Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**ETC Tiger Pipeline, LLC**	**AI #:**	**166496**	**TEMPO Activity No:**	**PER20090001**
Facility Name:	**Cannisnia Compressor Station**	**Remarks Submitted by:**	**Gordon R Moore, P.E., September 28, 2009**		
Permit Writer:	**Corbet Mathis**	**Permit Writer Email address:**	**corbet.mathis@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)
1.		
Air Permit Briefing Sheet, Section III, 1st paragraph Statement of Basis Section II, 2nd paragraph	Include emergency generator in description with other equipment in line 6.	Change Made.
2.		
Applicable Louisiana and Federal Air Quality Requirements Sheet, Section X, EQT 0001 through EQT 0005 COMP-1 through COMP-4 GEN-1	Include the applicability of LAC 33:III.1101.B for all the compressor engines and the generator as follows: Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).	Chapter 11 doesn't fit emissions from Internal Combustion Engines as well as Chapter 13 does. A policy was developed to include only Chapter 13 for Internal Combustion Engines.
3.		
Inventories Section, Stack Information EQT 0001 through EQT 0004 COMP-1 through COMP-4	Change the stack information for the compressor engines (EQT 0001 through EQT 0004) to the following: Velocity= 72 ft/sec, Flow Rate=41291 ACFM, Diameter=3.5 ft and Height= 60 ft.	Change Made.
4.		
Specific Requirements UNF0001 Unit or Facility Wide	Remove Specific Condition No. 35 [40 CFR 63] Subpart A- General Provisions. Does not need to comply as per the following citation under 40 CFR 63 Subpart ZZZZ- § 63.6665 and -§ 63.6590(c) The General Provisions in §§63.1 through 63.15 apply to you. If you own or operate any stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions	Change Made.

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	(except new or reconstructed 4SLB engines greater than or equal to 250 and less than or equal to 500 brake HP), **a stationary RICE located at an area source of HAP emissions**, or any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with any of the requirements of the General Provisions: An existing 2SLB RICE, an existing 4SLB stationary RICE, an existing CI stationary RICE, an existing stationary RICE that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, an existing emergency stationary RICE, or an existing limited use stationary RICE. If you own or operate any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with the requirements in the General Provisions except for the initial notification requirements: A new stationary RICE that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, a new emergency stationary RICE, or a new limited use stationary RICE. *Stationary RICE subject to Regulations under 40 CFR Part 60.* An affected source that is a new or reconstructed stationary RICE located at an area source, or is a new or reconstructed stationary RICE located at a major source of HAP emissions and is a spark ignition 2 stroke lean burn (2SLB) stationary RICE with a site rating of less than 500 brake HP, a spark ignition 4 stroke lean burn (4SLB) stationary RICE with a site rating of less than 250 brake HP, or a 4 stroke rich burn (4SRB) stationary RICE with a site rating of less than or equal to 500 brake HP, a stationary RICE with a site rating of less than or equal to 500 brake HP which combusts landfill or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, an emergency or	

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	limited use stationary RICE with a site rating of less than or equal to 500 brake HP, or a compression ignition (CI) stationary RICE with a site rating of less than or equal to 500 brake HP, must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under this part.	
5.		
General Information Section, Physical Location	The facility will be located on PR 410 4.57 miles NW of Williams, LA 71019.	Change Made.
6.		
Page No.1 of the Proposed Permit Draft Statement of Basis, Section I	Include Suite # 400 to the Company Information.	Change Made.
7.		
Statement of Basis Section IV Regulatory Analysis	Include an additional applicability of NSPS Requirements under Section IV, specifying that the five engines at the facility were ordered after the applicability "commence construction" date of June 12, 2006 and are subject to NSPS Subpart JJJJ and consequently any applicable NSPS General Provisions of Part 60 Subpart A.	Not necessary. A general statement referring back to the permit is included in the section.
8.		
Applicable Louisiana and Federal Air Quality Requirements Sheet, Section X, EQT0012 LOAD-Truck Loading	Add (3) under 2107 to maintain consistency with other pending applications. This change is requested to maintain consistency between other permit applications being drafted at LDEQ for other ETC Tiger compressor stations on the same pipeline.	Change Made.

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9.		
Applicable Louisiana and Federal Air Quality Requirements Sheet, Section X, FUG 1 FUG-Fugitive Emissions	Add (3) under 2121 to maintain consistency with other pending applications. This change is requested to maintain consistency between other permit applications being drafted at LDEQ for other ETC Tiger compressor stations on the same pipeline.	Change Made.
10.		
Applicable Louisiana and Federal Air Quality Requirements Sheet, Section X, EQT 1, EQT 2, EQT 3, EQT 4, EQT 5 Engines	Add (1) under Chapter 11 to maintain consistency with other pending applications. This change is requested to maintain consistency between other permit applications being drafted at LDEQ for other ETC Tiger compressor stations on the same pipeline.	Chapter 11 doesn't fit emissions from Internal Combustion Engines as well as Chapter 13 does. A policy was developed to include only Chapter 13 for Internal Combustion Engines.
11.		
Applicable Louisiana and Federal Air Quality Requirements Sheet, Section X, EQT 1, EQT 2, EQT 3, EQT 4, EQT 5 Engines	Add (2) under Chapter 15 to maintain consistency with other pending applications. This change is requested to maintain consistency between other permit applications being drafted at LDEQ for other ETC Tiger compressor stations on the same pipeline.	Added a "3" since Chapter 15 doesn't apply. All emission points have emissions below 5 tpy.
12.		
Applicable Louisiana and Federal Air Quality Requirements Sheet, Section X, UNF 1, Entire Facility – Cannisnia Compressor Station	Add (1) under Chapter 13 to maintain consistency with other pending applications. This change is requested to maintain consistency between other permit applications being drafted at LDEQ for other ETC Tiger compressor stations on the same pipeline.	Change Made
13.		
Applicable Louisiana and Federal Air Quality Requirements Sheet, Section X,	Add (1) under Chapter 29 to maintain consistency with other pending applications. This change is requested to maintain consistency	Change Made.

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UNF 1, Entire Facility – Cannisnia Compressor Station	between other permit applications being drafted at LDEQ for other ETC Tiger compressor stations on the same pipeline.	
13.		
Applicable Louisiana and Federal Air Quality Requirements Sheet, Section X, UNF 1, Entire Facility – Cannisnia Compressor Station	Add (1) under Chapter 56 to maintain consistency with other pending applications. This change is requested to maintain consistency between other permit applications being drafted at LDEQ for other ETC Tiger compressor stations on the same pipeline.	Chapter 56 was already included in the permit.

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