

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1419-AOP-R6 AFIN: 34-00111

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Enable Mississippi River Transmission, LLC - Tuckerman Compressor Station
210 Jackson 62
Tuckerman, Arkansas 72473

3. PERMIT WRITER:

Alexander Sudibjo

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
11/19/2020	Renewal	Limit annual hours of operation for SN-01, 02, 03, 04, 06, and 08

6. REVIEWER'S NOTES:

This permitting modification is necessary to renew the operating permit 1419-AOP-R5. In this renewal, the facility is requesting a limit on the hours of operation for the compressor engines SN-01, SN-02, SN-03, and SN-04 to 20,000 combined hours per year for all four engines, SN-06 and SN-08 to 5,000 hours per year per engine, and removal of the hours of operation limit for SN-11. Additionally the facility's permitted emissions are being updated due to updating the emission calculations to account for the new total sulfur limit of the pipeline gas based on the current FERC gas quality tariff, updating the HAPs emissions using the latest AP-42 factors, correcting the horsepower rating for SN-

11, and updating emission calculations for all insignificant activities. The facility's permitted annual emissions are decreasing by 5.3 tpy PM, 5.3 tpy PM₁₀, 15.4 tpy VOC, 37.3 tpy CO, and 376.1 tpy NO_x. The facility's permitted annual emissions are increasing by 3.6 tpy SO₂ and 0.39 tpy total HAPs.

7. COMPLIANCE STATUS:

As of November 19, 2020, there are no compliance issues with the facility. ECHO shows no violation identified (<https://echo.epa.gov/detailed-facility-report?fid=110007349299>).

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?

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. This is a Title V renewal with no construction, reconstruction, or modification of equipment.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN01 through SN-04, SN-06, SN-08, SN-10 and SN-12	HAPs	40 C.F.R. Pt. 63 Subpart <i>ZZZZ</i>
SN-11	NO _x and SO ₂	40 C.F.R. Pt. 60 Subpart GG

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 Regulation 18 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 C.F.R. Part 60, Subpart IIII	No affected sources
Facility	40 C.F.R. Part 60, Subpart JJJJ	No affected sources
Facility	40 C.F.R. Part 60, Subpart KKKK	No affected sources
Facility	40 C.F.R. Part 60, Subpart OOOO	No affected sources
Facility	40 C.F.R. Part 60, Subpart OOOOa	No affected sources
Facility	40 C.F.R. Part 63, Subpart HH	There are no glycol dehydrators at this site
Facility	40 C.F.R. Part 63, Subpart HHH	There are no glycol dehydrators at this site
Facility	40 C.F.R. Part 64	There are no emission controls at this site

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:

Based on Division of Environmental Quality procedures for review of non-criteria pollutants, emissions of non-criteria pollutants are below thresholds of concern.

c) H₂S Modeling:

The facility does not have any H₂S emissions.

15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Comments
01 thru 04 (880 HP)	Stack Testing	NO _x : 45.31 lb/hr (maximum emission from testing)	None	120% Load/safety factor included (for NO _x) 5000 operating hours 12.842 MMBtu/hr
	AGA Data	CO: 2.13 g/hp-hr		
	AP-42 Table 3.2-1	VOC: 1.20E-01 lb/MMBtu PM ₁₀ : 4.83E-02 lb/MMBtu SO ₂ : 1.47E-02 lb/MMBtu Total HAPs: 7.62E-02 lb/MMBtu		
06 (625 HP)	AGA Data	NO _x : 20.64 g/hp-hr CO: 1.96 g/hp-hr	none	5000 operating hours 7.348 MMBtu/hr
	AP-42 Table 3.2-1	VOC: 1.20E-01 lb/MMBtu PM ₁₀ : 4.83E-02 lb/MMBtu SO ₂ : 1.47E-02 lb/MMBtu Total HAPs: 7.62E-02 lb/MMBtu		
08 (1100 HP)	AGA Data	NO _x : 12.58 g/hp-hr CO: 3.71 g/hp-hr	none	5000 operating hours 10.861 MMBtu/hr
	AP-42 Table 3.2-1	VOC: 1.20E-01 lb/MMBtu PM ₁₀ : 4.83E-02 lb/MMBtu SO ₂ : 1.47E-02 lb/MMBtu Total HAPs: 7.62E-02 lb/MMBtu		
10 (300 HP)	Manufacturer's Data	VOC: 0.8 g/hp-hr CO: 11.5 g/hp-hr NO _x : 11.4 g/hp-hr	none	500 operating hours 2.653 MMBtu/hr
	AP-42 Table 3.2-3	PM ₁₀ : 1.94E-02 lb/MMBtu SO ₂ : 1.47E-02 lb/MMBtu Total HAPs: 3.12E-02 lb/MMBtu		
11 (6481 HP)	Manufacturer's Data	NO _x : 32.5 lbs/hr (max emission) CO: 7.0 lbs/hr (max emission)	none	8760 operating hours 70.86 MMBtu/hr
	AP-42 Table 3.2-2a	VOC: 2.10E-03 lb/MMBtu PM ₁₀ : 6.60E-03 lb/MMBtu SO ₂ : 6.58E-03 lb/MMBtu Total HAPs: 3.12E-02 lb/MMBtu		
12 (64 HP)	AP-42 Table 3.2-3	NO _x : 2.27 lb/MMBtu CO: 3.72 lb/MMBtu VOC: 2.96E-02 lb/MMBtu PM ₁₀ : 1.94E-02 lb/MMBtu SO ₂ : 1.47E-02 lb/MMBtu	none	500 operating hours 0.732 MMBtu/hr

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
01, 02, 03, and 04	CO NO _x	10 7E	One-half of each type of compressor engines every five years	See Plantwide Condition #8 in permit.
06	CO NO _x	10 7E	Every five years	See Plantwide Condition #8 in permit.
08	CO NO _x	10 7E	Every five years	See Plantwide Condition #8 in permit.
11	CO NO _x	10 20 or 7E	Every five years	See Plantwide Condition #8 in permit.

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)
N/A				

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, 02, 03, 04,	Hours of Operation	20,000 combined hours per rolling 12 month	Monthly	Y
06, 08	Hours of Operation	5,000 hours per rolling 12 month per engine	Monthly	Y
10, 12	Hours of Operation	500 hours per calendar year per engine	Monthly	Y
11	Valid purchase contract, tariff sheet or transportation contract	Meets definition of natural gas	Yearly	N
01, 02, 03,04,	Occurrence and duration of malfunction, performance	None	Monthly	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
06, 08, 10, 12	tests and evaluations, actions taken during malfunction, maintenance performed			

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01 thru 04, 06, 08, 10, 11, and 12	5%	Reg.18.501	Natural gas as fuel

20. DELETED CONDITIONS:

Former SC	Justification for removal
27 & 28	SN-11 is no longer limited to 4200 annual hours of operation.

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
Boiler (0.1 MMBtu/hr)	A-1	3.33E-03	2.58E-04	2.36E-03	3.61E-02	4.29E-02		
Produced Water Tank (3150 gal)	A-3			0.52			0.01	0.01
Produced Water Tank (3780 gal)	A-3			0.62			0.01	0.01
Lube Oil Tank (4200 gal)	A-3			0.21			0.01	0.01
Lube Oil Tank (1120 gal)	A-3			0.16			0.01	0.01
Used Oil Tank (1000 gal)	A-3			0.05			0.01	0.01
Antifreeze Mix Tank (8820 gal)	A-3			3E-05			0.01	0.01
Antifreeze Tank (4620 gal)	A-3			1E-05			0.01	0.01
Diesel Tank (500 gal)	A-3			1E-04			0.01	0.01
Lube Oil tank (125 gal)	A-3			7E-03			0.01	0.01

Source Name	Group A Category	Emissions (tpy)						
		PM/ PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
A-3 TOTAL				1.57			0.09	0.09
Compressor and facility blowdowns	A-13			2.62			0.01	0.01
Process and piping fugitive emissions	A-13			0.52			0.01	0.01
Tank truck loading	A-13			0.003			0.01	0.01
A-13 TOTAL				3.143			0.03	0.03

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 #
1419-AOP-R5

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-11-16

Facility Name: Enable Mississippi River Transmission,
 LLC - Tuckerman Compressor Station
 Permit Number: 1419-AOP-R6
 AFIN: 34-00111

\$/ton factor	23.93	Annual Chargeable Emissions (tpy)	784.3
Permit Type	Modification	Permit Fee \$	1000

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	<input type="checkbox"/>
If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$	0
Total Permit Fee Chargeable Emissions (tpy)	-393.2
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		16.3	11	-5.3		
PM ₁₀		16.3	11	-5.3	-5.3	11
PM _{2.5}		0	0	0		
SO ₂		1.4	5	3.6	3.6	5
VOC		37.5	22.1	-15.4	-15.4	22.1
CO		141.5	104.2	-37.3		
NO _x		1122.3	746.2	-376.1	-376.1	746.2
Total HAPs	<input type="checkbox"/>	13.2	13.59	0.39		