

Attachment A-1
Potential Emissions from WPG Pretreatment Heater
Puget Sound Energy - Liquefied Natural Gas Project
Tacoma, Washington

Pollutant	Emission Factor (lb/MMcf)	Potential Emissions	
		Hourly ^a (lbs/hr)	Annual ^b (tons/yr)
Criteria Pollutants			
PM/PM ₁₀ /PM _{2.5}	7.6 ¹	0.063	0.27
SO ₂	15 ^c	0.126	0.55
NO _x	53 ^d	0.436	1.91
CO	40 ^d	0.332	1.45
VOC	5.5 ¹	0.045	0.20
Lead	0.0005 ¹	4.1E-06	1.8E-05
Hazardous Air Pollutants			
Arsenic	2.0E-04 ³	1.6E-06	7.2E-06
Benzene	2.1E-03 ³	1.7E-05	7.6E-05
Beryllium	1.2E-05 ³	9.9E-08	4.3E-07
Cadmium	1.1E-03 ³	9.1E-06	4.0E-05
Chromium(total)	1.4E-03 ³	1.2E-05	5.0E-05
Cobalt	8.4E-05 ³	6.9E-07	3.0E-06
Formaldehyde	7.5E-02 ³	6.2E-04	2.7E-03
Hexane	1.8E+00 ³	1.5E-02	6.5E-02
Lead	5.0E-04 ¹	4.1E-06	1.8E-05
Manganese	3.8E-04 ³	3.1E-06	1.4E-05
Mercury	2.6E-04 ³	2.1E-06	9.4E-06
Naphthalene	6.1E-04 ³	5.0E-06	2.2E-05
Nickel	2.1E-03 ³	1.7E-05	7.6E-05
Polycyclic Organic Matter	7.0E-04 ³	5.7E-06	2.5E-05
2-Methylnaphthalene	2.4E-05 ³	2.0E-07	8.7E-07
3-Methylchloranthrene	1.8E-06 ³	1.5E-08	6.5E-08
7,12-Dimethylbenz(a)anthracene	1.6E-05 ³	1.3E-07	5.8E-07
Acenaphthene	1.8E-06 ³	1.5E-08	6.5E-08
Acenaphthylene	1.8E-06 ³	1.5E-08	6.5E-08
Anthracene	2.4E-06 ³	2.0E-08	8.7E-08
Benz(a)anthracene	1.8E-06 ³	1.5E-08	6.5E-08
Benzo(a)pyrene	1.2E-06 ³	9.9E-09	4.3E-08
Benzo(b)fluoranthene	1.8E-06 ³	1.5E-08	6.5E-08
Benzo(g,h,i)perylene	1.2E-06 ³	9.9E-09	4.3E-08
Benzo(k)fluoranthene	1.8E-06 ³	1.5E-08	6.5E-08
Chrysene	1.8E-06 ³	1.5E-08	6.5E-08
Dibenzo(a,h)anthracene	1.2E-06 ³	9.9E-09	4.3E-08
Fluoranthene	3.0E-06 ³	2.5E-08	1.1E-07
Fluorene	2.8E-06 ³	2.3E-08	1.0E-07
Indeno(1,2,3-cd)pyrene	1.8E-06 ³	1.5E-08	6.5E-08
Naphthalene	6.1E-04 ³	5.0E-06	2.2E-05
Phenanathrene	1.7E-05 ³	1.4E-07	6.1E-07
Pyrene	5.0E-06 ³	4.1E-08	1.8E-07
Selenium	2.4E-05 ³	2.0E-07	8.7E-07
Toluene	3.4E-03 ³	2.8E-05	1.2E-04
Total HAPs		0.016	0.068

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Calculations:

^a Hourly Emissions (lb/hr) = [Maximum Heat Input (MMBtu/hr)] / [Fuel Heating Value (Btu/scf)] x [Emission Factor (lb/MMcf)]

^b Annual Emissions (tons/yr) = [Maximum Fuel Usage (scf/hr)] x [1 MMscf/1,000,000 scf] x [Emission Factor (lb/MMcf)] x [Operating Hours (hrs/yr)] / [2,000 lbs/ton]

Maximum Heat Input (MMBtu/hr) = 9

Fuel Heating Value (Btu/scf) = 1,093

Projected Hours of Operation (hrs/yr) = 8,760

^c SO₂ Emission Factor (lb/MMcf) = [Natural Gas Density (lb/cf)] x [Sulfur Content (ppm)] / 10⁶ x [2 g-SO₂/g-S] x [10⁶ cf/MMcf]

Natural gas density (lb/cf) = 0.046

Sulfur Content of Fuel (ppm) = 166

^d Pollutant Emission Rate (lb/MMscf) = [Pollutant concentration by volume, dry basis (ppm_{d,v})] x ([Maximum Fuel Usage (scf/hr)] x [Fuel Heating Value (Btu/scf)] x [Combustion Gas Generated (dscf/MMBtu)] x [Pollutant Molecular Weight (lb/lb-mole)] x [2.59x10⁻⁹ lb-mole/dscf per ppm] + [CO₂ Volume in Waste Gas (dscf/hr)]) x [20.9 / (20.9 - Percent Oxygen)]

Pollutant Concentration NO_x (ppm) = 40²

Pollutant Concentration CO (ppm) = 50²

Percent Oxygen = 3²

Flue Gas Generated (dscf/MMBtu) = 8,710⁴

Notes:

¹ EPA. 1998a. Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources, Chapter 1.4, Table 1.4-2: Emission Factors for Criteria Pollutants and Greenhouse Gases from Natural Gas Combustion. AP-42. Office of Air Quality Planning and Standards, US Environmental Protection Agency. July.

² Vendor design specifications provided by CB&I.

³ EPA. 1998b. Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources, Chapter 1.4, Table 1.4-3: Emission Factors for Speciated Organic Compounds from Natural Combustion. AP-42. Office of Air Quality Planning and Standards, US Environmental Protection Agency. July.

⁴ NSPS Subpart D.

Attachment A-2
Potential Emissions from Regeneration Pretreatment Heater
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Tacoma, Washington

Pollutant	Emission Factor (lb/MMcf)	Potential Emissions	
		Hourly ^(a) (lbs/hr)	Annual ^(b) (tons/yr)
Criteria Pollutants			
PM/PM ₁₀ /PM _{2.5}	7.6 (1)	0.011	0.049
SO ₂	15 (c)	0.022	0.10
NO _x	53 (d)	0.078	0.34
CO	40 (d)	0.059	0.26
VOC	5.5 (1)	0.0081	0.035
Lead	0.0005 (1)	7.3E-07	3.2E-06
Hazardous Air Pollutants			
Arsenic	2.0E-04 (3)	2.9E-07	1.3E-06
Benzene	2.1E-03 (3)	3.1E-06	1.3E-05
Beryllium	1.2E-05 (3)	1.8E-08	7.7E-08
Cadmium	1.1E-03 (3)	1.6E-06	7.1E-06
Chromium(total)	1.4E-03 (3)	2.0E-06	9.0E-06
Cobalt	8.4E-05 (3)	1.2E-07	5.4E-07
Formaldehyde	7.5E-02 (3)	1.1E-04	4.8E-04
Hexane	1.8E+00 (3)	2.6E-03	1.2E-02
Lead	5.0E-04 (1)	7.3E-07	3.2E-06
Manganese	3.8E-04 (3)	5.6E-07	2.4E-06
Mercury	2.6E-04 (3)	3.8E-07	1.7E-06
Naphthalene	6.1E-04 (3)	8.9E-07	3.9E-06
Nickel	2.1E-03 (3)	3.1E-06	1.3E-05
Polycyclic Organic Matter	7.0E-04 (3)	1.0E-06	4.5E-06
2-Methylnaphthalene	2.4E-05 (3)	3.5E-08	1.5E-07
3-Methylchloranthrene	1.8E-06 (3)	2.6E-09	1.2E-08
7,12-Dimethylbenz(a)anthracene	1.6E-05 (3)	2.3E-08	1.0E-07
Acenaphthene	1.8E-06 (3)	2.6E-09	1.2E-08
Acenaphthylene	1.8E-06 (3)	2.6E-09	1.2E-08
Anthracene	2.4E-06 (3)	3.5E-09	1.5E-08
Benz(a)anthracene	1.8E-06 (3)	2.6E-09	1.2E-08
Benzo(a)pyrene	1.2E-06 (3)	1.8E-09	7.7E-09
Benzo(b)fluoranthene	1.8E-06 (3)	2.6E-09	1.2E-08
Benzo(g,h,i)perylene	1.2E-06 (3)	1.8E-09	7.7E-09
Benzo(k)fluoranthene	1.8E-06 (3)	2.6E-09	1.2E-08
Chrysene	1.8E-06 (3)	2.6E-09	1.2E-08
Dibenzo(a,h)anthracene	1.2E-06 (3)	1.8E-09	7.7E-09
Fluoranthene	3.0E-06 (3)	4.4E-09	1.9E-08
Fluorene	2.8E-06 (3)	4.1E-09	1.8E-08
Indeno(1,2,3-cd)pyrene	1.8E-06 (3)	2.6E-09	1.2E-08
Naphthalene	6.1E-04 (3)	8.9E-07	3.9E-06
Phenanathrene	1.7E-05 (3)	2.5E-08	1.1E-07
Pyrene	5.0E-06 (3)	7.3E-09	3.2E-08
Selenium	2.4E-05 (3)	3.5E-08	1.5E-07
Toluene	3.4E-03 (3)	5.0E-06	2.2E-05
Total HAPs		0.0028	0.012

Calculations:

(a) Hourly Emissions (lb/hr) = [Maximum Fuel Usage (scf/hr)] x [1 MMscf/1,000,000 scf] x [Emission Factor (lb/MMcf)]

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(b) Annual Emissions (tons/yr) = [Maximum Fuel Usage (scf/hr)] x [1 MMscf/1,000,000 scf] x [Emission Factor (lb/MMcf)] x [Operating Hours (hrs/yr)] / [2,000 lbs/ton]

Maximum Heat Input (MMBtu/hr) = 2
Fuel Heating Value (Btu/scf) = 1,093
Projected Hours of Operation (hrs/yr) = 8,760

(c) SO₂ Emission Factor (lb/MMcf) = [Natural Gas Density (lb/cf)] x [Sulfur Content (ppm)] / 10⁶ x [2 g-SO₂/g-S] x [10⁶ cf/MMcf]

Natural gas density (lb/cf) = 0.046
Sulfur Content of Fuel (ppm) = 166

(d) Pollutant Emission Rate (lb/MMscf) = [Pollutant concentration by volume, dry basis (ppm_{dv})] x [Maximum Heat Input Capacity (MMBtu/hr)] x [Combustion Gas Generated (dscf/MMBtu)] x [Pollutant Molecular Weight (lb/lb-mole)] x [2.59x10⁻⁹ lb-mole/dscf per ppm] x [20.9 / (20.9 - Percent Oxygen)]

Pollutant Concentration NO_x (ppm) = 40 (2)
Pollutant Concentration CO (ppm) = 50 (2)
Percent Oxygen = 3 (2)
Flue Gas Generated (dscf/MMBtu) = 8,710 (4)

Notes:

- (1) AP-42, Chapter 1.4, Table 1.4-2, *Emission Factors for Criteria Pollutants and Greenhouse Gases from Natural Gas Combustion* (July 1998).
- (2) Vender design specifications provided by CB&I.
- (3) AP-42, Chapter 1.4, Table 1.4-3, *Emission Factors for Speciated Organic Compounds from Natural Gas Combustion* and Table 1.4-4, *Emission Factors for Metals from Natural Gas Combustion* (July 1998).
- (4) NSPS Subpart D.

Attachment A-3
Potential Emissions for Emergency Generator
Puget Sound Energy - Liquefied Natural Gas Project
Tacoma, Washington

Pollutant	Emission Factor (lb/MMcf)	Potential Emissions	
		Hourly ^(a) (lbs/hr)	Annual ^(b) (tons/yr)
Criteria Pollutants			
PM/PM ₁₀ /PM _{2.5}	0.04 g/hp-hr (1)	0.19	0.0024
SO ₂	2.1E-04 lb/gal (c)	0.022	0.00027
NO _x	6.09 g/hp-hr (1)	30	0.37
CO	0.80 g/hp-hr (1)	3.9	0.049
VOCs	0.15 g/hp-hr (1)	0.73	0.0091
Hazardous Air Pollutants			
Total PAHs	2.1E-04 lb/MMBtu (3)	3.1E-03	3.8E-05
<i>Acenaphthylene</i>	9.2E-06 lb/MMBtu (3)	1.3E-04	1.7E-06
<i>Acenaphthene</i>	4.7E-06 lb/MMBtu (3)	6.8E-05	8.4E-07
<i>Fluorene</i>	1.3E-05 lb/MMBtu (3)	1.8E-04	2.3E-06
<i>Phenanthrene</i>	4.1E-05 lb/MMBtu (3)	5.9E-04	7.4E-06
<i>Anthracene</i>	1.2E-06 lb/MMBtu (3)	1.8E-05	2.2E-07
<i>Fluoranthene</i>	4.0E-06 lb/MMBtu (3)	5.8E-05	7.3E-07
<i>Pyrene</i>	3.7E-06 lb/MMBtu (3)	5.4E-05	6.7E-07
<i>Benz(a)anthracene</i>	6.2E-07 lb/MMBtu (3)	9.0E-06	1.1E-07
<i>Chrysene</i>	1.5E-06 lb/MMBtu (3)	2.2E-05	2.8E-07
<i>Benzo(b)fluoranthene</i>	1.1E-06 lb/MMBtu (3)	1.6E-05	2.0E-07
<i>Benzo(k)fluoranthene</i>	2.2E-07 lb/MMBtu (3)	3.1E-06	3.9E-08
<i>Benzo(a)pyrene</i>	2.6E-07 lb/MMBtu (3)	3.7E-06	4.6E-08
<i>Indeno(1,2,3-cd)pyrene</i>	4.1E-07 lb/MMBtu (3)	6.0E-06	7.5E-08
<i>Dibenz(a,h)anthracene</i>	3.5E-07 lb/MMBtu (3)	5.0E-06	6.2E-08
<i>Benzo(g,h,i)perylene</i>	5.6E-07 lb/MMBtu (3)	8.0E-06	1.0E-07
Acetaldehyde	2.5E-05 lb/MMBtu (3)	3.6E-04	4.5E-06
Acrolein	7.9E-06 lb/MMBtu (3)	1.1E-04	1.4E-06
Benzene	7.8E-04 lb/MMBtu (3)	1.1E-02	1.4E-04
Formaldehyde	7.9E-05 lb/MMBtu (3)	1.1E-03	1.4E-05
Naphthalene	1.3E-04 lb/MMBtu (3)	1.9E-03	2.3E-05
Toluene	2.8E-04 lb/MMBtu (3)	4.1E-03	5.1E-05
Xylenes	1.9E-04 lb/MMBtu (3)	2.8E-03	3.5E-05
Total HAPs		2.3E-02	2.8E-04

Calculations:

(a) Hourly Emissions (lb/hr) = [Emission Factor (g/hp-hr)] x [Power Output (hp)] x [1 lb/453.6 g]

Hourly Emissions (lb/hr) = [Emission Factor (lb/gal)] x [Fuel Consumption (gal/hr)]

Hourly Emissions (lb/hr) = [Emission Factor (lbs/MMBtu)] x [Fuel Consumption (gal/hr)] x [Higher Heating Value (Btu/gal)] / [1,000,000 Btu/MMBtu]

Hourly Emissions (lb/hr) = [Emission Factor (lb/hr)] x [Number of Engines]

Power Output (hp) = 2,206 (1)

Fuel Consumption (gal/hr) = 105 (1)

High Heating Value (Btu/gal) = 138,000 (2)

(b) Annual emissions (tons/yr) = [Hourly Emissions (lb/hr)] / [2,000 lb/ton] x [Hours of Operation (hr/yr)]

Annual Operating Hours (hr) = 25

(c) SO₂ Emission Factor (lb/gal) = [Fuel Density (lb/gal)] x [Sulfur Content (ppm)] / [1,000,000] x [2 gmol-SO₂/gmol-S]

Sulfur Content (ppm) = 15 (4)

Density of Diesel (lb/gal) = 7.0

Attachment A-3
Potential Emissions for Emergency Generator
Puget Sound Energy - Liquefied Natural Gas Project
Tacoma, Washington

Notes:

- (1) Manufacturer specifications.
- (2) 40 CFR 98.
- (3) AP-42, Chapter 3.4, Table 3.4-3. *Speciated Organic Compound Emission Factors For Large Uncontrolled Diesel Engines (10/96)* and Table 3.4-4. *PAH Emission Factors for Large Uncontrolled Stationary Diesel Engines.*
- (4) EPA Fuel Standard for Ultra-Low Sulfur Diesel