TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Florida Gas Transmission Company
2405 Lucien Way, Suite 200
Maitland, Florida 32751-7047

Compressor Station 24
Facility ID No. 0410004

PROJECT

Project No. 0410004-018-AC
Application for Minor Source Air Construction Permit
Heat Rate Modification EU001 & EU004

COUNTY

Gilchrist, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Section
Northeast District Office
7825 Baymeadows Way, Suite 200B
Jacksonville, Florida 32256-7590

August 2, 2011

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

Facility Description and Location

Florida Gas Transmission Company is an existing natural gas pipeline, which is categorized under Standard Industrial Classification Code No. 4922. The facility is located in Gilchrist County near Trenton at 5030 North U.S. Highway 129 in Trenton, Florida. The UTM coordinates of the existing facility are Zone 17, 321.3 km East, and 3282.8km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

Facility Regulatory Categories

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Project Description

Project 018-AC: Air construction permit, which authorizes the increase of Maximum Heat Input Rates for EU001 (Engine No. 2401) & EU004 (Engine No. 2403).

Processing Schedule

6/7/2011 Received the application for a minor source air pollution construction permit.
6/29/2011 Application complete
7/15/2011 Received Additional Information

2. APPLICATION REVIEW

Discussion of Emissions

Facility is a major source of emissions ≥ 100 TPY, but is not a PSD major source ≥ 250 TPY.

EU001 NO_X emission changes from: 52.1 TPY to 57.7 TPY.

EU004 NO_X emission changes from: 37.31 TPY to 41.1 TPY. Total NOx difference for both EUs is 9.39.

EU001 CO emission changes from: 63.5 to 70.2 TPY.

EU004 CO emission changes from: 37.84 TPY to 41.7 TPY. Total CO difference is 10.56 TPY.

State Requirements

Rule 62-297.310(7)(a)1, F.A.C., Rule 62-213.440(1)(b)2, F.A.C.

Federal NSPS Provisions

NSPS Subpart KKKK in 40 CFR 60 and NSPS Subpart GG in 40 CFR 60.

3. COMPLIANCE DEMONSTRATIONS

Initial Compliance Tests. Each gas turbine shall be tested to demonstrate initial compliance with the emissions standards for CO, NOx, visible emissions. The initial tests shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit. CO and NOx emissions shall be tested concurrently at permitted capacity. For each required NOx test, emissions shall be corrected to equivalent terms and compared to the NSPS Subpart GG standard identified in NSPS Subpart KKKK standard identified in Appendix KKKK. SO_2 emissions shall be calculated based on the vendor analysis of fuel sulfur content and the fuel consumption rate. Thereafter, **during each federal fiscal year** (October 1st to September 30th), each emissions unit shall be tested to demonstrate compliance with the emissions standards for CO, NOx, visible emissions.

[Rule 62-297.310(7)(a)1, F.A.C.]

4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Leslie Maybin is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Northeast District Office, Air Resources Section, Florida Department of Environmental Protection (Department). The Northeast District Office's mailing address is 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida 32256-7590.