Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**Columbia Gulf Transmission Company**	**AI #:**	**44779**	**TEMPO Activity No:**	**PER20080001**
Facility Name:	**Alexandria Compressor Station**	**Remarks Submitted by:**	**Kasey Gabbard, NiSource EH&S Permitting Team Leader**		
Permit Writer:	**Scott J. Templet**	**Permit Writer Email address:**	**Scott.Templet@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)
Air Permit Briefing Sheet Section III-Description	Incorrect statement pertaining to EQT6-EQT7 turbines; Needs corrected to: "The turbines can operate up to 160 percent of their nameplate (NEMA) rating". Short-term lb/hr rates are based on this higher HP rating.	Corrected language "60 percent" to "160 percent". Also added "NEMA".
Air Permit Briefing Sheet Section X-Applicable Regs	EQT002-EQT005 & EQT009 incorrectly listed as having requirements under LAC 33:III Chapter 5	Actually EQT002-EQT005 and EQT009 do have requirements subject to chapter 5; See specific requirements, these engines are subject to LAC 33:III.507.H.1.a.
Air Permit Briefing Sheet Section X-Applicable Regs	EQT002 incorrectly listed as specifically having requirements under LAC 33:III Chapter 9	The "1" listed in Section X on Table 1 for EQT 002 under chapter 9 has been removed.
Air Permit Briefing Sheet Section X-Applicable Regs	FUG001 incorrectly listed as being applicable to LAC 33:III Chapter 2121; Source neither a gas processing plant nor located within non-attainment area or specified parish.	Actually, FUG001 is listed as not applying to Chapter 2121, (i.e., "3"). There is an explanation in Section XI on Table 2

Air Permit Briefing Sheet Section X-Applicable Regs	FUG001 incorrectly listed as being applicable to LAC 33:III Chapter 2122; Source neither a gas processing plant nor contain components in "VOC service".	Actually, FUG001 is listed as not applying to Chapter 2122, (i.e., "3"). There is an explanation in Section XI on Table 2
Emission Rate Summary Table-EQT0007	Max lb/hr CO emission rate incorrectly listed as 23.02 lb/hr; Correct to 44.4 lb/hr as listed in EIQ (and current permit)	Application calculations showed max lb/hr CO emissions as 23.02. Updated information was submitted showing calculation correction. Max lb/hr CO emissions now listed as 44.35.
Emission Rate Summary Table-EQT0007	Max NO_x lb/hr emission rate incorrectly listed as 77.78 lb/hr; Correct to 100.0 lb/hr as listed in EIQ (and current permit)	Application calculations showed max lb/hr NOx emissions as 77.78. Updated information was submitted showing calculation correction. Max lb/hr NOx emissions now listed as 99.96.
Specific Requirement No. 3 EQT006	Specific aspect of condition modified to read: "The stack test's purpose is to demonstrate compliance with the emission limits of this permit and therefore must be conducted at greater 80% of maximum permitted capacity or highest achievable load." This is currently allowed in NSPS rules due to capacity of these type sources being dependent upon site conditions (i.e. ambient temperature, pipeline conditions etc).	Added language after "greater than 80% of maximum permitted capacity" which stats "or at the highest achievable load point if at least 80% of peak load cannot be achieved in practice."
Specific Requirement No. 8 EQT007	Specific aspect of condition modified to read: "The stack test's purpose is to demonstrate compliance with the emission limits of this permit and therefore must be conducted at greater 80% of maximum permitted capacity or highest achievable load." This is currently allowed in NSPS rules due to capacity of these type sources being dependent upon site conditions (i.e. ambient temperature, pipeline conditions etc).	Added language after "greater than 80% of maximum permitted capacity" which stats "or at the highest achievable load point if at least 80% of peak load cannot be achieved in practice."
Specific Requirement No. 3 EQT006	Specific aspect of condition modified to read: "Upon request, provide necessary sampling ports in stacks or ducts....." LAC33:III.913.A. is only applicable to new sources.	Added language "Upon request" to beginning of last statement in place of "As required by LAC 33:III.913" since this was only subject to new sources.
Specific Requirement No. 8 EQT007	Specific aspect of condition modified to read: "Upon request, provide necessary sampling ports in stacks or ducts....." LAC33:III.913.A. is only applicable to new sources.	Added language "Upon request" to beginning of last statement in place of "As required by LAC 33:III.913" since this was only subject to new sources.
Specific Requirement No. 20 EQT009	Specific aspect of condition modified to read: "Upon request, provide necessary sampling ports in stacks or ducts....." LAC33:III.913.A. is only applicable to new sources.	Added language "Upon request" to beginning of last statement in place of "As required by LAC 33:III.913" since this was only subject to new sources.
Specific Requirement No. 27 CRG001	Remove specific requirement for two of four 4400 hp compressor engines. Sources are existing engines with testing requirements triggered by modification and/or overhaul. For example, if one unit is modified and/or overhauled it redundant to test two units.	Removed language "For two of the four 4400 hp compressor engines" at the beginning of this requirement.

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Specific Requirement No. 28 CRG001	Add to end of condition: "In accordance with LDEQ testing guidance, test is not required if source does not operate >720 hours during previous semiannual period. In lieu of testing, parametric monitoring or preventative maintenance analysis may be performed. For sources performing preventative maintenance analysis in lieu of testing, preventative maintenance analysis is not required for any semiannual period for which source operates <720 hours."	Added language "Comply with LDEQ Engine and Turbine testing guidance which can be found on LDEQ website. Initial and/or semiannual testing is not required for units that do not operate more than 720 hours during a semiannual period. In lieu of semiannual testing, parametric monitoring or preventative maintenance may be performed" to the end of this requirement.
Specific Requirement No. 31 CRG001	Add to end of condition: "In accordance with LDEQ testing guidance, test is not required if source does not operate >720 hours during previous semiannual period. In lieu of testing, parametric monitoring or preventative maintenance analysis may be performed. For sources performing preventative maintenance analysis in lieu of testing, preventative maintenance analysis is not required for any semiannual period for which source operates <720 hours."	Added language "Comply with LDEQ Engine and Turbine testing guidance which can be found on LDEQ website. Initial and/or semiannual testing is not required for units that do not operate more than 720 hours during a semiannual period. In lieu of semiannual testing, parametric monitoring or preventative maintenance may be performed" to the end of this requirement.
Specific Requirement No. 32 CRG001	Add to end of condition: "In accordance with LDEQ testing guidance, test is not required if source does not operate >720 hours during previous semiannual period. In lieu of testing, parametric monitoring or preventative maintenance analysis may be performed. For sources performing preventative maintenance analysis in lieu of testing, preventative maintenance analysis is not required for any semiannual period for which source operates <720 hours."	Added language "Comply with LDEQ Engine and Turbine testing guidance which can be found on LDEQ website. Initial and/or semiannual testing is not required for units that do not operate more than 720 hours during a semiannual period. In lieu of semiannual testing, parametric monitoring or preventative maintenance may be performed" to the end of this requirement.
Statement of Basis Section II-Facility & Current Permit Status	Incorrect statement pertaining to EQT6-EQT7 turbines; Needs corrected to: "The turbines can operate up to 160 percent of their nameplate (NEMA) rating". Short-term lb/hr rates are based on this higher HP rating.	Corrected language "60 percent" to "160 percent". Also added "NEMA".
Inventories- EQT006 EQT007	Current max operating rates for both turbines are site average NEMA ratings and need moved to normal operating rate column; Max operating rates are 25600 (EQT006) and 16800 (EQT007)	Corrected operating rates to average. Added stated maximum rates.
General Information-Mailing Address	Needs changed to 201 Energy Parkway Suite 100 Lafayette, LA 70508	Forwarded to David Ferrand to update
General Information-Related People	Responsible Official needs changed to C. Randal Broussard 201 Energy Parkway Suite 100 Lafayette, LA 70508 rbroussard@nisource.com (337) 266-4685	Forwarded to David Ferrand to update
General Information-Related People	Add Air Permit Contact: Kasey Gabbard 1700 MacCorkle Avenue SE Charleston, WV 25314 kgabbard@nisource.com (304) 357-2079	Forwarded to David Ferrand to update

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