Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services

STATEMENT OF BASIS

Foxskin Compressor Station
Agency Interest No.: 39922
CenterPoint Energy Gas Transmission Company
Activity Number: PER20090001
Proposed Permit 0400-00002-V7

I. APPLICANT:

Company:
CenterPoint Energy Field Services, Inc.
P.O. Box 4567
Houston, TX 77210

Facility:
Foxskin Compressor Station
One mile Southeast of Oakland, Bossier Parish, Louisiana
Approximate: Latitude 32 degrees, 28 minutes, and 01 seconds
Longitude 93 degrees, 31 minutes, and 33 seconds
Zone 15

II. FACILITY AND CURRENT PERMIT STATUS:

CenterPoint Energy Field Services, Inc. operates the Foxskin Compressor Station, near Oakland, Bossier Parish under Permit 0400-00002-V6, dated February 17, 2009.

This is the Part 70 operating permit modification for the facility.

III. PROPOSED PERMIT / PROJECT INFORMATION:

Proposed Permit

A permit application dated October 9, 2009 was submitted requesting a Part 70 operating permit modification.

Project description

Natural gas from offsite wells is routed to separators to remove any entrained liquid prior to being compressed and dehydrated. The dry gas is then sent to a downstream natural gas plant. Vents from the glycol dehydrator still columns are routed through condensers and then burned in the reboilers' fireboxes. CenterPoint Energy Field Services requests a permit modification to 1) Add an amine unit rated at 46 MM scfd and equipped with a 16.5 MM BTU/hr reboiler; 2) Add a glycol dehydration unit rated at 50 MM scfd and equipped with a 1.5 MM BTU/hr reboiler; 3) add a 210 barrel produced water tank; 4) Add several tanks under the Insignficant Activities List; 5) Update fugitive emissions based on new count and new equipment; 6) Add Compliance Assurance Monitoring

requirements for the glycol dehydrators; and 7) Remove two Waukesha compressor engines (Emission Points 1-02 and 8-06). Permitted emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM/PM_{10}	9.14	8.73	- 0.41
SO_2	0.59	0.56	- 0.03
NO_x	482.47	411.78	- 70.69
CO	234.21	155.14	- 79.07
VOC	239.75	220.17	- 19.58
LAC 33:III Chapter 51 Toxic Air Pollutant (TAPs):			
Acrolein	2.51	2.30	- 0.21
Acetaldehyde	4.75	4.01	- 0.74
Benzene	4.67	5.63	+ 0.96
Ethyl benzene	0.05	0.05	-
Formaldehyde	18.33	17.47	- 0.86
Methanol	2.94	2.36	- 0.58
n-Hexane	3.20	3.22	+ 0.02
Toluene	3.92	5.53	+ 1.61
Xylenes	0.92	1.13	+ 0.21
Total	41.29	41.70	+ 0.41
Other VOC		178.47	
Total VOC		220.17	

Prevention of Significant Deterioration Applicability

This permit was reviewed for compliance with 40 CFR 70 and the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS), and National Emission Standards for Hazardous Air Pollutants (NESHAP). Prevention of Significant Deterioration (PSD) does not apply.

MACT requirements

This facility is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51.

Air Modeling Analysis

Emissions associated with the proposed facility/modification were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

Foxskin Compressor Station
Agency Interest No.: 39922
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General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to Section VIII of the proposed Part 70 permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to Section IX of the proposed Part 70 permit.

Regulatory Analysis

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit. See "SPECIFIC REQUIREMENTS" of the proposed Part 70 permit

IV. Permit Shields

There is no permit shield.

V. Periodic Monitoring

The Nitrogen Oxide, Carbon Monoxide and Oxygen stack gas concentrations of the compressor engines will be monitored by a portable analyzer semiannually. The Glycol Dehydrator Unit and the Amine Unit shall be monitored for throughput and emissions. Other exemptions or non applicability are show in the table below:

Foxskin Compressor Station
Agency Interest No.: 39922
CenterPoint Energy Field Services, Inc.
Activity Number: PER20090001
Proposed Permit 0400-00002-V7

VI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Status	Citation	Explanation
EQT0002, EQT0005, EQT0021, EQT0036, EQT0038, EQT0040, EQT0048, EQT0051	LAC 33:III.Chapter 15	Does not apply	LAC 33:III.1502.A.3	SO_2 emissions < 5 tons/yr
EQT0008	LAC 33:III.2107	Does not apply	LAC 33:III.2107.F	Load condensate or crude oil only
EQT0009, EQT0010, EQT0052	40 CFR 60 Subpart Kb	Does not apply	40 CFR 60.110b	Tank volume < 20,000 gallons
EQT0011	LAC 33:III.Chapter 15	Does not apply	LAC 33:III.1502.A.3	SO_2 emissions < 5 tons/yr
	40 CFR 60 Subpart JJJJ	Does not apply	40 CFR 60.4320(a)	Constructed prior to June 12, 2006 or manufactured before January 1, 2008
	40 CFR 63 Subpart ZZZZ	Does not apply	40 CFR 63.6590(b)(3)	Existing 4 stroke lean burn engine
EQT0012, EQT0013, EQT0023	LAC 33:III.2103 Storage of VOC	Exempt	LAC 33:III.2103.G.1	Store condensate or crude oil only
EQT0042, EQT0047, EQT0052	40 CFR 60 Subpart Kb	Does not apply	40 CFR 60.110b	Tank volume < 20,000 gallons
EQT0016 - EQT0020, EQT0025	LAC 33:III.Chapter 15	Does not apply	LAC 33:III.1502.A.3	SO_2 emissions < 5 tons/yr
EQT0016 - EQT0020, EQT0025	40 CFR 60 Subpart JJJJ	Does not apply	40 CFR 60.4320(a)	Constructed prior to June 12, 2006 or manufactured before January 1, 2008

Foxskin Compressor Station
Agency Interest No.: 39922
CenterPoint Energy Field Services, Inc.
Activity Number: PER20090001
Proposed Permit 0400-00002-V7

VI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Status	Citation	Explanation
EQT0026 – EQT0035	LAC 33:III.Chapter 15	Does not apply	LAC 33:III.1502.A.3	SO_2 emissions < 5 tons/yr
UNF0001	LAC 33:III.Chapter 51	Does not apply	LAC 33:III.5105.B.3.a	TAP emissions are from combustion of Group 1 virgin fossil fuels
	LAC 33:III.Chapter 59 40 CFR Part 68	Does not apply	LAC 33:III.5907.A	Does not store or handle any subject materials more than their threshold quantities
The above table provides explanation for both the exemption status or non-applicability of a source cited by 2 or 3 in the matrix presented in Section X of this permit				

VII. ***Streamlined Requirements***

Unit or Plant Site	Programs Being Streamlined	Stream Applicability	Overall Most Stringent Program
NA			

Foxskin Compressor Station
Agency Interest No.: 39922
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Proposed Permit 0400-00002-V7

VIII. Glossary

Best Available Control Technologies (BACT) - An emissions limitation (including a visible emission standard) based on the maximum degree of reduction for each pollutant subject to regulation under this part which would be emitted from any proposed major stationary source or major modification which the administrative authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes or available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant.

Carbon Monoxide (CO) – A colorless, odorless gas which is an oxide of carbon.

Grandfathered Status- Those facilities that were under actual construction or operation as of June 19, 1969, the signature date of the original Clean Air Act. These facilities are not required to obtain a permit. Facilities that are subject to Part 70 (Title V) requirements lose grandfathered status and must apply for a permit.

Hydrogen Sulfide (H_2S) - A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the action of acids on metallic sulfides, and is an important chemical reagent.

Maximum Achievable Control Technology (MACT) - The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

New Source Review (NSR) - A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C ("Prevention of Significant Deterioration of Air Quality") and D ("Nonattainment New Source Review").

Nitrogen Oxides (NO_x) - Compounds whose molecules consists of nitrogen and oxygen.

Nonattainment New Source Review (NNSR) - A New Source Review permitting program for major sources in geographic areas that do not meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. Nonattainment NSR is designed to

ensure that emissions associated with new or modified sources will be regulated with the goal of improving ambient air quality.

Organic Compound - Any compound of carbon and another element. Examples: Methane (CH_4), Ethane (C_2H_6), Carbon Disulfide (CS_2)

Part 70 Operating Permit- Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: $\geq$ 10 tons per year of any toxic air pollutant; $\geq$ 25 tons of total toxic air pollutants; and $\geq$ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM_{10}- Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) - The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO_2) – An oxide of sulphur.

Title V permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) - Any organic compound which participates in atmospheric photochemical reactions; that is, any organic compound other than those which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.