Florida Gas Transmission Company
Compressor Station No. 13
Facility ID No.: 1330005
Washington County

Title V Air Operation Permit Revision

DRAFT Permit No.: 1330005-007-AV
Revision to Title V Air Operation Permit No.: 1330005-005-AV

Permitting and Compliance Authority:
Florida Department of Environmental Protection
Northwest District Air Program
160 W. Government Street, Suite 308
Pensacola FL 32502-5740

Telephone: 850/595-8300
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Permittee:
Florida Gas Transmission Company
2508 River Road
Caryville, Florida 32427-2012

DRAFT Permit No.: 1330005-007-AV
Facility ID No.: 1330005
SIC No(s).: 49, 4922
Project: Title V Air Operation Permit Revision

This permit revision is being issued for the purpose of incorporating the terms and conditions of air construction permit, No. 1330005-006-AC, effective May 8, 2009, for a 223 bhp emergency generator located at the existing Compressor Station 13. This facility is located at 2508 River Road, Caryville, Florida, Washington County; UTM Coordinates: Zone 17, 610.7 km East and 3394.3 km North; and, Latitude: 30° 40' 40" North and Longitude: 85° 50' 40" West.

This Title V Air Operation Permit Revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Initial Effective Date: July 1, 2008
Revision Effective Date: [ARMS Day 55+1]
Renewal Application Due Date: November 18, 2012
Expiration Date: July 1, 2013

_____
Rick Bradburn
Air Program Administrator

RB/dm/c

Section I. Facility Information.

Subsection A. Facility Description.

This facility, Florida Gas Transmission Company Compressor Station No. 13, is a part of a natural gas transmission pipeline system from source wells in Texas and Louisiana for delivery throughout Florida. This station includes five 2,000 bhp and one 2,700 bhp natural gas fired reciprocating internal combustion (IC) engines.

The five 2,000 bhp engines are Cooper-Bessemer Model LS-8-SG engines installed between 1962 and 1968, and are identified as engines 1301 to 1305. The 2,700 bhp engine is a Cooper-Bessemer model GMVR-12C2 engine installed in 1991, and is identified as engine 1306.

Permit AC67-189220 was issued May 9, 1991 allowing the construction of Engine 1306 and including specific emission limits. This permit incorporated Best Available Control Technology (BACT) in accordance with Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD-FL-158). BACT was established as 2.0 g/bhp-hr NO_x for this engine, or the equivalent of 10.6 lbs/hr and 46.3 TPY NOx. Engine 1306 incorporates "lean burn" technology to minimize NOx emissions.

The above construction permit specified a maximum allowable emission rate for particulate matter (PM) based on an AP-42 emission factor. The permit did not specify any corresponding test method and did not impose initial or periodic testing to demonstrate compliance. The PM emission rate was incorporated into the construction permit as a reference of expected emissions and was not intended as a permit standard. Based on this determination (November 13, 2002 NSR Memorandum) and Florida Gas Transmission's November 14, 2002 request to modify the PM requirements, Air Construction Permit No. 1330005-004-AC was issued (concurrently with Title V permit renewal 1330005-003-AV) with new standards to supersede the PM standards of AC67-189220 (PSD-FL-158).

This revision incorporates construction permit 1330005-006-AC, which includes the Phase VIII expansion project. As part of the expansion, one Generac Model No. SG150 emergency generator powered by a 223 bhp reciprocating internal combustion engine (RICE) that fires pipeline natural gas was installed on May 28, 2010. The engine is a 4-stroke, rich burn, spark-ignition engine (4SRB) that was manufactured on December 8, 2008. According to 40 CFR 63 subpart ZZZZ {63.6590(c)(4)}, new 4SRB engines with a site rating equal to or less than 500 hp located at a major source, meet the requirements of subpart ZZZZ by meeting the requirements of 40 CFR 60 subpart JJJJ. Because the emergency generator was manufactured prior to January 1, 2009, there are no emissions standards in Table 1 to 40 CFR 60 subpart JJJJ that apply. The engine is subject only to recordkeeping requirements and is being added as an insignificant emissions unit. Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Based on the Title V Air Operation Permit Revision application received May 27, 2011, this facility is a major source of hazardous air pollutants (HAP).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

ID No.	Emission Unit Description
001	FGTC Unit No. 1301: One 2,000 bhp gas-fired reciprocating internal combustion engine (Cooper-Bessemer Model LS-8) serving as a compressor engine
002	FGTC Unit No. 1302: One 2,000 bhp gas-fired reciprocating internal combustion engine (Cooper-Bessemer Model LS-8) serving as a compressor engine
003	FGTC Unit No. 1303: One 2,000 bhp gas-fired reciprocating internal combustion engine (Cooper-Bessemer Model LS-8) serving as a compressor engine
004	FGTC Unit No. 1304: One 2,000 bhp gas-fired reciprocating internal combustion engine (Cooper-Bessemer Model LS-8) serving as a compressor engine
005	FGTC Unit No. 1305: One 2,000 bhp gas-fired reciprocating internal combustion engine (Cooper-Bessemer Model LS-8) serving as a compressor engine
006	FGT Unit No. 1306: One 2,700 bhp gas-fired reciprocating internal combustion engine (Cooper-Bessemer Model GMVR-12C2) serving as a compressor engine
007	Inactive
008	Miscellaneous Support Equipment: compressor buildings, miscellaneous emergency generators, and fugitive emission leaks from valves, flanges, etc.
009	FGTC GEN05: One 223 bhp emergency generator (Generac Model SG150)

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

<u>These documents are provided to the permittee for information purposes only:</u>
Appendix A-1: Abbreviations, Acronyms, Citations, and Identification Numbers
Statement of Basis
Appendix H-1: Permit History

<u>These documents are on file with the permitting authority:</u>
Initial Title V Air Operation Permit issued October 7, 1997
Application for a Title V Air Operation Permit Revision received May 27, 2011

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C., and Permit AC69-189229 issued May 8, 1991]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. [Rules 62-296.320(4)(b)1. & 4., F.A.C.]

4. Prevention of Accidental Releases (Section 112(r) of CAA).
a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center
Post Office Box 10162
Fairfax, VA 22038
Telephone: 703/227-7650

and,
b. The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.
[40 CFR 68]

5. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit. [Rules 62-213.440(1), 62-213.430(6) and 62-4.040(1)(b), F.A.C.]

6. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. Nothing was deemed necessary and ordered at this time. [Rule 62-296.320(1), F.A.C.; and Permit 1330005-005-AV]

7. Emissions of Unconfined Particulate Matter. Pursuant to Rules 62-296.320(4)(c)1., 3. & 4., F.A.C., reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following requirements:

a. Chemical or water application to unpaved roads and yard areas;
b. Paving and maintenance of roads, parking areas and yards,
c. Landscaping or planting of vegetation, and
d. Other techniques, as necessary.

[Rule 62-296.320(4)(c)2., F.A.C.; Permit Application No. 1330005-007-AV]

8. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department and EPA within 60 days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C. [Rules 62-213.440(3) and 62-213.900, F.A.C.]

9. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northwest District office.

Department of Environmental Protection
Northwest District Air Program
160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740
Telephone: 850/595-8300; Fax: 850/595-8096

Notification of compliance testing may be submitted to NWDAIR@dep.state.fl.us.

10. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch
Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155; Fax: 404/562-9163

11. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information. [Rule 62-213.420(4), F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions units.

E.U. ID No.	Brief Description
001-005	Natural Gas Internal Combustion Engine Nos.1301, 1302, 1303, 1304, 1305

This section addresses emission units 001 through 005, FGT engines 1301 through 1305 respectively. These five engines are reciprocating internal-combustion (IC) engines, manufactured by Cooper-Bessemer (Model LS-8-SG engines). The engines are fired by pipeline natural gas and each is rated at 2,000 brake horsepower (bhp) with a maximum heat input of 15 MMBtu/hr. The engines are naturally aspirated and operate at near stoichiometric air-to-fuel ratio. Nitrogen oxides and carbon monoxide are emitted uncontrolled through raised stacks.

These engines were installed between 1962 and 1968 (engines 1301, 1302 and 1303 in 1962; engine 1304 in 1966; engine 1305 in 1968).

The following specific conditions apply to the emissions units listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Heat Input. The maximum heat input shall not exceed 131,400 MMBtu per rolling 12-month period for each engine (Nos. 1301, 1302, 1303, 1304 and 1305). Rolling 12-month totals shall be maintained and made available on site for a minimum of five years for Department inspection. For compliance testing purposes, the maximum heat input rate shall not exceed 15 MMBtu per hour for each engine. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Title V Permit 1330005-001-AV issued October 7, 1997; renewal Title V permit application initially received April 8 and revised September 12, 2002]
{Permitting Note: The hourly heat input limitation has been included to identify the capacity of each unit, to establish a compliance testing operating rate and to aid in determining future rule applicability. The hourly heat input is not to be construed as an operating limit during normal operation.}

A.2. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Subsection B. This section addresses the following emissions unit.

E.U. ID No.	Brief Description
006	Natural Gas Internal Combustion Engine No.1306

This section addresses Emissions Unit 006, Engine 1306. This engine is a natural gas fired reciprocating internal combustion (IC) engine, manufactured by Cooper-Bessemer (Model GMVR-12C). This engine is rated at 2,700 brake horsepower (bhp) with a maximum heat input of 21.7 MMBtu/hr and incorporates "lean burn" technology to minimize NOx emissions**.**

This engine was installed and placed in service in 1991 in accordance with Permit AC67-189220 (PSD-FL-158) issued in accordance with Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD), and incorporated a Best Available Control Technology (BACT) determination dated May 8, 1991 of 2.0 grams/bhp-hr NO_x for this engine.

The following conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

B.1. Capacity. The maximum allowable operating rate (rated capacity) is 2,700 bhp (full speed, full load, 100°F ambient site temperature). Fluctuations in measured bhp, plus or minus ten percent (± 10%) may occur as a result of natural uncontrolled fluctuations in ambient temperature, ambient pressure, fuel temperature, and a pulsation phenomenon inherent to the operation of reciprocating compressor engines. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Title V Permit 1330005-001-AV issued October 7, 1997]

B.2. Heat Input. The maximum heat input rate shall not exceed 21.69 million Btu per hour. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Construction permit AC67-189220 issued June 30, 1992 and amended June 29, 1993; Title V Permit 1330005-001-AV issued October 7, 1997]
{Permit Note: based on an assumed heat value of 1,040 Btu/scf of gas.}

B.3. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours per year. [Rules 62-4.160(2) and 62-210.200(243)"PTE", F.A.C.]

B.4. Fuel Consumption. The maximum natural gas consumption shall not exceed 20,856 scf per hour. Records shall be kept of monthly natural gas consumption and shall be averaged to determine hourly consumption. These records shall be maintained on site for a period of five years and shall be made available for Department inspection as necessary. [Rule 62-210.200(PTE), F.A.C.; Construction permit AC67-189220 issued June 30, 1992 and amended June 29, 1993; Title V Permit 1330005-001-AV issued October 7, 1997]

Emission Limitations and Standards

B.5. The maximum allowable emission rate shall not exceed the emission rates as follows:

	Emission Rate	
Pollutant	lb/hr	tons/year
Nitrogen Oxides	10.6	46.4
Carbon Monoxide	11.1	48.8
VOC (non methane)	2.6	11.5
PM(TSP)	Minimized by good combustion design	
PM(PM10)	with exclusive firing of natural gas.	
Sulfur Dioxide	0.46	2.0
Visible emissions	10 % opacity	

[Construction Permit AC20-189220 issued June 30, 1992 (PSD-FL-159); Title V Permit 1330005-001-AV issued October 7, 1997, Construction Permit 1330005-004-AC issued February 13, 2003]

Excess Emissions
{Permitting Note: The Excess Emissions Rule at Rule 62-210.700, F.A.C., cannot vary any requirement of an NSPS or NESHAP provision.}

B.6. Excess Emissions.
(1) Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
(2) Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.
(3) Considering operational variations in types of industrial equipment operations affected by this rule, the Department may adjust maximum and minimum factors to provide reasonable and practical regulatory controls consistent with the public interest.
(4) In case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.
[Rule 62-210.700, F.A.C.]

Test Methods and Procedures

B.7. Emissions tests are required to show continuing compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. Tests shall be conducted once every federal fiscal year (Oct. 1 – Sept. 30) unless otherwise noted in specific conditions. Results shall be submitted to the Department within 45 days after testing. The Department shall be notified at least 15 days prior to testing to allow witnessing. [Rule 62-297.310, F.A.C.]

Testing of emissions shall be conducted with the emissions unit operating at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it

is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity (i.e., at less than 90 percent of the maximum operation rate allowed by the permit); in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted, provided however, operations do not exceed 100 percent of the maximum operation rate allowed by the permit. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rules 62-297.310(2) & (2)(b), F.A.C.]

B.8. Nitrogen Oxides. The test method for nitrogen oxide shall be EPA Method 7E, incorporated and adopted by reference in Chapter 62-297, F.A.C. [Rule 62-297.401, F.A.C.]

B.9. Carbon Monoxide. The test method for carbon monoxide shall be EPA Method 10, incorporated and adopted by reference in Chapter 62-297, F.A.C. [Rule 62-297.401, F.A.C.]

B.10. Volatile Organic Compounds. The test method for volatile organic compounds shall be EPA Method 25A, incorporated and adopted by reference in Chapter 62-297, F.A.C. VOC emissions limits will be assumed provided the CO allowable emission rate is achieved. [Rule 62-297.401, F.A.C.]

B.12. Visible Emissions. The test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C. [Rule 62-297.401, F.A.C.]

B.13. Sulfur Dioxide. The test method for SO_2 shall be EPA Method 6, incorporated and adopted by reference in Chapter 62-297, F.A.C. Compliance with the SO_2 emissions limit can be determined by calculations based on fuel analysis using ASTM D1072-80, D3031-81, D4084-82, D3246-81, D5504-98, or approved alternative method for sulfur content of gaseous fuels. [Rules 62-297.401 and 62-297.440, F.A.C.]

Other Requirements

B.14. Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7), F.A.C.]

Subsection C. This section addresses the following emissions unit.

E.U. ID No.	Brief Description
009	One 223 bhp natural gas fired spark ignition emergency generator

As part of the Phase VIII expansion project, one Generac Model No. SG150 emergency generator powered by a 223 bhp reciprocating internal combustion engine (RICE) that fires pipeline natural gas was installed on May 28, 2010. The engine is a 4-stroke, rich burn, spark-ignition engine (4SRB) that was manufactured on December 8, 2008. According to 40 CFR 63 subpart ZZZZ {63.6590(c)(4)}, new 4SRB engines with a site rating equal to or less than 500 hp located at a major source, meet the requirements of subpart ZZZZ by meeting the requirements of 40 CFR 60 subpart JJJJ. Because the emergency generator was manufactured prior to January 1, 2009, there are no emissions standards in Table 1 to 40 CFR 60 subpart JJJJ that apply. The engine is subject only to recordkeeping requirements and is being added as an insignificant emissions unit.

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

C.1. Methods of Operation - (i.e., Fuels). The emergency generator shall be fired exclusively with pipeline natural gas, with the exception of using propane for a maximum of 100 hours per year as an alternative fuel solely during emergency operations, but records must be kept of such use. [40 CFR 60.4243(e), Rule 62-213.440, F.A.C.; and Permit 1330005-006-AC]

C.2. Methods of Operation. Owners or operators of a stationary SI internal combustion engine greater than 25 HP and less than or equal to 500 HP, must to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR 60.4243(b)(2)(i)]

C.3. Hours of Operation. Emergency stationary ICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. There is no time limit on the use of emergency stationary ICE in emergency situations. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency ICE beyond 100 hours per year. Emergency stationary ICE may operate up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. For owners and operators of emergency engines, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as permitted in this section, is prohibited. [40 CFR 60.4243(d) and Rule 62-210.200(PTE), F.A.C.]

Recordkeeping and Reporting Requirements

C.4. Owners and operators of all stationary SI ICE must keep records of the following:

(a) All notifications submitted to comply with this subpart and all documentation supporting any notification.

(b) Keep a maintenance plan and records of maintenance conducted on the engine.

[40 CFR 60.4243(b)(2)(i) and 40 CFR 60.4245(a)(1 & 2)]