



Florida Gas Transmission Company

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February 29, 2000

OVERNIGHT

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BUREAU OF AIR REGULATION

Mr. Bob Kriegel
Northwest District
Florida Department of Environmental Protection
160 Governmental Center
Pensacola, Florida 32501-5794

Reference: File No. 1130037-002-AC
Facility: 1130037
Compressor Station No. 12, Santa Rosa County
File No. 0390029-002-AC
Facility: 0390029
Compressor Station No. 14, Gadsden County

Dear Mr. Kriegel:

Subject: Comments on Draft Permit

Thank you for taking time to meet with us at FGT's Mt. Vernon Compressor Station. We hope it was informative. While we were there, we reviewed and discussed the draft air permit applications for Compressor Stations No. 12 and 14. During this review of the draft permit a number of items were discussed. This letter addresses each of these items and FGT's viewpoint.

FGT respectfully, submits the following comments.

Item 1 Reference

Page [3]

Section II. Facility-wide Conditions

6. General Pollutant Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions

Item 1 Comment:

The words: "[insert any required systems]" appear to be left by error and need to be removed.

Item 2 Reference

Page [6]

Section III. Emission Unit(s) and Conditions

First Paragraph. Last Sentence.

Item 2 Comment:

The stack exit diameter is listed as "8.74 feet." This is the equivalent diameter (D_e) of the stack. The stack is rectangular in cross section with dimensions of 7.5 x 8 feet. FGT suggest clarifying this by either indicating that 8.74 is an equivalent diameter or by giving the actual dimensions.

Item 3

Page [6]
Section III. Emission Unit(s) and Conditions
Essential Potential to emit (PTE) Parameters
[A].1. Capacity

Item 3 Comment:

The word "either" should be deleted.

The value of 88.6 MMBtu/hr is based on heat input at ISO conditions. FGT suggests that this be stated for correctness.

Finally, since the curve attached to the permit expresses heat input as fuel flow in units of lbM/hr, FGT suggest that the value of 4256.8 lbM/hr be substituted or used in addition to the MMBtu/hr value in this condition to facilitate understanding by others.

Item 4 Reference

Page [8]
Section III. Emission Unit(s) and Conditions
Test Requirements, Methods and Procedures
[A].8.

Item 4 Comment:

The schedule, as written, would be difficult to meet. This is particularly true of notifying the DEP 15 days prior to testing when testing is required to be done within 30 days after initial operation. That allows two weeks to establish a test schedule with a qualified testing company. Additionally, 30 days after initial operation does not allow for any start-up problems that may take more than 30 days to correct.

FGT suggest that the requirement to test "within thirty (30) days after initial operation" be changed to the schedule given in 40 CFR Part 60.8 Performance Tests since the new emission unit will be subject to 40 CFR 60 Subpart GG and the requirements of 60.8(a). 40 CFR 60.8(a) requires that testing be performed "within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility..."

Item 5 Reference

Page [8]
Section III. Emission Unit(s) and Conditions
Test Requirements, Methods and Procedures
[A].10.
First Sentence.

Item 5 Comment:

The first sentence requires testing at four different loads. FGT requests that this requirement be changed to require peak load only since testing at different loads is intended to establish operating conditions for turbines with water injection and this turbine will not have water injection.

Item 6 Reference

Page [8]
Section III. Emission Unit(s) and Conditions
Test Requirements, Methods and Procedures
[A].10.
Second Sentence.

Item 6 Comment:

The word "corrected" is misspelled.

Item 7 Reference

Page [8]
Section III. Emission Unit(s) and Conditions
Test Requirements, Methods and Procedures
[A].10.
Last Sentence.

Item 7 Comment:

This sentence refers to the attached curve. The use of this curve is not clear from the permit condition as written in the draft permit. From our discussion, FGT's understanding is that emissions will be limited to 8.8 lb/hr at inlet temperatures below ISO conditions and to the value on the curve for inlet temperatures above ISO conditions.

FGT believes that this is an unreasonable requirement and inappropriate application of this curve. The curve clearly indicates that emissions could exceed 8.8 lb/hr at inlet temperatures below ISO conditions. Limiting emissions to 8.8 lb/hr below ISO conditions could potentially lead to non-compliance situations whenever lower inlet temperatures occur. Additionally, use of the curve instead of 8.8 lb/hr at higher inlet temperatures is inconsistent.

FGT requests that lb/hr emission rates be limited to the curve value for a given inlet temperature. The 8.8 lb/hr emission rate represents a nominal short-term emission rate that is based on the expected tons per year (tpy) emission rate at ISO conditions. Emissions at ISO conditions are a slightly conservative estimate of annual emissions compared to the average annual site conditions. The curve shows that a maximum short-term emission rate of approximately 9.6 lb/hr could occur at extremely low inlet temperatures. FGT suggests that a separate maximum lb/hr emission rate of 9.6 lb/hr be identified in the permit along with the nominal 8.8 lb/hr.

FGT would like to point out that the National Ambient Air Quality Standard (NAAQS) for NO_x is an annual standard only. Impacts of NO_x emissions on this standard are assessed using tpy emission rates. There is no short-term NAAQS for NO_x. Also, Prevention of Significant Deterioration (PSD) is based on annual ton per year emission rates and not short-term, lb/hr emission rates. Finally, the New Source Performance Standards (40 CFR 60 Subpart GG) for NO_x is a concentration standard (ppmv) and not a mass rate standard. Likewise, Best Available Control Technology for stationary gas-fired turbines under PSD is normally established as a concentration (ppmv). Severely limiting short-term emission rates (lb/hr) of NO_x, as this permit condition does, is inconsistent with the established regulations and standards pertaining to NO_x and stationary turbines.

Item 8

Page [9]
Section III. Emission Unit(s) and Conditions
Recordkeeping and Reporting Requirements
[A].12. Custom Fuel Monitoring Schedule

Item 8 Comment:

FGT accepts the schedule as given; however, there is a question as to the correct procedure for approval of this schedule. It is FGT's understanding that custom fuel monitoring schedules cannot be used until approved and that individual requests must be made to the Administrator and approvals given on a case-by-case basis. FGT further understands that the Administrator, in this case, is considered to be the USEPA Regional Office. If this is the true, then this permit condition would not be valid until such a request is made and subsequent approval given.

Please confirm that FGT can legally use this custom fuel monitoring schedule prior to approval from the Administrator.

Thank you for the opportunity to comment on the draft permit. FGT trusts that this letter clearly presents FGT's view on these matters. If you have any need to further discuss these items or need additional information, please call me at (407) 838-7119.

Sincerely,



David H. Parham, P.E.

Attachments

CC: Jordan Hunter, FGT w/o attachments
Glenn Sellars, FGT
Arnold Eisenstein, Enron
Frank Diemont, Enron
Clay Roesler, FGT
Alvero Linero, FDEP - Tallahassee
V. Duane Pierce, Ph.D., AQMcs, LLC
Compressor Station No. 12
Compressor Station No. 14
Project file

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