Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**ETC Tiger Pipeline, LLC**	**AI #:**	**166495**	**TEMPO Activity No:**	**PER20090001**
Facility Name:	**ETC Tiger Pipeline, LLC - Chatham Compressor Station**	**Remarks Submitted by:**	**Gordon R. Moore P.E., September 28, 2009**		
Permit Writer:	**Dawei Pan**	**Permit Writer Email address:**	**Dawei.Pan@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.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
1.		
Specific Requirements UNF 0001 Entire Facility Applicable Louisiana and Federal Air Quality Requirements Sheet, Section X, UNF1 Facility Wide	Remove Specific Requirement Condition 38 [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	Removed as requested.

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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.	
2.		
General Information Section, Physical Address	Change the zip code to 71226.	The permit writer is not permitted to change the General Information. Please contact Ms. Tommie Milam, Permit Support Services Division, at (225)219-3259 or email the changes to facupdate@la.gov.
3.		
Statement of Basis Section IV Regulatory Analysis	Include the a additional applicability of NSPS Requirements under Section IV, specifying that the five 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.	No need to change. 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.

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4.		
Applicable Louisiana and Federal Air Quality Requirements Sheet, EQT01, EQT02, EQT03 EQT04 Engines	Add (1) under Chapter 5 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.	Unchanged. 1 is already under Chapter 5 for EQT01, EQT02, EQT03 and EQT04 in Table 1 – Applicable Louisiana and Federal Air Quality Requirements of the draft permit.
5.		
Applicable Louisiana and Federal Air Quality Requirements Sheet, EQT01, EQT02, EQT03 EQT04 Engines And UNF1 Facility Wide	Remove (1) under 40 CFR 60 NSPS A 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. (NOTE: There are provisions under Subpart A that are applicable, as a result of JJJJ applicability, but it has been my understanding that Subpart A is only referenced for flares)	Unchanged. See Table 3 of 40 CFR 60 Subpart JJJJ – Applicability of General Provisions to Subpart JJJJ. This table lists all applicable requirements of 40 CFR 60 Subpart A to the engines.
6.		
Applicable Louisiana and Federal Air Quality Requirements Sheet, UNF1 Facility Wide	Remove (1) under 40 CFR 63 NESHAP A 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. 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	Removed as requested.

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	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 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	

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	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.	
7.		
Applicable Louisiana and Federal Air Quality Requirements Sheet, UNF1 Facility Wide	Remove (1) under 40 CFR 63 NESHAP ZZZZ to maintain consistency with other pending applications. Except as described in comment # 6 above, ZZZZ is not applicable facility wide. 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.	Removed as requested.