ADEQ
OPERATING
AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation 26:

Permit No. : 1432-AOP-R3
Renewal #1
IS ISSUED TO:
CenterPoint Energy – Mississippi River Transmission Corp.
West Point Compressor Station
Highway 36E, Route 1 Box 230 A
West Point, AR 72143
White County
AFIN: 73-00127

THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:

February 17, 2005 AND February 16, 2010

THE PERMITTEE IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

_____ _____

Michael Bonds
Chief, Air Division

Date Modified

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List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO_x	Nitrogen Oxide
PM	Particulate Matter
PM10	Particulate Matter Smaller Than Ten Microns
SNAP	Significant New Alternatives Program (SNAP)
SO_2	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

SECTION I: FACILITY INFORMATION

PERMITTEE:	CenterPoint Energy - Mississippi River Transmission Corp. – West Point Compressor Station
AFIN:	73-00127
PERMIT NUMBER:	1432-AOP-R3
FACILITY ADDRESS:	Highway 36 E, Route 1, Box 230 A West Point, AR 72143
MAILING ADDRESS	P.O.Box 21734 Shreveport, LA 71151
COUNTY:	White
CONTACT POSITION:	Laura L. Guthrie
TELEPHONE NUMBER:	318-429-3706
REVIEWING ENGINEER:	Kimberly O'Guinn
UTM North South (Y):	Zone 15: 2896.0
UTM East West (X):	Zone 15: 627.0

SECTION II: INTRODUCTION

Summary of Permit Activity

Centerpoint Energy – Mississippi River Transmission Corporation (MRT) owns and operates the West Point Compressor Station, a natural gas compressor station, located in White County, AR. This permitting modification is to include the finalized language agreed upon by the Department and CenterPoint Energy in the Permit Appeal Resolution (PAR). No other changes were made to the permit.

Process Description

The West Point Compressor Station is a natural gas compressor station. Friction losses cause a pressure drop in natural gas pipelines. To maintain flow, gas must be removed from the pipeline, repressurized, and returned to the pipe. Natural gas enters the station where it is compressed, exiting the station at a higher pressure. Prior to compression, the gas will pass through an inlet separator where entrained liquids will be removed from the gas stream. Condensate/pipeline liquids will be stored in the produced water tank and removed from the station via tanker truck when necessary. Piping components will be a source of fugitive emissions.

Regulations

The following table contains the regulations applicable to this permit.

Source No.	Regulations
Facility	Regulation 18 - *Arkansas Air Pollution Control Code*
Facility	Regulation 19 - *Arkansas Plan of Implementation for Air Pollution Control*
Facility	Regulation 26 - *Arkansas Operating Air Permit Program*

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

Emission Summary

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
Total Allowable Emissions		PM_{10}	0.8	3.6	
		SO_2	0.01	0.3	
		VOC	2.5	11.2	
		CO	417.2	1827.2	
		NO_x	238.5	1044.7	
HAPS		Formaldehyde* Methanol* Acetaldehyde* Benzene* Toluene* Acrolein*	0.94 0.13 0.13 0.06 0.03 0.13	4.1 0.63 0.57 0.32 0.13 0.51	
01	Natural Gas Compressor 1000 HP, Ingresoll Rand Model KVG	PM_{10} SO_2 VOC CO NO_x Formaldehyde* Methanol* Acetaldehyde* Benzene* Toluene* Acrolein*	0.13 001 0.41 51.9 38.8 0.15 0.02 0.02 0.01 0.01 0.02	0.58 0.04 1.81 227.32 169.94 0.65 0.10 0.09 0.05 0.02 0.08	11
02	Natural Gas Compressor 1000 HP, Ingresoll Rand Model KVG	PM_{10} SO_2 VOC CO NO_x Formaldehyde* Methanol* Acetaldehyde* Benzene* Toluene* Acrolein*	0.13 0.01 0.41 76.6 40.3 0.15 0.02 0.02 0.01 0.01 0.02	0.58 0.04 1.81 335.51 176.51 0.65 0.10 0.09 0.05 0.02 0.08	13

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
03	Natural Gas Compressor 1000 HP, Ingresoll Rand Model KVG	PM_{10}	0.13	0.58	15
		SO_2	0.01	0.04	
		VOC	0.41	1.81	
		CO	44.1	193.16	
		NO_x	38.7	169.51	
		Formaldehyde*	0.15	0.65	
		Methanol*	0.02	0.10	
		Acetaldehyde*	0.02	0.09	
		Benzene*	0.01	0.05	
		Toluene*	0.01	0.02	
		Acrolein*	0.02	0.08	
04	Natural Gas Compressor 1000 HP, Ingresoll Rand Model KVG	PM_{10}	0.13	0.58	17
		SO_2	0.01	0.04	
		VOC	0.41	1.81	
		CO	108.6	475.67	
		NO_x	40.2	176.08	
		Formaldehyde*	0.15	0.65	
		Methanol*	0.02	0.10	
		Acetaldehyde*	0.02	0.09	
		Benzene*	0.01	0.05	
		Toluene*	0.01	0.02	
		Acrolein*	0.02	0.08	
05	Natural Gas Compressor 1000 HP, Ingresoll Rand Model KVG	PM_{10}	0.13	0.58	19
		SO_2	0.01	0.04	
		VOC	0.41	1.81	
		CO	65.9	288.64	
		NO_x	36.4	159.43	
		Formaldehyde*	0.15	0.65	
		Methanol*	0.02	0.10	
		Acetaldehyde*	0.02	0.09	
		Benzene*	0.01	0.05	
		Toluene*	0.01	0.02	
		Acrolein*	0.02	0.08	

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
06	Natural Gas Compressor 1000 HP, Ingresoll Rand Model KVG	PM_{10}	0.13	0.58	21
		SO_2	0.01	0.04	
		VOC	0.41	1.81	
		CO	60.2	263.68	
		NO_x	38.1	166.88	
		Formaldehyde*	0.15	0.65	
		Methanol*	0.02	0.10	
		Acetaldehyde*	0.02	0.09	
		Benzene*	0.01	0.05	
		Toluene*	0.01	0.02	
		Acrolein*	0.02	0.08	
08	300 hp Caterpillar G379 Generator Engine	PM_{10}	0.03	0.11	23
		SO_2	0.01	0.01	
		VOC	0.08	0.34	
		CO	9.86	43.18	
		NO_x	6.02	26.35	
		Formaldehyde*	0.04	0.20	
		Methanol*	0.01	0.03	
		Acetaldehyde*	0.01	0.03	
		Benzene*	0.003	0.02	
		Toluene*	0.001	0.01	
		Acrolein*	0.01	0.03	

*HAPs included in the VOC totals. Other HAPs are not included in any other totals unless specifically stated.

SECTION III: PERMIT HISTORY

Mississippi River Transmission Corporation (MRT) – West Point Compressor Station began operation in 1949.

Air Permit #1432-AR-1 was issued to this facility on July 13, 1994. This permit established limits of 1,104.09 tons/year of NOx, 1,788.13 ton/year of CO, 29.45 tons/year of VOC, and 0.12 tons/year of SO_2.

Air Permit #1432-AOP-R0 was the initial Title V permit. There were no physical changes to the facility.

Air Permit #1432-AOP-R1 was issued to this facility on March 9, 2000. In order to avoid confusion with the final permit issued on November 13, 1998, and the agreed upon changes in the Permit Appeal Resolution (PAR), the permit number was changed from 1432-AOP-R0 to 1432-AOP-R1.

Air Permit #1432-AOP-R2 was issued to this facility on February 17, 2005. This permitting action was to renew the facility's existing Title V air permit. One (1) 275 hp Ingersoll-Rand PVG-8 electrical generator (SN-07) is no longer operational and was deleted from the permit. In addition, emissions from the 300 hp Caterpillar G-379 electrical generator (SN-08) was increased with this permitting action to reflect an operating rate of 8760 hours per year. All other changes in emissions reflected updated AP-42 emission factors. PM_{10}, SO_2, and CO emissions increased by 3.59 tons/year (tpy), 0.25 tpy, and 38.86 tpy, respectively. VOC, NO_x, and total HAP emissions decreased by 18.4 tpy, 59.5 tpy, 3.38 tpy, respectively.

SECTION IV: SPECIFIC CONDITIONS

SN- 01

Natural Gas Compressor Engine

Source Description

This compressor engine was installed in 1949. The engine is an 1000 HP, Ingersoll Rand Model KVG internal combustion 4-cycle rich burn engine. Emissions are based on maximum operating rate of 120% capacity.

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by the use of natural gas and operating at or below maximum capacity of the equipment. [Regulation 19, §19.501 et seq., effective December 19, 2004 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM_{10}	0.13	0.58
SO_2	0.01	0.04
VOC	0.41	1.81
CO	51.9	227.32
NO_x	38.8	169.94

- Formaldehyde, methanol and other HAPs are included in the VOC totals.

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by the use of natural gas and operating at or below maximum capacity of the equipment. The HAP emissions listed for this source were based upon published emission factors at the time of permit issuance. Any change in these emission factors will not constitute a violation of the HAP emission rates listed below.[Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
Formaldehyde	0.15	0.65
Methanol	0.02	0.10
Acetaldehyde	0.02	0.09
Benzene	0.01	0.05
Toluene	0.01	0.02
Acrolein	0.02	0.08

- Formaldehyde, methanol and other HAPs are included in the VOC totals.

3. The permittee shall not exceed a 5% opacity from source SN-01 as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated by burning natural gas. [Regulation 18, §18.501 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN- 02

Natural Gas Compressor Engine

Source Description

This compressor engine was installed in 1949. The engine is an 1000 HP, Ingersoll Rand Model KVG internal combustion 4-cycle rich burn engine. The engines are capable of running at 120% of rated capacity and are being permitted to do so.

Specific Conditions

4. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by the use of natural gas and operating at or below maximum capacity of the equipment. [Regulation 19, §19.501 et seq., effective December 19, 2004 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM_{10}	0.13	0.58
SO_2	0.01	0.04
VOC	0.41	1.81
CO	76.6	335.5
NO_x	40.3	176.5

- Formaldehyde, methanol and other HAPs are included in the VOC totals.

5. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by the use of natural gas and operating at or below maximum capacity of the equipment. The HAP emissions listed for this source were based upon published emission factors at the time of permit issuance. Any change in these emission factors will not constitute a violation of the HAP emission rates listed below.[Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
Formaldehyde	0.15	0.65
Methanol	0.02	0.10
Acetaldehyde	0.02	0.09
Benzene	0.01	0.05
Toluene	0.01	0.02
Acrolein	0.02	0.08

- Formaldehyde, methanol and other HAPs are included in the VOC totals.

6. The permittee shall not exceed a 5% opacity from source SN-02 as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated by burning natural gas. [Regulation 18, §18.501 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN- 03

Natural Gas Compressor Engine

Source Description

This compressor engine was installed in 1949. The engine is an 1000 HP, Ingersoll Rand Model KVG internal combustion 4-cycle rich burn engine. The engines are capable of running at 120% of rated capacity and are being permitted to do so.

Specific Conditions

7. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by the use of natural gas and operating at or below maximum capacity of the equipment. [Regulation 19, §19.501 et seq., effective December 19, 2004 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM_{10}	0.13	0.58
SO_2	0.01	0.04
VOC	0.41	1.81
CO	44.1	193.2
NO_x	38.7	169.5

- Formaldehyde, methanol and other HAPs are included in the VOC totals.

8. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by the use of natural gas and operating at or below maximum capacity of the equipment. The HAP emissions listed for this source were based upon published emission factors at the time of permit issuance. Any change in these emission factors will not constitute a violation of the HAP emission rates listed below.[Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
Formaldehyde	0.15	0.65
Methanol	0.02	0.10
Acetaldehyde	0.02	0.09
Benzene	0.01	0.05
Toluene	0.01	0.02
Acrolein	0.02	0.08

- Formaldehyde, methanol and other HAPs are included in the VOC totals.

9. The permittee shall not exceed a 5% opacity from source SN-03 as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated by burning natural gas. [Regulation 18, §18.501 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN- 04

Natural Gas Compressor Engine

Source Description

This compressor engine was installed in 1949. The engine is an 1000 HP, Ingersoll Rand Model KVG internal combustion 4-cycle rich burn engine. The engines are capable of running at 120% of rated capacity and are being permitted to do so.

Specific Conditions

10. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by the use of natural gas and operating at or below maximum capacity of the equipment. [Regulation 19, §19.501 et seq., effective December 19, 2004 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM_{10}	0.13	0.58
SO_2	0.01	0.04
VOC	0.41	1.81
CO	108.6	475.7
NO_x	40.2	176.1

- Formaldehyde, methanol and other HAPs are included in the VOC totals.

11. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by the use of natural gas and operating at or below maximum capacity of the equipment. The HAP emissions listed for this source were based upon published emission factors at the time of permit issuance. Any change in these emission factors will not constitute a violation of the HAP emission rates listed below.[Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
Formaldehyde	0.15	0.65
Methanol	0.02	0.10
Acetaldehyde	0.02	0.09
Benzene	0.01	0.05
Toluene	0.01	0.02
Acrolein	0.02	0.08

- Formaldehyde, methanol and other HAPs are included in the VOC totals.

12. The permittee shall not exceed a 5% opacity from source SN-04 as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated by burning natural gas. [Regulation 18, §18.501 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN- 05

Natural Gas Compressor Engine

Source Description

This compressor engine was installed in 1949. The engine is an 1000 HP, Ingersoll Rand Model KVG internal combustion 4-cycle rich burn engine. The engines are capable of running at 120% of rated capacity and are being permitted to do so.

Specific Conditions

13. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by the use of natural gas and operating at or below maximum capacity of the equipment. [Regulation 19, §19.501 et seq., effective December 19, 2004 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM_{10}	0.13	0.58
SO_2	0.01	0.04
VOC	0.41	1.81
CO	65.9	288.6
NO_x	36.4	159.4

- Formaldehyde, methanol and other HAPs are included in the VOC totals.

14. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by the use of natural gas and operating at or below maximum capacity of the equipment. The HAP emissions listed for this source were based upon published emission factors at the time of permit issuance. Any change in these emission factors will not constitute a violation of the HAP emission rates listed below.[Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
Formaldehyde	0.15	0.65
Methanol	0.02	0.10
Acetaldehyde	0.02	0.09
Benzene	0.01	0.05
Toluene	0.01	0.02
Acrolein	0.02	0.08

- Formaldehyde, methanol and other HAPs are included in the VOC totals.

15. The permittee shall not exceed a 5% opacity from source SN-05 as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated by burning natural gas. [Regulation 18, §18.501 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN- 06

Natural Gas Compressor Engine

Source Description

This compressor engine was installed in 1949. The engine is an 1000 HP, Ingersoll Rand Model KVG internal combustion 4-cycle rich burn engine. The engines are capable of running at 120% of rated capacity and are being permitted to do so.

Specific Conditions

16. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by the use of natural gas and operating at or below maximum capacity of the equipment. [Regulation 19, §19.501 et seq., effective December 19, 2004 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM_{10}	0.13	0.58
SO_2	0.01	0.04
VOC	0.41	1.81
CO	60.2	263.7
NO_x	38.1	166.9

- Formaldehyde, methanol and other HAPs are included in the VOC totals.

17. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by the use of natural gas and operating at or below maximum capacity of the equipment. The HAP emissions listed for this source were based upon published emission factors at the time of permit issuance. Any change in these emission factors will not constitute a violation of the HAP emission rates listed below.[Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
Formaldehyde	0.15	0.65
Methanol	0.02	0.10
Acetaldehyde	0.02	0.09
Benzene	0.01	0.05
Toluene	0.01	0.02
Acrolein	0.02	0.08

- Formaldehyde, methanol and other HAPs are included in the VOC totals.

18. The permittee shall not exceed a 5% opacity from source SN-06 as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated by burning natural gas. [Regulation 18, §18.501 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN- 08

Natural Gas Compressor Engine

Source Description

The standby generator was installed in 1983. The engine is a 300 HP, Caterpillar Model G379 internal combustion 4-cycle rich burn engine. SN-08 is used for back up purposes only.

Specific Conditions

19. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by the use of natural gas and operating at or below maximum capacity of the equipment. [Regulation 19, §19.501 et seq., effective December 19, 2004 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM_{10}	0.03	0.11
SO_2	0.01	0.01
VOC	0.08	0.34
CO	9.86	43.2
NO_x	6.02	26.4

- Formaldehyde, methanol and other HAPs are included in the VOC totals.

20. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by the use of natural gas and operating at or below maximum capacity of the equipment. The HAP emissions listed for this source were based upon published emission factors at the time of permit issuance. Any change in these emission factors will not constitute a violation of the HAP emission rates listed below.[Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
Formaldehyde	0.04	0.20
Methanol	0.01	0.03
Acetaldehyde	0.01	0.03
Benzene	0.003	0.02
Toluene	0.001	0.01
Acrolein	0.01	0.03

- Formaldehyde, methanol and other HAPs are included in the VOC totals.

21. The permittee shall not exceed a 5% opacity from source SN-08 as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated by burning natural gas. [Regulation 18, §18.501 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SECTION V: COMPLIANCE PLAN AND SCHEDULE

Mississippi River Transmission Corporation – West Point Compressor Station will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

SECTION VI: PLANTWIDE CONDITIONS

1. The permittee shall notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation 19, §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation 19, §19.410(B) and 40 CFR Part 52, Subpart E]

3. The permittee must 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) new equipment or newly 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) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. 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 shall submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation 19, §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

4. The permittee must provide: [Regulation 19, §19.702 and/or Regulation 18, §18.1002 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; and
    d. Utilities for sampling and testing equipment.

5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee shall maintain the equipment in good condition at all times. [Regulation 19, §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation 26 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

7. Pipeline quality natural gas shall be the only fuel used to fire the compressor engines at this facility. [Regulation 19, §19.705, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and 40 CFR 70.6]

8. The permittee shall simultaneously conduct tests for CO and NO_x on one-half of each type of compressor engine in accordance with Plantwide Condition #3 and every five years thereafter. EPA Reference Method 7E shall be used to test NO_x for the reciprocating engines and Reference Method 20 shall be used to test NO_x for the turbines, and EPA reference Method 10 shall be used to determine CO. The permittee shall test the engines

within 90% of their rated capacity. If the tests are not performed within this range, the permittee shall be limited to operating within 10% above the tested rate. The Department reserves the right to select the engine(s) to be tested. The engine(s) tested shall be rotated so that no such engine(s) is tested twice before another similar (make and model) engine of equal horsepower is tested once. If the tested emission rate for any pollutant is in excess of the permittee emission rate, all similar (make and model) engines shall be tested for that pollutant. [Regulation 19, §19.702 and 40 CFR Part 52, Subpart E]

9. The permittee shall use good maintenance practices to control emissions from valves, fittings, flanges, seals, and other associated equipment. [Regulation 19, §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

10. The permittee may replace any existing engines on a temporary or permanent basis with an engine(s) that has the same or lower emission rates on a pound per hour basis; has the same or lower horsepower; and which replacement does not result in a significant emissions increase as defined and applied pursuant to 40 CFR 52.21, and as set out below:

    a. The permittee shall notify ADEQ of the replacement within 30 days after the replacement is made, which notification shall identify the previous and replacement engines, and provide the reason why the replacement was necessary. If applicable, the notification shall also provide a permit application and, when required, a CAM plan under 40 CFR Part 64.

    b. The permittee shall conduct NO_x and CO emission testing within 90 days of the date of replacement to verify the emissions from the newly installed engine(s). The testing shall be conducted in accordance with EPA Reference Method 7E for NO_x and EPA Reference Method 10 for CO.

    c. Notwithstanding the above, as provided by Regulation 26, in the event an emergency occurs, the permittee shall have an affirmative defense of emergency to an action brought for non-compliance with technology-based limitations if the conditions of Regulation 26, §26.707 are met. [Regulation No. 19, §19.705, ACA 8-4-203 as referenced by ACA 8-4-304 and 8-4-311, 19-304 and 40 CFR Part 64.]

Permit Shield

11. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements, as of the date of permit issuance, included in and specifically identified in item A of this condition:

    a. The following have been specifically identified as applicable requirements based upon information submitted by the permittee in an application dated March, 1997.

Source No.	Regulation	Description
Facility Wide	19	Compilation of Regulations of the Arkansas State Implementation Plan for Air Pollution Control
Facility Wide	26	Regulations of the Arkansas Operating Air Permit Program

b. The following requirements have been specifically identified as not applicable, based upon information submitted by the permittee in an application dated March, 1997.

Source No.	Regulation	Description	Basis for Determination
Facility	Regulation 19.8	111(d) Designated facilities	The facility is not identified in the list of regulated sources.
Facility	Regulation 26.4(g)	Applications for initial Phase II acid rain permits.	The facility is not an acid rain category source.
Facility	Regulation 26.5(a)-(d), (f)	Action on applications	These rules apply only to state and federal agencies.
Facility	Regulation 26.6(a), (d)-(g)	Permit review	These rules apply only to state and federal agencies.
Facility	Regulation 26.12	Acid rain sources provisions	The facility is not an acid rain source.
Facility	40 CFR 60	New source performance standards	Source categories do not apply to any units at the facility as of the effective date of the permit.
Facility	40 CFR 62	State plans for designated facilities	This rule is administrative and jurisdictional.
Facility	40 CFR 63	National emission standards for hazardous air pollutants	The facility is not a major source of HAPs.
Facility	40 CFR 79	Registration of fuels and fuel additives.	The facility is not in this source category.
Facility	40 CFR 80	Registration of fuels and fuel additives.	The facility is not in this source category.
Facility	40 CFR 81.304	Non-attainment	The facility is not located in a non-attainment area as of the effective date of the permit.

c. Nothing shall alter or affect the following:
   i. Provisions of Section 303 of the Clean Air Act;
   ii. The liability of an owner or operator for any violation of applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; or
iv. The ability of the EPA to obtain information under Section 114 of the Clean Air Act.

Title VI Provisions

12. The permittee must comply with the standards for labeling of products using ozone-depleting substances. [40 CFR Part 82, Subpart E]

    a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
    b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
    c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
    d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.

13. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]

    a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
    b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
    c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
    d. Persons disposing of small appliances, MVACs, and MVAC like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC like appliance" as defined at §82.152)
    e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
    f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

14. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.

15. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include the air tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC 22 refrigerant.

16. The permittee can switch from any ozone depleting substance to any alternative listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G.

SECTION VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated July 12, 2004.

Description	Category
Used Oil Tank, 7,392 gallons	A3
Entrained Liquid Tank, 1,134 gallons	A3
Entrained Liquid Tank, 3,000 gallons	A3
Antifreeze Tank 4,200 gallons	A3
Antifreeze Mix Tank 1,008 gallons	A3
Antifreeze Mix Tank 8,820 gallons	A3
Lube Oil Tank 12,012 gallons	A13
Antifreeze Mix Tank 8,000 gallons	A3
Smart Ash Incinerator	A13
Piping Component Fugitive Emissions	A13
Blowdown Vent	A13

SECTION VIII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which 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 which 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. [40 CFR 70.6(b)(2)]

2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective August 10, 2000]

3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due. [Regulation 26, §26.406]

4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, et seq. (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation 26, §26.701(A)(2)]

5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and Regulation 26, §26.701(C)(2)]
    a. The date, place as defined in this permit, and time of sampling or measurements;
    b. The date(s) analyses performed;
    c. The company or entity performing the analyses;
    d. The analytical techniques or methods used;
    e. The results of such analyses; and
    f. The operating conditions existing at the time of sampling or measurement.

6. The permittee must retain the records of all required monitoring data and support information for at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [40 CFR 70.6(a)(3)(ii)(B) and Regulation 26, §26.701(C)(2)(b)]

7. The permittee must submit reports of all required monitoring every six (6) months. If permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due within thirty (30) days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26, §26.2 must certify all required reports. The permittee will send the reports to the address below: [40 C.F.R. 70.6(a)(3)(iii)(A) and Regulation 26, §26.701(C)(3)(a)]

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

8. The permittee shall report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.

    a. For all upset conditions (as defined in Regulation19, § 19.601), the permittee will make an initial report to the Department by the next business day after the discovery of the occurrence. The initial report my be made by telephone and shall include:

        i. The facility name and location
        ii. The process unit or emission source deviating from the permit limit,
        iii. The permit limit, including the identification of pollutants, from which deviation occurs,
        iv. The date and time the deviation started,
        v. The duration of the deviation,
        vi. The average emissions during the deviation,
        vii. The probable cause of such deviations,
        viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
        ix. The name of the person submitting the report.

    The permittee shall make a full report in writing to the Department within five (5) business days of discovery of the occurrence. The report must include, in addition to the information required by the initial report, a schedule of actions taken or planned to eliminate future occurrences and/or to minimize the amount the permit's limits were exceeded and to reduce the length of time the limits were exceeded. The permittee may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence, and the report will serve as both the initial report and full report.

    b. For all deviations, the permittee shall report such events in semi-annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 8a above. The semi-annual report must include all the information as required by the initial and full reports required in 8a.

[Regulation 19, §19.601 and §19.602, Regulation 26, §26.701(C)(3)(b), and 40 CFR 70.6(a)(3)(iii)(B)]

9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable. [40 CFR 70.6(a)(5), Regulation 26, §26.701(E), and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation 26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. §7401, et seq. and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation 26, §26.701(F)(1)]

11. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation 26, §26.701(F)(2)]

12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation 26, §26.701(F)(3)]

13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation 26, §26.701(F)(4)]

14. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation 26, §26.701(F)(5)]

15. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [40 CFR 70.6(a)(7) and Regulation 26, §26.701(G)]

16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation 26, §26.701(H)]

17. If the permit allows different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the

permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation 26, §26.701(I)(1)]

18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation 26, §26.702(A) and (B)]

19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation 26, §26.2. [40 CFR 70.6(c)(1) and Regulation 26, §26.703(A)]

20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation 26, §26.703(B)]
    a. Enter upon the permittee's premises where the permitted source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
    b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;
    c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
    d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.

21. The permittee shall submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation 26, §26.703(E)(3)]
    a. The identification of each term or condition of the permit that is the basis of the certification;
    b. The compliance status;
    c. Whether compliance was continuous or intermittent;
    d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit;
    e. and Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.

22. Nothing in this permit will alter or affect the following: [Regulation 26, §26.704(C)] The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section; the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance; the applicable requirements of the

acid rain program, consistent with §408(a) of the Act or, the ability of EPA to obtain information from a source pursuant to §114 of the Act.

23. This permit authorizes only those pollutant emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]