

Governor

Florida Department of Environmental Protection

Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Virginia B. Wetherell Secretary

December 9, 1993

Mr. Allan Weatherford Compliance Environmentalist Florida Gas Transmission Company P.O. Box 94500 Maitland, Florida 32794-5100

Dear Mr. Weatherford:

RE: Request for Amendments and Extensions to Air Construction Permits AC 57-188869, AC 67-189220, AC 20-189438, AC 62-189439, AC 04-189454, AC 42-189455, AC 48-189456, AC 05-189655, and AC 56-189457 Phase II - Florida Gas Transmission Company

The Department is in receipt of Mr. Barry Andrew's letter dated December 3, 1993, on behalf of your company, requesting to amend the above permits to use EPA Method 3A instead of EPA Method 3 for Gas Analysis. The Department has reviewed this request and has determined to amend the above mentioned permits as requested.

Specific Condition No. 8 of the above mentioned permits will be amended as follows:

SPECIFIC CONDITION NO. 8

FROM:

- 8. Compliance with the NO_X , SO_2 , CO, VE, and VOC standards shall be determined by the following reference methods as described in 40 CFR 60, Appendix A (July 1, 1988) and adopted by reference in F.A.C. Rule 17-2.700.
 - Method 1. Sample and Velocity Traverses
 - Method 2. Volumetric Flow Rate
 - Method 3. Gas Analysis
 - Method 7E. Determination of Nitrogen Oxides Emissions from Stationary Sources
 - Method 9. Determination of the Opacity of the Emissions from Stationary Sources
 - Method 10. Determination of the Carbon Monoxide Emission from Stationary Sources
 - Method 25. Determination of Total Gaseous Nonmethane Organic Emissions as Carbon

Mr. Allan Weatherford December 9, 1993 Page Two

TO:

- 8. Compliance with the NO_X , SO_2 , CO, VE, and VOC standards shall be determined by the following reference methods as described in 40 CFR 60, Appendix A (July 1, 1992) and adopted by reference in F.A.C. Rule 17-2.700.
 - Method 1. Sample and Velocity Traverses
 - Method 2. Volumetric Flow Rate
 - Method 3A. Gas Analysis
 - Method 7E. Determination of Nitrogen Oxides Emissions from Stationary Sources
 - Method 9. Determination of the Opacity of the Emissions from Stationary Sources
 - Method 10. Determination of the Carbon Monoxide Emission from Stationary Sources
 - Method 25A. Determination of Total Gaseous Organic Concentrations Using a Flame Ionization Analyses

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, 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 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of their receipt of this amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;

Mr. Allan Weatherford December 9, 1993 Page Three

- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action;
- (g) A statement of the relief sought by petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this amendment in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

This letter must be attached to the above mentioned permits and shall become a part of each permit.

Sincerely,

Howard Rhodes

Director

Division of Air Resources Management

Attachment to be Incorporated

Mr. Barry Andrew's letter of December 3, 1993.

cc: E. Middleswart, NWD
Robert Leetch, NED
Charles Collins, CD
Isidore Goldman, SED
Duane Pierce, FGTC
Barry Andrews, ENSR

Mr. Allan Weatherford December 9, 1993 Page Four

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this AMENDMENT and all copies were mailed by certified mail before the close of business on $\frac{|A|}{|A|} \frac{|A|}{|A|}$ to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to \$120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby

acknowledged.

Date



December 3, 1993

Mr. Clair Fancy, P.E. Chief, Bureau of Air Regulation Florida Department of Environmental Protection 2600 Blairstone Road Tallahassee, FL 32399-2400

Dear Clair:

RE: Request for Amendments to Permits

Florida Gas Transmission Company

Station 12 - Permit No. AC57-188869

Munson, Santa Rosa County, Florida

Station 13 - Permit No. AC67-189220 Caryville, Washington county, Florida

Station 14 - Permit No. AC20-189438

Quincy, Gadsden County, Florida

Station 15 - Permit No. AC62-189439

Perry, Taylor County, Florida

Station 16 - Permit No. AC04-189454

Brooker, Bradford County, Florida

Station 17 - Permit No. AC42-189455

Salt Springs, Marion County, Florida

Station 18 - Permit No. AC48-189456

Orlando, Orange County, Florida

Station 19 - Permit No. AC05-189665

Melbourne, Brevard County, Florida

Station 20 - Permit No. AC56-189457

Ft. Pierce, St. Lucie County, Florida

ENSR Consulting and Engineering

2809 West Mall Drive Florence, AL 35630 (205) 767-1210 FAX (205) 767-1211

RECEIVED

Division of Air Resources Management



December 3, 1993 Mr. Clair Fancy Page 2

This letter is in response to our recent conversation regarding a previous request by Florida Gas Transmission Company (FGTC) to amend the above permits to include Method 3A instead of Method 3.

On June 29, 1993, FGTC requested that the permits for the compressor engines referenced in this letter be amended to adjust the horsepower ratings and heat input rates. On September 9, 1993 (letter attached), FGTC further requested that specific condition 8 in each of the permits be amended to replace Method 3 with 3A, and that the SO_2 emission limits be clarified to base SO_2 emissions on the fuels sulfur content.

On September 17, 1993 the Division of Air Resources Management (DARM) responded to FGTC's request with a letter amending the permits. Included were the amendments for horsepower ratings, heat input, restrictions, and clarification of sulfur as the basis for SO₂ emissions.

It has recently come to FGTC's attention through the process of obtaining operating permits from the district offices that the request to replace Method 3 with Method 3A was not included in DARM's response. Until now it was assumed that the request had been included in the September 17, 1993 letter of amendment.

Accordingly, FGTC requests that DARM evaluate the request for the amendment to the testing method. This should not require an alternate sampling procedure since there is no regulatory requirement for determining the oxygen and carbon dioxide concentrations from compressor station engines.

Your expedited response to this request is appreciated since it relates to the issuance of our operating permits. Should you need additional information or have any questions please contact Mr. Alan Weatherford with FGTC at (407) 875-5816.

Sincereiy.

Barry D. Andrews, P.E.

Manager, Air Quality Services

Barry Gulun_

cc : Alan Weatherford

Enclosure



Florida Department of Environmental Protection

Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Virginia B. Wetherell Secretary

September 17, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Allan Weatherford Compliance Environmentalist Florida Gas Transmission Company P. O. Box 94500 Maitland, Florida 32794-5100

Dear Mr. Weatherford:

Re: Request for Amendments and Extensions to Air Construction Permits AC57-188869, AC67-189220, AC20-189438, AC62-189439, AC04-189454, AC42-189455, AC48-189456, AC05-189655, and AC56-189457

The Department is in receipt of your letter dated June 29, 1993, requesting to extend the expiration date and to change the engine horsepower (HP) capacity, fuel consumption and heat input at various compressor stations. The Department has reviewed this request and has determined to amend the above mentioned permits as requested since there is no increase in permitted emission levels (lbs/hr and tons/yr).

The following changes are allowed by the Department:

COMPRESSOR STATION NO. 12 - SANTA ROSA COUNTY:

Description

FROM: For the construction of one 4,000 bhp natural gas fired engine to be located at the Florida Gas Transmission facility in Munson, Santa Rosa County, Florida. The UTM coordinates are Zone 16, 510.83 km East and 3419.03 km North.

TO: For the construction of one 4,100 bhp natural gas fired engine to be located at the Florida Gas Transmission facility in Munson, Santa Rosa County, Florida. The UTM coordinates are Zone 16, 510.83 km East and 3419.03 km North.

Specific Condition No. 1

FROM: The maximum allowable emissions from this source shall not exceed the emission rates as follows:

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Mr. Allan Weatherford Request for Amendments and Extensions Page 2

Pollutant	lbs/hr	tons/yr	Emission Factor
Nitrogen Oxides	17.6	77.2	2.0 g/bhp-hr
Carbon Monoxide	22.1	96.6	2.5 g/bhp-hr
Volatile Organic Compounds	8.8	38.6	1.0 g/bhp-hr
(non-methane)			
Particulate Matter (TSP)	0.14	0.61	5 lbs/MMscf
Particulate Matter (PM ₁₀)	0.14	0.61	5 lbs/MMscf
Sulfur Dioxide	0.8	3,5	10 gr/100scf

TO: The maximum allowable emissions from this source shall not exceed the emission rates as follows:

Pollutant	lbs/hr	tons/yr	Emission Factor
Nitrogen Oxides	17.6	77.2	1.95 g/bhp-hr
Carbon Monoxide	22.1	96.6	2.44 g/bhp-hr
Volatile Organic Compounds	8.8	38.6	0.97 g/bhp-hr
(non-methane)			-
Particulate Matter (TSP)	0.14	0.61	4.03 lbs/MMscf
Particulate Matter (PM ₁₀)	0.14	0.61	4.03 lbs/MMscf
Sulfur Dioxide	0.8	3.5	8.06 gr S/100scf

Specific Condition No. 5

FROM: The permitted operating parameters and utilization rates for this natural gas compressor engine shall not exceed the values stated in the application. The parameters include, but are not limited to:

- Maximum natural gas consumption shall not exceed 27,810 scf/hr.
- Maximum heat input shall not exceed 29.20 MMBtu/hr.

- Maximum natural gas consumption shall not exceed 34,525 scf/hr.
- Maximum heat input shall not exceed 36.25 MMBtu/hr.

COMPRESSOR STATION NO. 13 - WASHINGTON COUNTY:

Description

FROM: For the construction of one 2,400 bhp natural gas fired engine to be located 9 miles south of Caryville on CR 284. The UTM coordinates are Zone 16, 610.69 km East and 3394.28 km North.

TO: For the construction of one **2,700** bhp natural gas fired engine to be located at the Florida Gas Transmission facility in Caryville, Washington County, Florida. The UTM coordinates are Zone 16, 610.69 km East and 3394.28 km North.

Specific Condition No. 1

FROM: The maximum allowable emissions from this source shall not exceed the emission rates as follows:

Pollutant	lbs/hr_	tons/yr	Emission Factor
Nitrogen Oxides	10.6	46.3	2.0 g/bhp-hr
Carbon Monoxide	11.1	48.7	2.1 g/bhp-hr
Volatile Organic Compounds	2.6	11.6	0.5 g/bhp-hr
(non-methane)			3, 1
Particulate Matter (TSP)	0.08	0.4	5 lbs/MMscf
Particulate Matter (PM ₁₀)	0.08	0.4	5 lbs/MMscf
Sulfur Dioxide	0.46	2.0	10 <u>qr/</u> 100scf

TO: The maximum allowable emissions from this source shall not exceed the emission rates as follows:

Pollutant	lbs/hr	tons/yr	Emission Factor
Nitrogen Oxides	10.6	46.3	1.78 g/bhp-hr
Carbon Monoxide	11.1	48.7	1.87 g/bhp-hr
Volatile Organic Compounds	2.6	11.6	0.44 g/bhp-hr
(non-methane)			
Particulate Matter (TSP)	0.08	0.4	3.87 lbs/MMscf
Particulate Matter (PM ₁₀)	0.08	0.4	3.87 lbs/MMscf
Sulfur Dioxide	0.46	2.0	7.74 gr S/100scf

Specific Condition No. 5

- Maximum natural gas consumption shall not exceed 16,154 scf/hr.
- Maximum heat input shall not exceed 16.80 MMBtu/hr.

TO: The permitted operating parameters and utilization rates for this natural gas compressor engine shall not exceed the values stated in the application. The parameters include, but are not limited to:

- Maximum natural gas consumption shall not exceed 20,856 scf/hr.
- Maximum heat input shall not exceed 21.69 MMBtu/hr.

COMPRESSOR STATION NO. 14 - GADSDEN COUNTY:

Description

FROM: For the construction of one 2,400 bhp natural gas fired engine to be located 8 miles southwest of Quincy on SR 65. The UTM coordinates are Zone 16, 719.97 km East and 3377.39 km North.

TO: For the construction of one 2,700 bhp natural gas fired engine to be located at the Florida Gas Transmission facility in Quincy, Gadsden County, Florida. The UTM coordinates are Zone 16, 719.97 km East and 3377.39 km North.

Specific Condition No. 1

FROM: The maximum allowable emissions from this source shall not exceed the emission rates as follows:

Pollutant	lbs/hr	tons/yr	Emission Factor
Nitrogen Oxides	10.6	46.3	2.0 g/bhp-hr
Carbon Monoxide	11.1	48.7	2.1 g/bhp-hr
Volatile Organic Compounds	2.6	11.6	0.5 g/bhp-hr
(non-methane)			
Particulate Matter (TSP)	0.08	0.4	5 lbs/MMscf
Particulate Matter (PM10)	0.08	0.4	5 lbs/MMscf
Sulfur Dioxide	0.46	2.0	10 gr/100scf

TO: The maximum allowable emissions from this source shall not exceed the emission rates as follows:

<u>Pollutant</u>	<u>lbs/hr</u>	tons/yr	Emission Factor
Nitrogen Oxides	10.6	46.3	1.78 g/bhp-hr
Carbon Monoxide	11.1	48.7	1.87 g/bhp-hr

Volatile Organic Compounds	2.6	11.6	0.44 g/bhp-hr
(non-methane)			2. 2
Particulate Matter (TSP)	0.08	0.4	3.87 lbs/MMscf
Particulate Matter (PM ₁₀)	0.08	0.4	3.87 lbs/MMscf
Sulfur Dioxide	0.46	2.0	7.74 gr 8/100scf

Specific Condition No. 5

FROM: The permitted operating parameters and utilization rates for this natural gas compressor engine shall not exceed the values stated in the application. The parameters include, but are not limited to:

- Maximum natural gas consumption shall not exceed 16,154 scf/hr.
- Maximum heat input shall not exceed 16.80 MMBtu/hr.

TO: The permitted operating parameters and utilization rates for this natural gas compressor engine shall not exceed the values stated in the application. The parameters include, but are not limited to:

- Maximum natural gas consumption shall not exceed 20,856 scf/hr.
- Maximum heat input shall not exceed 21.69 MMBtu/hr.

COMPRESSOR STATION NO. 18 - ORANGE COUNTY:

FROM: For the construction of one 2,400 bhp natural gas fired engine to be located at 7990 Steer Lake Road. The UTM coordinates are Zone 17, 451.86 km East and 3154.79 km North.

TO: For the construction of one 2,700 bhp natural gas fired engine to be located at the Florida Gas Transmission facility in Orlando, Orange County, Florida. The UTM coordinates are Zone 16, 451.86 km East and 3154.79 km North.

Specific Condition No. 1

FROM: The maximum allowable emissions from this source shall not exceed the emission rates as follows:

Pollutant	lbs/hr	tons/yr	Emission Factor
Nitrogen Oxides	10.6	46.3	2.0 g/bhp-hr
Carbon Monoxide	11.1	48.7	2.1 g/bhp-hr

Volatile Organic Compounds (non-methane)	2.6	11.6	0.5 g/bhp-hr
Particulate Matter (TSP)	0.08	0.4	5 lbs/MMscf
Particulate Matter (PM ₁₀)	0.08	0.4	5 lbs/MMscf
Sulfur Dioxide	0.476	2.2	<u> 10 gr/100scf</u>

TO: The maximum allowable emissions from this source shall not exceed the emission rates as follows:

Pollutant	<u>lbs/hr</u>	tons/yr	Emission Factor
Nitrogen Oxides	10.6	46.3	.1.78 g/bhp-hr
Carbon Monoxide	11.1	48.7	1.87 g/bhp-hr
Volatile Organic Compounds	2.6	11.6	0.44 g/bhp-hr
(non-methane)			J, L
Particulate Matter (TSP)	0.08	0.4	3.95 lbs/MMscf
Particulate Matter (PM ₁₀)	0.08	0.4	3.95 lbs/MMscf
Sulfur Dioxide	0.476	2.2	7.90 gr S/100scf

Specific Condition No. 5

FROM: The permitted operating parameters and utilization rates for this natural gas compressor engine shall not exceed the values stated in the application. The parameters include, but are not limited to:

- Maximum natural gas consumption shall not exceed 16,311 scf/hr.
- Maximum heat input shall not exceed 16.80 MMBtu/hr.

TO: The permitted operating parameters and utilization rates for this natural gas compressor engine shall not exceed the values stated in the application. The parameters include, but are not limited to:

- Maximum natural gas consumption shall not exceed 20,640 scf/hr.
- Maximum heat input shall not exceed 21.26 MMBtu/hr.

COMPRESSOR STATION NO. 19 - BREVARD COUNTY:

Description

FROM: For the construction of two 2,500 bhp natural gas fired engines to be located 6 miles west-southwest of Melbourne Regional Airport. The UTM coordinates are Zone 17, 528.67 km East and 3101.64 km North.

TO: For the construction of two 2,600 bhp natural gas fired engine to be located at the Florida Gas Transmission facility in Melbourne, Brevard County, Florida. The UTM coordinates are Zone 17, 528.67 km East and 3101.64 km North.

Specific Condition No. 1

FROM: The maximum allowable emissions from each engine shall not exceed the emission rates as follows:

Pollutant	lbs/hr	_ tons/yr	Emission Factor
Nitrogen Oxides	11.0	48.3	2.0 g/bhp-hr
Carbon Monoxide	15.4	67.6	2.8 g/bhp-hr
Volatile Organic Compounds (non-methane)	9.4	41.0	1.7 g/bhp-hr
Particulate Matter (TSP)	0.09	0.4	5 lbs/MMscf
Particulate Matter (PM ₁₀)	0.09	0.4	5 lbs/MMscf
Sulfur Dioxide	0.51	2.2	10 gr/100scf

TO: The maximum allowable emissions from each engine shall not exceed the emission rates as follows:

<u>Pollutant</u>	lbs/hr	tons/yr	Emission Factor
Nitrogen Oxides	11.0	48.3	1.92 g/bhp-hr
Carbon Monoxide	15.4	67.6	2.69 g/bhp-hr
Volatile Organic Compounds	9.4	41.0	1.64 g/bhp-hr
(non-methane)			2, 2
Particulate Matter (TSP)	0.09	0.4	3.90 lbs/MMscf
Particulate Matter (PM ₁₀)	0.09	0.4	3.90 lbs/MMscf
Sulfur Dioxide	0.51	2.2	7.80 gr 5/100scf

Specific Condition No. 5

FROM: The permitted operating parameters and utilization rates for these natural gas compressor engines shall not exceed the values stated in the application. The parameters include, but are not limited to:

- Maximum natural gas consumption shall not exceed 17,718 scf/hr per engine.
- Maximum heat input shall not exceed 36.50 MMBtu/hr for both engines.

- Maximum natural gas consumption shall not exceed 22,703 scf/hr per engine.
- Maximum heat input shall not exceed 46.77 MMBtu/hr for both engines.

COMPRESSOR STATION NO. 15 - TAYLOR COUNTY:

Specific Condition No. 1

FROM: The maximum allowable emissions from this source shall not exceed the emission rates as follows:

<u>Pollutant</u>	lbs/hr	tons/yr	Emission Factor
Nitrogen Oxides	17.6	77.2	2.0 g/bhp-hr
Carbon Monoxide	22.0	96.6	2.5 g/bhp-hr
Volatile Organic Compounds	8.8	38.6	1.0 g/bhp-hr
(non-methane)			2,
Particulate Matter (TSP)	0.13	0.6	5 lbs/MMscf
Particulate Matter (PM ₁₀)	0.13	0.6	5 lbs/MMscf
Sulfur Dioxide	0.75	3.3	10 gr/100scf

TO: The maximum allowable emissions from this source shall not exceed the emission rates as follows:

Pollutant	lbs/hr	tons/yr	Emission Factor
Nitrogen Oxides	17.6	77.2	2.0 g/bhp-hr
Carbon Monoxide	22.0	96.6	2.5 g/bhp-hr
Volatile Organic Compounds	8.8	38.6	1.0 g/bhp-hr
(non-methane)			3, 1
Particulate Matter (TSP)	0.13	0.6	4.23 lbs/MMscf
Particulate Matter (PM ₁₀)	0.13	0.6	4.23 lbs/MMscf
Sulfur Dioxide	0.75	3.3	8.53 gr 8/100scf

Specific Condition No. 5

- Maximum natural gas consumption shall not exceed 26,154 scf/hr.
- Maximum heat input shall not exceed 27.20 MMBtu/hr.

TO: The permitted operating parameters and utilization rates for this natural gas compressor engine shall not exceed the values stated in the application. The parameters include, but are not limited to:

- Maximum natural gas consumption shall not exceed 30,943 scf/hr.
- Maximum heat input shall not exceed 32.18 MMBtu/hr.

COMPRESSOR STATION NO. 16 - BRADFORD COUNTY:

Specific Condition No. 1

FROM: The maximum allowable emissions from this source shall not exceed the emission rates as follows:

<u>Pollutant</u>	lbs/hr	tons/yr	Emission Factor
Nitrogen Oxides	17.6	77.2	2.0 g/bhp-hr
Carbon Monoxide	22.0	96.6	2.5 g/bhp-hr
Volatile Organic Compounds	8.8	38.6	1.0 g/bhp-hr
(non-methane)			3,
Particulate Matter (TSP)	0.13	0.6	5 lbs/MMscf
Particulate Matter (PM ₁₀)	0.13	0.6	5 lbs/MMscf
Sulfur Dioxide	0.75	3.3	<u> 10 gr/100scf</u>

TO: The maximum allowable emissions from this source shall not exceed the emission rates as follows:

<u>Pollutant</u>	lbs/hr	tons/yr	Emission Factor
Nitrogen Oxides	17.6	77.2	2.0 g/bhp-hr
Carbon Monoxide	22.0	96.6	2.5 g/bhp-hr
Volatile Organic Compounds	8.8	38.6	1.0 g/bhp-hr
(non-methane)		*	3, 1
Particulate Matter (TSP)	0.13	0.6	3.90 lbs/MMscf
Particulate Matter (PM ₁₀)	0.13	0.6	3.90 lbs/MMscf
Sulfur Dioxide	0.75	3.3	7.80 gr 8/100scf

Specific Condition No. 5

- Maximum natural gas consumption shall not exceed 26,408 scf/hr.
- Maximum heat input shall not exceed 27.20 MMBtu/hr.

TO: The permitted operating parameters and utilization rates for this natural gas compressor engine shall not exceed the values stated in the application. The parameters include, but are not limited to:

- Maximum natural gas consumption shall not exceed 33,833 scf/hr.
- Maximum heat input shall not exceed 34.85 MMBtu/hr.

COMPRESSOR STATION NO. 17 - MARION COUNTY

Specific Condition No. 1

FROM: The maximum allowable emissions from this source shall not exceed the emission rates as follows:

Pollutant	lbs/hr	tons/yr	Emission Factor
Nitrogen Oxides	10.6	46.3	2.0 g/bhp-hr
Carbon Monoxide	14.8	64.9	2.8 g/bhp-hr
Volatile Organic Compounds	9.0	39.4	1.7 g/bhp-hr
(non-methane)	•		3, 1
Particulate Matter (TSP)	0.09	0.4	5 lbs/MMscf
Particulate Matter (PM ₁₀)	0.09	0.4	5 lbs/MMscf
Sulfur Dioxide	0.49	2.2	10 gr/100scf

TO: The maximum allowable emissions from this source shall not exceed the emission rates as follows:

Pollutant	lbs/hr	tons/yr	Emission Factor
Nitrogen Oxides	10.6	46.3	2.0 g/bhp-hr
Carbon Monoxide	14.8	64.9	2.8 g/bhp-hr
Volatile Organic Compounds	9.0	39.4	1.7 g/bhp-hr
(non-methane)			3 · L
Particulate Matter (TSP)	0.09	0.4	4.13 lbs/MMscf
Particulate Matter (PM ₁₀)	0.09	0.4	4.13 lbs/MMscf
Sulfur Dioxide	0.49	2.2	8.27 gr S/100scf

Specific Condition No. 5

- Maximum natural gas consumption shall not exceed 17,010 scf/hr.
- Maximum heat input shall not exceed 17.52 MMBtu/hr.

To: The permitted operating parameters and utilization rates for this natural gas compressor engine shall not exceed the values stated in the application. The parameters include, but are not limited to:

- Maximum natural gas consumption shall not exceed 20,569 scf/hr.
- Maximum heat input shall not exceed 21.19 MMBtu/hr.

COMPRESSOR STATION NO. 20 - ST. LUCIE COUNTY

FROM: The maximum allowable emissions from this unit shall not exceed the emission rates as follows:

Pollutant	lbs/hr	tons/yr	Emission Factor
Nitrogen Oxides	10.6	46.3	2.0 g/bhp-hr
Carbon Monoxide	14.8	64.9	2.8 g/bhp-hr
Volatile Organic Compounds (non-methane)	9.0	39.4	1.7 g/bhp-hr
Particulate Matter (TSP)	0.09	0.4	5 lbs/MMscf
Particulate Matter (PM ₁₀)	0.09	0.4	5 lbs/MMscf
Sulfur Dioxide	0.49	2.0	10 gr/100scf

TO: The maximum allowable emissions from this unit shall not exceed the emission rates as follows:

<u>Pollutant</u>	lbs/hr	tons/yr	<pre>Emission Factor</pre>
Nitrogen Oxides	10.6	46.3	2.0 g/bhp-hr
Carbon Monoxide	14.8	64.9	2.8 g/bhp-hr
Volatile Organic Compounds	9.0	39.4	1.7 g/bhp-hr
(non-methane)			3, 1
Particulate Matter (TSP)	0.09	0.4	4.13 lbs/MMscf
Particulate Matter (PM ₁₀)	0.09	0.4	4.13 lbs/MMscf
Sulfur Dioxide	0.49	2.0	8.27 gr 8/100scf

Specific Condition No. 5

- Maximum natural gas consumption shall not exceed 17,010 scf/hr.
- Maximum heat input shall not exceed 17.52 MMBtu/hr.

TO: The permitted operating parameters and utilization rates for this natural gas compressor engine shall not exceed the values stated in the application. The parameters include, but are not limited to:

- Maximum natural gas consumption shall not exceed 20,569 scf/hr.
- Maximum heat input shall not exceed 21.19 MMBtu/hr.

Expiration Date

The expiration date of the above mentioned permit will be changed from June 30, 1993, to December 31, 1993.

This letter must be attached to the above mentioned permits and shall become a part of each permit. If you have any questions, please call Teresa Heron at (904) 488-1344.

Sincerely,

Howard L. Rhodes

Director

Division of Air Resources

Management

HLR/TH/plm

Attachment to be Incorporated:

Mr. Allan Weatherford's letter of June 29, 1993

cc: E. Middleswart, NWD
Robert Leetch, NED
Charles Collins, CD
Isidore Goldman, SED
Duane Pierce, FGTC
Barry Andrews, ENSR

STATION 16

BROOKER, FLORIDA

05/27/93 15:28

		MAXIMUM 1-HR CONCENTRATION				Maximur	n Emissio	n (lb/hr)			
Station	Model Run		((ug/m**3)		,				(,	
	Factor	NOx	CO	VOCs Pa	articulates	SO2	NOx	CO	VOCs Pa	rticulates	SO2
16 Permitted	3.396	59.770	74.712	29.885	0.441	2.547	17.60	22.00	8.80	0.13	0.75
16 Revised	1.808	31.893	39.866	15.947	0.289	1.428	17.64	22.05	8.82	0.16	0.79

Model Run Factor is maximum 1—hr concentration based on emission of 1 lb/hr.

Maximum 1—hr concentrations calculated as (Model Run Factor) X (Maximum Emission).

```
*** SCREEN-1.1 MODEL RUN ***
  *** VERSION DATED 88300 ***
Station 16--Permit--Simple Terrain, no Downwash
SIMPLE TERRAIN INPUTS:
   SOURCE TYPE
                                   POINT
   EMISSION RATE (G/S)
                                   .1260
   STACK HEIGHT (M)
                                   10.67
   STK INSIDE DIAM (M)
                                   . 59
   STK EXIT VELOCITY (M/S)=
                                  24.95
   STK GAS EXIT TEMP (K) = 560.93
AMBIENT AIR TEMP (K) = 293.00
   RECEPTOR HEIGHT (M)
   IOPT (1=URB, 2=RUR)
                            =
   BUILDING HEIGHT (M)
                                   .00
                                   .00
   MIN HORIZ BLDG DIM (M) =
   MAX HORIZ BLDG DIM (M) =
                                    .00
*** FULL METEOROLOGY ***
**********
*** SCREEN AUTOMATED DISTANCES ***
*********
*** TERRAIN HEIGHT OF .00 M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***
  DIST
            CONC
                               U10M USTK MIX HT
                                                       PLUME
                                                                SIGMA
                                                                         SIGMA
          (UG/M**3) STAB
                             (M/S) (M/S) (M) HT (M)
   (M)
                                                               Y (M) Z (M) DWASH
                       ----
                                              -----
                               .0 .0 .0
         .0000
                        0
                                                          .0
                                                                   .0
                                                                            .0

    3
    10.0
    10.1
    3200.0
    22.8
    12.6
    7.7

    3
    10.0
    10.1
    3200.0
    22.8
    23.9
    14.4

    3
    8.0
    8.1
    2560.0
    25.8
    34.6
    20.8

    4
    10.0
    10.1
    3200.0
    .22.8
    29.7
    15.7

    4
    8.0
    8.1
    2560.0
    25.8
    36.4
    18.8

   100.
           .5284
                                                                                    NO
         3.317
                                                                                    NO
   300. 3.200
                                                                                    NO
   400. 2.970
                                                                                    NO
         2.830
   500.
MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 1. M: 225. 3.396 3 10.0 10.1 3200.0 22.8 26.7 16.1
                                                                                    NO
         MEANS NO CALC MADE (CONC = 0.0)
 DWASH=NO MEANS NO BUILDING DOWNWASH USED
 DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
 DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
 DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB
     ***********
     *** SUMMARY OF SCREEN MODEL RESULTS ***
 CALCULATION
                     MAX CONC
                                   DIST TO
                                             TERRAIN
 PROCEDURE
                    (UG/M**3)
                                   MAX (M)
                                               HT (M)
 ----------
                    -------
                                    _____
SIMPLE TERRAIN
                      3.396
                                       225.
```

 *** SCREEN-1.1 MODEL RUN ***
*** VERSION DATED 88300 ***

Station 16--Actual--Simple Terrain, no Downwash

SIMPLE TERRAIN INPUTS:

POINT SOURCE TYPE EMISSION RATE (G/S) .1260 STACK HEIGHT (M) 19.99 STK INSIDE DIAM (M) = .76 14.99 STK EXIT VELOCITY (M/S)= STK GAS EXIT TEMP (K) = 560.93 AMBIENT AIR TEMP (K) 293.00 RECEPTOR HEIGHT (M) = .00 IOPT (1=URB, 2=RUR) .00 BUILDING HEIGHT (M) = .00 MIN HORIZ BLDG DIM (M) = .00 MAX HORIZ BLDG DIM (M) =

*** FULL METEOROLOGY ***

*** SCREEN AUTOMATED DISTANCES ***

*** TERRAIN HEIGHT OF .00 M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

DIST	CONC	STAB	U10M (M/S)	USTK (M/S)	MIX HT	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
(M)	(UG/M**3)	SIAD	(M/3)	(m/3)	(14)	пт (п)	I (PI)	Z (F1)	DWASA
1.	.0000	0	.0	.0	.0	.0	.0	.0	
100.	.2402E-01	2	5.0	5.2	1600.0	43.3	19.7	11.4	NO
200.	1.354	1	3.0	3.1	960.0	58.8	51.1	31.2	NO
300.	1.760	2	5.0	5.2	1600.0	43.3	52.6	30.9	NO
400.	1.772	3	5.0	5.4	1600.0	42.8	45.1	27.2	NO
500.	1.776	3	. 5.0	5.4	1600.0	42.8	55.2	33.1	NO
600.	1.701	3	4.0	4.3	1280.0	48.5	65.2	39.2	NO
700.	1.614	3	3.0	3.2	960.0	58.0	75 .3	45.4	ИО
MAXIMUM	1-HR CONCENT	RATION	AT OR	BEYOND	1. M	:			
448	1.808	3	5.0	5.4	1600.0	42.8	50.1	30.1	NO

DWASH= MEANS NO CALC MADE (CONC = 0.0)
DWASH=NO MEANS NO BUILDING DOWNWASH USED
DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

*** SUMMARY OF SCREEN MODEL RESULTS ***

CALCULATION	MAX CONC	DIST TO	TERRAIN
PROCEDURE	(UG/M**3)	MAX (M)	HT (M)
SIMPLE TERRAIN	1.808	448.	0.

** REMEMBER TO INCLUDE BACKGROUND CONCENTRATIONS **

Engine Emission Calculation Worksheet

Station 16; Brooker, FL Emergency Generator Engine 1

Engine data

Annual use (maximum); hr./yr.	400 hr./yr.
Power: Hp	200 Hp
	1605200 Btu/hr.
Power; Btu/hr. (@ 8026 (Btu/hr.)/Hp)	
Fuel consumption: scf/hr. (@ 1040 Btu/scf)	1543 scf/hr.

Emission Factors

NOx	21.0 g/Hp-hr.
СО	2.0 g/Hp-hr.
NMHC	0.5 g/Hp-hr.
SO2	0.1 grains/scf
PM	5.0 lb/MMscf

Calculated Emissions

NOx	1.85 TPY
CO	0.18 TPY
NMHC	0.04 TPY
SO2	0.01 TPY
PM	0.00 TPY

Engine Emission Calculation Worksheet

Station 16; Brooker, FL

Emergency Generator Engine 2

Engine data

Annual use (maximum); hr./yr.	400 hr./yr.
Power; Hp	220 Hp
Power; Btu/hr. (@ 8026 (Btu/hr.)/Hp)	1765720 Btu/hr.
Fuel consumption; scf/hr. (@ 1040 Btu/scf)	1698 scf/hr.

Emission Factors

NOx	22.0 g/Hp-hr.
СО	2.0 g/Hp-hr.
NMHC	1.0 g/Hp-hr.
SO2	0.1 grains/scf
PM	5.0 lb/MMscf

Calculated emissions

NOx	2.13 TPY
CO	0.19 TPY
NMHC	0.10 TPY
SO2	0.01 TPY
PM	0.00 TPY

Engine Emission Calculation Worksheet

Station 16; Brooker, FL Air Compressor Engine 1

Engine data

Annual use (maximum); hr./yr.	600 hr./yr.
Power; Hp	80 Hp
Power; Btu/hr. (@ 8026 (Btu/hr.)/Hp)	642080 Btu/hr.
Fuel consumption; scf/hr. (@ 1040 Btu/scf)	617 scf/hr.

Emission factors

NOx	11.0 g/Hp-hr.
CO	3.1 g/Hp-hr.
NMHC	0.044 g/Hp-hr.
SO2	0.1 grains/scf
PM	5.0 lb/MMscf

Calculated Emissions

NOx	0.58 TPY
co	0.16 TPY
NMHC	0.00 TPY
SO2	0.01 TPY
PM	0.00 TPY

```
FIXED ROOF TANK VOLATILE ORGANIC COMPOUND EMISSIONS (Rev. 6/90)
             (C) COPYRIGHT 1990, PHOENIX ENGINEERING, INC.
  CLIENT! Florida Gas Transmission
                                                       DATE: 05/14/93
LOCATION: Station 16
                                                    JOB NO:
CALCULATED USING AP-42, FOURTH EDITION SEP. 85, EQUATIONS 4.3-(1)&(2)
TANK PHYSICAL DATA
                                                Oil & Water Separator 1
  TANK IDENTIFICATION NUMBER
                                                None
  EMISSION CONTROLS
                                                                      0 %
         PERCENT EFFICIENCY
                                             Black
  TANK PAINT COLOR
  TANK DIAMETER (FT), D
                                                                   10.0
                                                                   15.0
  TANK HEIGHT (FT), H
  PAINT FACTOR, FsubP
                                                                   1.58
  TANK CAPACITY (BBLS), VB
                                                                    210
  TANK CAPACITY (GALLONS), V
                                                                   8820
  ADJUSTMENT FACTOR FOR DIA., C
                                                                   0.53
                                               Gainsville
WEATHER DATA
  AVG. DAILY TEMP. CHANGE (DEG F), DeltaT
                                                                   20.0
  STORAGE TEMP. (DEG. F)
                                                                   73.8
  AVG. ATM. PRESS. (PSIA), PsubA
                                                                   14.7
PRODUCT PHYSICAL DATA
                                               Oily Wastewater
  MATERIAL STORED
  MOLECULAR WEIGHT (#/#MOLE) MsubV
                                                                  53.00
  VAPOR PRESS. AT STG. TEMP. (DEG. F), P
                                                                   2.80
  PRODUCT FACTOR, KsubC (CRUDE 0.65, OTHER 1.0)
                                                                   1.00
THROUGHPUT DATA
                                                                    365
  DAYS IN SERVICE, DsubS
  VAPOR SPACE HEIGHT (FT), VH
                                                                   7.50
  TANK THROUGHPUT (BBLS FOR DAYS IN SERVICE), TT
                                                                1190.50
  FILLING RATE (BBLS/HR), FR
  NUMBER OF TURNOVERS FOR DAYS IN SERVICE, N
                                                                    5.7
  TURNOVER FACTOR, KsubN
                                                                   1.00
FIXED ROOF TANK BREATHING LOSS, # LsubB =
 2.26x10-2*(MsubV)*(P/(PsubA-P)) EXP 0.68*(D)EXP 1.73*(VH)EXP 0.51*
 (DeltaT) EXP 0.5*(FsubP)*(C)*(KsubC)*DsubS/365*(100-%eff)/100
FIXED ROOF TANK WORKING LOSS, # LsubW =
 2.4 EXP-05*MsubV*P*V*N*KsubN*KsubC*(100-%eff)/100
VOLATILE ORGANIC COMPOUND LOSSES
                                                                   TOTAL
                                     BREATHING
                                                     WORKING
POUNDS FOR DAYS SERVICE
                                            252
                                                       179
                                                                    431
                                                       0.09
                                                                   0.22
TONS FOR DAYS SERVICE
                                           0.13
                             =
                                                                    431
ANNUALIZED POUNDS
                                            252
                                                       179
                                           0.13
                                                       0.09
                                                                   0.22
ANNUALIZED TONS
                                                      0.02
                                                                   0.05
                                           0.03
POUND/HR (AVG)
MAXIMUM EMISSION RATE (\#/HR) =
```

FIXED ROOF TANK VOLATILE ORGANIC COMPO	DUND EM	ISSIONS	(Rev.	6/9	0)
(C) COPYRIGHT 1990, PHOENIX ENGINE	ERING,	INC.			
CLIENT: Florida Gas Transmission		DATE:	05/14	/93	
LOCATION: Station 16		JOB NO:			
CALCULATED USING AP-42, FOURTH EDITION SEP. 85	, EQUAT	IONS 4.:	3-(1)&(2) ===:	
TANK PHYSICAL DATA TANK IDENTIFICATION NUMBER EMISSION CONTROLS	Oil & None	Water :	Separato		
PERCENT EFFICIENCY				0	ક
TANK PAINT COLOR	Black		4		
TANK DIAMETER (FT), D TANK HEIGHT (FT), H				0.0 5.0	
PAINT FACTOR, FSubP				.58	
TANK CAPACITY (BBLS), VB		•		210	
TANK CAPACITY (GALLONS), V				820	
ADJUSTMENT FACTOR FOR DIA., C			0	. 53	
WEATHER DATA	Gains	villo			
AVG. DAILY TEMP. CHANGE (DEG F), DeltaT	Gains	ATTTE	20	0.0	
STORAGE TEMP. (DEG. F)				3.8	
AVG. ATM. PRESS. (PSIA), PsubA			14	4.7	
PRODUCT PHYSICAL DATA MATERIAL STORED MOLECULAR WEIGHT (#/#MOLE) MsubV VAPOR PRESS. AT STG. TEMP. (DEG. F), P PRODUCT FACTOR, KsubC (CRUDE 0.65, OTHER 1.0)	_	Wastewat	53 2	.00 .80	
THROUGHPUT DATA DAYS IN SERVICE, DsubS VAPOR SPACE HEIGHT (FT), VH			7.	365 .50	
TANK THROUGHPUT (BBLS FOR DAYS IN SERVICE), T	T		1190	.50	Ì
FILLING RATE (BBLS/HR), FR NUMBER OF TURNOVERS FOR DAYS IN SERVICE, N				5.7	
TURNOVER FACTOR, Ksubn				.00	
FIXED ROOF TANK BREATHING LOSS, # LsubB = 2.26x10-2*(MsubV)*(P/(PsubA-P)) EXP 0.68*(D)EX (DeltaT)EXP 0.5*(FsubP)*(C)*(KsubC)*DsubS/365* FIXED ROOF TANK WORKING LOSS, # LsubW = 2.4 EXP-05*MsubV*P*V*N*KsubN*KsubC*(100-%eff)/	:(100−%				== :
WOLLDAY I ORGANIC COMPONE TO SEE		=======		===:	≕= •
VOLATILE ORGANIC COMPOUND LOSSES BREATHIN POUNDS FOR DAYS SERVICE = 252		WORKING 179	_	OTA) 131	
TONS FOR DAYS SERVICE = 252		0.09		22	
ANNUALIZED POUNDS = 252		179		131	
ANNUALIZED TONS = 0.13	•	0.09		.22	
POUND/HR (AVG) = 0.03	-	0.02	0.	.05	
MAXIMUM EMISSION RATE (#/HR) =	<u> </u>		 		1

FIXED ROOF TANK VOLATILE ORGANIC COMPOUND EMISSIONS (Rev. 6/90)

(C) COPYRIGHT 1990, PHOENIX ENGINEERING, INC.

CLIENT: Florida Gas Transmission DATE: 05/14/93

LOCATION: Station 16 JOB NO:

CALCULATED USING AP-42, FOURTH EDITION SEP. 85, EQUATIONS 4.3-(1)&(2)

TANK PHYSICAL DATA			
TANK IDENTIFICATION NUMBER	Condensate 1	•	
EMISSION CONTROLS	None		
PERCENT EFFICIENCY		0	ક
TANK PAINT COLOR	Black		
TANK DIAMETER (FT), D		10.0	
TANK HEIGHT (FT), H		15.0	
PAINT FACTOR, FsubP		1.58	
TANK CAPACITY (BBLS), VB		210	
TANK CAPACITY (GALLONS), V		8820	
ADJUSTMENT FACTOR FOR DIA., C		0.53	
WEATHER DATA	Gainsville		
AVG. DAILY TEMP. CHANGE (DEG F), DeltaT		20.0	
STORAGE TEMP. (DEG. F)	•	73.8	
AVG. ATM. PRESS. (PSIA), PsubA		14.7	
PRODUCT PHYSICAL DATA			
MATERIAL STORED	Condensate		
MOLECULAR WEIGHT (#/#MOLE) MsubV ,		53.00	
VAPOR PRESS. AT STG. TEMP. (DEG. F), P		2.80	
PRODUCT FACTOR, KsubC (CRUDE 0.65, OTHER 1.0)		1.00	
THROUGHPUT DATA			
DAYS IN SERVICE, DsubS		365	
VAPOR SPACE HEIGHT (FT), VH		7.50	
TANK THROUGHPUT (BBLS FOR DAYS IN SERVICE), T	ı r ı	23.80	
FILLING RATE (BBLS/HR), FR	*	23.80	
NUMBER OF TURNOVERS FOR DAYS IN SERVICE, N		0.11	
TURNOVER FACTOR, Ksubn		1.00	
MENUNCOUR FACTOR, RSubn			

FIXED ROOF TANK BREATHING LOSS, # LsubB =

2.26x10-2*(MsubV)*(P/(PsubA-P)) EXP 0.68*(D)EXP 1.73*(VH)EXP 0.51*
(DeltaT)EXP 0.5*(FsubP)*(C)*(KsubC)*DsubS/365*(100-%eff)/100

FIXED ROOF TANK WORKING LOSS, # LsubW =

2.4 EXP-05*MsubV*P*V*N*KsubN*KsubC*(100-%eff)/100

	:=====			========
VOLATILE ORGANIC COMPOUND L	OSSES	BREATHING	WORKING	TOTAL
POUNDS FOR DAYS SERVICE	= .	252	3	255
TONS FOR DAYS SERVICE	=	0.13	0.00	0.13
ANNUALIZED POUNDS	=	252	3	255
ANNUALIZED TONS	==	0.13	0.00	0.13
POUND/HR (AVG)	=	0.03	0.00	0.03
MAXIMUM EMISSION RATE (#/HR	() =	i		

FIXED ROOF TANK VOLATILE ORGANIC COMPO	OUND EMISSIONS	(Rev. 6/90
(C)COPYRIGHT 1990, PHOENIX ENGINE	ERING, INC.	
CLIENT: Florida Gas Transmission	DATE:	05/13/93
LOCATION: Station 16	JOB NO:	
CALCULATED USING AP-42, FOURTH EDITION SEP. 85	, EQUATIONS 4.3	3-(1)&(2)
TANK PHYSICAL DATA TANK IDENTIFICATION NUMBER EMISSION CONTROLS	Lube Oil Stor None	cage Tank 1
PERCENT EFFICIENCY	****	0
TANK PAINT COLOR TANK DIAMETER (FT), D	White	17.7
TANK BIAMETER (FI), B	,	7.0
PAINT FACTOR, FSubP		1.00
TANK CAPACITY (BBLS), VB		238
TANK CAPACITY (GALLONS), V ADJUSTMENT FACTOR FOR DIA., C		10000
industrial indication but, c		0.03
WEATHER DATA	Gainsville	
AVG. DAILY TEMP. CHANGE (DEG F), DeltaT STORAGE TEMP. (DEG. F)		20.0 68.8
AVG. ATM. PRESS. (PSIA), PsubA		14.7
PRODUCT PHYSICAL DATA MATERIAL STORED MOLECULAR WEIGHT (#/#MOLE) MsubV VAPOR PRESS. AT STG. TEMP. (DEG. F), P PRODUCT FACTOR, KsubC (CRUDE 0.65, OTHER 1.0)	Lube oil	190.00 0.0019 1.00
THROUGHPUT DATA		
DAYS IN SERVICE, DsubS		365
VAPOR SPACE HEIGHT (FT), VH		3.50
TANK THROUGHPUT (BBLS FOR DAYS IN SERVICE), S FILLING RATE (BBLS/HR), FR	TT	238.00
NUMBER OF TURNOVERS FOR DAYS IN SERVICE, N		1.0
TURNOVER FACTOR, KsubN		1.00
FIXED ROOF TANK BREATHING LOSS, # LsubB = 2.26x10-2*(MsubV)*(P/(PsubA-P)) EXP 0.68*(D) EX (DeltaT) EXP 0.5*(FsubP)*(C)*(KsubC)*DsubS/365 FIXED ROOF TANK WORKING LOSS, # LsubW = 2.4 EXP-05*MsubV*P*V*N*KsubN*KsubC*(100-%eff)	*(100-%eff)/100	
2.4 EXF-05 MSdDV - F - V - N - RSdDN - RSdDC - (100 - %e11)	, 100 ==========	
VOLATILE ORGANIC COMPOUND LOSSES BREATHING	· · ·	TOTA
POUNDS FOR DAYS SERVICE = 10 TONS FOR DAYS SERVICE = 0.06	0 0.00	10 0.00
	0 0.00	10
ANNUALIZED TONS = 0.06 POUND/HR (AVG) = 0.06		0.00

Effective Diameter for a Horizontal Fixed Roof Tank

(From Supplement E of AP-42)

FGT Station 16 Luba Oil Storage Tank No. 1

Tank Measurements

Length of Tank (ft) - L	35
Actual Diameter of Tank (ft) - D	7
Calculated Values	
Effective Tank Diameter (ft) - Deff	17.7
Vapor Space Outage (ft) - Hvo	3.5

Equations:

 $Deff = SQRT(L^*D/0.785)$

Hvo = D/2

Equation 1-5 of Chapter 12

Equation 1-6 of Chapter 12

FIXED ROOF TANK VOLATILE ORGANIC COMPOUND EMISSIONS (Rev. 6/90)

(C) COPYRIGHT 1990, PHOENIX ENGINEERING, INC.

CLIENT: Florida Gas Transmission DATE: 05/13/93

LOCATION: Station 16 JOB NO:

CALCULATED USING AP-42, FOURTH EDITION SEP. 85, EQUATIONS 4.3-(1)&(2)

TANK PHYSICAL DATA			
TANK IDENTIFICATION NUMBER	Lube Oil Storage	Tank 2	
EMISSION CONTROLS	None		
PERCENT EFFICIENCY		0	ક
TANK PAINT COLOR	White		
TANK DIAMETER (FT), D		7.0	
TANK HEIGHT (FT), H		4.0	
PAINT FACTOR, FsubP		1.00	
TANK CAPACITY (BBLS), VB		238	
TANK CAPACITY (GALLONS), V		500	
ADJUSTMENT FACTOR FOR DIA., C		0.38	
WEATHER DATA	Gainsville		
AVG. DAILY TEMP. CHANGE (DEG F), DeltaT	•	20.0	
STORAGE TEMP. (DEG. F)		68.8	
AVG. ATM. PRESS. (PSIA), PsubA		14.7	
PRODUCT PHYSICAL DATA			
MATERIAL STORED	Lube oil		
MOLECULAR WEIGHT (#/#MOLE) MsubV		190.00	i
VAPOR PRESS. AT STG. TEMP. (DEG. F), P		0.0019	
PRODUCT FACTOR, KsubC (CRUDE 0.65, OTHER 1.0)		1.00	
THROUGHPUT DATA			
DAYS IN SERVICE, DsubS		12	ĺ
VAPOR SPACE HEIGHT (FT), VH		2.00	
TANK THROUGHPUT (BBLS FOR DAYS IN SERVICE), T	ጥ	143.00	- 1
FILLING RATE (BBLS/HR), FR	•	145.00	
NUMBER OF TURNOVERS FOR DAYS IN SERVICE, N		12.0	
TURNOVER FACTOR, KsubN		1.00	
			

FIXED ROOF TANK BREATHING LOSS, # LsubB = 2.26x10-2*(MsubV)*(P/(PsubA-P)) EXP 0.68*(D)EXP 1.73*(VH)EXP 0.51* (DeltaT)EXP 0.5*(FsubP)*(C)*(KsubC)*DsubS/365*(100-%eff)/100

FIXED ROOF TANK WORKING LOSS, # LsubW = 2.4 EXP-05*MsubV*P*V*N*KsubN*KsubC*(100-%eff)/100

VOLATILE ORGANIC COMPOUND L	OSSES	BREATHING	WORKING	TOTAL
POUNDS FOR DAYS SERVICE	=	0	0	0
TONS FOR DAYS SERVICE	=	0.00	0.00	0.00
ANNUALIZED POUNDS	=	1	2	2
ANNUALIZED TONS	=	0.00	0.00	0.00
POUND/HR (AVG)	=	0.00	0.00	0.00
MAXIMUM EMISSION RATE (#/HR) =			

Effective Diameter for a Horizontal Fixed Roof Tank (From Supplement E of AP-42)

FGT Station 16 Lube Oil Storage Tank No. 2

Tank Measurements	
Length of Tank (ft) - L	9.5
Actual Diameter of Tank (ft) - D	4
Calculated Values	•
Effective Tank Diarneter (ft) - Deff	7.0
Vapor Space Outage (ft) - Hvo	2

Equations: Deff = SQRT(L*D/0.785) Equation 1-5 of Chapter 12
Hvo = D/2 Equation 1-6 of Chapter 12

FIXED ROOF TANK VOLATILE ORGANIC COMPOUND EMISSIONS (Rev. 6/90) (C) COPYRIGHT 1990, PHOENIX ENGINEERING, INC. CLIENT: Florida Gas Transmission DATE: 05/14/93 LOCATION: Station 16 JOB NO: CALCULATED USING AP-42, FOURTH EDITION SEP. 85, EQUATIONS 4.3-(1)&(2) TANK PHYSICAL DATA Waste Oil Tank 1 TANK IDENTIFICATION NUMBER **EMISSION CONTROLS** None 0 % PERCENT EFFICIENCY TANK PAINT COLOR Black 7.9 TANK DIAMETER (FT), D TANK HEIGHT (FT), H 10.0 1.58 PAINT FACTOR, FsubP TANK CAPACITY (BBLS), VB 90 TANK CAPACITY (GALLONS), V 3780 ADJUSTMENT FACTOR FOR DIA., C 0.41 WEATHER DATA Gainsville AVG. DAILY TEMP. CHANGE (DEG F), DeltaT 20.0 STORAGE TEMP. (DEG. F) 73.8 AVG. ATM. PRESS. (PSIA), PsubA 14.7 PRODUCT PHYSICAL DATA MATERIAL STORED Waste oil MOLECULAR WEIGHT (#/#MOLE) MsubV 190.00 VAPOR PRESS. AT STG. TEMP. (DEG. F), P 0.0019 PRODUCT FACTOR, KsubC (CRUDE 0.65, OTHER 1.0) 1.00 THROUGHPUT DATA DAYS IN SERVICE, DsubS 365 VAPOR SPACE HEIGHT (FT), VH 5.00 TANK THROUGHPUT (BBLS FOR DAYS IN SERVICE), TT 9.50 FILLING RATE (BBLS/HR), FR NUMBER OF TURNOVERS FOR DAYS IN SERVICE, N 0.1 TURNOVER FACTOR, KsubN 1.00 FIXED ROOF TANK BREATHING LOSS, # LsubB = 2.26x10-2*(MsubV)*(P/(PsubA-P)) EXP 0.68*(D) EXP 1.73*(VH) EXP 0.51* (DeltaT) EXP 0.5*(FsubP)*(C)*(KsubC)*DsubS/365*(100-%eff)/100 FIXED ROOF TANK WORKING LOSS, # LsubW = 2.4 EXP-05*MsubV*P*V*N*KsubN*KsubC*(100-%eff)/100 TOTAL VOLATILE ORGANIC COMPOUND LOSSES BREATHING WORKING POUNDS FOR DAYS SERVICE = 2 0 2 TONS FOR DAYS SERVICE 0.00 0.00 0.00 ANNUALIZED POUNDS 0 2 0.00 0.00

0.00

0.00

0.00

0.00

ANNUALIZED TONS

MAXIMUM EMISSION RATE (#/HR) =

POUND/HR (AVG)

Calculation of annual HC emissions from blowdowns (for a typical station)

unmetered gas released (due to blowdowns)	300	MSCI/MO.
unmetered gas released (due to blowdowns)	3.6	MMscf/yr.
unmetered gas released (due to blowdowns) (@21.98 scf/lb)	0.16	MMlb/yr.
unmetered gas released (due to blowdowns) (@21.98 scf/lb)	81.89	TPY
VOCs released (due to blowdowns) (@2% VOCs)	1.64	TPY

Compressor Station: Number 16

Name: Brooker

County: Bradford Nearest City: Brooker

Compressor Supervisor: William "Les" Shadd

Mailing Address: P.O. Box 8

Brooker, Florida 32622-0008

Telephone: 904-485-1211

Letitude: 29-55-16 Longitude: 82-19-34

UTM Zone: 17

UTM Easting: \$71.98 km UTM Northing: \$.310.57 km

Elevation (fi): 100

Fax: 904-485-2723

Phase I Engine Characteristics

0

Engine Identification	1	2	3	4	· 5
Permit Number	•	•	•	7	· a
Serial Number	G-2372	G-2373	G-2374	G-2663	G-2777
Operating Time	0-mir	Q-2510	4-2014	<u>G</u> -2000	G-2111
Hours/Day	24	24	24	24	- 24
Days/Week	7	7	7	7	7
Weeks/Year	52	52	52	52	52
Engine Type	Recip	Recko	Recip	Recip	Recip
Date of Installation	1958	1958	. 1958	1966	1968
Engine Make	Worthington	Worthington	Worthington	Worthington	Worthington
Engine Model	SEHG-8	SEHG-8	SEHG-8	SEHG-8	SEHG-8
Horsepower Rating	2000	2000	2000	2000	2000
Air Charging	Turbo.	Turbo.	Turbo.	Turbo.	Turbo.
Exhaust Temperature (F)	600	600	600	600	600
Mess Flow Rate (lbs/hr) (a)	26172	26172	26172	26172	26172
Volumetric Flow Rate (actm)	11637	11637	11637	11637	11637
Volumetric Flow Rate (dsctm)	5333	5333	5333	5333	5333
Edit Velocity (at/s)	119.5	119.5	119.5	119.5	119.5
Water Vapor Content (%)	8	8	8	8	8
Ave. Fuel Consumption (MMCF/Hr) (b)	0.0148	0.0146	0.0148	0.0146	0.0146
Mex. Fuel Consumption (MMCF/Hr) (b)	0.0146	0.0148	0.0146	0.0146	0.0146
Specific Fuel Consump. (BTU/bhp-hr)	6350	6350	6350	6350	6350
Meximum Heat Input (MMBTU/Hr)	15	15 .	15	15	15
manifest transmission of the					
Stack Height (ff)	28.08	28.08	28.08	28.08	28.08
Stack Diameter (in)	17.25	17.25	17.25	17.25	17.25
Stack to Building Offset (ff)	17.00	17.00	17.00	17.00	17.00
Building Height (ft) (c)	31.75				
Building Length (ft) (c)	195.00				
Building Width (ft) (c)	55,00				
Phase I Fuel Characteristics					
Fuel Type	N.G.	N.G.	N.G.	N.G.	N.G.
Heating Value (BTU/CF)	1030	1030	1030	1030	1030
Heat Capacity (BTU/lb)	22637	22637	22637	22637	22637
Density (lb/cubic ft)	0.0455	0.0455	0.0455	0.0455	0.0455
Percent Sulfur (%) (d)	0.031	0.031	0.031	0.031	0.031
Percent Ash (%)	N/A	N/A	N/A	N/A	N/A
	* 4.2	14/1	-414	.4.7	.47

Engines 1 through 6 are in the same building.

Bulling length 235 St. Bulling width 55 St.

Building Reight. 31.75 St. in the 195 St of length housing units 1-5.
33.75 St. in the 40 St of length housing unit 6.

Engine Identification	Rates by Engine for Station 16 n	1	2	3	4	5
Grams/BHP - Hour						
	NOX	11.000	11.000	11.000	11.000	11,000
	co	1.400	1.400	1.400	1.400	1.400
	NMHC	0.440	0.440	0.440	0.440	0.440
	SO2 (e)	0.093	0.093	0.093	0.093	0.093
	PM (n)	0.016	0.016	0.016	0.016	0.016
Pounds/Hour	•					
•	NOX	48.51	48.51	48.51	48.51	48.51
	co	6.17	6.17	6.17	6.17	6.17
	NMHC	1.94	1.94	1.94	1,94	1.94
	SO2	0.41	0.41	0.41	0.41	0.41
	PM	0.07	0.07	0.07	0.07	0.07
Tons/Year						•
	NOX	212.47	212.47	212.47	21 2.47	212.47
	co ·	27,04	27.04	27.04	27.04	27.04
	NMHC	8.50	8.50	8.50	8.50	8.50
	SO2	1.79	1.79	1.79	1.79	1.79
•	PM .	0.31	0.31	0.31	0.31	0.31
Phase (Emissions	Rates for Total Station					
Grams/BHP-Hour						
Ē	NOX	11.000				
		4 444				

-	NOX	11.000	
	co	1.400	•
	NMHC	0.440	•
	SO2	0.093	•
	PM ·	0.016	•
Pounds/Hour			
)	NOX	242.55	
	œ	30.87	
	NMHC	9.70	
	SO2	2.04	
	PM	0.36	•
Tons/Year			SOURCE CLASSIFICATION WITH RESPECT TO PSE
	NOX	1062.37	
	co	135.21	MAJOR SOURCE
	NMHC	42.49	•
	SO2	8.94	
	PM	1,57	
			_

Notes:

- (a) Wet mass flow (@ 60 F, 14.7 psi).
 - (b) Based on heating value of fuel gas.
 - (c) All engines enclosed in one building.
 - (d) Percent by weight.
 - (a) Based on 10 grains/SCF.
 - (f) Based AP-42 factor of 5 lbs/MMSCF.

. .

Fax: 904-485-2723

Compressor Station: Number 16

Name: Brooker County: Bradford Nearest City: Brooker

Compressor Supervisor: William "Les" Shadd

Mailing Address: P.O. Box 8

Brooker, Florida 32622-0008

Telephone: 904—485—1211

Latitude: 29-55-16 Longitude: 82-19-34

UTM Zone: 17

UTM Easting: 371.98 km UTM Northing: 3,310.57 km

Bevation (ft): 100

Phase II Engine Characteristics

Engine Identification	6
Permit Number	
Serial Number	G-49117
Operating Time	·.
Hours/Day	24
Days/Week	7
Weeks/Year	52
Engine Type	Recip
Date of Installation	1991
Engine Make	Cooper-Bessemer
Engine Model	GW-330C2
Horsepower Rating	4000
Air Charging	Turbo.
Exhaust Temperature (F)	550
Mass Flow Rate (lbs/hr) (a)	71100
Volumetric Flow Rate (acfm)	30138
Volumetric Flow Rate (dscfm)	14487
Exit Velocity (at/s)	102.33
Water Vapor Content (%)	· 8
Ave. Fuel Consumption (MMCF/Hr) (b)	0.0264
Max. Fuel Consumption (MMCF/Hr) (b)	0.0264
Specific Fuel Consump. (BTU/bhp-hr)	6800
Maximum Heat Input (MMBTU/Hr)	27.2
Stack Height (ft)	65.625
Stack Diameter (in)	30
Stack to Building Offset (ft)	· 17.00
Building Height (ft) (c)	31.75
Building Length (ft) (c)	★ \ 235.00 \
Building Width (ft) (c)	55.00

Phase II Fuel Characteristics

Fuel Type	N.G.
Heating Value (BTU/CF)	1030
Heat Capacity (BTU/lb)	22637
Density (lb/cubic ft)	0.0455
Percent Sulfur (%) (d)	0.031
Percent Ash (%)	N/A

* see page with information on units 1-5.

Phase II Emissions Rates by Engine for Station 16		
Engine Identification	6	
79		
Grams/BHP-Hour	0.000	
NOX	2.000	
co	2.500 1.000	
NMHC	0.090	
SO2 (e)		
PM (f)	0.018	
Pounds/Hour	47.04	
NOX	17.64	
co	22.05	
NMHC	8.82	
SO2	0.79	•
PM .	0.15	•
Tons/Year		•
NOX	77.26	•
œ	96.58	
NMHC	38.63	•
SO2	3.48	
. PM	0.68	•
		 · ·
D		
Phase II Emissions Rates for Total Station		•
Grams/BHP—Hour		
NOX	8.428	
co CO	1.714	
NMHC	0.600	•
SO2	0.092	
PM	0.017	•
Pounds/Hour		
NOX	260.19	
CO	52.92	
. NMHC	18.52	•
sn2	2.84	·
PM	0.51 ,	•
Tons/Year		E CLASSIFICATION WITH RESPECT TO PSD
NOX	1139.63	
CO	231.79	MAJOR SOURCE
	81.13	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
NMHC	. 01.13	

12.42

2.24

Notes:

- (a) Wet mass flow (@ 60 F, 14.7 psi). (b) Based on heating value of fuel gas.
- (c) All engines enclosed in one building.

SO2 PM

- (d) Percent by weight.
- (e) Based on 10 grains/SCF. (f) Based AP-42 factor of 5 lbs/MMSCF.



Florida Gas Transmission Company

P. O. Box 945100 Maitland, Florida 32794-5100 (407) 875-5800

June 29, 1993

VIA FEDERAL EXPRESS (overnight delivery)

Mr. Clair Fancy, P.E. Chief, Bureau of Air Regulation Florida Department of Environmental Regulation 2600 Blair Stone Road Tallahassee, FL 32399-2400

Dear Mr. Fancy:

RE: Request for Amendments and Extensions to Air Construction Permits

Permit No. AC57-188869
Florida Gas Transmission Company, Station 12 = This file contains
Munson, Santa Rosa County, Florida

all the attachments
related to this

Permit No. AC67-189220 Florida Gas Transmission Company, Station 13 Caryville, Washington County, Florida

Permit No. AC20-189438
Florida Gas Transmission Company, Station 14
Quincy, Gadsden County, Florida

Permit No. AC62-189439 Florida Gas Transmission Company, Station 15 Perry, Taylor County, Florida

Permit No. AC04-189454 Florida Gas Transmission Company, Station 16 Brooker, Bradford County, Florida

Permit No. AC42-189455 Florida Gas Transmission Company, Station 17 Salt Springs, Marion County, Florida

Permit No. AC48-189456 Florida Gas Transmission Company, Station 18 Orlando, Orange County, Florida

Permit No. AC05-189665 Florida Gas Transmission Company, Station 19 Melbourne, Brevard County, Florida

Permit No. AC56-189457 PSD-FL-164
Florida Gas Transmission Company, Station 20
Ft. Pierce, St. Lucie County, Florida

(PSA-FC-203 AC 56-230129)

correspondence.

On May 27, 1993, Florida Gas Transmission Company (FGT) submitted Certificates of Completion of Construction to the appropriate district offices to obtain operating permits for



Florida Department of Environmental Regulation

Twin Towers Office Bldg. ● 2600 Blair Stone Road ● Tallahassee, Florida 32399-2400 Lawton Chiles, Governor Carol M. Browner, Secretary

February 12, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Alan Weatherford Compliance Environmentalist Florida Gas Transmission Company P.O. Box 945100 Maitland, Florida 32794-5100

Dear Mr. Weatherford:

Re: Permits AC57-188869, AC67-189220, AC20-189438, AC62-189439, AC04-189454, AC42-189455, AC48-189456, AC05-189665 and AC56-189457; Permit Amendment Request

The Department is in receipt of your letter dated January 18, 1993, requesting an amendment of the specific condition regarding test method for measuring VOC emissions for each one of the above referenced permits. The Department has reviewed your request and has determined to change Specific Condition No. 10 for each one of the permits as follows:

Specific Condition No. 10:

FROM: Initial compliance with the volatile organic compound emission (VOC) limits will be demonstrated by EPA Method 25, thereafter, compliance with the VOC emission limits will be assumed, provided the CO allowable emission rate is achieved.

To: Initial compliance with the volatile organic compound emission (VOC) limits will be demonstrated by EPA Method 25A, thereafter, compliance with the VOC emission limits will be assumed, provided the CO allowable emission rate is achieved.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, 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 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within



Mr. Alan Weatherford Florida Gas Transmission Company Page 2

14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

A statement of how and when each petitioner received notice of (b)

the Department's action or proposed action; A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

A statement of the material facts disputed by Petitioner, if (d)

any:

A statement of facts which petitioner contends warrant (e) reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or

proposed action; and

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

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this intent in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Mr. Alan Weatherford Florida Gas Transmission Company Page 3

A copy of this letter shall be attached to the above mentioned permit and shall become a part of that permit.

Sincerely

Howard L. Rhodes

Director

Division of Air Resources

Management

HLR/TH/plm

Attachment to be Incorporated:

Mr. Alan Weatherford's letter of December 7, 1992

cc: Ed Middleswart, NWD
 Charles Collins, CD
 Isidore Goldman, SED
 Andy Kutyna, NED



Florida Gas Transmission Company

P. O. Box 945100 Maitland, Florida 32794-5100 (407) 875-5800

Certified Mail

December 7 , 1992

Mr. Clair Fancy Florida Department of Environmental Regulation Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

RE: Request for Modification to Permits

Permit No. AC57-188869 Florida Gas Transmission Company, Station 12 Munson, Santa Rosa County, Florida

Permit No. AC67-189220 Florida Gas Transmission Company, Station 13 Caryville, Washington County, Florida

Permit No. AC20-189438
Florida Gas Transmission Company, Station 14
Quincy, Gadsden County, Florida

Permit No. AC62-189439 Florida Gas Transmission Company, Station 15 Perry, Taylor County, Florida

Permit No. AC04-189454
Florida Gas Transmission Company, Station 16
Brooker, Bradford County, Florida

Permit No. AC42-189455 Florida Gas Transmission Company, Station 17 Salt Springs, Marion County, Florida

Permit No. AC48-189456 Florida Gas Transmission Company, Station 18 Orlando, Orange County, Florida

Permit No. Ac05-189665
Florida Gas Transmission Company, Station 19
Melbourne, Brevard County, Florida

Permit No. AC56-189457
Florida Gas Transmission Company, Station 20
Ft. Pierce, St. Lucie County, Florida

RECEIVED

DEC 17 1992

Mr. Clair Fancy Page 2 of 2 December 7, 1992

Florida Gas Transmission Company (FGT) requests that the permits referenced above be modified as follows:

Modify Specific Condition 10 which currently reads

"Initial compliance with the volatile organic compound (VOC) emissions limits will be demonstrated by EPA Method 25, thereafter, compliance with the VOC emission limits will be assumed, provided the CO allowable emission rate is achieved.",

so that it reads

"Initial compliance with the volatile organic compound (VOC) emissions limits will be demonstrated by EPA Method 25A, thereafter, compliance with the VOC emission limits will be assumed, provided the CO allowable emission rate is achieved."

FGT has supplied your office with evidence supporting our contention that the use of Method 25 to measure VOC emissions in compressor engines is questionable. We believe the evidence supports the use of Method 25A. Mr. Barry Andrews, ENSR Consulting & Engineering, has spoken to you about this on FGT's behalf.

Since no specific test method is listed for our source (i.e. NSPS or 17-2.700), we ask that this change be made through a simple permit modification.

Please call me at 407-875-5816 if you have any questions.

Sincerely,

Allan Weatherford

Compliance Environmentalist

allan Weatherford

bc aw1207cf

cc: Chuck Truby Raymond Young

Fred Griffin

Barry Andrews, ENSR

D. MUNICO 1. Middle SIME



Florida Department of Environmental Regulation

Twin Towers Office Bldg. ● 2600 Blair Stone Road ● Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

May 15, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Allan Weatherford Compliance Environmentalist Florida Gas Transmission Company P.O. Box 945100 Maitland, Florida 32399-2400

Dear Mr. Weatherford:

Re: Construction Permits Nos. AC 57-188869, AC 67-189220, AC 20-189438, AC 62-189439, AC 04-189454, AC 42-189455, AC 48-189456, AC 05-189665, and AC 56-189457

The Department is in receipt of your letter dated April 29, 1992, requesting the extension of the expiration dates of the above referenced permits. This request is acceptable. The expiration dates of these construction permits will be changed as follows:

FROM: June 30, 1992 TO: June 30, 1993

This letter must be attached to the above mentioned permits and shall become a part of each permit.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, 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 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

Mr. Allan Weatherford Page 2 of 2

The Petition shall contain the following information:

The name, address, and telephone number of each petitioner, (a) the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

A statement of how and when each petitioner received notice of (b)

the Department's action or proposed action;

A statement of how each petitioner's substantial interests are (c) affected by the Department's action or proposed action;

A statement of the material facts disputed by Petitioner, if (d)

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or

proposed action; and

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

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this intent in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Sincerely,

STEVE SMALLWOOD,

Division of Air Resources Mgmt.

SS/TH/plm

Attachment to be Incorporated:

Mr. Weatherford's letter of April 29, 1992

cc: Ed Middleswart Andy Kutyna Charles Collins Isidore Goldman



Florida Gas Transmission Company

DER - MAIL ROS 1992 APR 30 AH 10: 49

P. O. Box 945100 Maitland, Florida 32794-5100 (407) 875-5800

Federal Express

April 29, 1992

Mr. Clair Fancy
Florida Department of
Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

RE: Request for Extensions of Construction Permits
Phase II Air Permits

Permit No. AC57-188869 Florida Gas Transmission Company, Station 12 Munson, Santa Rosa County, Florida

Permit No. AC67-189220 Florida Gas Transmission Company, Station 13 Caryville, Washington County, Florida

Permit No. AC20-189438
Florida Gas Transmission Company, Station 14
Quincy, Gadsden County, Florida

Permit No. AC62-189439
Florida Gas Transmission Company, Station 15
Perry, Taylor County, Florida

Permit No. AC04-189454 Florida Gas Transmission Company, Station 16 Brooker, Bradford County, Florida

Permit No. AC42-189455 Florida Gas Transmission Company, Station 17 Salt Springs, Marion County, Florida

Permit No. AC48-189456 Florida Gas Transmission Company, Station 18 Orlando, Orange County, Florida

Permit No. AC05-189665 Florida Gas Transmission Company, Station 19 Melbourne, Brevard County, Florida

Permit No. AC56-189457 Florida Gas Transmission Company, Station 20 Ft. Pierce, St. Lucie County, Florida Mr. Clair Fancy Page 2 of 2 April 29, 1992

On behalf of Florida Gas Transmission Company, I respectfully request extensions of the construction permits referenced above. The permits are due to expire on June 30, 1992 and FGT needs more time to evaluate the operation and performance of the engines.

Emissions tests were done on the engines in March 1992. The test reports will be submitted to DER within the next two weeks. Preliminary results indicate that all emission limits were met.

FGT requests the expiration dates be extended to June 30, 1993. This 12-month extension will allow FGT the necessary time to thoroughly evaluate the operation of the new engines and to determine if additions or revisions to the permits are needed.

In anticipation of your approval, I've enclosed a check for \$450 to cover the permit extension fee for each of the nine stations.

Sincerely,

Allan Weatherford

Compliance Environmentalist

bc aw0429cf

cc:

Chuck Truby Raymond Young Fred Griffin Bill Osborne Glenn Sellars Levon Carroll Bob Beckham Don Sterba Duwood Mulford Buddy Morris James Dollar Jim Read Les Shadd Leroy Coker Wayne Daniels Riley Jackson Donnie Owings Joe Kolb Tom Gardiner, ENSR

U. TRELIEV