TECHNICAL EVALUATION

APPLICANT

Southern Natural Gas Company, LLC
1001 Louisiana Street Suite 1000
Houston, Texas 77002

Facility ID No. 0890442

PROJECT

Project No. 0890442-001-AC
Natural Gas Transmission Compressor Station

COUNTY

Nassau, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Northeast District Office
Waste and Air Resource Management
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

COMPLIANCE AUTHORITY

Florida Department of Environmental Protection
Northeast District Office
Compliance Assurance
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

January 16, 2014

1. APPLICATION INFORMATION

Applicant Name and Address

Southern Natural Gas Company, LLC
1001 Louisiana Street Suite 1000
Houston, Texas 77002

Authorized Representative: Mr. Girish Misra, Pipeline System Engineer

Processing Schedule

11/10/14	Department received EPSAP No. 3830-1 for the construction of a natural gas transmission compressor station
12/10/2015	Request for Additional Information
01/13/2015	Additional Information received
01/16/2015	Draft Permit Issued

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.

Project Description and Location

Southern Natural Gas Company, LLC proposes to construct a new natural gas transmission compressor station (Hilliard Compressor Station) (Standard Industrial Classification No. 4922) in Nassau County, along the existing Southern Natural Gas (SNG) Cypress Line approximately 550 feet south of County Highway 108, and approximately 5 miles from Hilliard, Florida. The UTM coordinates are Zone 17, 408.4 km East, and 3389.55 km North.

The proposed Hilliard Compressor Station will include one 4,700 horsepower (under ISO conditions) natural gas fired turbine to boost the pressure of the incoming gas in the existing pipeline to maintain downward flow. To support the operation of the compressor station in the event of an electrical power failure, SNG also proposes to construct a natural gas fired 400 kW emergency generator as a part of the proposed compressor station and a small fuel gas heater which will be used to heat the natural gas withdrawn from the pipeline for use as fuel in the compressor turbine and emergency generator. The natural gas emergency generator will be operated for emergency electricity generation only in the event of normal power supply failure. Ancillary equipment includes associated above-grade piping and valves, a suction scrubber, oil lube coolers, blowdown silencers, a condensate storage tank, a station transformer and associated electrical and mechanical systems.

Facility Regulatory Categories

- The facility **is not** a major source of hazardous air pollutants (HAP).
- The facility **does not** operate units subject to the acid rain provisions of the Clean Air Act.
- The facility **is not** a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility **is not** a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.
- This facility has emissions unit(s) subject to NSPS (40CFR 60).

2. Emissions Inventory

Below is a detailed description of estimated emission calculations from all emissions sources associated with the proposed new facility including fugitive emissions and emissions from blowdowns.

Solar Centaur Combustion Turbine (CT-1) Estimated Emissions

Criteria Pollutant & Greenhouse Gas Emissions Calculations:

Pollutant	Emission Factor			Potential Emissions	
	Value	Units	Reference	lb/hr	tons/yr
CO	0.1210	lb/MMBtu	1	4.90	21.47
NO_x	0.1000	lb/MMBtu	1	4.05	17.74
SO_2	0.0034	lb/MMBtu	2	0.14	0.60
VOC	0.0350	lb/MMBtu	1	1.42	6.21
PM_{10} (Filterable + Condensable)	0.0180	lb/MMBtu	1	0.73	3.19
$PM_{2.5}$ (Filterable + Condensable)	0.0180	lb/MMBtu	1	0.73	3.19
Total CO_2e				4,744	20,777
Non-Biogenic CO_2	53.06	kg/MMBtu	3	4,739	20,756
CH_4	0.001	kg/MMBtu	4	0.089	0.39
N_2O	0.0001	kg/MMBtu	4	0.009	0.039

[1]. Maximum hourly emission rates of CO, NOx, and VOC based on manufacturer's specifications and assuming continuous annual operations.

2. AP-42, 5th ed., Section 3.1: Stationary Combustion Turbines, Table 3.1-2 Emission Factors for Criteria Pollutants and Greenhouse Gases from Stationary Gas
3. 40 CFR Part 98 Subpart C, Table C-1: Default CO_2 Emission Factors and High Heat Values for Various Types of Fuel, for natural gas.
4. 40 CFR Part 98 Subpart C, Table C-2: Default CH_4 and N_2O Emission Factors and High Heat Values for Various Types of Fuel, for natural gas.

Emergency Diesel Generator (EG-1) Estimated Emissions

Criteria Pollutant & Greenhouse Gas Emissions Calculations:

Pollutant	Emission Factor			Potential Emissions	
	Value	Units	Reference	lb/hr	tons/yr
CO	4.0	g/hp-hr	1	4.73	0.24
NO_X	2.0	g/hp-hr	1	2.36	0.12
SO_2	0.93	g/hp-hr	2	1.10	0.05
VOC	1.0	g/hp-hr	1	1.18	0.06
PM_{10} (Filterable + Condensable)	1.00	g/hp-hr	2	1.18	0.06
$PM_{2.5}$ (Filterable + Condensable)	1.00	g/hp-hr	2	1.18	0.06
Total CO_2e				614	31
Total GHG				612	31
Non-Biogenic CO_2	73.96	kg/MMBtu	3	612	31
CH_4	0.003	kg/MMBtu	4	0.025	0.0012
N_2O	0.0006	kg/MMBtu	4	0.005	0.0002

1. Maximum hourly emission rates of CO, NOx, and VOC based on compliance with NSPS Subpart JJJJ.
2. AP-42, 5th ed., Section 3.3: Gasoline and Diesel Industrial Engines, Table 3.3-1 Emission Factors for Uncontrolled Gasoline and Diesel Industrial Engines.
3. 40 CFR Part 98 Subpart C, Table C-1: Default CO_2 Emission Factors and High Heat Values for Various Types of Fuel, for Distillate Fuel Oil No. 2.
4. 40 CFR Part 98 Subpart C, Table C-2: Default CH_4 and N_2O Emission Factors and High Heat Values for Various Types of Fuel, for Petroleum.

Fuel Gas Heater (FGH-1) Estimated Emissions

Criteria Pollutant Emissions Calculations

	Potential Emissions		
Pollutant	(lb/hr)		(tons/yr)[c]
NO_X	0.04	[b]	0.17
CO	0.03	[b]	0.14
SO_2	0.000	[b]	0.001
PM_{10}	0.00	[b]	0.01
VOC	0.00	[b]	0.01

[b] Potential Emissions (lb/hr) = Heat Input (MMBtu/hr) × Emission Factor (lb/MMBtu)

[c] Potential Emissions (tons/yr) = (lb/hr) × (8,760 hr/yr) × (1 ton/2,000 lb)

Fugitive Emissions

The fugitive emissions are calculated using the Emission Factors based on "Protocol for Equipment Leaks," U.S. EPA Document No. EPA-453/R-95-017 Emission Estimates, Table 2.4 and the component counts are provided, based on a comparable, yet worst-case facility Fugitive emission sources include those originating from pipeline components (i. e., valves, flanges, etc.), engine coolant, and truck loading activities. (RAI Response letter dated 01/13/15)

Summary of Fugitive Emissions:

Equipment	Emission Factor[b] (kg/hr/source)	Equipment[c] (No. of Sources)	Amount Released[d] (lb/yr)	VOC Emissions[e] (tpy)	Hexane Emissions[e] (tpy)
Connections	2.00E-04	10,029	38,655.8	9.66E-01	1.14E-01
Flanges	3.90E-04	0	-	-	0.00E+00
Open Ended Lines	2.00E-03	108	4,162.8	1.04E-01	1.23E-02
Pump Seals	2.40E-03	7	323.8	8.09E-03	9.53E-04
Valves	4.50E-03	1,873	162,434.1	4.06E+00	4.78E-01
Other	8.80E-03	31	5,257.4	1.31E-01	1.55E-02
Total			210,833.8	**5.27**	**0.62**

[b] Based on "Protocol for Equipment Leaks," U.S. EPA Document No. EPA-453/R-95-017 Emission Estimates, Table 2.4.

[c] Component counts are provided, based on worst-case counts from a comparable facility. EPA's "other" category was derived from compressors, diaphragms, grains, dump arms, hatches, instruments, meters, pressure release valves, polished rods, relief valves, and vents.

[d] Potential Emissions (lb/yr) = Emission Factor (kg/hr/count) x 2.2 lb/kg x Equipment (No. of Sources).

[e] Potential Emissions (tpy) = Amount Released (lb/yr) x Weight Percent of Pollutant (%) / 100 x (1 ton/2,000 lb).

Blowdown Emissions

The blowdowns at the facility may be associated with start-ups, shutdowns, maintenance activities, and emergency situations. In order to estimate the potential emissions from blowdowns, Southern Natural Gas Company (SNG) based the average blowdown volumes from highest 12-month volume over a three year period at a comparable compressor station (RAI Response letter dated 01/13/15)

Summary of Blowdown Emissions:

Pollutant	Weight Fraction[f]	Potential Emissions (lb/hr)[h]	Potential Emissions (tpy)[g]
Hexane	0.00589	0.11	0.49
VOC	0.01975	0.38	1.66

[f] Weight fraction data based on a general gas analysis.

[g] Potential Emissions (tpy) = Weight Fraction x Potential Releases (lb/yr) x (1 ton/2,000 lb).

[h] Potential Emissions (lb/hr) = Potential Emissions (tpy) x 2000 lb/ton / 8760 hr/yr.

Facility-Wide Emissions

A summary of estimated facility-wide annual emission rates is presented below. As shown, the estimated facility-wide annual emission rates for all criteria pollutants are below 250 TPY, the threshold that triggers new source review (NSR) under PSD regulations for this type of facility. The potential facility-wide GHG emissions are below 100,000 CO_2e. A discussion of the regulatory implications of these emission rates with regard to PSD applicability is presented in Section 3.0.
Estimated annual emissions of CO, and VOCs are above 100 TPY, the Title V Air Operation applicability threshold for criteria pollutants and individual and total HAP emissions are below the Title V applicability thresholds of 25 and 10 TPY, respectively

Summary of Potential Emissions

EU ID	Source	CO		NO_X		$PM_{10}/_{2.5}$			SO_2		VOC		CH_4		N_2O		CO_2		CO_2 [1]		Total HAP	
		lb/hr	TPY	lb/hr	TPY	lb/hr	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
CT-1	Turbine	4.90	21.5	4.05	17.7	0.73	0.73	3.2	0.14	0.6	1.42	6.2	0.09	0.4	0.01	0.0	4,738.74	20,755.70	4,743.64	20,777.13	0.03	0.1
EG-1	Generator	4.73	0.24	2.36	0.12	1.18	1.18	0.06	1.10	0.05	1.18	0.06	0.02	0.00	0.00	0.00	611.78	30.59	613.88	30.69	0.01	0.00
FGH-1	Fuel Heater	0.03	0.14	0.04	0.17	0.00	-	-	0.00	0.00	0.00	0.01	-	-	-	-	-	-			0.00	0.00
F001	Fugitives	-	-	-	-	-	-	-	-	-	1.32	5.79	23.00	100.95	-	-	0.11	0.47	575.11	2,524.15	0.26	1.14
BD01	Blowdowns	-	-	-	-	-	-	-	-	-	0.38	1.66	18.40	80.42	-	-	0.09	0.37	460.09	2,010.85	0.11	0.49
TL01	Truck Unload	-	-	-	-	-	-	-	-	-	0.00	0.00	-	-	-	-	-	-			-	-
	Total	**9.63**	**21.71**	**6.41**	**17.86**	**1.91**	**1.91**	**3.25**	**1.24**	**0.66**	**4.30**	**13.73**	**41.51**	**181.76**	**0.01**	**0.04**	**5,350.72**	**20,787.13**	**6,392.7**	**25,342.8**	**0.41**	**1.77**

3. PSD APPLICABILITY

General PSD Applicability

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, Portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the "significant emission rates" defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides (NO_X); sulfur dioxide (SO_2); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM_{10}); volatile organic compounds (VOC); lead (Pb); fluorides (Fl); sulfuric acid mist (SAM); hydrogen sulfide (H_2S); total reduced sulfur (TRS), including H_2S; reduced sulfur compounds, including H_2S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as SO_2 and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as non-methane organic compounds (NMOC); and mercury (Hg). In addition, significant emissions rate also means any emissions rate or any net emissions increase associated with a major stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than 1 $\mu g/m^3$, 24-hour average.

If the potential emission exceeds the defined significant emissions rate of a PSD pollutant, the project is considered "significant" for the pollutant and the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants.

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PSD Applicability for Project

This facility is not within an industry included in the list of the 28 Major Facility Categories per Table 62-212.400-1, F.A.C. As such, the facility is subject to the 250 ton per year of any PSD pollutant applicability threshold. For sources that are not on the list of the 28 Major Facility Categories, fugitive emissions are not required to be considered when calculating potential emissions for PSD applicability.

The facility would not be a major PSD source due to greenhouse gases. It is noted that on June 23, 2014, the Supreme Court issued a decision addressing the application of stationary source permitting requirements to greenhouse gases in *Utility Air Regulatory Group (UARG) v. Environmental Protection Agency (EPA)*, No. 12-1146. The Supreme Court stated that EPA may not treat greenhouse gases as an air pollutant for purposes of determining whether a source is a major source required to obtain a PSD or Title V Permit.

	CO (tons)	**NO_x (tons)**	**SO_2 (tons)**	**PM_{10}/ $PM_{2.5}$ (tons)**	**VOC (tons)**	**HAP**	**CO_2e**
Facility Potential Emissions in TPY[a]	21.71	17.86	0.66	3.25	13.73	1.77	25,342.8
PSD Applicability Threshold	250	250	250	250	250		
Title V Applicability Threshold	100	100	100	100	100	10/25	
Pollutant triggers PSD Review?	No	No	No	No	No		No
Pollutant triggers Title V Applicability?	No	No	No	No	No	No	

As shown in the above table, total project emissions are not equal to or exceed the TV Facility and PSD applicability thresholds; the facility is classified as a true minor stationary source. PSD preconstruction review does not apply to this project and a minor air construction permit is required.

State Rule

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.

State Rule Applicability

Chapter	**Description**
62-4	permits
62-204	Air Pollution Control – General Provisions
62-210	Stationary Sources of Air Pollution – General Requirements
62-296	Stationary Sources – Emission Standards
62-297	Stationary Sources – Emissions Monitoring

Federal Regulation Applicability (NSPS and NESHAP)

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.

NSPS Applicability

40 CFR 60 Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

NSPS Subpart Dc applies to steam generating units with a heat input capacity greater than or equal to 10 MMBtu/hr and less than or equal to 100 MMBtu/hr that constructed, modified, or reconstructed after June 9, 1989. Based on the information provided by the applicant, proposed the natural gas fired fuel gas heater which is designed to raise the temperature of the gas so that after pressure reduction, the temperature of the gas will be above the dew point temperature at operating conditions and maximum flow required for the turbine and gas heater has a maximum capacity significantly below 10 MMBtu/hr. Therefore, the unit is not subject to requirements of NSPS Subpart Dc.

40 CFR 60 – Subpart GG- Standards of Performance for Stationary Gas Turbines

Per 40 CFR §60.4305(b), under **40 CFR Part 60 Subpart KKKK**, **Standards of Performance for Stationary Combustion Turbines** stationary combustion turbines regulated under Subpart KKKK are exempt from the requirements of Subpart GG. Therefore the proposed turbine is exempt from requirements of Subpart GG.

40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels

NSPS Subpart Kb, regulates storage vessels with a capacity greater than 75 cubic meters (m^3) (19,813 gallons) that are used to store volatile organic liquids for which construction, reconstruction, or modification commenced after July 23, 1984. Based on the information provided by the applicant, the proposed facility will include one 1000 gallon double-walled condensate tank. NSPS Subpart Kb will not apply to this tank based on the size threshold. There are no volatile organic liquids at the facility that meet the 19,813-gallon applicability threshold for Subpart Kb. Therefore Subpart Kb does not apply to any storage vessels at the proposed facility. (RAI Response letter dated 01/13/15).

40 CFR 60 – Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

NSPS Subpart JJJJ applies to stationary SI ICE constructed after June 12, 2006, where constructed is the date the engine is ordered by the owner or operator, and manufactured after July 1, 2007. The proposed reciprocating internal combustion engine for emergency electricity generation at the facility appear to have been manufactured on or after January 1, 2009; with a capacity greater than 25 HP therefore, is subject to 40 CFR 60 Subpart JJJJ. Based on information received from the facility the emergency generator is designed to operate in compliance with the applicable emissions standard for NO_X, CO, and VOC and will comply will all other applicable requirements of this regulation.

Pursuant to 40 CFR 63.6590(c), a new SI RICE at an area source must meet the requirements of 40 CFR 63 Subpart ZZZZ by meeting the requirements of 40 CFR 60 Subpart JJJJ no further requirements apply. Thus, by complying with 40 CFR 60 Subpart JJJJ, the emergency generator will also be in compliance with 40 CFR 63 Subpart ZZZZ.

40 CFR 60 – Subpart KKKK - Standards of Performance for Stationary Combustion Turbines

Pursuant to 40 CFR 60. 4305(a), the proposed new 4,700 ISO bhp natural gas turbine compressor engine model No. Centaur 40-4700S manufactured by Solar Turbines has been estimated to have a potential heat input of 44.0 MMbtu/hr (which is greater than 10 million Btu per hour), and will be constructed after the applicability date of Subpart KKKK (February 18, 2005).The proposed turbine at the facility; therefore, is subject to 40 CFR 60 Subpart KKKK and must meet the emission limits for the regulated pollutants nitrogen oxide (NO_X) and sulfur dioxide (SO_2).
Based on the application received on November 20, 2014 the combustion turbine is designed to operate in compliance with the applicable emissions standard for NO_X. The turbine will be operated in compliance with the applicable emissions standard for SO_2 by exclusively firing pipeline quality natural gas. The turbine at the facility will not use water or steam injection to control NO_X emissions, and shall perform annual performance tests in accordance with §60.4400 to demonstrate compliance with Subpart KKKK.

40 CFR Part 60 Subpart OOOO – Standards of Performance for Natural Gas Production, Transmission and Distribution

NSPS Subpart OOOO establishes emission standards and compliance schedules for the control of VOC and SO2 emissions from affected facilities that commence construction, modification or reconstruction after August 23, 2011. Affected facilities include storage vessels located in the natural gas transmission and storage segment that have the potential for VOC emissions equal to or greater than 6 tpy per 40 CFR 60.5365(e).
The PTE for the condensate tank at the proposed compressor station is less than 6 tons per year. Therefore, NSPS Subpart OOOO does not apply to the compressor Station. (RAI Response letter dated 01/13/15).

NESHAP Applicability

40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Engines

The proposed new natural gas emergency generator is subject to Subpart ZZZZ, NESHAP for Stationary Reciprocating Internal Combustion Engines, located at area source of HAP emissions for which construction commenced on or after June 12, 2006.

Pursuant to 40 CFR 63.6590(c), a new SI RICE at an area source must meet the requirements of 40 CFR 63 Subpart ZZZZ by meeting the requirements of 40 CFR 60 Subpart JJJJ, no further requirements of the Subpart apply. Thus, by complying with 40 CFR 60 Subpart JJJJ, the emergency generator will also be in compliance with 40 CFR 63 Subpart ZZZZ.

Greenhouse Gas (GHG) Emissions, 40 CFR 98

Greenhouse Gas Permitting is not required because the potential estimated total GHG emissions of 20,756 ton/yr which is less than 100,000 tons per year (tpy) threshold. It is also noted that the Supreme Court vacated the 100,000 tons per year of carbon dioxide equivalent (CO_2e) emissions PSD Major source threshold on June 23, 2014.

Exempt Emissions Units

Natural Gas Fired Fuel Gas Heater

The proposed 0.4 MMbtu/hr (high heating value (HHV) of the natural gas) fired fuel gas heater is designed to raise the temperature of the gas so that after pressure reduction, the temperature of the gas will be above the dew point temperature at operating conditions and maximum flow required for the turbine and gas heater. The fuel gas heater is exempt from the requirement to obtain an air construction permit under the provisions of Rule 62-210.300 (3)(a)33., F.A.C. – Categorical Exemptions.

Based on Rule 62-210.300(3)(a)35., F.A.C. - Categorical and Conditional Exemptions, the natural gas emergency generator is exempt from the requirement to obtain an air construction permit as the projected annual amount of natural gas proposed to be burned at the facility is below the 8.8 million standard cubic feet of natural gas per year threshold stated in the rule. The owner or operator shall comply with all limitations and requirements of Subpart JJJJ that apply to the engine.

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. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Yasmin K. Enriquez 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 Florida Department of Environmental Protection, Northeast District Office, 8800 Baymeadows Way, Suite 100, Jacksonville, FL 32256, Phone: 904/256-1700.