Florida Department of Environmental Protection

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Tallahassee, Florida 32399-2400

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

April 14, 2011

VIA ELECTRONIC MAIL
al.taylor@williams.com

Mr. Albert R. Taylor
Vice President, Operations
Gulfstream Natural Gas System, L.L.C.
1905 Intermodal Circle, Suite 310
Palmetto, Florida 34221

Dear Mr. Taylor:

Enclosed is the Department's order allowing the use of EPA Method 19 when determining stack flow during NO_X compliance tests at the Gulfstream Natural Gas System, L.L.C.'s Compressor Station 420 located in Palmetto, Manatee County. This order is in response to the request dated March 31, 2011 and received by e-mail on April 6, 2011.

This order stipulates that Gulfstream Natural Gas System, L.L.C.'s Compressor Station 420 be allowed to utilize EPA Method 19 when determining stack flow during NO_X compliance tests of the three turbines provided it is used in accordance with the provisions of 40 CFR 60.4400(a)(1)(ii). Prior to its expiration, please incorporate this order into the next permit revision or renewal.

If you have any questions concerning the above recommendation, please contact me at 850/717-9031 or by email at ed.svec@dep.state.fl.us.

Sincerely,

Edward J. Svec, Engineer IV
Emissions Monitoring Section
Bureau of Air Monitoring
and Mobile Sources

ES/sdl

Enclosure

cc: Chris Adams, Gulfstream Air Quality Compliance Support (chris.adams@williams.com)
Pamala Vazquez, DEP Southwest District (pamala.vazquez@dep.state.fl.us)
Bill Schroeder, DEP Southwest District (bill.schroeder@dep.state.fl.us)

APPENDIX ASP

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the matter of:	)	Permit No.: 0810215-003-AC
Gulfstream Natural Gas System, L.L.C.	)	
1905 Intermodal Circle, Suite 310	)	
Palmetto, Florida 34221	)	
	)	
Petitioner	)	File No.: 11-D-AP

ORDER ON REQUEST FOR ALTERNATE PROCEDURES AND REQUIREMENTS

Pursuant to Rule 62-297.620, Florida Administrative Code (F.A.C.), Gulfstream Natural Gas System, L.L.C. has petitioned for approval of an alternate testing procedure for Compressor Station 420, a natural gas pipeline compressor station, located in Palmetto, Manatee County, Florida. The Petitioner requests approval to use EPA Method 19 instead of EPA Methods 1 – 4 for stack flow determination, as specified in the permit. The basis for the request is EPA Method 19 is allowed under 40 CFR 60, Subpart KKKK, the rule regulating the gas turbines which are the subject of the permit.

Having considered Petitioner's written request and all supporting documentation, the following Findings of Fact, Conclusions of Law, and Order are entered:

FINDINGS OF FACT

1. The Petitioner has three gas turbines subject to the requirements of 40 CFR 60, Subpart KKKK, Standards of Performance for Stationary Combustion Turbines. The conditions regulating the turbines are contained in Air Construction Permit 0810215-003-AC.

2. The three gas turbines are fired with natural gas, only.

3. Air Construction Permit 0810215-003-AC, Specific Condition A.10., requires compliance tests be performed in accordance with EPA Methods 1 – 4; EPA Method 7E or 20; and, EPA Method 9. The condition further states that no other method(s) may be used unless prior written approval is received from the Department.

4. Compliance testing for nitrogen oxides in 40 CFR 60, Subpart KKKK, Standards of Performance for Stationary Combustion Turbines, for units fired solely by natural gas at 40 CFR 60.4400(a)(1)(ii) states: "Measure the NO_X and diluents gas concentrations, using either EPA Methods 7E and 3A, or EPA Method 20 in appendix A of this part. Concurrently measure the heat input to the unit, using a fuel flowmeter (or flowmeters), and measure the electrical and thermal output of the unit. Use EPA Method 19 in appendix A of this part to calculate the NO_X emission rate in lb/MMBtu. Then, use Equations 1 and, if necessary, 2 and 3 in 40 CFR 60.4350(f) to calculate the NO_X emission rate in lb/MWh."

5. As the basis for the request, the Petitioner states: "Gulfstream Natural Gas System, L.L.C. (Gulfstream) hereby submits a request for an alternative procedure for compliance tests on Units 001, 002 and 003 at Gulfstream Station 420. Gulfstream is requesting an alternate approval from condition A.12 of permit number 0810215-003-AO and condition A.10 of permit 0810215-003-AC to use Method 19 instead of Methods 1 – 4 for stack flow determination. Method 19 and Method 1 – 4 are both considered to be acceptable methods for calculating flow under Subpart KKKK, specifically in 40 CFR 60.4400(a)(1)(ii)." They further state: "This alternate condition is requested to protect the safety of contractors conducting the stack test as Method 1 – 4 would create greater exposure to high temperature stack gas under positive pressure. Method 19 requires a smaller probe for testing and would allow contractors to determine a stoichiometric stack flow with a reduced risk for injury."

CONCLUSIONS OF LAW

1. The Department has jurisdiction to consider Petitioner's request pursuant to Section 403.061, Florida Statutes (F.S.), and Rule 62-297.620, F.A.C.

2. Petitioner has provided sufficient justification to allow the use of EPA Method 19 for the determination of flow.

ORDER

Having considered Petitioner's written request and supporting documentation, it is hereby ordered that:

1. EPA Method 19 can be utilized to determine flow for the three turbines provided it is used in accordance with the provisions of 40 CFR 60.4400(a)(1)(ii).

2. This Order shall not abrogate the Petitioner's obligation to comply with any periodic monitoring requirements established pursuant to the provisions of the Federal Clean Air Act (42 USC 1857, et seq) as amended in 1990.

3. The Petitioner shall incorporate this order into the permit at the next opening for revision or renewal.

4. If an application to incorporate this order into the permit at the next opening for revision or renewal is not made, this order shall expire on April 15, 2016.

5. When incorporated into the permit, this order shall remain in effect until the underlying rule requirement for this order is modified or changed. At that time the Petitioner shall submit a new request, if required, in accordance with Rule 62-297.620, F.A.C., "**Exceptions and Approval of Alternate Procedures and Requirements**", to the Bureau of Air Monitoring and Mobile Sources.

PETITION FOR ADMINISTRATIVE REVIEW

The Department's Proposed Agency Action will become final upon expiration of the petition period described below unless a timely petition for an Administrative Hearing is filed pursuant to

Sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the Proposed Agency Action may petition for an Administrative Proceeding (hearing) under Sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within 21 days of receipt of this Notice of Intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3) of the Florida Statutes must be filed within 21 days of publication of the Public Notice or within 21 days of receipt of this notice, whichever occurs first. Under Section 120.60(3), however, any person who asked the Department for Notice of Agency Action may file a petition within 21 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an Administrative Determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a Motion in Compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information:

(a) The name and address of each agency affected and each agency's file or identification number, if known;

(b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;

(c) A statement of how and when petitioner received notice of the agency action or proposed action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;

(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action;

(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301

Because the Administrative Hearing process is designed to formulate Final Agency Action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

NOTICE OF APPEAL RIGHTS

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes, by filing a notice of appeal under Rule 9.110 of the Florida rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

DONE AND ORDERED this 15 day of April, 2011 in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Michael P. Halpin, P.E.

Michael P. Halpin, P.E.
Division Director
Air Resource Management
Mail Station 5500
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
(850) 717-9000

Clerk Stamp

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

(Clerk) 4/15/11 (Date)

APPENDIX ASP