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

STATEMENT OF BASIS

Texas Gas Transmission LLC
Texas Gas Transmission LLC - Bastrop Compressor Station
Bastrop, Morehouse Parish, Louisiana
Agency Interest Number: 3247
Activity Number: PER20070001
Proposed Permit Number: 1920-00012-V3

I. APPLICANT

Company:
Texas Gas Transmission LLC - Bastrop Compressor Station
PO Box 20008
Owensboro, Kentucky 42304

Facility:
Texas Gas Transmission LLC
7152 Pumping Station Rd
Bastrop, Morehouse Parish, Louisiana
Approximate geographic coordinates are latitude 32°57'33.95" and longitude 91°51'23.64". (UTM coordinates are 606.9 kilometers East and 3647.2 kilometers North, Zone 15)

II. FACILITY AND CURRENT PERMIT STATUS

The Bastrop Compressor Station utilizes nine internal combustion engines with a maximum capacity of 19,593 brake horsepower (bhp) and two turbines with a maximum capacity of 15,128 bhp to compress imported natural gas and re-inject into a sales pipeline.

Texas Gas Transmission LLC - Bastrop Compressor Station is a designated Part 70 source. The Part 70 permit which has been issued to this facility is as follows:

Permit No.	Unit or Source	Date Issued
1920-00012-V2	Bastrop Compressor Station	05/12/2003

III. PROPOSED PROJECT/PERMIT INFORMATION

Application

A permit application was submitted on October 31, 2007 requesting a Part 70 operating permit renewal for the Bastrop Compressor Station. Additional information dated December 3, 2007 and March 3, 2008 was also submitted.

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Project

There have been a few equipment changes since the issuance of the current permit which are to be incorporated into this permit renewal. These changes include:

- Remove old emergency generator (AX01) from the permit as it was retired in 2001.
- Remove gasoline storage tank (TK15) from the permit as it has been removed form the facility in 2005 (as notified on May 16, 2005 letter to LDEQ).
- Update Insignificant Activities List
  - Replaced Engine Fuel Gas Heater (BL01) with a smaller unit (BL06) in 2005.
  - Replaced Turbine Fuel Gas Heater (BL03) with a new unit (BL05) in 1997, although it was never updated on the Part 70 permit.
  - Remove the Jacket Water Heater (BL02) as it was retired in 2005.
- Update emissions using latest emission factors

Proposed Permit

Permit 1920-00012-V3 will be the renewal of Part 70 operating permit 1920-00012-V3 for the Bastrop Compressor Station.

Permitted Air Emissions

Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM_{10}	40.27	40.26	-0.01
SO_2	0.54	0.51	-0.03
NO_X	4036.52	4035.58	-0.94
CO	409.10	408.16	-0.94
VOC *	96.50	95.73	-0.77

*VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Before	After	Change
Acetaldehyde	5.85	5.85	-
Acrolein	5.91	5.91	-
Benzene	0.11	0.10	-0.01
Formaldehyde	42.17	42.17	-
Ethylene Glycol	<0.01	<0.01	-
n-Hexane	0.14	0.11	-0.03

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*VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Before	After	Change
Toluene	0.15	0.14	-0.01
Xylene	0.12	0.10	-0.02
Total	54.45	54.38	-0.07

IV 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.

Applicability and Exemptions of Selected Subject Items

See section XI table 2 in the permit.

Prevention of Significant Deterioration/Nonattainment Review

This permit was reviewed for compliance with 40 CFR 70, 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 apply.

Streamlined Equipment Leak Monitoring Program

None

MACT Requirements

The Bastrop Compressor Station is not subject to the Maximum Achievable Control Technology (MACT) standards.

Air Quality Analysis

Louisiana Toxic Air Pollutant (LTAP) dispersion modeling is performed for the applicable LTAP compounds with emissions above the Minimum Emission Rate. The screening modeling results predict the maximum ground level concentrations of toxic air pollutants are below the Ambient Air Standards (AAS).

Impact on air quality from the emissions of the proposed units will be below the National Ambient Air Quality Standards (NAAQS) and the Louisiana Ambient Air Standards (AAS) beyond industrial property.

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 the Section VIII – General Condition XVII Activities of the proposed permit.

Insignificant Activities

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

V. PERMIT SHIELD

None

VI. PERIODIC MONITORING

All periodic monitoring is conducted in accordance with state and federal regulations. See the Specific Requirements Section of the proposed permit for monitoring requirements.

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VII. GLOSSARY

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

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.

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 reaction of acids on metallic sulfides, and is an important chemical reagent.

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 consist of nitrogen and oxygen.

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 sulfur.

Sulfuric Acid (H_2SO_4) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

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.