Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**ETC Tiger Pipeline, LLC**	**AI #:**	**166494**	**TEMPO Activity No:**	**PER20090001**
Facility Name:	**Bienville Compressor Station**	**Remarks Submitted by:**	**Gordon Moore, September 28, 2009**		
Permit Writer:	**Dan Nguyen**	**Permit Writer Email address:**	**Dan.nguyen@la.gov**		

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. "Specific Condition 120", or "Section II Air Permits Briefing Sheet", etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information ***must be submitted.*** Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – ***DO NOT COMPLETE THIS SECTION.*** This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during any required public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.
- ***DO NOT USE THIS FORM TO SUBMIT COMMENTS DURING THE OFFICIAL PUBLIC COMMENT PERIOD.***

Permit Reference	Remarks	Air Permits Division Response (for official use only)
1.		
Air Permit Briefing Sheet, Section III, 1st paragraph Statement of Basis Section II, 2nd paragraph	Include emergency generator in description with other equipment in line 6.	The draft permit is revised to include the requested change.
2.		
Air Permit Briefing Sheet, Section III, 1st paragraph - Estimated Emissions Summary Statement of Basis Section III, 3rd paragraph – Permitted Air Emissions (tons/year)	Add Formaldehyde– 7.91 tons per year NOTE: Totals are based on our records.	The draft permit is revised to include the requested change.
3.		
Applicable Louisiana and Federal Air Quality Requirements Sheet, Section X, EQT0008 TANK-1-Condensate Tank	Delete (1) under 2103 and remove the applicability of LAC 33:III.2103 for EQT0008. Does not apply. Tank has a storage capacity of less than 420,000 gallons and stores crude oil or condensate prior to custody transfer.	The draft permit is revised to include the requested change.
4.		
Applicable Louisiana and Federal Air Quality Requirements Sheet, Section X, UNF0001 AI166494-Bienville Compressor Station	Remove the applicability of Federal Requirement 40 CFR 63 Subpart R. Does not apply to compressed natural gas pipelines. This facility does not fit the definition of bulk gasoline terminal and pipeline breakout station as per § 63.421-Definitions.	The draft permit is revised to include the requested change.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
5.		
Specific Requirements UNF 0001 AI166494 Bienville Compressor Station Applicable Louisiana and Federal Air Quality Requirements Sheet, Section X, UNF0001 AI166494-Bienville Compressor Station	Remove Specific Requirement 22 [40 CFR 63] and the applicability of 40 CFR 63 Subpart A: General Provisions in Section X. Does not apply to this facility under 40 CFR 63 Subpart ZZZZ -§ 63.6590(c) and § 63.6665 as per the following citation: *Stationary RICE subject to Regulations under 40 CFR Part 60.* An affected source that is a new or reconstructed stationary RICE located at an area source, or is a new or reconstructed stationary RICE located at a major source of HAP emissions and is a spark ignition 2 stroke lean burn (2SLB) stationary RICE with a site rating of less than 500 brake HP, a spark ignition 4 stroke lean burn (4SLB) stationary RICE with a site rating of less than 250 brake HP, or a 4 stroke rich burn (4SRB) stationary RICE with a site rating of less than or equal to 500 brake HP, a stationary RICE with a site rating of less than or equal to 500 brake HP which combusts landfill or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, an emergency or limited use stationary RICE with a site rating of less than or equal to 500 brake HP, or a compression ignition (CI) stationary RICE with a site rating of less than or equal to 500 brake HP, must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under this part. The General Provisions in §§63.1 through 63.15 apply to you. If you own or operate any stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions (except new or reconstructed 4SLB engines greater	The draft permit is revised to include the requested change.

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	than or equal to 250 and less than or equal to 500 brake HP), **a stationary RICE located at an area source of HAP emissions**, or any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with any of the requirements of the General Provisions: An existing 2SLB RICE, an existing 4SLB stationary RICE, an existing CI stationary RICE, an existing stationary RICE that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, an existing emergency stationary RICE, or an existing limited use stationary RICE. If you own or operate any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with the requirements in the General Provisions except for the initial notification requirements: A new stationary RICE that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, a new emergency stationary RICE, or a new limited use stationary RICE.	
6.		
General Information Section, Physical Address	Change the zip code to 71016.	The LDEQ database will be updated
7.		
1st Page of the Proposed Permit Draft Statement of Basis, Section I	Include Suite # 400 to the Company Information.	The draft permit is revised to include the requested change.

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8.		
Statement of Basis Section IV Regulatory Analysis	Include the a additional applicability of NSPS Requirements under Section IV, specifying that the seven engines at the facility were ordered after the applicability "commence construction" date of June 12, 2006 and are subject to NSPS Subpart JJJJ and consequently any applicable NSPS General Provisions of Part 60 Subpart A.	The requirements of 40 CFR 60 Subpart JJJJ is straight forward and is cited in the draft permit. No explanation is needed in the statement of basis.
9.		
Applicable Louisiana and Federal Air Quality Requirements Sheet, UNF 0001 AI166494 Bienville Compressor Station	Remove the applicability of Federal Requirement 40 CFR 63 Subpart A. Under ZZZZ, engines > 500 hp at area sources satisfy the requirements of the rule by complying with NSPS JJJJ and compliance with 40 CFR 63, Subpart A Does not apply to this facility-ref. 40 CFR 63 Subpart ZZZZ -§ 63.6590(c) and § 63.6665	The draft permit is revised to include the requested change.
10.		
Applicable Louisiana and Federal Air Quality Requirements Sheet, UNF 0001 AI166494 Bienville Compressor Station	Remove the "3" from Federal Requirement 40 CFR 68. The regulations do not normally apply to this type of natural gas transmission facility and 40 CFR 68 is clearly not application. This change is requested to maintain consistency between other permit applications being drafted at LDEQ for other ETC Tiger compressor stations on the same pipeline.	The draft permit is revised to include the requested change.
11.		
Applicable Louisiana and Federal Air Quality Requirements Sheet, Section X, EQT0014 LOAD-Truck Loading	Add (3) under 2107 to maintain consistency with other pending applications. This change is requested to maintain consistency between other permit applications being drafted at LDEQ for other ETC Tiger compressor stations on the same pipeline.	LAC 33:III.2107 clearly does not apply to this type of the facility. An explanation is not necessary

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12.		
Applicable Louisiana and Federal Air Quality Requirements Sheet, Section X, FUG0001 FUG-Fugitive Emissions	Add (3) under 2121 to maintain consistency with other pending applications. This change is requested to maintain consistency between other permit applications being drafted at LDEQ for other ETC Tiger compressor stations on the same pipeline.	LAC 33:III.2121 clearly does not apply to this type of the facility. An explanation is not necessary
13.		
Applicable Louisiana and Federal Air Quality Requirements Sheet, Section X, EQT0001, EQT0002, EQT0003, EQT0004, EQT0005, EQT0006, EQT0007 Engines	Add (2) under Chapter 15 to maintain consistency with other pending applications. This change is requested to maintain consistency between other permit applications being drafted at LDEQ for other ETC Tiger compressor stations on the same pipeline.	LAC 33:III. Chapter 15 does not apply to this type of the engine with SO2 emissions < 5 tons/yr.
14.		
Applicable Louisiana and Federal Air Quality Requirements Sheet, UNF 0001 AI166494 Bienville Compressor Station	Add (1) under Chapter 29 to maintain consistency with other pending applications. This change is requested to maintain consistency between other permit applications being drafted at LDEQ for other ETC Tiger compressor stations on the same pipeline.	The draft permit is revised to include the requested change.
15.		
Applicable Louisiana and Federal Air Quality Requirements Sheet, UNF 0001 AI166494 Bienville Compressor Station	Add (1) under Chapter 56 to maintain consistency with other pending applications. This change is requested to maintain consistency between other permit applications being drafted at LDEQ for other ETC Tiger compressor stations on the same pipeline.	The draft permit is revised to include the requested change.