



Walter Wright, Jr.
wwright@mwlaw.com
(501) 688.8839

Self-Disclosure/Air Enforcement: Arkansas Department of Environmental Quality and Van Buren County, Arkansas, Natural Gas Compression Station Operator Enter into Consent Administrative Order

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The Arkansas Department of Environmental Quality (“ADEQ”) and Desoto Gathering Company, LLC (“DGC”) entered into a November 21st Consent Administrative Order (“CAO”) addressing a self-disclosed violation of an air permit. See LIS No. 18-090.

DGC is stated to own and operate a natural gas compression station (“Station”) in Van Buren County, Arkansas.

The Station operates pursuant to an Air Operating Permit (“Permit”) 2204-AOP-R1.

The CAO provides that Specific Condition 10(b) of the Permit requires DGC to conduct performance testing of its Natural gas-Fired Compressor Engines, Unit 15270 (SN-20) and Unit 15271 (SN-19), every 8,760 hours or three years, whichever comes first. It further concludes that based on the testing cycle the units should have been re-tested on or before April 5, 2018. Additional dates are referenced in which the units were stated to have been required to be tested which did not take place because of shutdown/mechanical failures.

DGC is stated to have discovered during an August 29, 2018, monthly audit of its natural gas-fired compressor engines (addressing state and federal testing requirements) that the 8,760 hour allotted run time for SN-20 had been exceeded by 120 hours and by 156 hours for SN-19. This is alleged to violate Specific Condition 10(b) of the Permit. DGC is stated to have immediately shut down the units and scheduled a new test date for August 31, 2018. On August 31, 2018, DGC is stated to have successfully conducted performance testing of SN-20 and SN-19.

DGC requested consideration in correspondence dated September 7, 2018, under ADEQ’s Environmental Self-Disclosure Incentive Policy for its disclosure of deviations of established performance testing limits at SN-20 and SN-19.

The CAO provides that to prevent reoccurrence DGC has implemented the following actions:

1. Any unit shut down for maintenance for an extended period of time will be tracked on a list;

2. Hours of operation since the last emissions test will be recorded when the unit is shut down;
3. Operations will notify the regulatory team before unit is returned to regular service and will make sure there are enough hours remaining to fulfill the thirty day test notice requirement prior to testing the unit; and
4. If the unit is within 720 hours of its 8,760 operational limit, it will not be returned to service until an emissions test has been scheduled.

ADEQ determines that DGC met all conditions of the ADEQ Self-Disclosure Policy. As a result, it determined mitigation up to 100 percent of the gravity-based component of any civil administrative penalty in a CAO regarding such violations is appropriate.

No penalties are assessed.

A copy of the CAO can be found [here](#).