RESPONSE TO COMMENTS
DRAFT PERMIT

This is our response to the comments received on the subject draft New Source Review (NSR)/Title V permit in accordance with our regulations.

Permit No.:	R6DPA-GM2
Applicant:	Gulf Gateway Energy Bridge, LLC
Facility Name/Location:	Gulf Gateway Energy Bridge, Gulf of Mexico Latitude: 28° 05' 42" N Longitude: 93° 03' 35" W 116 miles off the coast of Louisiana in the Gulf of Mexico
Draft Permit Public Notice Date:	2/11/08
Prepared by:	Stephanie D. Kordzi

Issue No. 1.

The permit applicant indicated that not all vessels have been or will be retrofitted with continuous exhaust analyzers. Excelerate Energy's current fleet of Energy Bridge Regasification Vessels (EBRVs) consists of the Excelsior, the Excellence, the Excelerate, and the Explorer. Excelsior has not be retrofitted with Selective Catalytic Reduction (SCR) equipment or a continuous exhaust analyzer because it will not be utilized to call on Northeast Gateway Deepwater Port (NEG); Excellence and Excelerate were retrofitted in anticipation of their use at the NEG; and Explorer was designed with the SCR and exhaust analyzers already installed. The continuous exhaust analyzers will be monitoring NOx, CO, and O_2, but not "exhaust flow rate".

Gulf Gateway stated that 40 CFR 60.13 and 40 CFR 60, Appendix B do not identify certification requirements, rather 40 CFR 60.13(a) refers to Appendix B for performance specifications and 60.13(i) allows for alternatives. In addition, Gulf Gateway stated that EPA Region 1 is accepting the use of the continuous exhaust analyzers for compliance purposes without requiring that they meet performance specifications in 40 CFR Part 60, Appendix B.

Response No. 1.

The language in the second paragraph of Section III.B.(b)(i) of the permit has been revised for clarity and to address that not all vessels will be outfitted with SCR controls.

"For vessels that are retrofitted with continuous exhaust analyzers for NOx, compliance

monitoring shall be conducted per an EPA approved monitoring, recordkeeping, and reporting plan using installed, calibrated and operational continuous emission monitoring systems (CEMSs) for NOx. The CEMSs shall be approved in accordance with 40 CFR Part 60, Subpart A at Section 60.13 and the applicable Performance Specifications of 40 CFR Part 60, Appendix B. These CEMSs are not subject to the requirements of 40 CFR Part 60, Appendix F. Compliance using manual test methods found in 40 CFR Part 60, Appendix A, or ASTM D6522-00, or other methods identified in a test protocol that is pre-approved by EPA for this facility must be demonstrated if the analyzers are unable to conform to the EPA approved monitoring, recordkeeping, and reporting plan."

The language in Section III.B(b)(iii), has also been revised to the following:

> "The permittee shall demonstrate compliance with the Carbon Monoxide (CO) emission limits of this permit, as applicable, by performing stack tests once per regasification episode on Emission Units U-00001, U-00002, and U-00008. For vessels that are retrofitted with continuous exhaust analyzers for CO, compliance monitoring shall be conducted per an EPA approved monitoring, recordkeeping, and reporting plan using installed, calibrated and operational continuous emission monitoring systems (CEMSs) for CO. The CEMSs shall be approved in accordance with 40 CFR Part 60, Subpart A at Section 60.13 and the applicable Performance Specifications of 40 CFR Part 60, Appendix B. These CEMSs are not subject to the requirements of 40 CFR Part 60, Appendix F. Compliance using manual test methods found in 40 CFR Part 60, Appendix A, or ASTM D6522-00, or other methods identified in a test protocol that is pre-approved by EPA for this facility must be demonstrated if the analyzers are unable to conform to the EPA approved monitoring, recordkeeping, and reporting plan."

The use of the Ultramat 23 Analyzer must be approved by EPA Region 6 prior to its use as an alternative CEMs device for NOx. Gulf Gateway will need to submit an official request to Mr. David Garcia, Chief, Air Toxics and Coordination Branch, (6EN-A), U.S.EPA Region 6, requesting approval of the alternative monitoring plan in accordance with 40 CFR Part 60.13(i). The language in the proposed permit allows use of EPA *approved* alternative monitoring methods. If the device is approved, the permit condition will require compliance with EPA approved manual test methods should the continuous exhaust analyzers not be able to conform to the EPA approved plan.

Issue No. 2.

The applicant requested that manual stack testing methods only be required if the Ultramats are not able to conform to the EPA approved monitoring, recordkeeping, and reporting plan. The applicant specifically requested the permit language to be revised to the following:

> "If the continuous exhaust analyzers are not able to conform to the EPA approved monitoring, recordkeeping, and reporting plan, compliance will be determined using manual test methods."

Response No. 2

The permit conditions were revised. See the language in Response No. 1 above.

Issue No. 3

The permit applicant requested a revision to the Statement of Basis to reflect the removal of references to 40 CFR 60.46(b) in Section III.B, which they support, but the reference is still included in Section III.B.(b)(i)(A) of the draft revised permit.

Response No. 3

Section III.B.(b)(i)(A) was removed. However a reference to the test methods found in 40 CFR Part 60, Subpart Db remains in the first paragraph of Section III.B.(b)(i) as it pertains to the need for manual testing. Use of the Siemens Ultramat 23 has not been approved by Region 6 to date.

Issue No. 4

The applicant stated that the manual test methods identified in Section III.B(b)(i) and (iii) of the draft permit are unclear, i.e., the concluding test identifies that "compliance will be determined by using portable analyzers, certified using ASTM D6522 and EPA Test Method 205, in accordance with performance testing requirements stated above," but then also includes a subsection (A) that refers to only methods in 40 CFR 60. The applicant further stated they wanted to retain flexibility to use either and requested that the reference to "certification" be removed since portable analyzers are not certified under these methods. They also requested the reference to Method 205 be removed, since this refers to the use of dilution probes in lieu of a full range of calibration gases and therefore should not be required.

Response No. 4

The language was revised for clarity. See Response No. 1 above.

Issue No. 5

The applicant requested that the CO emission limits for the Arrow Engines (U-00008) be corrected in the permit. The Statement of Basis correctly refers to the revised CO emission limits, but these limits are not reflected in the draft permit.

Response No. 5

The EPA agrees with the comment. Section II.A, Table 3 in the final permit has been revised to incorporate the corrected CO emission limits for Unit U 00008 and the resulting changes to the Totals emission limits. These revised values were reflected in the February 11, 2008, Public Notice and Statement of Basis.

Issue No. 6

The permit applicant requested the footnote to Table 3 in Section II.A, be corrected to reflect that for Emission Unit U-00008, the CO emission limits are based on test data, not AP-42, and the revised annual emissions were not based on "all three generating engines running concurrently" for 8760 hrs/year. Instead the annual emissions are based on the engines generating 320,760 kWh/year, as represented in the permit application, dated October 31, 2006. For U-00009, the applicant represented that NOx and CO emission limits are based on vendor data, not AP-42.

Response No. 6

EPA agrees with the comment. The footnotes to Table 3 have been revised as follows to include the corrected information.

1. The annual emission rates are based on 320,760 kWh/year, as reflected in the permit application.
2. Emissions rates for U-00008 for CO are based on test data.
3. NOx and CO emission limits for U-00009 are based on vendor data.
4. Source must monitor and record hours of operation for each generator.

In addition, as a result of the addition of Footnote 4, Section III(e) was added to the permit to further identify the monitoring requirement.

> "III.(e) The number of hours of operation for each of the generators under U-00008 and U-00009."

Issue No. 7

The permit applicant requested that the permit language in Section III.B(b)(v) be revised from referencing opacity and replacing it with visible emissions. They clarify that "Opacity" could be confused with Method 9 measurements, and the applicant states the crew is not trained in making Method 9 measurements.

Response No. 7

The opacity requirement contained in the permit is based on Louisiana Administrative Code (LAC) Title 33, Part III, Chapter 11, Section 1101.B. and Chapter 13 Section 1311.C. This provision was placed in the permit as a result of Sec 19 (b) of the Deepwater Port Act (DPA) requiring the law of the nearest adjacent coastal State and its associate air quality standards to be applied. However, the DPA goes on to say that the law of the nearest adjacent coastal state shall be applied to the extent applicable and not inconsistent with any provision or regulation under the Act or other Federal laws and regulations now in effect or hereafter adopted, amended, or repealed.

Chapter 11 states that compliance with the opacity standard does not have to be demonstrated when the following conditions are met.

1. The source of the emissions is in a relatively unpopulated area of the state.
2. The administrative authority determines it is not technically practicable nor economically reasonable to eliminate the emissions.

Compliance with Chapter 13, Section 1311.G. states that the administrative authority may find that by reason of exceptional circumstances, strict conformity with any provisions of the regulations would cause undue hardship, would be unreasonable, impractical or not feasible under the circumstances.

The EPA contacted the Louisiana Department of Environmental Quality (LDEQ) regarding the applicability of the opacity provisions, considering that the location where the vessels will be undergoing regasification is 116 miles offshore. The State's preliminary reaction was that the LDEQ provisions would not be binding because the site is not located in State waters and it appears that the provisions laid out in LAC 33, Part III, Chapter 11, Section 1111.B. and Chapter 13, Section 1311.G are satisfied in this particular case.

As a result of information provided by the permit applicant and their request for relief, the EPA Region 6 has made a decision that Gulf Gateway meets the Louisiana variance criteria. In light of this information, and since there is no Federal requirement under the Clean Air Act to include an opacity provision in the permit, EPA Region 6 has made the decision to remove the monitoring requirements for opacity from the final permit. Changes to the final permit are as follows. Section II.A., Table 3 on pages 8 and 9 has been revised to remove the opacity limitation of not darker than 20% for all the emission units. Section III.B.(b)(v) on page 16 has been removed from the permit. Section III.F (a) and (b) on page 22 has been revised to reflect EPA's determination that compliance with the Louisiana opacity standard is not required because the facility meets the variance criteria.