STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1432-AOP-R8 AFIN: 73-00127

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Enable Mississippi River Transmission, LLC - West Point Compressor Station
800 Highway 36 East
Searcy, Arkansas 72143-9736

3. PERMIT WRITER:

Amanda Leamons

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
6/4/2025	Renewal	None

6. REVIEWER'S NOTES:

Enable Mississippi River Transmission, LLC owns and operates the West Point Compressor Station (West Point) which is located in White County, Arkansas. The facility is in Section 25, Township 7 North, and Range 6 West. With this Title V Air Permit renewal there are no operational changes and no modifications to existing sources. However, the 40 C.F.R. Part 63, Subpart ZZZZ were updated to include recent rule updates and the permit was streamlined to group all of the main engines (SN-01 through SN-06) in the first source group and to remove redundant conditions. Throughout the permit, rule citations were updated to the current CAR references. Permitted annual emissions did not change with this renewal.

7. COMPLIANCE STATUS:

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

Inspection performed in May of 2025 only found reporting error with GP-7 for the emergency hour use the after a couple of attempts the facility submitted a revised SAM and ACC with the hours of operation and purpose for those hours corrected. Currently there are no active/pending enforcement actions or recent compliance issues.

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? NA

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. There was not a modification in this application for the renewal.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-01-SN-06 & SN-08	HAP	40 C.F.R. Part 63, Subpart 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
None				

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 C.F.R. Part 63, Subpart HH – NESHAP from Oil and Natural Gas Production Facilities	This is not a production facility
Facility	40 C.F.R. Part 63, Subpart HHH – NESHAP from Natural Gas Transmission and Storage Facilities	This facility does not have any glycol dehydrators
Facility	40 C.F.R. Part 60, Subpart OOOO - Standards of Performance for Crude Oil and Natural Gas Facilities (8/23/2011 through 9/18/2015)	No affected sources
Facility	40 C.F.R. Part 60, Subpart OOOOa - Standards of Performance for Crude Oil and Natural Gas Facilities (9/19/2015 through 12/6/2022)	No affected sources
Facility	40 C.F.R. Part 60, Subpart OOOOb - Standards of Performance for Crude Oil and Natural Gas Facilities (after 12/6/2022)	No affected sources
All engines	40 C.F.R. Part 60, Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	All natural gas engines were installed prior to applicability dates

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
NA	NA	No Sources use a control device

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: *1432-AOP-R8 is a renewal with no changes. Screening and modeling was not updated with this permit renewal. The information below is from the R7 review.*

The non-criteria pollutants listed below were evaluated. Based on Division of Environmental Quality 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 Division of Environmental Quality 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 × TLV	Proposed lb/hr	Pass?
Acrolein	0.23	0.0253	0.207	No
Total PAH	0.02	0.022	0.012	Yes

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 ($\mu g/m^3$) = 1/100 of Threshold Limit Value	Modeled Concentration ($\mu g/m^3$)	Pass?
Acrolein	2.3	0.4183*	Yes

**1432-AOP-R8 is a renewal with no changes. Modeling results are from R7 review.*

c) H_2S 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_2S Standards NA
If exempt, explain: The facility has no permitted H_2S emissions

15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01-06	AP-42 Chapter 3.2 Table 3.2-3 Emission rates for CO and NO_x are based on stack testing values from 1993 with a 20% contingency	lb/MMBtu PM/PM_{10} =1.941E-2 SO_2 =1.47E-2 VOC = 2.96E-2 lb/hr NO_x SN-01 – 38.77 SN-02 – 40.31 SN-03 – 38.65 SN-04 – 40.15 SN-05 – 36.38 SN-06 – 38.11 CO SN-01 – 51.85 SN-02 – 76.52 SN-03 – 44.03 SN-04 – 108.48 SN-05 – 65.86 SN-06 – 60.16 1,3-Butadiene= 6.63e-4 Acetaldehyde =2.79e-3 Acrolein =2.63e-3 Benzene =1.58e-3 Formaldehyde =2.05e-2 Methanol=3.06e-3 PAH= 1.41e-4	N/A	N/A	1100-HP Ingersoll-Rand KVG-103 13.10 MMBtu/hr SO_2 based on 0.2 g/100 scf - site-specific based on 5.0 g/100 scf

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
08	AP-42 Chapter 3.2 Table 3.2-3	lb/MMBtu PM/PM_{10} =1.941E-2 SO_2 =1.47E-2 CO = 3.72 NOx= 2.27 VOC = 2.96E-2 1,3-Butadiene= 6.63e-4 Acetaldehyde =2.79e-3 Acrolein =2.63e-3 Benzene =1.58e-3 Formaldehyde =2.05e-2 Methanol=3.06e-3 PAH= 1.41e-4	N/A	N/A	300 HP Caterpillar G379 (Emergency Engine) 2.65 MMBtu/hr 500 hrs/yr SO_2 based on 0.2 g/100 scf - site-specific based on 5.0 g/100 scf

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
Facility	Total Sulfur	See PWC 8	Every 60 months, if facility chooses to comply with PWC 8 using sulfur testing.	8 CAR § 41-602
01-06	CO	10	One-half of each type of compressor every five years	8 CAR § 41-602
	NO_x	7E		

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)
08	Hours of Operation	Non-resettable meter	continuous	Y

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)
Facility	Verification that only pipeline quality natural gas is fired in all engines, proved by one of the following documents: Valid Gas Tariff, Purchase Contract, Fuel Analysis, Other appropriate documentation, or by conducting Total Sulfur testing.	Natural gas (NG) that contains less than 5 grains total sulfur/100ft^3 of NG and composed of at least 70% methane by vol. OR has a gross calorific value between 950 and 1100 Btu/ft^3. (See PWC #8)	As needed	N
01-06	Engine Maintenance	(See PWC 13) Change oil & filter, Inspect spark plugs, Inspect all hoses & belts.	Every 2,160 hours or Annually	N
	Remote Status Evaluation	(See PWC 14) (if found not remote, must comply with non-remote standards within 1 year of losing remote status)	Annually	N
01-06 & 08	Malfunction occurrence, duration, & all corrective actions taken	(See PWC 25)	As occurs	Y
08	Engine Maintenance	(See PWC 13) Change oil & filter, Inspect all hoses & belts.	Every 500 hours or Annually	N
		Inspect spark plugs	Every 1,000 hours or Annually	N
	Hours of Operation	(See SC 7) 500 hrs/calendar yr	Monthly	Y
	Purpose of Operation: Classified use (Emergency. Non-emergency, testing)	(See PWC 29)	As operated	Y
	If used for 63.6640f4ii), to supply power as part of a financial agreement: emergency situation, date, start time, and end time. (See PWC 29)	(See PWC 23c) 50 hours and must meet provisions in PWC 23(c)(1-5) *(included in the max of 100 hours for testing. main. checks etc. under 23b)*	As operated	Y

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01-06 & 08	5%	8 CAR § 40-401	Use of natural gas

20. DELETED CONDITIONS:

Former SC	Justification for removal
4, 7, 10, 13, 16	Conditions combined with SC #1 in revised permit
5, 8, 11, 14, 17	Conditions combined with SC #2 in revised permit
6, 9, 12, 15, 18	Conditions combined with SC #3 in revised permit

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
Diesel Storage Tank (105 gallon)	A-2			0.00003				
Produced Water Storage Tank (1,000 gallon)	A-3			0.16				
Waste Water Storage Tank (1,700 gallon)	A-3			0.27				
AntiFreeze Mix Tank (8,820 gallon)	A-3			0.00003				
AntiFreeze Storage Tank (4,200 gallon)	A-3			0.00001				
Engine Oil Storage Tank (7,900 gallon)	A-3			0.36				
Used Oil Storage Tank (5,000 gallon)	A-3			0.25				
Total for A-3 Activities				*1.004*				
Blowdown Vents	A-13			0.10				
Compressor Blowdown Vents	A-13			0.23				
Produced Water Truck Loading	A-13			0.001				
Process Piping Fugitives	A-13			0.14				
Total for A-13 Activities				0.471				

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 #
1432-AOP-R7

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-11-16

Facility Name: Enable Mississippi River Transmission, LLC - West Point Compressor Station
Permit Number: 1432-AOP-R8
AFIN: 73-00127

$/ton factor	28.14	Annual Chargeable Emissions (tpy)	1042.8
Permit Type	Renewal No Changes	Permit Fee $	0

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 Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
PM		7.3	7.3	0		
PM_{10}		7.3	7.3	0	0	7.3
$PM_{2.5}$		0	0	0		
SO_2		5.5	5.5	0	0	5.5
VOC		10.3	10.3	0	0	10.3
CO		1785	1785	0		
NO_X		1019.7	1019.7	0	0	1019.7
Single HAP (max)	☐	7.07	7.07	0		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Total HAPs	☐	11.25	11.25	0		