

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

Mailing Address:  
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Houston, TX 77251-1642

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January 13 2010 JAN 13 PM 12:38

Mr. Barry R. Stevens, P.E.  
Technical Secretary  
Division of Air Pollution Control  
Attn: Randall Thompson  
Tennessee Department of Environment and Conservation  
9<sup>th</sup> 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:

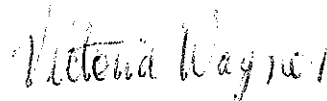
*The owner or operator may elect not to monitor the total sulfur content of the gaseous fuel combusted in the turbine, if the gaseous fuel is demonstrated to meet the definition of natural gas in §60.331(u), as demonstrated by a current, valid purchase contract, tariff sheet or transportation contract 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.*

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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](mailto:sgomez@spectraenergy.com).

Sincerely,

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

Victoria L. Wagner  
Manager,  
EHS – US Operations