



Florida Gas Transmission Company

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

April 2, 1997

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

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APR 07 1997

BUREAU OF
AIR REGULATION

Dear Mr. Fancy:

Re: Air Permit No. AC 62-229319/PSD-FL-202
FGT Compressor Station No. 15, Taylor County
Turbine Unit 1507

1230034-004-AC

* Air Permit No. AC 50-229440
FGT Compressor Station No. 21, Palm Beach County
Turbine Units 2101 and 2102

0990333-003-AC

Air Permit No. AC 09-229441
FGT Compressor Station No. 26, Citrus County
Turbine Unit 2601

0170035-003-AC

Air Permit No. AC 29-228821
FGT Compressor Station No. 30, Hillsborough County
Turbine Units 3001, 3002, and 3003

0570438-004-AC

Subject: Permit Revisions

Florida Gas Transmission Company (FGT) is requesting permit revision to the above referenced permits.

As discussed in our meeting with you on 1 April 1997, turbines at the above referenced facilities will require routine major maintenance in the near future. This maintenance will be required sooner than FGT had originally anticipated. Additionally, FGT cannot predict exactly when this maintenance will be required and the turbines can fail suddenly without warning. The maintenance work requires that the turbine be removed from the compressor station and transported to a facility where the necessary work can be performed. This also requires that a replacement turbine be installed at the compressor station as soon as the old one is removed since it is essential to be public that FGT maintain its gas transmission service to its customers which include several electric power utilities.

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FGT is requesting permit revisions to allow the removal and replacement of the above referenced turbines with a similar unit as soon as a turbine fails or needs major maintenance and must be replaced. The replacement units would not exceed the horsepower ratings or the emission limits of the units being replaced. Compressor Station No. 15 is a major source and the net difference between actual and potential emissions of the replacement units will not exceed significant levels requiring a Prevention of Significant Deterioration permit.

FGT respectfully suggests for consideration the following permit provisions wording:

"The existing turbine, Identification No. ****, may be replaced by a similar turbine whenever maintenance requires removal of the turbine from the site provided the following requirements are met:

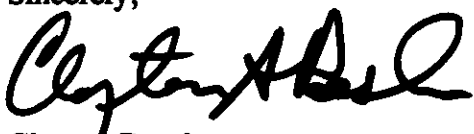
- a) the horsepower rating of the replacement turbine does not exceed that of the existing turbine,
- b) the emissions of the replacement turbine shall not exceed the permitted emission limits of the existing turbine,
- c) the difference between the actual emissions of the existing turbine and the potential emissions of the replacement turbine does not require that a Prevention of Significant Deterioration permit be obtained, and
- d) the replacement turbine meets all requirements of 40 CFR 60 Subpart GG.

Written notification of the change shall be sent to the [local program] within 14 days of the start of operation of the replacement turbine".

A check for \$1000 has been enclosed for the permit fee (\$250 for each of the four permits to be revised).

Any questions or need for additional information should be directed to Clay Roesler at 407/875-5865. Thank you for your attention to this matter.

Sincerely,



Clayton Roesler
Division Environmental Specialist

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David Parham, P.E.
Senior Environmental Engineer

cc: Ms. Margaret Cangro, Air Quality Division, Florida Department of
Environmental Protection, Southwest District, 3804 Coconut Palm Drive,
Tampa, Florida 33619 w/o attachments

DP/PL
4/4/97

Mr. Richard C. Kirby, IV, P.E. Environmental Protection Commission of
Hillsborough County, 1900 9th Avenue, Tampa, Florida 33605

Mr. Jeff Koerner, Air Pollution Control Section, Palm Beach County Public
Health Unit, P.O. Box 29, West Palm Beach, Florida 33402-0029

Mr. Chris Kirts, Air Administrator, Northeast District, Florida Department of
Environmental Protection, 7825 Bay Meadows Way, Suite 200B, Jacksonville,
Florida 32256-7577

William Rome - FGT
Jim Groenjes, FGT Plant City, C/S 30
Norman Tedder, FGT Perry C/S 15, Taylor County
Pedro Sobero, FGT West Palm Beach C/S 21
Fred Morris, FGT LeCanto C/S 26

SED
T. Nelson