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East Tennessee Natural Gas, LLC
5400 Westheimer Court
Houston, TX 77056

Mailing Address:
P.O. Box 1642
Houston, TX 77251-1642



2011 MAR -2 AM 11:14

February 28, 2011

Mr. Barry R. Stephens, Director
Division of Air Pollution Control
Tennessee Department of Environment & Conservation
9th Floor, L & C Annex
401 Church Street
Nashville, TN 37243-1531

Attention: Olga Jacobsen

RE: TEMPORARY OPERATING PERMIT NO. 963779P
EMISSION SOURCE REFERENCE NO. 65-0028-01
STATION 3110 (WARTBURG)
EAST TENNESSEE NATURAL GAS, LLC

Dear Mr. Stephens:

East Tennessee Natural Gas, LLC (ETNG) is in receipt of the Temporary Operating Permit (TOP) that was issued February 17, 2011 for the Wartburg Station. In reviewing the TOP, it was noticed that Condition 8 prescribes adherence to a custom fuel monitoring plan that was submitted on December 20, 1995. ETNG had submitted a request for amendment dated January 13, 2010 (copy enclosed) to allow compliance with Subpart GG requirements in accordance with the July 8, 2004 amendment to Subpart GG, specifically, §60.334(h)(3). Additionally, the June 2, 2010 renewal application transmittal letter referenced this amendment request.

ETNG respectfully requests the administrative amendment to the TOP to replace Condition 8 of Permit No. 963779P with the same language as in Condition 8 of Permit No. 965056F (05-0132-01) for the Maryville Station, which was issued on February 11, 2011. An excerpt of the latter permit is enclosed for convenience.

Should you have any questions concerning this matter, please feel free to contact me or Sabino Gomez at (713) 989-8342.

Sincerely,

A handwritten signature in cursive script that reads "Victoria Wagner".

Victoria Wagner
EHS Manager – US Operations

Enclosures

c: Daniel Myshrrall, Spectra Energy Transmission/ETNG, Nashville
Barry Buchanan, Spectra Energy Transmission/ETNG, Abingdon, VA

East Tennessee Natural Gas, LLC
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January 13, 2010

Mr. Barry R. Stevens, P.E.
Technical Secretary
Division of Air Pollution Control
Attn: Randall Thompson
Tennessee Department of Environment and Conservation
9th Floor, L&C Annex
Nashville, TN 37243-1531

**RE: ADMINISTRATIVE PERMIT AMENDMENT REQUEST
PERMIT 053993F
COMPRESSOR STATION 3110**

Dear Mr. Stevens:

East Tennessee Natural Gas, LLC (ETNG) operates Compressor Station 3110 near Wartburg, in Morgan County, under authority of Permit No. 053993F.

TURBINE REPLACEMENT

The current Permit does not include a provision allowing for "in-kind" turbine replacement in order to maintain gas delivery capacity. Such a provision has routinely been included in other ETNG major and minor source permits. ETNG respectfully requests the inclusion of the following language as an additional provision to the existing operating permit:

One or more of the Station's turbines or turbine components may be removed and replaced with new, repaired or refurbished equivalent capacity turbines of in-kind components in order to maintain gas delivery capacity.

This wording was taken from Condition 10 of Operating Permit No. 462875 (Estill Springs).

SULFUR FUEL MONITORING

Condition 8 includes specific custom fuel monitoring requirements based on 40 CFR 60, Subpart GG as originally promulgated. ETNG is requesting that compliance with GG requirements be consistent with the July 8, 2004 amendments to Subpart GG, which includes alternatives to sulfur monitoring as provided in §60.334(h)(3). ETNG therefore respectfully requests amendment of Condition 8 to read as follows:

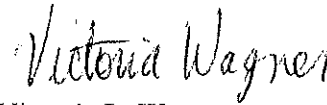
The owner or operator may elect not to monitor the total sulfur content of the gaseous fuel combusted in the turbine, if the gaseous fuel is demonstrated to meet the definition of natural gas in §60.331(u), as demonstrated by a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less, regardless of whether an existing custom schedule approved by the administrator for subpart GG requires such monitoring.

Barry R. Stevens
Tennessee Department of Environment and Conservation
January 13, 2010
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The Tennessee Department of Environment and Conservation has approved similar language at other ETNG locations subject to GG.

Should you have any questions concerning this matter, please contact Mr. Sabino Gomez at (713) 989-8342, or sgomez@spectraenergy.com.

Sincerely,

A handwritten signature in black ink that reads "Victoria Wagner". The script is cursive and fluid.

Victoria L. Wagner
Manager,
EHS – US Operations

2. The total design heat input capacity for this source shall not exceed 15.43 MMBtu/hr, on a daily average basis. TAPCR 1200-03-09-.01(1)(d) and the application dated September 30, 2010.
3. Only natural gas shall be used as fuel for this source. TAPCR 1200-03-09-.01(1)(d) and the application dated September 30, 2010.
4. Particulate matter (TSP) emitted from this source shall not exceed 9.3 pounds per hour. TAPCR 1200-03-06-.02(2)(a).
5. Volatile organic compounds (VOC) emitted from this source shall not exceed 0.42 pound per hour. TAPCR 1200-03-07-.07(2)
6. Carbon monoxide (CO) emitted from this source shall not exceed 13.5 pounds per hour. TAPCR 1200-03-07-.07(2)
7. A monthly log of the fuel usage must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. This log must be maintained for a period of not less than two (2) years. All data, including all required calculations, must be entered in the log no later than thirty (30) days from the end of the month for which the data is required TAPCR 1200-03-10-.02(2)(a).

8. This source shall comply with all applicable requirements of 40 CFR Part 60, Subpart GG - Standards of Performance for Stationary Gas Turbines.

(a) No owner or operator shall cause to be discharged into the atmosphere from any stationary gas turbine any gases which contain sulfur dioxide in excess of 0.015 percent by volume at 15 percent oxygen and on a dry basis.

40 CFR § 60.333

(b) The owner or operator may elect not to monitor the total sulfur content of the gaseous fuel combusted in the turbine, if the gaseous fuel is demonstrated to meet the definition of natural gas in 60.331 (u), as demonstrated by a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20 grains/100 scf or less, regardless of whether an existing custom schedule approved by the administrator for subpart GG requires such monitoring.

(c) Nitrogen oxides emitted from this source shall not exceed 0.015% by volume on a dry basis corrected to 15% oxygen. Consistent with the provisions of the memorandum of August 14, 1987 by John B. Rasnic of EPA, the monitoring of fuel nitrogen content shall not be required while natural gas is the only fuel fired in the gas turbines (attachment #1).

9. Visible emissions from this source shall not exhibit greater than twenty percent (20%) opacity except for one six-minute period per one (1) hour or more than twenty four (24) minutes in any twenty four (24) hours. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average). TAPCR 1200-03-05-.01(1) and TAPCR 1200-03-05-.03(6).

(conditions continued on next page)