

**RESPONSE TO COMMENTS**  
**Title V Permit to Operate**  
**Permit No.: V-LL-R50002-04-01**

On August 7, 8, 12 and 19, 2004, the United States Environmental Protection Agency (EPA) published notices in the Bemidji Pioneer, the Harold Review, the Walker Pilot, and the Western Itasca Review notifying the public that a Title V operating permit for Great Lakes Gas Transmission Limited Partnership Compressor Station No. 4 had been drafted and available for comment.

In accordance with 40 CFR Part 71.11(j), the following is a summary of the comments received during the public notice period and a brief EPA response:

**Comments received from the Leech Lake Band of Ojibwe (September 3<sup>rd</sup>, 2004):**

**Comment #1:** In Section 1.0 of the permit in the last sentence of the last paragraph it should state "365 days", not "356 days".

**Response #1:** This typographical error was corrected prior to public notice.

**Comment #2:** Leech Lake has concern with the statement in Condition 4.0(S)(1)(ii), "The source is issued a valid part 70 permit". This permit will be issued by either the USEPA or the Leech Lake Band of Ojibwe, in which case either party will issue a Part 71 permit.

**Response #2:** This is a typographical error and has been corrected (language that is added is shown in **bold** and language deleted is ~~stricken~~).

(S). *Permit Expiration and Renewal [40 CFR §§71.5(a)(1)(iii), 71.6(a)(11), 71.7(b), 71.7(c)(1)(i) and (ii), 71.8(d)]*

1. *This permit shall expire upon the earlier occurrence of the following events:*

i. *Five years elapses from the date of issuance; or*

- ii. The source is issued a valid ~~part 70~~ **Part 71** permit.

**Comment #3:** Why on emission unit 003 are there no limitations on operational hours? In our course of reviewing permits the backup generator/boiler has some type of operational limits, i.e.: hours or days per year, especially when it is deemed as a standby generator as EU 003 is at Compressor Station #4.

**Response #3:** EPA's regulatory authority under 40 CFR Part 71 does not allow the permitting authority to establish any new operational limits in a part 71 operating permit. Because limits on operational hours were not established in the any previous construction permit, EPA cannot establish them in the Part 71 permit. EPA has not modified the permit based on this comment.

**Comment #4:** We are concerned that there are no pollution control devices on any of the three emission units. Being a major facility with a potential to emit of 100 tons per year of CO and VOCs, one would like to think there would be some type of pollution control. Since the previous Minnesota Pollution Control Agency (MCPA) permits are considered by EPA to be invalid, does EPA then consider the Prevention of Significant Deterioration (PSD) review by the MPCA also invalid?

**Response #4:** Since none of the emission units at the Facility have ever been subject to PSD review, EPA cannot establish pollution control requirements on any of the three emission units through the Part 71 process. According to information submitted by the source, emission unit 001 was originally constructed prior to PSD regulations. The Facility was able to utilize emission credits from the shut down of two older gas turbines to offset the emissions increase from the addition of emission unit 002, thereby netting emission unit 002 out of any PSD requirements. As discussed in Response #3 above, the net emissions increase from the addition of emission unit 003 was less than the significance threshold and therefore the modification was not subject to PSD.

The construction permit issued by MPCA in July 1992 was not a PSD permit. EPA has not modified the Part 71 permit based on this comment.

**Comments received from the Mille Lacs Band of Ojibwe  
(September 9<sup>th</sup>, 2004):**

**Comment #5:** The Mille Lacs Band have noticed the turbines for operating the compressors are not equipped with emission control devices. Will Great Lakes install a control device, such as a water/stream injector or the SCONOx system on EU 001 and EU 002 at this facility? According to AP-42, Table 3.1-2a, with an injector emission control device, the NOx emission factor is 0.13 and CO emission factor is 0.03, both lower than the current, uncontrolled emission factors of 0.211 and 1.176, respectively based on your performance test. According to Campbell and Shareef in *Source Book: NOx Control Technology Data*, they seem to imply a water injector would decrease NOx but would elevate CO and VOC emissions, depending on the amount of the water being injected.

**Response #5:** As discussed in Response #4 above, since none of the emission units at the Facility have ever been subject to the Prevention of Significant Deterioration (PSD) regulations (40 CFR Part 52.21), EPA cannot establish pollution control requirements on any of the three emission units through the Part 71 process. EPA has not modified the permit based on this comment.

**Comment #6:** It appears that Great Lakes may have over estimated their potential to emit particulate matter (PM) for emission unit 003. According to AP-42, Table 3.2-1, the PM emission factor is 0.0384, not 0.0483 as used in your calculations.

**Response #6:** The PM emission factor used for EU003 was a compilation of both PM10 (filterable), 0.0384 lb/MMBtu and PM (condensable), 0.00991 lb/MMBtu from AP-42, Table 3.2-1. EPA has not modified the Part 71 permit based on this comment.

**Comment #7:** The third area to which we would like to address is keeping an accurate log of the generator run-time such that actual emissions for this unit may be calculated and be reported, if the run-hours warrant reporting. We understand this unit is not always running. However, since significant amounts of emissions can arise during start-up, and pollutants of concern would be emitted during its run, and this unit might be operating often if

frequent power outages or "brown-out" conditions were to occur, such recording of operations for this unit would be prudent.

**Response #7:** Because of the size of emission unit 003 and the use to which the Facility intends to put it, EPA does not believe that it is necessary at this time to require the Facility to maintain operational logs. Great Lakes Gas will likely maintain an operational log for emission calculation for annual fee calculation purposes. EPA has not modified the Part 71 permit based on this comment.

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