Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**Columbia Gulf Transmission Company**	**AI #:**	**2780**	**TEMPO Activity No:**	**PER20070001**
Facility Name:	**Delhi Compressor Station**	**Remarks Submitted by:**	**Kasey Gabbard, Permitting Team Leader (Columbia Gulf)**		
Permit Writer:	**Jada Lewis**	**Permit Writer Email address:**	**Jada.Lewis@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 Permit 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 the 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)
X. Table 1 Applicable Requirements	**Remove applicable reference to Turbine NSPS Subpart GG; a source cannot be applicable to both NSPS's**	**Updated briefing sheet.**
X. Table 2 Applicable Requirements	**Remove exemption reference to Turbine NSPS Subpart GG; a source cannot be applicable to both NSPS's**	**Updated briefing sheet.**
CRG0001 Specific Conditions 4-6	**Note testing not required for sources that did not operate >720 hours in semi-annual period (in accordance with LDEQ guidance)**	**All engines that are included in the common requirements group operate > 720 hrs. The EIQs state 8760 hrs per year.**
CRG0001 Specific Conditions 4-6	**Note parametric monitoring and/or preventative maintenance can be performed in lieu of semi-annual testing (in accordance with LDEQ guidance)**	**Updated permit with preventative maintenance option.**

Permit Reference	Remarks	Air Permits Division Response (for official use only)
CRG0002 Specific Condition 9	Remove condition altogether; Not Applicable because neither unit uses heat recovery nor have emissions combined with other sources	Deleted from permit.
CRG0002 Specific Condition 10	Remove condition altogether; Not Applicable because neither unit uses water nor steam injection to control NOx emissions	Deleted from permit.
CRG0002 Specific Condition 11	Remove condition altogether; Not Applicable because neither unit uses water nor steam injection to control NOx emissions; also not complying with output based standards (mw-hr) so continuous monitoring of fuel flow and/or firing rate not warranted	Deleted from permit.
CRG0002 Specific Condition 13	Use of CEM and/or CPMS is not specifically required for these sources; Add to beginning of condition "As an alternative to performing performance test in accordance with 40 CFR 4340(a)....."	Updated requirement.
CRG0002 Specific Condition 14	Use of CEM and/or CPMS is not specifically required for these sources; Add to beginning of condition "As an alternative to performing performance test in accordance with 40 CFR 4340(a)....."	Updated requirement.
GRP0004 Specific Condition 30	Specify recordkeeping of startup/shutdown cycles duration; For example: "Keep records of the total Normal dry low NOx operating hours, Low load operating hours at <50% design load, low temperature operating hours at ambient temperatures of <0 deg F, and duration of startup/shutdown cycles each month"; Monitoring currently established to record actual duration of SU/SD cycles each month.	Updated custom requirement.
General Information-Related Organization	Page 1 of 2: Columbia Gulf (Operates) address needs corrected from 950 Manifold Rd Washington, PA 15301 to 201 Energy Parkway Suite 100 Lafayette, LA 70508	Updated the TEMPO master file.
General Information-Related Organization	Page 2 of 2: Columbia Gulf (Water Billing Party) address needs corrected from 950 Manifold Rd Washington, PA 15301 to 201 Energy Parkway Suite 100 Lafayette, LA 70508	Updated the TEMPO master file.
General Information-Related Organization	Page 2 of 2: Columbia Gulf (Air Billing Party) phone number needs corrected from (337) 233-7383 to (724) 223-2764.	Updated the TEMPO master file.
Emission Rate Summary Table-EQT0017	Remove avg CO emission rates (16.4 lb/hr & 71.9 tpy)	Deleted from permit.
Emission Rate Summary Table-EQT0016	Remove avg NO_x emission rates (10.6 lb/hr & 46.6 tpy)	Deleted from permit.
Emission Rate Summary Table-EQT0017	Remove avg NO_x emission rates (14.1 lb/hr & 61.6 tpy)	Deleted from permit.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Emission Rate Summary Table-GRP0004	For consistency and operational variability between two turbines (EQT0016-0017), add NO_x emission rate cap (24.7 lb/hr & 108.2 tpy)	Updated permit.
Emission Rate Summary Table-EQT0016	Remove avg VOC emission rates (0.4 lb/hr & 1.6 tpy)	Deleted from permit
Emission Rate Summary Table-EQT0017	Remove avg VOC emission rates (0.5 lb/hr & 2.1 tpy)	Deleted from permit
Emission Rate Summary Table-GRP0004	For consistency and operational variability between two turbines (EQT0016-0017), add VOC emission rate cap (0.9 lb/hr & 3.7 tpy)	Updated permit.
Emission Rate Summary Table-EQT0016	Add max SO_2 emission rate (7.5 lb/hr) to correlate with NSPS max fuel sulfur content (20 grains S/100 scf—0.06 lb SO_2/MMBtu) in accordance with 40 CFR 60.4365	Updated permit.
Emission Rate Summary Table-EQT0017	Add max SO_2 emission rate (9.3 lb/hr) to correlate with NSPS max fuel sulfur content (20 grains S/100 scf—0.06 lb SO_2/MMBtu) in accordance with 40 CFR 60.4365	Updated permit.