Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**Gulf South Pipeline Company, LP**	**AI #:**	**71**	**TEMPO Activity No:**	**PER20080002**
Facility Name:	**Montpelier Compressor Station**	**Remarks Submitted by:**	**David Nickel - Gulf South Pipeline Company, LP**		
Permit Writer:	**Pamela Parish**	**Permit Writer Email address:**	**pamela.parish@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)
General Information – page 1 of 2 – under Related People.	Responsible Official Stephen Bienvenu has changed to Christie Simon, 520 Alliance Street, Kenner, LA 70062; phone: (504) 469-5903 ext. 231.	Permit writer is not authorized to make changes to the General Information Page; request forwarded to proper section, Permit Support Services Division, for follow-up.
General Information – page 1 of 2 – under Related People.	Station manager Al Jeansonne has changed to Steve Copeland, 477 Hwy. 441, Holden, LA 70744; phone: (225) 777-4300 ext. 222.	

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirements - SR 66 (page 5 of 11), SR 77 (page 6 of 11), and SR 97 (page 9 of 11) for the three Clark compressor engines.	Wording in this condition was changed from the previous permit to state that notice is required prior to any LDEQ performance/emissions test. It is Gulf South's continued understanding that prior notice and submittal of test reports is only required for initial performance/emissions tests and post-overhaul performance/emissions tests, but not for semiannual stack gas concentration testing using our portable analyzer.	On June 09, 2008, LDEQ updated the standard LA stack test policy to incorporate language changes and new requirements. This is Montpelier's first permit to incorporate the new language. SR 61, 81, and 95 (originally SR 66, 77, and 97) state "Submit notification: Due at least 30 days prior to any LDEQ required performance/ emissions test to the Office of Environmental Assessment, to provide the opportunity to conduct a pretest meeting and observe the emission testing." This requirement is applicable to conducting performance/emissions tests as indicated in SR 65, 75, and 90 (originally SR 64, 81, and 92). Please contact the Office of Environmental Assessment, Air Quality Assessment Division for further clarification of testing protocols, notification, and submittal requirements.
Specific Requirement 122 (page 11 of 11).	Gulf South is requesting clarification of what additional information is required to be included in the existing Housekeeping Plan by this specific requirement.	Refers to (HRVOC) requirement preceding it; requirements were brought forward from the previous permit issued 7/6/06.
Emission Rates for TAP/HAP & Other Pollutants (page 3 & 4 of 5) – EQT 0009 (E-9).	Emission rates shown do not match the EIQ sheet provided in the June 17, 2009 permit application update for the Auxiliary Generator.	(E-9): Emission rates from the EIQ were revised based on review of the supporting calculations. TAP/HAP emission factors were corrected to match the referenced AP-42 factors from Table 3.2-3 for this 4-stroke rich burn engine. (C-1) and (T-1): Emission rates (C6+) were adjusted by the permit writer to include the mole fraction of 2,2,4-Trimethylpentane and to parallel the C6+ speciation of the gas blowdown (B-1), which was based on gas test data from the site versus default speciation as indicated in the 5/29/09 submittal. (T-1): Pounds/hour emission rates were adjusted to comply with LDEQ data procedures for intermittent emission sources. (F-1): Emission rates from the EIQs were revised based on review and correction of the original supporting calculations by the permit writer when the response to Item 6 of the additional information request did not provide updated information. Emission rates (C6+) for gas and light liquid components were adjusted as indicated for (C-1) and (T-1) above and to include n-Hexane. UNF 0001: No changes made. Emission rate totals are the summation of emissions as included in the permit.
Emission Rates for TAP/HAP & Other Pollutants (page 4 of 5) – EQT 0011 (C-1).	Emission rates shown do not match the EIQ sheet provided in the November 10, 2008 permit renewal application for the Condensate Tank.	
Emission Rates for TAP/HAP & Other Pollutants (page 4 of 5) – EQT 0013 (T-1).	Emission rates shown do not match the EIQ sheet provided in the November 10, 2008 permit renewal application for Loading Operations.	
Emission Rates for TAP/HAP & Other Pollutants (page 4 of 5) – FUG 001 (F-1).	Emission rates shown do not match the EIQ sheet provided in the November 10, 2008 permit renewal application for Fugitive Components.	
Emission Rates for TAP/HAP & Other Pollutants (page 4 & 5 of 5) – UNF 0001 (FacilityF-1).	Total facility emission rates shown will change upon correction of single point source emission rates.	

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Emission Rates for Criteria Pollutants – EQT 0001 through EQT 0005 (E-1 through E-5).	The PM10 emission rates shown do not match the EIQ sheets provided in the June 17, 2009 permit application update for the five Worthington Compressor Engines.	(E-1 through E-8): Emission rates from the 6/17/09 EIQs were revised based on review and correction by the permit writer of the supporting calculations. PM10 emission factor was revised to match the AP-42 factor from Table 3.2-1 for the 2-stroke lean burn engines. AP-42 PM10 factor includes PM2.5 emissions. (E-6 through E-8): CO and NOx emission rates were adjusted to conform to federally enforceable condition limits (< 1500 hp annual capacity).
Emission Rates for Criteria Pollutants – EQT 0006 through EQT 0008 (E-6 through E-8).	The PM10, CO, and NOx emission rates shown do not match the EIQ sheets provided in the June 17, 2009 permit application update for the three Clark Compressor Engines.	
Emission Rates for Criteria Pollutants – EQT 0001 (F-1).	The VOC emission rates shown do not match the EIQ sheets provided in the November 10, 2008 permit renewal application for the Fugitive Components.	(F-1): Emission rates from the EIQs were revised based on review and correction of the original supporting calculations by the permit writer when the response to Item 6 of the additional information request did not provide updated information.
Regular Permit Renewal (DRAFT) No. 2540-00003-V2 – Air Permit Briefing Sheet (Page 4).	Total facility emission rates shown will change upon correction of single point source emission rates.	No changes made. Emission rate totals are the summation of emissions as included in the permit.
Public Notice for Proposed Title V Permit (Page 1).	Total facility emission rates shown will change upon correction of single point source emission rates.	
Statement of Basis – Permitted Air Emissions (Page 3).	Total facility emission rates shown will change upon correction of single point source emission rates.	