63 Subpart HHH— National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities	A compressor station that transports natural gas prior to the point of custody transfer or to a natural gas processing plant (if present) is not considered a part of the natural gas transmission and storage source category.
Facility	40 CFR Part 60 Subpart GG— Standards of Performance for Stationary Gas Turbines	No stationary gas turbines at the facility.
Facility	40 CFR Part 60 Subpart IIII— Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	No compression ignition internal combustion engines.
Facility	40 CFR Part 60 Subpart JJJJ— Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	The latest installation/construction date is 2006. The engines have not been modified or reconstructed.
Facility	40 CFR Part 60 Subpart KKKK— Standards of Performance for Stationary Combustion Turbines	No stationary combustion turbines at the facility.
Facility	40 CFR Part 60 Subpart OOOO— Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution	There has been no construction, modification, or reconstruction after August 23, 2011, and on or before September 18, 2015.
Facility	40 CFR Part 60 Subpart OOOOa— Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution	There has been no construction, modification, or reconstruction after September 18, 2015.
Facility	40 CFR Part 62— State Plans for Designated Facilities	Plans for Arkansas are not for facilities of this type (natural gas compressor stations).
Facility	40 CFR Part 64— Compliance Assurance Monitoring	The only control device used is to achieve compliance with a standard under the Clean Air Act
Facility	40 CFR Part 68— Chemical Accident Prevention Provisions/Risk Management	The facility does not have authorization to have a threshold quantity of a regulated substance under this Part.
Facility	40 CFR Part 79— Registration of Fuels and Fuel Additives	The facility is not a fuel manufacturer as defined in this Part.
Facility	40 CFR Part 80— Registration of Fuels and Fuel Additives	The facility does not process the kind of fuel regulated under this Part.
Facility	40 CFR Part 81.304— Non-Attainment	At issuance of this permit, the facility was not in a nonattainment area for any pollutant.

12. COMPLIANCE ASSURANCE MONITORING (CAM) – TITLE V PERMITS ONLY:

List sources potentially subject to CAM because they use a control device to achieve compliance and have pre-control emissions of at least 100 percent of the major source level. List the pollutant of concern and a brief summary of the CAM plan (temperature monitoring, CEMs, opacity monitoring, etc.) and frequency requirements of § 64.

Source	Pollutant Controlled	Cite Exemption or CAM Plan Monitoring and Frequency
N/A		

13. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

14. 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 DEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

1st Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Division of Environmental Quality has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m³), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m ³)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Acetaldehyde	45	4.95	1.49E-01	Yes
Acrolein	0.23	0.0253	1.48E-01	No
Benzene	0.06389	.007028	4.50E-02	No
Carbon Tetrachloride	31	3.41	1.13E-03	Yes

Pollutant	TLV (mg/m ³)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Chlorobenzene	46	5.06	8.24E-04	Yes
Chloroform	49	5.39	8.75E-04	Yes
Ethylbenzene	87	9.57	1.95E-03	Yes
Ethylene Dibromide	0.35	0.0385	1.36E-03	Yes
Formaldehyde	0.12	0.0132	9.27E-01	No
Methanol	262	28.82	6.67E-02	Yes
Methylene Chloride	174	19.14	2.72E-03	Yes
n-Hexane	176	19.36	7.12E-03	Yes
Phenol	19	2.09	6.74E-04	Yes
Styrene	42.6	4.686	9.82E-04	Yes
Toluene	75	8.25	2.03E-02	Yes
Vinyl Chloride	2.6	.286	4.59E-04	Yes
Xylene	434	47.74	6.01E-03	Yes
Total POM	0.2	0.022	4.20E-02	No*

*None of the Individual POMs are above their respective TLV limits

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 Division of Environmental Quality to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

Pollutant	PAIL (µg/m ³) = 1/100 of Threshold Limit Value	Modeled Concentration (µg/m ³)	Pass?
Acrolein	2.3	0.503	Y
Benzene	0.63	0.229	Y
Formaldehyde	15.0	3.05	Y

c) H₂S 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 H₂S Standards Y

If exempt, explain: This facility is not a major source of H₂S

15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01, 02	2008 Testing	lb/hr 9.2 CO 26.7 NO _x	None	N/A	8,760 op hr/yr
01, 02	AP-42 Table 3.2-1 (2-stroke lean burn)	lb/MMBtu PM/PM ₁₀ = PM _{filterable} + PM _{condensable} 0.04831 PM/PM ₁₀ 0.0147 SO ₂ 0.12 VOC Total Combustion HAP 0.0795	None	N/A	8,760 op hr/yr; 8 MMBtu/hr. Site-specific sulfur content, 0.2 gr / 100scf, or 25x std AP-42 factor.
03, 12	AP-42 Table 3.2-3 (4-stroke rich burn)	lb/MMBtu PM/PM ₁₀ = PM _{filterable} + PM _{condensable} 0.01941 PM/PM ₁₀ 0.0147 SO ₂ 0.0296 VOC	None	N/A	SN-03: 8,760 op hr/yr; 8.83 MMBtu/hr. SN-12: 500 op hr/yr; 0.732 MMBtu/hr.
03	Testing	lb/hr 53.8 CO	None	N/A	8,760 op hr/yr; 8.83 MMBtu/hr
03	Testing	lb/hr 30.1 NO _x	NSCR	26%	8,760 op hr/yr; 8.83 MMBtu/hr

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
03	AP-42 Table 3.2-3 (4-stroke rich burn)	lb/MMBtu 0.0205 Formaldehyde (before control factor) Total Combustion HAP 0.01684	NSCR	76% (formaldehyde only)	8,760 op hr/yr; 8.83 MMBtu/hr
12	Testing	g/hp-hr 130.1 CO 3.4 NO _x	None	N/A	500 op hr/yr; 0.732 MMBtu/hr
12	AP-42 Table 3.2-3 (4-stroke rich burn)	lb/MMBtu 3.72 CO 2.27 NO _x Total Combustion HAP 0.03242	None	N/A	500 op hr/yr; 0.732 MMBtu/hr

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
01 and 02	CO NO _x	10 7E	One of two compressor engines every five years	See Plantwide Condition (PWC) #7
03	CO NO _x	10 7E	Every five years	See PWC #7
03	CO or THC	CO: §63.6630(e)(3) THC: §63.6630(e)(4)	Initial Compliance Demonstration	40 C.F.R. § 63.6630(e)
03	CO or THC	CO: §63.6640(c)(3) THC: §63.6640(c)(4)	Annual Compliance Demonstration	40 C.F.R. § 63.6640(c)

17. 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)
03	Catalyst Inlet Temperature	Thermocouple	At least once every 15 minutes, reducing the data to 4-hour rolling averages, or immediately shutting down the engine if the catalyst inlet temperature exceeds 1250°F	N

18. 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)
01 and 02	Required Maintenance	Plantwide Condition (PWC) #32	Every 4,320 hours, annually, or other as applicable	N
01 and 02	Failure to Meet Requirements	PWC #28	N/A	Y
01 and 02	Records required by 63.6655	PWC #29	N/A	N
03	Failure to Meet Requirements	PWC #28	N/A	Y
03	Records required by 63.6655	PWC #29	N/A	Y
12	Operating Hours	500 hours	Year	Y
12	Required Maintenance	PWC #39	N/A	N
12	Records required by 63.6655	PWC #41	N/A	N

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01, 02, 03, 12	5%	Department Guidance	Burn only pipeline-quality natural gas

20. DELETED CONDITIONS:

Former SC	Justification for removal
N/A	

21. 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
8,820-gallon Used Oil Storage Tank	A-3			0.34				
8,820-gallon Produced Water Storage Tank	A-3			0.01				
5,880-gallon New Oil Storage Tank	A-3			0.28				
500-gallon New Oil Storage Tank	A-3			0.03				
265-gallon New Oil Storage Tank	A-3			0.01				
120-gallon New Oil Storage Tank	A-3			0.004				
120-gallon New Oil Storage Tank	A-3			0.004				
565-gallon Diesel Storage Tank	A-3			0.0002				
565-gallon Antifreeze Storage Tank	A-3			0.00001				
A-13 Total				0.68				
Compressor and Facility Blowdowns	A-13			0.115				
Piping Component Fugitive Emissions	A-13			0.093				
Truck Loading	A-13			0.144				
A-13 Total				0.352				

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22. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
1217-AOP-R7

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Facility Name: Enable Gas Transmission, LLC-Helena Compressor
 Permit Number: 12-AOP-R8
 AFIN: 54-00120

\$/ton factor	28.14	Annual Chargeable Emissions (tpy)	<u>382.5</u>
Permit Type	Renewal No Changes	Permit Fee \$	<u>0</u>

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

If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$ 0

Total Permit Fee Chargeable Emissions (tpy) 0

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 Per mit	New Per mit	Change in Emissi ons	Permit Fee Chargea ble Emissio ns	Annual Chargea ble Emissio ns
PM		4.3	4.3	0		
PM ₁₀		4.3	4.3	0	0	4.3
PM _{2.5}		0	0	0		
SO ₂		1.9	1.9	0	0	1.9
VOC		9.9	9.9	0	0	9.9
CO		317	317	0		
NO _x		366.4	366.4	0	0	366.4