

Florida Department of Environmental Protection

Memorandum

TO: Trina Vielhauer, Bureau of Air Regulation
THRU: Al Linero, Air Permitting South
FROM: Jeff Koerner, Air Permitting South *JK*
DATE: March 15, 2005
SUBJECT: Exemption from Requirement to Obtain an Air Construction Permit
Florida Gas Transmission Company, Bradford Compressor Station 16
Replacement of Gas Generator Component of Engine 1607
Title V Air Operation Permit No. 0070012-007-AV

Attached for your approval and signature is a letter that exempts the Florida Gas Transmission Company (FGTC) from the requirement to obtain an air construction permit for replacement of the gas generator component of Engine 1607. The unit has sustained internal damage to the zero stage of the boost compressor. The replacement component will be functionally equivalent and of the same make and model. The design emissions profile will be identical and, after completing the replacement, FGTC will test Engine 1607 to demonstrate that the repaired unit complies with the permitted emissions standards. I recommend your approval and signature.

Attachments

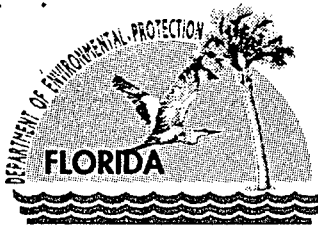
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Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

March 16, 2005

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Richard Craig, Vice President of Southeast Operations
Florida Gas Transmission Company
P.O. Box 4657
Houston, TX 77210-4657

Re: Exemption from the Requirement to Obtain an Air Construction Permit
Florida Gas Transmission Company, Brooker Compressor Station 16
Replacement of Gas Generator Component of Engine 1607 (EU-003)
Title V Air Operation Permit No. 0070012-007-AV

Dear Mr. Craig:

On March 11, 2005, Florida Gas Transmission Company submitted a request for an exemption from the requirement to obtain an air construction permit pursuant to Rule 62.4.040(1)(b), F.A.C. to replace the gas generator portion of existing Engine No. 1607. The unit has sustained internal damage to the zero stage of the boost compressor. This emissions unit is a nominal 7200 bhp (ISO) Cooper-Rolls Model 501-KC7 DLE gas turbine compressor engine that is located at existing Station 16 in Bradford County approximately 3 miles north of the city of Brooker on Highway 231. The replacement component will be a "like-kind" gas generator of the same make and model. The gas turbine will be tested within 60 days of startup to demonstrate compliance with the emission standards.

The Department approves this request and exempts the proposed replacement activity from the requirement to obtain an air construction permit subject to the following requirements:

- a. Components shall only be replaced with functionally equivalent "like-kind" equipment. Replacement components may consist of improved or newer equipment, but such components shall not change operation or increase the capacity (heat input and power output rates) of the gas turbine. Replacement components that affect emissions shall be designed to achieve the emissions standards specified in all valid air permits and shall achieve these standards or better. After a component replacement, the gas turbine compressor engine remains subject to the standards of all valid air permits. [Rule 62-210.200(169), F.A.C.]
- b. The permittee shall notify the Compliance Authority within seven days after beginning any replacement of the gas generator component of the compressor engine. Within seven days of first fire on a replacement gas generator, the permittee shall submit the following information to the Compliance Authority: date of first fire and certification from the vendor that the replacement gas generator is a functionally equivalent "like-kind" component. The vendor certification shall also identify the make, model number, maximum heat input rate (MMBtu/hour), power output (bhp) at ISO conditions, and that the permitted emission rates are achievable with the replacement component. This notification may be made by letter, fax, or email. A copy of the information shall be kept on site at the compressor station. Within 60 days of restarting the unit after a gas generator replacement, the permittee shall conduct stack tests to demonstrate compliance with the applicable emission standards. The permittee shall notify the Compliance Authority in writing at least 15 days prior to conducting these tests. The permittee shall comply with all permit requirements for test notification, test methods, test procedures, and reporting. [Rules 62-4.130, 62-4.160(2), (6), and (15) and 62-297.310(7)(b), F.A.C.]
- c. After investigation and for good cause, the Department may require special compliance tests pursuant to Rule 62-297.310(7)(b), F.A.C.

In accordance with the Department's rules, Engine 1607 remains subject to all conditions in the original air construction permit and the current Title V Air Operation Permit No. 0070012-007-AV. This determination may be revoked if the

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proposed activity is substantially modified or the basis for the exemption is determined to be materially incorrect. Florida Gas Transmission Company shall maintain a copy of this letter at Station 16. This permitting decision is made pursuant to Chapter 403, Florida Statutes.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within 21 days of receipt of this notice of intent. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

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

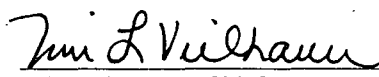
Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of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

Mediation is not available in this proceeding.

This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Department.

Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty (30) days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this order was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 3/18/05 to the persons listed:

Mr. Richard Craig, FGTC*
Mr. James Fleak, FGTC
Mr. V. Duane Pierce, AQMcS
Mr. Chris Kirts, NED

Clerk Stamp

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

Barbara J. Friday (Clerk) 3/18/05 (Date)

Item 4 if Restricted Delivery is desired.
 ■ Print your name and address on the reverse so that we can return the card to you.
 ■ Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
 Mr. Richard Craig, Vice President of
 Southeast Operations
 Florida Gas Transmission Company
 P.O. Box 4657
 Houston, TX 77210-4657

2. Article Number
 (Transfer from service label): 7000 2870 0000 7028 0146

PS Form 3811, August 2001 Domestic Return Receipt 102595-02-04-1540

A. V
 B. Received by (Printed Name) J. S. K. L. A. W. H. C. Date of Delivery 9/2/05
 D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail G.O.D.

4. Restricted Delivery? (Extra Fee) Yes

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

7000 2870 0000 7028 0146

Mr. Richard Craig, Vice President of Southeast
 Operations

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Sent To
 Mr. Richard Craig, Vice President
 Street, Apt. No., or PO Box No.
 P. O. Box 4657
 Houston, TX 77210-4657

PS Form 3800, May 2000 See Reverse for Instructions