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AIRC



January 18, 2019

Ms. Sarah Kirksey – Air Section Manager
Texas Commission on Environmental Quality
Beaumont Regional Office (Region 10)
3870 Eastex Freeway
Beaumont, Texas 77703-1830

SUBJECT: Semiannual Compliance Report Required Under 40 CFR 63, Subpart ZZZZ
Gulf South Pipeline Company, LP - Goodrich Compressor Station
Primary TCEQ Account Number: PF-0019-V
Regulated Entity Number RN100218494
TCEQ Customer Reference: CN600129696
Operating Permit Number O3066

Dear Ms. Kirksey:

This letter constitutes the semiannual Compliance Report required for the above referenced facility by 40 CFR 63, Subpart ZZZZ. This report is submitted pursuant to the requirements of 40 CFR 63.6650 and covers Compressor Engines C-1 through C-6. The other reciprocating engines at this facility are not subject to emission standards under Subpart ZZZZ and are not required to be addressed in this report.

Each of the required data elements outlined in 40 CFR 63.6650(c) is provided below.

63.6650(c)(1): Gulf South Pipeline Company, LP
Goodrich Compressor Station
228 East FM 1988
Goodrich, TX 77335

63.6650(c)(2): See certification statement at the end of this letter.

63.6650(c)(3): Report covers from July 1, 2018 through December 31, 2018.

63.6650(c)(4): There were no startups, shutdowns or malfunctions that caused exceedance of the emission limits during the reporting period.

63.6650(c)(5): There were no deviations from the emission or operating limitations during the reporting period.

63.6650(c)(6): There is no continuous monitoring system (CMS) required for any of these units; therefore, there were no periods during which a CMS was "out of control" during the reporting period. Each of these units ensures continuous compliance through automatic shutdown based on high catalyst temperatures rather than employing a CMS.



The annual compliance demonstrations for Compressor Engines C-1 through C-6, required under Subpart ZZZZ, were all conducted on July 25. The results of the annual compliance demonstrations are summarized below. These demonstrations were conducted pursuant to 40 CFR 63.6640(c) and the limits are taken from Subpart ZZZZ, Table 6. As shown in the summary table below, the results of the annual compliance evaluations indicate that each engine was in compliance with its emission limit from Subpart ZZZZ.

Engine ID	Test Date	Observed CO Concentration (ppmvd at 15% O ₂)	CO Concentration Limit (ppmvd at 15% O ₂)
Compressor Engine C-1	7/25/2018	191.95	270
Compressor Engine C-2	7/25/2018	43.36	270
Compressor Engine C-3	7/25/2018	97.17	270
Compressor Engine C-4	7/25/2018	162.22	270
Compressor Engine C-5	7/25/2018	173.20	270
Compressor Engine C-6	7/25/2018	151.85	270

If you have questions or need additional information, please contact David Nickel at [REDACTED] or (903) 753-7209 (extension 2926).

I certify that I am a Responsible Official for these facilities and that, based on information and belief formed after reasonable inquiry, the statements and information contained in this submittal are true, accurate, and complete.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Perkins".

Dave Perkins
Vice President – Environmental, Safety & Security

cc: TCEQ Central Office
EPA, Region VI
Goodrich Air Files
David Nickel – Gulf South Pipeline Company, LP