



# Florida Department of Environmental Protection

Lawton Chiles  
Governor

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<sub>x</sub>, SO<sub>2</sub>, 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  
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TO:

8. Compliance with the NO<sub>x</sub>, SO<sub>2</sub>, 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 the 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  
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(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  
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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 12/21/93 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.

Barbara J. Boutwell  
Clerk

12/21/93  
Date



ENSR Consulting  
and Engineering

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

December 3, 1993

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

RECEIVED

DEC - 6 1993

Division of Air  
Resources Management

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



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<sub>2</sub> emission limits be clarified to base SO<sub>2</sub> 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 SO<sub>2</sub> 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.

Sincerely,

A handwritten signature in cursive script that reads "Barry Andrews".

Barry D. Andrews, P.E.  
Manager, Air Quality Services

cc : Alan Weatherford

Enclosure



# Florida Department of Environmental Protection

Lawton Chiles  
Governor

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:

<u>Pollutant</u>	<u>lbs/hr</u>	<u>tons/yr</u>	<u>Emission Factor</u>
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 (non-methane)	8.8	38.6	1.0 g/bhp-hr
Particulate Matter (TSP)	0.14	0.61	5 lbs/MMscf
Particulate Matter (PM <sub>10</sub> )	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:

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

**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 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:

<u>Pollutant</u>	<u>lbs/hr</u>	<u>tons/yr</u>	<u>Emission Factor</u>
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 <sub>10</sub> )	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>	<u>tons/yr</u>	<u>Emission Factor</u>
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 (non-methane)	2.6	11.6	0.44 g/bhp-hr
Particulate Matter (TSP)	0.08	0.4	3.87 lbs/MMscf
Particulate Matter (PM <sub>10</sub> )	0.08	0.4	3.87 lbs/MMscf
Sulfur Dioxide	0.46	2.0	7.74 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 16,154 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:

<u>Pollutant</u>	<u>lbs/hr</u>	<u>tons/yr</u>	<u>Emission Factor</u>
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 <sub>10</sub> )	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>	<u>tons/yr</u>	<u>Emission Factor</u>
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 (non-methane)	2.6	11.6	0.44 g/bhp-hr
Particulate Matter (TSP)	0.08	0.4	3.87 lbs/MMscf
Particulate Matter (PM <sub>10</sub> )	0.08	0.4	3.87 lbs/MMscf
Sulfur Dioxide	0.46	2.0	7.74 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 16,154 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 <sub>10</sub> )	0.08	0.4	5 lbs/MMscf
Sulfur Dioxide	0.476	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	1.78 g/bhp-hr
Carbon Monoxide	11.1	48.7	1.87 g/bhp-hr
Volatile Organic Compounds (non-methane)	2.6	11.6	0.44 g/bhp-hr
Particulate Matter (TSP)	0.08	0.4	3.95 lbs/MMscf
Particulate Matter (PM <sub>10</sub> )	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:

<u>Pollutant</u>	<u>lbs/hr</u>	<u>tons/yr</u>	<u>Emission Factor</u>
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 <sub>10</sub> )	0.09	0.4	5 lbs/MMscf
Sulfur Dioxide	0.51	2.2	10 qr/100scf

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

<u>Pollutant</u>	<u>lbs/hr</u>	<u>tons/yr</u>	<u>Emission Factor</u>
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 (non-methane)	9.4	41.0	1.64 g/bhp-hr
Particulate Matter (TSP)	0.09	0.4	3.90 lbs/MMscf
Particulate Matter (PM <sub>10</sub> )	0.09	0.4	3.90 lbs/MMscf
Sulfur Dioxide	0.51	2.2	7.80 qr S/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.

**TO:** 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 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>	<u>lbs/hr</u>	<u>tons/yr</u>	<u>Emission Factor</u>
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 (non-methane)	8.8	38.6	1.0 g/bhp-hr
Particulate Matter (TSP)	0.13	0.6	5 lbs/MMscf
Particulate Matter (PM <sub>10</sub> )	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:

<u>Pollutant</u>	<u>lbs/hr</u>	<u>tons/yr</u>	<u>Emission Factor</u>
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 (non-methane)	8.8	38.6	1.0 g/bhp-hr
Particulate Matter (TSP)	0.13	0.6	4.23 lbs/MMscf
Particulate Matter (PM <sub>10</sub> )	0.13	0.6	4.23 lbs/MMscf
Sulfur Dioxide	0.75	3.3	8.53 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 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>	<u>lbs/hr</u>	<u>tons/yr</u>	<u>Emission Factor</u>
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 (non-methane)	8.8	38.6	1.0 g/bhp-hr
Particulate Matter (TSP)	0.13	0.6	5 lbs/MMscf
Particulate Matter (PM <sub>10</sub> )	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:

<u>Pollutant</u>	<u>lbs/hr</u>	<u>tons/yr</u>	<u>Emission Factor</u>
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 (non-methane)	8.8	38.6	1.0 g/bhp-hr
Particulate Matter (TSP)	0.13	0.6	3.90 lbs/MMscf
Particulate Matter (PM <sub>10</sub> )	0.13	0.6	3.90 lbs/MMscf
Sulfur Dioxide	0.75	3.3	7.80 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 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:

<u>Pollutant</u>	<u>lbs/hr</u>	<u>tons/yr</u>	<u>Emission Factor</u>
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 <sub>10</sub> )	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:

<u>Pollutant</u>	<u>lbs/hr</u>	<u>tons/yr</u>	<u>Emission Factor</u>
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	4.13 lbs/MMscf
Particulate Matter (PM <sub>10</sub> )	0.09	0.4	4.13 lbs/MMscf
Sulfur Dioxide	0.49	2.2	8.27 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 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:

<u>Pollutant</u>	<u>lbs/hr</u>	<u>tons/yr</u>	<u>Emission Factor</u>
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 <sub>10</sub> )	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>	<u>lbs/hr</u>	<u>tons/yr</u>	<u>Emission Factor</u>
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	4.13 lbs/MMscf
Particulate Matter (PM <sub>10</sub> )	0.09	0.4	4.13 lbs/MMscf
Sulfur Dioxide	0.49	2.0	8.27 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 17,010 scf/hr.
- Maximum heat input shall not exceed 17.52 MMBtu/hr.

Mr. Allan Weatherford  
Request for Amendments and Extensions  
Page 12

**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 14

QUINCY, FLORIDA

Station	Model Run Factor	MAXIMUM 1-HR CONCENTRATION (ug/m**3)					Maximum Emission (lb/hr)				
		NOx	CO	VOCs	Particulates	SO2	NOx	CO	VOCs	Particulates	SO2
14 Permitted	3.888	41.213	43.157	10.109	0.311	1.788	10.60	11.10	2.60	0.08	0.46
14 Revised	3.827	45.541	47.838	11.404	0.421	2.067	11.90	12.50	2.98	0.11	0.54

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 14--Permit--Simple Terrain, no Downwash

SIMPLE TERRAIN INPUTS:

SOURCE TYPE = POINT  
EMISSION RATE (G/S) = .1260  
STACK HEIGHT (M) = 15.24  
STK INSIDE DIAM (M) = .44  
STK EXIT VELOCITY (M/S) = 23.49  
STK GAS EXIT TEMP (K) = 560.93  
AMBIENT AIR TEMP (K) = 293.00  
RECEPTOR HEIGHT (M) = .00  
IOPT (1=URB,2=RUR) = 2  
BUILDING HEIGHT (M) = .00  
MIN HORIZ BLDG DIM (M) = .00  
MAX HORIZ BLDG DIM (M) = .00

\*\*\* FULL METEOROLOGY \*\*\*

\*\*\*\*\*  
\*\*\* SCREEN AUTOMATED DISTANCES \*\*\*  
\*\*\*\*\*

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

DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
1.	.0000	0	.0	.0	.0	.0	.0	.0	
100.	1.005	1	3.0	3.1	960.0	39.4	27.4	15.0	NO
200.	3.673	2	5.0	5.1	1600.0	29.7	36.4	20.7	NO
300.	3.888	3	5.0	5.2	1600.0	29.6	34.5	20.7	NO
400.	3.728	3	3.0	3.1	960.0	39.1	45.2	27.3	NO
500.	3.493	3	3.0	3.1	960.0	39.1	55.2	33.1	NO

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 1. M:  
300. 3.888 3 5.0 5.2 1600.0 29.6 34.5 20.7 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 PROCEDURE	MAX CONC (UG/M**3)	DIST TO MAX (M)	TERRAIN HT (M)
SIMPLE TERRAIN	3.888	300.	0.

\*\*\*\*\*  
\*\* REMEMBER TO INCLUDE BACKGROUND CONCENTRATIONS \*\*  
\*\*\*\*\*

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

Station 14--Actual--Simple Terrain, no Downwash

SIMPLE TERRAIN INPUTS:

SOURCE TYPE = POINT  
EMISSION RATE (G/S) = .1260  
STACK HEIGHT (M) = 15.47  
STK INSIDE DIAM (M) = .66  
STK EXIT VELOCITY (M/S) = 10.35  
STK GAS EXIT TEMP (K) = 560.93  
AMBIENT AIR TEMP (K) = 293.00  
RECEPTOR HEIGHT (M) = .00  
IOPT (1=URB,2=RUR) = 2  
BUILDING HEIGHT (M) = .00  
MIN HORIZ BLDG DIM (M) = .00  
MAX HORIZ BLDG DIM (M) = .00

\*\*\* FULL METEOROLOGY \*\*\*

\*\*\*\*\*  
\*\*\* SCREEN AUTOMATED DISTANCES \*\*\*  
\*\*\*\*\*

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

DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
1.	.0000	0	.0	.0	.0	.0	.0	.0	
100.	.9683	1	3.0	3.1	960.0	39.6	27.4	15.0	NO
200.	3.614	2	5.0	5.2	1600.0	30.0	36.4	20.7	NO
300.	3.827	3	5.0	5.2	1600.0	29.8	34.5	20.7	NO
400.	3.686	3	4.0	4.2	1280.0	33.3	44.9	26.9	NO
500.	3.464	3	3.0	3.1	960.0	39.3	55.2	33.1	NO
600.	3.210	3	2.0	2.1	640.0	51.2	65.5	39.7	NO

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 1. M:  
303. 3.827 3 5.0 5.2 1600.0 29.8 35.0 21.0 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 PROCEDURE	MAX CONC (UG/M**3)	DIST TO MAX (M)	TERRAIN HT (M)
SIMPLE TERRAIN	3.827	303.	0.

\*\*\*\*\*  
\*\* REMEMBER TO INCLUDE BACKGROUND CONCENTRATIONS \*\*  
\*\*\*\*\*

Air Emissions Estimates for Permitting

Station 14; Quincy, FL

	NOX (TPY)	CO (TPY)	NMHC (TPY)	SO2 (TPY)	PM (TPY)
<b>Engines</b>					
Compressor Engine 1	212.5	27.0	8.5	1.8	0.3
Compressor Engine 2	212.5	27.0	8.5	1.8	0.3
Compressor Engine 3	212.5	27.0	8.5	1.8	0.3
Compressor Engine 4	212.5	27.0	8.5	1.8	0.3
Compressor Engine 5	212.5	27.0	8.5	1.8	0.3
Compressor Engine 6	46.4	48.7	23.2	2.1	0.4
Emergency Generator Engine 1	2.3	0.2	0.1	0.0	0.0
Emergency Generator Engine 2	1.9	0.2	0.1	0.0	0.0
Air Compressor Engine 1	5.0	0.5	0.2	0.0	0.0
<b>Tanks</b>					
Oil and Water Separator 1	0.0	0.0	0.2	0.0	0.0
Oil and Water Separator 2	0.0	0.0	0.2	0.0	0.0
Pipeline Condensate Tank 1	0.0	0.0	0.1	0.0	0.0
Waste Oil Storage Tank 1	0.0	0.0	0.0	0.0	0.0
Diesel Storage Tank 1 (removed)	0.0	0.0	0.0	0.0	0.0
Diesel Storage Tank 2 (de minimus)	0.0	0.0	0.0	0.0	0.0
Lube Oil Storage Tank 1 (de minimus)	0.0	0.0	0.0	0.0	0.0
Lube Oil Waste Tank 1 (de minimus)	0.0	0.0	0.0	0.0	0.0
Lube Oil Rundown Tank 1 (de minimus)	0.0	0.0	0.0	0.0	0.0
<b>Machines</b>					
Parts Cleaning Machine 1	?	?	?	?	?
Parts Cleaning Machine 2	?	?	?	?	?
Paint Cleaning Machine 1 (removed)	0.0	0.0	0.0	0.0	0.0
<b>Blowdowns</b>					
ESD and Maintenance blowdowns	0.0	0.0	1.6	0.0	0.0
<b>Fugitive Emissions</b>					
Valves	?	?	?	?	?
Flanges	?	?	?	?	?
<b>Total Emissions</b>	<b>1117.9</b>	<b>184.8</b>	<b>68.2</b>	<b>11.0</b>	<b>2.0</b>

Engine Emission Calculation Worksheet

Station 14; Quincy, FL

Emergency Generator Engine 1

Engine data

Annual use (maximum); hr./yr.	400 hr./yr.
Power; Hp	235 Hp
Power; Btu/hr. (@ 8026 (Btu/hr.)/Hp)	1886110 Btu/hr.
Fuel consumption; scf/hr. (@ 1040 Btu/scf)	1814 scf/hr.

Emissions data

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

Emissions calculations

NOx	2.3 TPY
CO	0.2 TPY
NMHC	0.1 TPY
SO2	0.0 TPY
PM	0.0 TPY



# Engine Emission Calculation Worksheet

## Station 14; Quincy, FL

### Emergency Generator Engine 2

#### Engine data

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

#### Emissions data

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

#### Emissions calculations

NOx	1.9 TPY
CO	0.2 TPY
NMHC	0.1 TPY
SO2	0.0 TPY
PM	0.0 TPY

Engine Emission Calculation Worksheet

Station 14; Quincy, FL

Air Compressor Engine 1

Engine data

Annual use (maximum); hr./yr.	2555 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.

Emissions data

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

Emissions calculations

NOx	5.0 TPY
CO	0.5 TPY
NMHC	0.2 TPY
SO2	0.0 TPY
PM	0.0 TPY

**FIXED ROOF TANK VOLATILE ORGANIC COMPOUND EMISSIONS**

COMPANY: Florida Gas Transmission Co.

DATE: 5/9/93

LOCATION: Station 14; Quincy, FL

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

**TANK PHYSICAL DATA**

TANK IDENTIFICATION NUMBER	Oil and Water Separator 1
EMISSION CONTROLS	None
PERCENT EFFICIENCY	0
TANK PAINT COLOR	Black
TANK DIAMETER (FT), D	10.0
TANK HEIGHT (FT), H	15.0
PAINT FACTOR, Fp	1.58
TANK CAPACITY (BBLS), VB	210
TANK CAPACITY (GALLONS), V	8812
ADJUSTMENT FACTOR FOR DIA., C	0.5

**WEATHER DATA**

AVG. DAILY TEMP. CHANGE (DEG F), DeltaT	20.0
STORAGE TEMP. (DEG. F)	72.4
AVG. ATM. PRESS. (PSIA), Pa	14.7

**PRODUCT PHYSICAL DATA**

MATERIAL STORED	Condensate, oil, water
MOLECULAR WEIGHT (##/MOLE) Mv	53.0
VAPOR PRESS. AT STG. TEMP. (DEG. F), P	2.8
PRODUCT FACTOR, KsubC (CRUDE 0.65, OTHER 1.0)	1.0

**THROUGHPUT DATA**

DAYS IN SERVICE, Ds	365
VAPOR SPACE HEIGHT (FT), VH	7.5
TANK THROUGHPUT (BBLS FOR DAYS IN SERVICE), TT	1000
FILLING RATE (BBLS/HR), FR	40
NUMBER OF TURNOVERS FOR DAYS IN SERVICE, N	4.8
TURNOVER FACTOR, Kn	1

FIXED ROOF TANK BREATHING LOSS, # Lb =  
 $0.0226 * Mv * ((P / (Pa - P))^{0.68}) * (D^{1.73}) * (VH^{0.51}) * (\Delta T^{0.5}) * Fp * C * Kc * Ds / 365 * (100 - \%eff) / 100$

FIXED ROOF TANK WORKING LOSS, # Lw =  
 $0.000024 * Mv * P * V * N * Kn * Kc * (100 - \%eff) / 100$

VOLATILE ORGANIC COMPOUND LOSSES	BREATHING	WORKING	TOTAL
POUNDS FOR DAYS SERVICE =	237.4	149.6	387.0
TONS FOR DAYS SERVICE =	0.1	0.1	0.2
POUNDS PER YEAR =	237.4	149.6	387.0
TONS PER YEAR =	0.1	0.1	0.2
AVERAGE POUNDS PER HOUR =	0.0	0.0	0.0
MAXIMUM POUNDS PER HOUR =	0.1	6.0	6.0

**FIXED ROOF TANK VOLATILE ORGANIC COMPOUND EMISSIONS**

COMPANY: Florida Gas Transmission Co.

DATE: 5/9/93

LOCATION: Station 14; Quincy, FL

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

**TANK PHYSICAL DATA**

TANK IDENTIFICATION NUMBER	Oil and Water Sperator 2
EMISSION CONTROLS	None
PERCENT EFFICIENCY	0
TANK PAINT COLOR	Black
TANK DIAMETER (FT), D	10.0
TANK HEIGHT (FT), H	15.0
PAINT FACTOR, Fp	1.58
TANK CAPACITY (BBLs), VB	210
TANK CAPACITY (GALLONS), V	8812
ADJUSTMENT FACTOR FOR DIA., C	0.5

**WEATHER DATA**

AVG. DAILY TEMP. CHANGE (DEG F), DeltaT	20.0
STORAGE TEMP. (DEG. F)	72.4
AVG. ATM. PRESS. (PSIA), Pa	14.7

**PRODUCT PHYSICAL DATA**

MATERIAL STORED	Condensate, oil, water
MOLECULAR WEIGHT (##/MOLE) Mv	53.0
VAPOR PRESS. AT STG. TEMP. (DEG. F), P	2.8
PRODUCT FACTOR, KsubC (CRUDE 0.65, OTHER 1.0)	1.0

**THROUGHPUT DATA**

DAYS IN SERVICE, Ds	365
VAPOR SPACE HEIGHT (FT), VH	7.5
TANK THROUGHPUT (BBLs FOR DAYS IN SERVICE), TT	1000
FILLING RATE (BBLs/HR), FR	40
NUMBER OF TURNOVERS FOR DAYS IN SERVICE, N	4.8
TURNOVER FACTOR, Kn	1

FIXED ROOF TANK BREATHING LOSS, # Lb =  
 $0.0226 * Mv * ((P / (Pa - P))^{0.68}) * (D^{1.73}) * (VH^{0.51}) * (\Delta T^{0.5}) * Fp * C * Kc * Ds / 365 * (100 - \%eff) / 100$

FIXED ROOF TANK WORKING LOSS, # Lw =  
 $0.000024 * Mv * P * V * N * Kn * Kc * (100 - \%eff) / 100$

VOLATILE ORGANIC COMPOUND LOSSES	BREATHING	WORKING	TOTAL
POUNDS FOR DAYS SERVICE =	237.4	149.6	387.0
TONS FOR DAYS SERVICE =	0.1	0.1	0.2
POUNDS PER YEAR =	237.4	149.6	387.0
TONS PER YEAR =	0.1	0.1	0.2
AVERAGE POUNDS PER HOUR =	0.0	0.0	0.0
MAXIMUM POUNDS PER HOUR =	0.1	6.0	6.0

**FIXED ROOF TANK VOLATILE ORGANIC COMPOUND EMISSIONS**

COMPANY: Florida Gas Transmission Co.

DATE: 5/9/93

LOCATION: Station 14; Quincy, FL

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

**TANK PHYSICAL DATA**

TANK IDENTIFICATION NUMBER	<b>Condensate 1</b>
EMISSION CONTROLS	<b>None</b>
PERCENT EFFICIENCY	<b>0</b>
TANK PAINT COLOR	<b>Black</b>
TANK DIAMETER (FT), D	<b>10.0</b>
TANK HEIGHT (FT), H	<b>15.0</b>
PAINT FACTOR, Fp	<b>1.58</b>
TANK CAPACITY (BBLS), VB	<b>210</b>
TANK CAPACITY (GALLONS), V	<b>8812</b>
ADJUSTMENT FACTOR FOR DIA., C	<b>0.5</b>

**WEATHER DATA**

AVG. DAILY TEMP. CHANGE (DEG F), DeltaT	<b>20.0</b>
STORAGE TEMP. (DEG. F)	<b>72.4</b>
AVG. ATM. PRESS. (PSIA), Pa	<b>14.7</b>

**PRODUCT PHYSICAL DATA**

MATERIAL STORED	<b>Condensate</b>
MOLECULAR WEIGHT (##/MOLE) Mv	<b>53.0</b>
VAPOR PRESS. AT STG. TEMP. (DEG. F), P	<b>2.8</b>
PRODUCT FACTOR, KsubC (CRUDE 0.65, OTHER 1.0)	<b>1.0</b>

**THROUGHPUT DATA**

DAYS IN SERVICE, Ds	<b>365</b>
VAPOR SPACE HEIGHT (FT), VH	<b>7.5</b>
TANK THROUGHPUT (BBLS FOR DAYS IN SERVICE), TT	<b>100</b>
FILLING RATE (BBLS/HR), FR	<b>40</b>
NUMBER OF TURNOVERS FOR DAYS IN SERVICE, N	<b>0.5</b>
TURNOVER FACTOR, Kn	<b>1</b>

FIXED ROOF TANK BREATHING LOSS, # Lb =  
 $0.0226 * Mv * ((P / (Pa - P))^{0.68} * (D^{1.73}) * (VH^{0.51}) * (\Delta T^{0.5}) * Fp * C * Kc * Ds / 365 * (100 - \%eff) / 100$

FIXED ROOF TANK WORKING LOSS, # Lw =  
 $0.000024 * Mv * P * V * N * Kn * Kc * (100 - \%eff) / 100$

VOLATILE ORGANIC COMPOUND LOSSES	BREATHING	WORKING	TOTAL
POUNDS FOR DAYS SERVICE =	237.4	15.0	252.4
TONS FOR DAYS SERVICE =	0.1	0.0	0.1
POUNDS PER YEAR =	237.4	15.0	252.4
TONS PER YEAR =	0.1	0.0	<u>0.1</u>
AVERAGE POUNDS PER HOUR =	0.0	0.0	0.0
MAXIMUM POUNDS PER HOUR =	0.1	6.0	6.0

**FIXED ROOF TANK VOLATILE ORGANIC COMPOUND EMISSIONS**

COMPANY: Florida Gas Transmission Co.

DATE: 5/9/93

LOCATION: Station 14; Quincy, FL

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

**TANK PHYSICAL DATA**

TANK IDENTIFICATION NUMBER	<b>Waste Oil 1</b>
EMISSION CONTROLS	<b>None</b>
PERCENT EFFICIENCY	<b>0</b>
TANK PAINT COLOR	<b>Black</b>
TANK DIAMETER (FT), D	<b>8.0</b>
TANK HEIGHT (FT), H	<b>10.0</b>
PAINT FACTOR, Fp	<b>1.58</b>
TANK CAPACITY (BBLs), VB	<b>90</b>
TANK CAPACITY (GALLONS), V	<b>3760</b>
ADJUSTMENT FACTOR FOR DIA., C	<b>0.4</b>

**WEATHER DATA**

AVG. DAILY TEMP. CHANGE (DEG F), DeltaT	<b>20.0</b>
STORAGE TEMP. (DEG. F)	<b>72.4</b>
AVG. ATM. PRESS. (PSIA), Pa	<b>14.7</b>

**PRODUCT PHYSICAL DATA**

MATERIAL STORED	<b>Waste oil</b>
MOLECULAR WEIGHT (##/MOLE) Mv	<b>190.0</b>
VAPOR PRESS. AT STG. TEMP. (DEG. F), P	<b>0.0019</b>
PRODUCT FACTOR, KsubC (CRUDE 0.65, OTHER 1.0)	<b>1.0</b>

**THROUGHPUT DATA**

DAYS IN SERVICE, Ds	<b>365</b>
VAPOR SPACE HEIGHT (FT), VH	<b>7.5</b>
TANK THROUGHPUT (BBLs FOR DAYS IN SERVICE), TT	<b>10</b>
FILLING RATE (BBLs/HR), FR	<b>15</b>
NUMBER OF TURNOVERS FOR DAYS IN SERVICE, N	<b>0.1</b>
TURNOVER FACTOR, Kn	<b>1</b>

FIXED ROOF TANK BREATHING LOSS, # Lb =  
 $0.0226 * Mv * ((P / (Pa - P))^{0.68}) * (D^{1.73}) * (VH^{0.51}) * (\Delta T^{0.5}) * Fp * C * Kc * Ds / 365 * (100 - \%eff) / 100$

FIXED ROOF TANK WORKING LOSS, # Lw =  
 $0.000024 * Mv * P * V * N * Kn * Kc * (100 - \%eff) / 100$

VOLATILE ORGANIC COMPOUND LOSSES	BREATHING	WORKING	TOTAL
POUNDS FOR DAYS SERVICE =	2.8	0.0	2.8
TONS FOR DAYS SERVICE =	0.0	0.0	0.0
POUNDS PER YEAR =	2.8	0.0	2.8
TONS PER YEAR =	0.0	0.0	<u>0.0</u>
AVERAGE POUNDS PER HOUR =	0.0	0.0	0.0
MAXIMUM POUNDS PER HOUR =	0.0	0.0	0.0

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

unmetered gas released (due to blowdowns)	300 Mscf/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

UNIT	Included in Most Recent Operating Permit As	Required to be in Title V Operating Permit	In Compliance with Current Regulations	Information Required For New Permit Application
WORTH. SEHG-8	Engine 1	X	Yes	None
WORTH. SEHG-8	Engine 2	X	Yes	None
WORTH. SEHG-8	Engine 3	X	Yes	None
WORTH. SEHG-8	Engine 4	X	Yes	None
WORTH. SEHG-8	Engine 5	X	Yes	None
CB GMVR-12	Engine 6	X	Yes	None
Emergency Generator # 1	Omitted	X	No	Btu/hp-hr, Stack temp., Emission rates for NOx, CO, NM-NE HC, SO2, and PM
Emergency Generator # 2	Omitted	X	No	Btu/hp-hr, Stack temp., Horsepower, Emission rates for NOx, CO, NM-NE HC, SO2, and PM
Air Compressor # 1	Omitted	X	No	Stack Parameters, Emission rates for NOx, CO, NM-NE HC, SO2, and PM
Oil and Water Separator # 1	Omitted	X	No	Emission rate for NM-NE HC, Throughput, Tank Dimensions, Tank Condition, Vent data, Fill rate
Oil and Water Separator # 2	Omitted	X	No	See O&W Separator # 1
Waste Oil Storage # 1	Omitted	X	No	Emission rate for NM-NE HC, Throughput, Tank Dimensions, Tank Condition, Vent data, Fill rate
Pipeline Condensate # 1	Omitted	X	No	Emission rate for NM-NE HC, Throughput, Tank Dimensions, Tank Condition, Vent data, Fill rate
Lube Oil Storage # 1	Omitted	X	No	Emission rate for NM-NE HC, Throughput, Tank Dimensions, Tank Condition, Vent data, Fill rate
Lube Oil Waste Tank # 1	Omitted	X	No	Emission rate for NM-NE HC, Throughput, Tank Dimensions, Tank Condition, Vent data, Fill rate
Lube Oil Rundown Tank # 1	Omitted	X	No	Emission rate for NM-NE HC, Throughput, Tank Dimensions, Tank Condition, Vent data, Fill rate
(removed) Diesel Tank # 1	Omitted	X	No	Emission rate for VOC's, Throughput, Tank Dimensions, Tank Condition, Vent data, Fill rate
Diesel Tank # 2	Omitted	X	No	Emission rate for VOC's, Throughput, Tank Dimensions, Tank Condition, Vent data, Fill rate
Part Cleaner # 1	Omitted	X	No	Emission rate for VOC's, Manf., Model
Part Cleaner # 2	Omitted	X	No	Emission rate for VOC's, Manf., Model
(removed) Paint Cleaner # 1	Omitted	X	No	Emission rate for VOC's
ESD & Blowdown Stacks	Omitted	X	No	Emission rates, Volume B/D, Stack Information

ESD suction : 10', 10" dia  
 ESD discharge : 10', 10" dia



FGTC  
 NATURAL GAS COMPRESSION FACILITY  
 STATION 14  
 QUINCY, FLORIDA

PURPOSE OF ENGINES: THE ENGINES ACT AS PRIME MOVERS FOR THE NATURAL GAS COMPRESSORS

EMISSION SOURCE	CURRENT PERMIT STATUS	SOURCE ID	SERIAL NUMBER	HP	BTU/HP*HR	PERMIT EMISSION RATES (TPY)				
						NOX	NMHC	CO	SO2	PM
ENGINE # 1	PERMITTED UNIT	_____	G-2369	2000	6350	212.5	8.5	27	1.79	0.31
ENGINE # 2	PERMITTED UNIT	_____	G-2370	2000	6350	212.5	8.5	27	1.79	0.31
ENGINE # 3	PERMITTED UNIT	_____	G-2371	2000	6350	212.5	8.5	27	1.79	0.31
ENGINE # 4	PERMITTED UNIT	_____	G-2662	2000	6350	212.5	8.5	27	1.79	0.31
ENGINE # 5	PERMITTED UNIT	_____	G-2779	2000	6350	212.5	8.5	27	1.79	0.31
ENGINE # 6	PERMITTED UNIT	_____	48489	2400	7000	46.36	23.2	48.68	2.1	0.41
						1109	66	184	11	2

Phase I Station Characteristics

08-Jun-92  
CS14.WK1

Compressor Station: Number 14  
 Name: Quincy  
 County: Gadsden  
 Nearest City: Quincy  
 Compressor Supervisor: James Dollar  
 Mailing Address: Route 3, Box 3390  
 Quincy, Florida 32351-9803  
 Telephone: 904-627-8090  
 Latitude: 30-30-38  
 Longitude: 84-42-28  
 UTM Zone: 16  
 UTM Easting: 719.97 km  
 UTM Northing: 3,377.39 km  
 Elevation (ft): 260

Phase I Engine Characteristics

Engine Identification	1	2	3	4	5
Permit Number					
Serial Number	G-2369	G-2370	G-2371	G-2662	G-2779
Operating Time					
Hours/Day	24	24	24	24	24
Days/Week	7	7	7	7	7
Weeks/Year	52	52	52	52	52
Engine Type	Recip	Recip	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
Mass Flow Rate (lbs/hr) (a)	26172	26172	26172	26172	26172
Volumetric Flow Rate (acfm)	11637	11637	11637	11637	11637
Volumetric Flow Rate (dscfm)	5333	5333	5333	5333	5333
Exit Velocity (af/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)	0.0144	0.0144	0.0144	0.0144	0.0144
Max. Fuel Consumption (MMCF/Hr) (b)	0.0144	0.0144	0.0144	0.0144	0.0144
Specific Fuel Consump. (BTU/bhp-hr)	6350	6350	6350	6350	6350
Maximum Heat Input (MMBTU/Hr)	15	15	15	15	15
Stack Height (ft)	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 (ft)	17.00	17.00	17.00	17.00	17.00
Building Height (ft) (c)	31.75	← Same	← Same	← Same	← Same
Building Length (ft) (c)	240-200.00	←	←	←	←
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)	1040	1040	1040	1040	1040
Heat Capacity (BTU/lb)	22857	22857	22857	22857	22857
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

Phase I Emissions Rates by Engine for Station 14

Engine Identification	1	2	3	4	5
<b>Grams/BHP-Hour</b>					
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 (f)	0.016	0.016	0.016	0.016	0.016
<b>Pounds/Hour</b>					
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
<b>Tons/Year</b>					
NOX	212.47	212.47	212.47	212.47	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 I Emissions Rates for Total Station

<b>Grams/BHP-Hour</b>		
NOX	11.000	
CO	1.400	
NMHC	0.440	
SO2	0.093	
PM	0.016	
<b>Pounds/Hour</b>		
NOX	242.55	
CO	30.87	
NMHC	9.70	
SO2	2.04	
PM	0.36	
<b>Tons/Year</b>		
NOX	1062.37	
CO	135.21	
NMHC	42.49	
SO2	8.94	
PM	1.57	

SOURCE CLASSIFICATION WITH RESPECT TO PSD

MAJOR SOURCE

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

## Phase II Station Characteristics

08-Jun-92  
CS14.WK1

Compressor Station: Number 14  
 Name: Quincy  
 County: Gadsden  
 Nearest City: Quincy  
 Compressor Supervisor: James Dollar  
 Mailing Address: Route 3, Box 3390  
 Quincy, Florida 32351-9803  
 Telephone: 904-627-8090  
 Latitude: 30-30-38  
 Longitude: 84-42-28  
 UTM Zone: 16  
 UTM Easting: 719.97 km  
 UTM Northing: 3,377.39 km  
 Elevation (ft): 260

## Phase II Engine Characteristics

Engine Identification	6
Permit Number	
Serial Number	48489
Operating Time	
Hours/Day	24
Days/Week	7
Weeks/Year	52
Engine Type	Recip
Date of Installation	1991
Engine Make	Cooper-Bessemer
Engine Model	GMVR-12 CZ
Horsepower Rating	-2400 2700
Air Charging	Turbo.
Exhaust Temperature (F)	550
Mass Flow Rate (lbs/hr) (a)	36860
Volumetric Flow Rate (acfm)	15857
Volumetric Flow Rate (dscfm)	7511
Exit Velocity (ft/s)	71.68
Water Vapor Content (%)	8
Ave. Fuel Consumption (MMCF/hr) (b)	0.0162
Max. Fuel Consumption (MMCF/hr) (b)	0.0162
Specific Fuel Consump. (BTU/bhp-hr)	7000
Maximum Heat Input (MMBTU/hr)	16.8
Stack Height (ft)	50.75
Stack Diameter (in)	26
Stack to Building Offset (ft)	17.00
Building Height (ft) (c)	31.75
Building Length (ft) (c)	240.00
Building Width (ft) (c)	55.00

## Phase II Fuel Characteristics

Fuel Type	N.G.
Heating Value (BTU/CF)	1040
Heat Capacity (BTU/lb)	22857
Density (lb/cubic ft)	0.0455
Percent Sulfur (%) (d)	0.031
Percent Ash (%)	N/A

Phase II Emissions Rates by Engine for Station 14

Engine Identification		6
Grams/BHP-Hour		
	NOX	2.000
	CO	2.100
	NMHC	-1.000
	SO2 (e)	0.090
	PM (f)	0.018
Pounds/Hour		
	NOX	10.58
	CO	11.11
	NMHC	-5.29
	SO2	0.48
	PM	0.09
Tons/Year		
	NOX	46.36
	CO	48.68
	NMHC	-23.18
	SO2	2.09
	PM	0.41

Phase II Emissions Rates for Total Station

Grams/BHP-Hour		
	NOX	9.258
	CO	1.535
	NMHC	-0.548
	SO2	0.092
	PM	0.016
Pounds/Hour		
	NOX	253.13
	CO	41.98
	NMHC	-14.99
	SO2	2.52
	PM	0.45
Tons/Year		
	NOX	1108.73
	CO	183.89
	NMHC	65.67
	SO2	11.03
	PM	1.97

SOURCE CLASSIFICATION WITH RESPECT TO PSD

MAJOR SOURCE

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

. . . IC  
 NATURAL GAS COMPRESSION FACILITY  
 STATION 14  
 QUINCY, FLORIDA

PURPOSE OF EMERGENCY GENERATOR: THE EMERGENCY GENERATOR USED IN THE CASES OF POWER FAILURE

PURPOSE OF AIR COMPRESSOR: TO PROVIDE AIR FOR TIRES, ETC...

EMISSION SOURCE	CURRENT PERMIT STATUS	SOURCE ID	SERIAL NUMBER	HP	BTU/HP*HR	PERMIT EMISSION RATES (TPY)				
						NOX	NMHC	CO	SO2	PM
EMERGENCY GENERATOR # 1	NOT PERMITTED	_____	_____	235	_____	_____	_____	_____	_____	_____
EMERGENCY GENERATOR # 2	NOT PERMITTED	_____	_____	_____	_____	_____	_____	_____	_____	_____
AIR COMPRESSOR # 1	NOT PERMITTED	_____	_____	80	_____	_____	_____	_____	_____	_____
						0	0	0	0	0

FLORIDA GAS TRANSMISSION COMPANY  
COMPRESSOR STATION EMISSIONS QUESTIONNAIRE  
STATION No. 14

GENERATORS SETS

UNIT NUMBER 1 1085560	
Installed	EXISTING
Permitted	YES
Internal Combustion Engine	YES
If Int. Comb. Engine, Is Catalytic Converter present	NO
Manufacturer	Waukesha
Model	6WAK
Actual Maximum Hours of Operation ( Hr / Year )	<del>250</del> 400
If Internal Combustion Engine Complete the following information:	
Type of Fuel Used	N.G.
BTU Rating (MMBTU/HR)	
Horse Power Rating	235
Stack Height Above Grade ( ft )	10'
Stack Diameter ( inch )	14" 2" horiz
Location of Stack(s)	Outside Wall Aux. Bldg.
Stack Temperature ( F )	405

UNIT NUMBER 2 05089A-02-RG	
Installed	PHASE II
Permitted	NO
Internal Combustion Engine	YES
If Int. Comb. Engine, Is Catalytic Converter present	NO
Manufacturer	Ford
Model	LSG-875 R
Actual Maximum Hours of Operation ( Hr / Year )	400
If Internal Combustion Engine Complete the following information:	
Type of Fuel Used	N.G.
BTU Rating (MMBTU/HR)	
Horse Power Rating	200
Stack Height Above Grade ( ft )	8' 10" 3"
Stack Diameter ( inch )	12" 4' vert.
Location of Stack(s)	Above Unit
Stack Temperature ( F )	

FLORIDA GAS TRANSMISSION COMPANY  
 COMPRESSOR STATION EMISSIONS QUESTIONNAIRE  
 STATION No. 14

OTHER SOURCES

221C424054905

Unit No. 1	EXISTING
Permitted	YES
Purpose of Unit	Drive - Worth. Air Compressor
Type	6 cyl.
Manufacturer	International
Model	UC221
Size ( BTU ,or HP ,or Kw )	80 HP
Fuel Used ( if applicable )	N.G.
Stack Parameters ( ft )	11'5" ; 570°F ; vert

2555 hrs/yr

OTHER.



C  
 NATURAL GAS COMPRESSION FACILITY  
 STATION 14  
 QUINCY, FLORIDA

PURPOSE OF OIL/WATER SEPARATOR TANKS: TO SEPARATE AN OIL AND WATER MIXTURE IN ORDER TO REUSE THE WATER.

PURPOSE OF WASTE OIL TANK: TO STORE EXCESS OIL COLLECTED IN COMPRESSOR STATION PROCESSES.

PURPOSE OF PIPELINE CONDENSATE TANK: TO STORE LIGHT HYDROCARBON LIQUID OBTAINED BY CONDENSATION OF HYDROCARBON VAPORS.

PURPOSE OF LUBE OIL STORAGE TANKS: TO STORE LUBE OIL USED FOR ENGINE OPERATIONS.

PURPOSE OF LUBE OIL WASTE TANK: TO STORE WASTE LUBE OIL FROM ENGINE OPERATIONS.

PURPOSE OF THE LUBE OIL RUNDOWN TANK: TO CAPTURE EXCESS LUBE OIL FROM ENGINE OPERATIONS.

PURPOSE OF DIESEL TANKS: TO STORE FUEL FOR EQUIPMENT USAGE.

VESSEL	PERMIT STATUS	SOURCE ID	CAPACITY (GAL)	PERMIT FUGITIVE EMISSION RATES (TPY) NMHC
OIL/WATER SEPARATOR # 1	NOT PERMITTED		8820	
OIL/WATER SEPARATOR # 2	NOT PERMITTED		8820	
WASTE OIL TANK # 1	NOT PERMITTED		3780	
PIPELINE CONDENSATE # 1	NOT PERMITTED		8820	
LUBE OIL STORAGE # 1	NOT PERMITTED		10000	
LUBE OIL WASTE TANK # 1	NOT PERMITTED		150	
LUBE OIL RUNDOWN TANK # 1	NOT PERMITTED			
DIESEL TANK # 1	NOT IN USE		N/A	
DIESEL TANK # 2	NOT PERMITTED		353	

FLORIDA GAS TRANSMISSION  
AN ENRON/BONAT AFFILIATE

TELETYPE TRANSMITTAL SHEET

DESTINATION FAX #

ATTN: BILL LEFFLER

DATE: 7/23/93

FROM: ALLAN WEATHERSORD

TIME: 2:30

NUMBER OF PAGES (INCLUDING THIS TRANSMITTAL SHEET)

6

SENT VIA: PITNEY BOWES 9200F

IF YOU DO NOT RECEIVE ALL OF THE PAGES OR IF THEY ARE NOT  
COMING IN CLEARLY, PLEASE CALL 407/875-5821.

Bill:

Engine operating parameters are documented in  
Table 2. Please call me if you  
need any additional info.

Al

## SUMMARY OF RESULTS

One Dresser Rand 10TCV compressor engine was tested to determine the quantity of emissions vented to the atmosphere. The emission measurements reported herein result from tests conducted on March 17, 1992 at Compressor Station No. 12 located near Munson, in Santa Rosa County, Florida. The purpose of these tests was to determine the compliance status of this engine with regard to the FDER permit.

The permit required that tests be conducted for NO<sub>x</sub>, O<sub>2</sub>, CO<sub>2</sub>, CO, nonmethane hydrocarbons (i.e. VOC), SO<sub>2</sub>, and opacity. These parameters were measured throughout three 1-hour test runs on this engine while operating at full load and full speed.

The results from these three test runs are presented in Table 2. This table includes the operating data and ambient conditions for each test run. The measured concentrations of NO<sub>x</sub>, CO, O<sub>2</sub>, CO<sub>2</sub>, VOC, and the stack flow rates are presented in the same units and using the same test methods listed in the permit. The calculated mass emission rates of NO<sub>x</sub>, CO, and VOC are presented in terms of lbs/hr, TPY, and g/hp-hr for comparison with the permit limits.

The sulfur content of the fuel provided an indirect measurement of SO<sub>2</sub> emissions. The SO<sub>2</sub> emission rate is calculated from the total sulfur in the fuel and the estimated fuel flow as based on the Florida Gas provided horsepower.

The average emissions over the three test runs for NO<sub>x</sub> were found to be 9.27 lbs/hr, 40.7 tons/yr, and 1.01 g/hp-hr. By comparison, permit limits are 17.6 lbs/hr, 77.2 tons/yr, and 2.0 g/hp-hr. CO emissions averaged 20.6 lbs/hr, 90.4 tons/yr, and 2.25 g/hp-hr and are limited by the permit to 22.1 lbs/hr, 96.6 tons/yr, and 2.5 g/hp-hr. The tons/yr emission rates are based on 8760 hrs/year operation of the engine.

The total sulfur content of the fuel was determined via laboratory analysis by Southern Petroleum Labs of Houston, Texas. The result of that analysis is contained in Appendix H and show that the fuel contained less than 0.059 grams/100 DSCF. The permit limits the sulfur content of the fuel to

10 grains/100 DSCF. The mass emission rate of SO<sub>2</sub> presented in Table 2 was calculated from the estimated fuel flow to the engine assuming that all sulfur in the fuel was oxidized to SO<sub>2</sub>. The SO<sub>2</sub> emission rate based on this calculation averaged <0.0026 lbs/hr or <0.012 tons/yr. The permit limits for SO<sub>2</sub> mass emissions are 0.8 lbs/hr and 3.5 tons/yr.

Nonmethane hydrocarbon (i.e. VOC) concentrations were measured as required by the permit using EPA Method 25. Table 2 contains the results of those measurements. The average VOC emissions using Method 25 were 15.3 lbs/hr, 67.0 tons/yr, and 1.66 g/hp hr. The permit limits nonmethane hydrocarbon emissions to 8.8 lbs/hr, 38.6 tons/yr, and 1.0 g/hp-hr.

It is Cubix's belief that the applicability of using EPA Method 25 on this type of source is questionable. Method 25 results are affected by CO<sub>2</sub> and moisture interferents, both of which are present in percent levels in engine exhaust. These interferences would be expected to cause a high bias of the VOC concentration measurements. Even under ideal circumstances (i.e. measurements made from a matrix of air containing little or no CO<sub>2</sub> or moisture), the minimum detection limit of this method is 50 ppmv as compared to a minimum detection limit of <1.0 ppmv using other EPA test methods. For this reason, Cubix chose to also monitor VOC testing on this source using alternate, more appropriate methods.

Appendix I contains the unofficial results of these engine tests using alternate test methods. The alternate methods provided for a continuous measurement of total hydrocarbon concentrations (THC) using EPA Method 25a. The nonmethane portion of the THC was measured periodically during each test run using an on-site gas chromatograph as per EPA Method 18.

Examination of the data in Appendix I shows that the VOC emissions using the alternate methods averaged 3.53 lbs/hr (15.4 tons/yr and 0.38 g/hp-hr). When compared with the data obtained from Method 25, one can see that the CO<sub>2</sub> and moisture interferents may have biased the VOC concentrations high. In addition, the alternate methods are much less labor intensive, which eliminates a lot of the possibility of human error from the field or lab personnel.

Other alternate methods test results presented in Appendix I include the use of EPA Method 3a for O<sub>2</sub> and CO<sub>2</sub> concentrations rather than the Orsat procedure of EPA Method 3. Also, since turbulent, pulsating, engine exhaust can sometimes produce questionable flow rate results using a pitot tube, the exhaust flow rates were calculated stoichiometrically using two

methods: (1) EPA Method 19 F-factors and (2) American Gas Association's Carbon Balance Method. Appendix I contains data that compares the flow rate results using these methods with those using the pitot tube traverse techniques of EPA Methods 1-4. The moisture content was also calculated stoichiometrically and compared with that obtained using EPA Method 4.

Appendix I shows that the instrumental techniques of EPA Method 3a provide more precision in measuring O<sub>2</sub> and CO<sub>2</sub> concentrations than the Orsat procedures of Method 3. When the proper analyzer range is used, EPA Method 3a provides a precision of tenfold that of EPA Method 3, even under the best of circumstances (i.e. no human error in performing Orsat). In addition, the *Quality Assurance* section of this report shows that EPA Method 3a results can be directly traced to various QA procedures including certified calibration gases and instrument linearity and interference tests. EPA Method 3 provides for no quality assurance procedures to ensure the accuracy of the results.

Data showing the use of stoichiometric calculations for determination of stack flow rate (i.e. F-factors and carbon balance) as well as for the stack moisture content included in Appendix I demonstrates that alternate methods are in agreement with the pitot tube traverse technique. During all three test runs on this engine, the moisture content obtained from stoichiometric calculations showed agreement within 10% of that obtained using EPA Method 4. The flow rate determination using F-factors agreed with the pitot tube measurements within 10%, averaged over the three test runs, and the carbon balance provided agreement within 15%.

Cubix used the flow measurement technique that resulted in the highest calculated mass emission rates. In this case, the pitot tube technique provided the worst case scenario. The higher pitot tube flow is believed to be due to the turbulent exhaust flow causing the pitot tube readings to be biased high. However, the data of Appendix I shows that alternate flow rate measurement techniques can produce good results when pitot tube traverses are impractical. The data from the stoichiometry provides a good check of the pitot tube data.

Cubix's purpose in performing the additional testing on this unit in order to provide the data included in Appendix I is threefold:

(1) The unofficial VOC data provides alternate results to consider with regard to the compliance status of the unit. As stated earlier, Cubix believes that the data obtained from the alternate methods is more accurate than that obtained from the permit required test method.

(2) It is hoped that the data included in Appendix I can be used to

allow for alternate test methods to be used on future emission tests on similar sources.

(3) The stoichiometric flow rate data included in Appendix I helps to verify the reasonableness of the results obtained from the pitot tube measurements of the exhaust flow.

Examples of any calculations necessary for presentation of the results of this section of the report or the unofficial data contained in Appendix I are available in Appendix B of this report. Field data sheets and chain of custody records is presented in Appendix A as is the Method 25 laboratory analysis results. The strip chart records on which the instrumental analyses were recorded are provided in Appendix E and the chromatograms used for the Method 18 analyses can be found in Appendix F.

Opacity observation results and the certification for the technician performing the visible emission readings are contained in Appendix G. The permit stipulated that visible emissions shall not exceed 10%. No opacity was observed throughout the three 1-hour tests.

**TABLE 2  
SUMMARY OF RESULTS**

Operator/Plant  
Location  
Source  
Technicians

Florida Gas Munson Compressor Station  
Santa Rosa County, Florida  
Dresser Rand Compressor Engine  
LF,TS,NF

Test Run No.	C-1	C-2	C-3
Date	3/17/92	3/17/92	3/17/92
Start Time	14:15	15:35	16:52
Stop Time	15:15	16:35	17:52
<b>Engine/Compressor Operation</b>			
✓ Engine Speed (rpm)	330	330	330
Ignition Timing (°BTDC)	8	8	8
Air Manifold Pressure (psig)	16	16	16
Air Manifold Temperature (°F)	124	124	124
Estimated Fuel Flow AT 7600 BTU/hp-hr (SCFH)	31386	31386	31386
Fuel Temperature (°F)	48	47	46
Fuel Manifold Pressure (psig)	35	35.5	35
Loading Step (pockets open out of 10 total)	9	9	9
✓ Suction Pressure (psig)	681	680	679
✓ Suction Temperature (°F)	63	63	62
✓ Discharge Pressure (psig)	919	920	918
✓ Discharge Temperature (°F)	105	105	105
✓ Engine Load (BHP)	4171	4171	4171
✓ Torque (%)	97	99	98
<b>Ambient Conditions</b>			
Atmospheric Pressure (in. Hg)	29.95	29.92	29.92
Temperature (°F) : Dry bulb	78	78	71
(°F) Wet bulb	73	76	66
Humidity (lb/lb air)	0.0159	0.0184	0.0123
<b>Measured Emissions</b>			
NOx (ppmv)	68.0	66.0	62.0
CO (ppmv)	240	236	240
O2 via EPA Method 3 (vol %)	15.00	15.50	15.50
CO2 via EPA Method 3 (vol %)	3.00	3.00	3.00
VOC via EPA Method 2a (ppmv)	318.0	331.6	277.7
SO2 in fuel (lb/lbs/100 SCF)	<0.059	<0.059	<0.059
<b>Stack Volumetric Flow Rates</b>			
via Pitot Tube (SCFH, dry)	1.21E+06	1.20E+06	1.16E+06
<b>Calculated Emission Rates (via pitot tube)</b>			
NOx (lbs/hr)	9.83	9.43	8.60
CO (lbs/hr)	21.1	20.5	20.3
VOC (lbs/hr)	18.0	16.5	13.4
SO2 (lbs/hr)	<0.0026	<0.0026	<0.0026
NOx (tons/yr)	43.1	41.3	37.7
CO (tons/yr)	92.5	89.9	88.8
VOC (tons/yr)	70.0	72.2	58.7
SO2 (tons/yr)	<0.01E	<0.01E	<0.01E
NOx (g/hp-hr)	1.07	1.03	0.94
CO (g/hp-hr)	2.30	2.23	2.21
VOC (g/hp-hr)	1.74	1.79	1.46

Post-It™ brand fax transmittal memo 7671		# of pages >
To: <b>BILL LOEWER</b>	From: <b>BOB KRIEGL</b>	
Co. <b>DFRM</b>	Co. <b>NW-DEP</b>	
Dept.	Phone # <b>436-8364</b>	
Fax # <b>292-6979</b>	Fax #	

9225 Lockhart Hwy., Austin, Texas 78747  
(512) 243-0202 FAX (512) 243-0222

## EMISSION TEST PLAN

### Caryville Compressor Station Florida Gas Transmission Company

**Sources:** One Natural Gas Fired Compressor Engine, 2400 Hp, Cooper Bessemer, Model GMVR-12C2, Unit #6.

**Location:** 9 miles south of Caryville, Washington County, Florida.

**Applicable Permits and Regulations:** Florida Department of Environmental Protection  
Permit No. AC 67-189220

**Owner/Operator:** Florida Gas Transmission Company  
601 South Lake Destiny Drive  
Maitland, Florida 32751  
Attn: Allan Weatherford  
(407) 875-5816 TEL  
(407) 875-5896 FAX

RECEIVED

**Test Contractor:** Cubix Corporation  
9225 Lockhart Highway  
Austin, Texas 78747  
Attn: Rick J. Krenzke  
(512) 243-0202 TEL  
(512) 243-0222 FAX

JUL 20 1993

Northwest Florida  
DEP.

**Proposed Test Dates:** July 27, 1993  
This is the 2nd of 9 compressor stations tested along the pipeline during this project, so delays at prior test sites could affect the proposed test date.

### Test Protocol

I) Test Matrix



- A) Three test runs of 60-minutes each shall be conducted on one unit (#6) during which NO<sub>x</sub>, CO, and O<sub>2</sub> shall be continuously monitored.
- B) One pitot tube traverse shall be conducted before each test run.
- C) Moisture determinations as required for stack gas flow rate calculations shall be determined stoichiometrically based on the fuel's combustion moisture content, excess air dilution factor, and combustion air humidity due to ambient conditions. One moisture train shall be run throughout the three test runs to verify the validity of the stoichiometric calculations.
- D) Three 6-minute opacity observations shall be conducted on the engine.

## II) Test Measurements by Cubix

- A) EPA Method 1 for traverse point layout.
- B) EPA Method 2 for stack gas velocity and volumetric flow rate.
- C) EPA Method 3a for O<sub>2</sub> and CO<sub>2</sub> concentrations.
- D) Stoichiometric calculation of moisture content.
- E) EPA Method 4 for moisture content.
- F) EPA Method 7e for NO<sub>x</sub> concentrations.
- G) EPA Method 9 for opacity observations
- H) EPA Method 10 for CO concentrations
- I) Ambient conditions
  - 1) temperature
  - 2) barometric pressure
  - 3) humidity

## III) Operational Data to be provided by Florida Gas

- A) Fuel flow (if available)
- B) Recent fuel composition analysis
- C) Suction and discharge pressures
- D) Gas flow
- E) Engine speed
- F) Ignition timing
- G) Fuel and air manifold temperatures and pressures
- H) Engine load
- I) Any other data available to document each test run

## IV) Quality Assurance/ Quality Control

(as appropriate for the test methods listed above).

- A) Sample system leak check.
- B) Calibration of O<sub>2</sub>, CO, and CO<sub>2</sub> analyzers with vendor certified calibration gases.

- C) Calibration of NOx analyzers with gases traceable via EPA protocol #1.
- D) Analyze audit samples provided by regulatory agency (if available).
- E) NOx converter efficiency test.
- F) Pitot tube meeting EPA criteria and wind tunnel tested.
- G) Zero and span analyzer calibration drift tests between each test run.
- H) Multipoint calibration to demonstrate instrument linearity.
- I) Sampling system bias check (using NOx).
- J) Interference response documentation.
- K) Sample system response time data.

### **Test Report**

- A) Summary of Results
  - 1) Tabular summary of each test run showing NOx emissions in ppmv, lbs/hr, tons/year, and g/hp-hr for comparison with permit limits.
  - 2) Operating conditions reported in tabular summary.
- B) Process Description
- C) Description of Analytical Techniques
- D) Quality Assurance Activities
- E) Appendices:
  - Documentation including field data forms, strip charts, calibration gas certifications, equipment calibrations, example calculations, audit sample results, etc...

### **Miscellaneous**

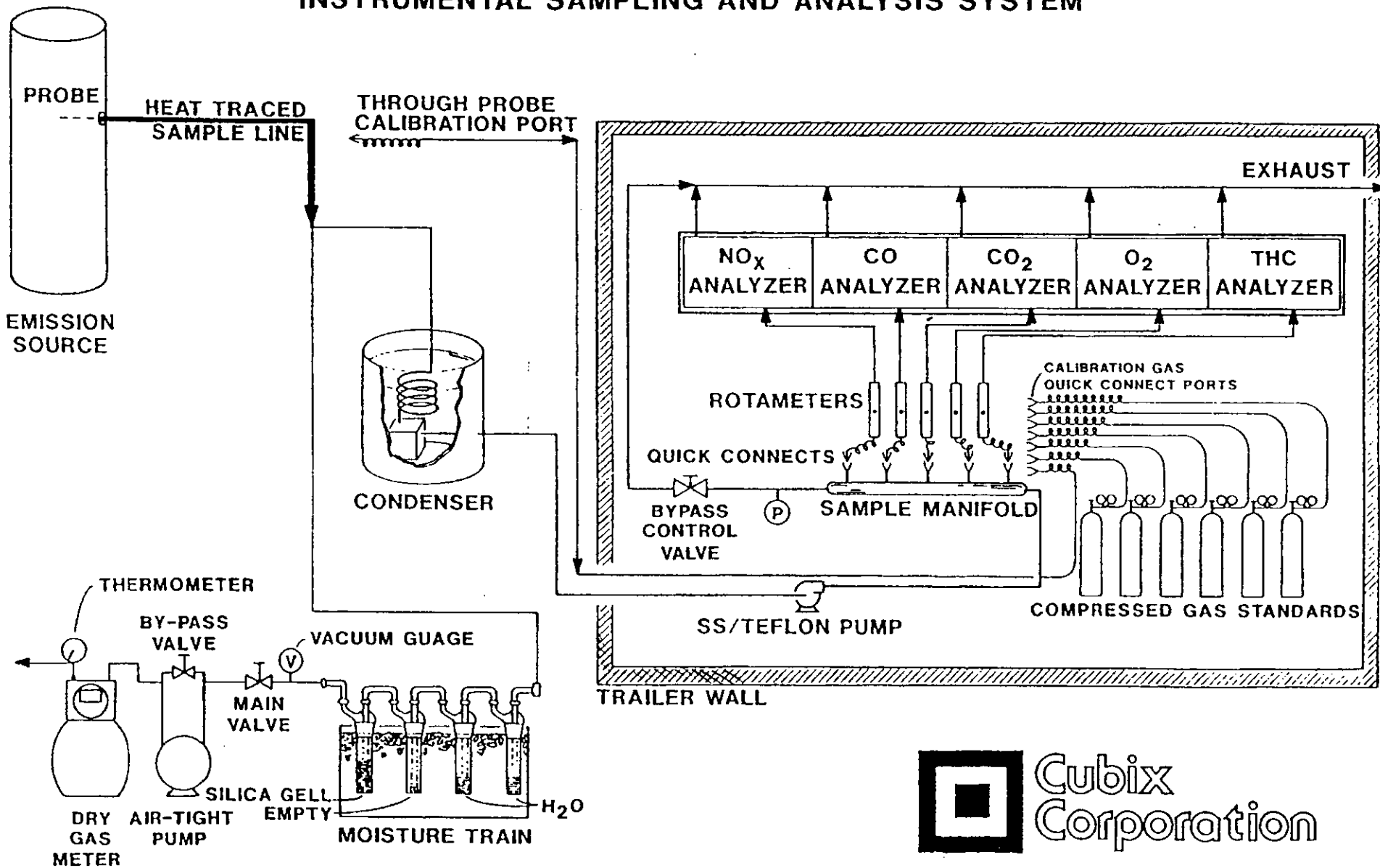
- 1) It is assumed that Florida Gas will provide adequate sampling facilities and safe access to same. (see enclosed information regarding requirements for stack testing)

### **Attachments:**

Sampling System Diagram  
Analytical Instrumentation  
Requirements for Emission Testing  
Engine Sample Port Requirements Diagram

This test plan is the property of Cubix Corporation and is intended solely for the use of Florida Gas

# INSTRUMENTAL SAMPLING AND ANALYSIS SYSTEM



## Analytical Instrumentation

<u>Parameter</u>	<u>Model and Manufacturer</u>	<u>Common Use Ranges</u>	<u>Sensitivity</u>	<u>Response Time (sec.)</u>	<u>Detection Principle</u>
NO <sub>x</sub>	TECO 10AR	0-10 ppm 0-100 ppm 0-200 ppm 0-500 ppm 0-1,000 ppm 0-5,000 ppm	0.1ppm	1.7	Thermal reduction of NO <sub>2</sub> to NO. Chemiluminescence of reaction of NO with O <sub>3</sub> . Detection by PMT. Inherently linear for listed ranges.
CO	TECO 48	0-10 ppm 0-20 ppm 0-50 ppm 0-100 ppm 0-200 ppm 0-500 ppm 0-1000 ppm	0.1ppm	10	Infrared absorption, gas filter correlation detector, micro-processor based linearization
CO <sub>2</sub>	Servomex 1410 B	0-4% 0-20%	0.02%	30	Infrared absorption, analog linearization.
O <sub>2</sub>	Servomex 1420 B	0-10% 0-25 %	0.1%	15	Paramagnetic cell, inherently linear.

NOTE: Higher ranges available by sample dilution.  
Other ranges available via signal attenuation.

## SUPPORT REQUIREMENTS FOR EMISSIONS TESTING

The following should be provided by the client. If any of these specifications cannot be met, please advise Cubix as soon as possible so other arrangements can be made and the field work is not delayed.

**Lab Parking:** A level parking site is needed for the mobile laboratory/trailer within 80 feet of the emission source. The location selected should have no traffic between the stack and the mobile lab.

**Electrical:** Electrical power for the mobile lab is to be provided within 100 feet of the parking site. Three 20-amp, 120 volt, 60 Hz, single-phase circuits are needed. NEMA 5-20R or NEMA 5-15R outlets should be provided to accept the standard household three-prong plugs on Cubix's extension cords. Pigtail adapter plugs should be provided to adapt to explosion-proof receptacles. To avoid delays, please check that the electrical power is in place and operational before the test team arrives.

**Unit Operation:** Operation of the source at the load conditions required for testing (e.g., maximum normal load), and instrumentation for collection of operating data (e.g., fuel consumption, load, pressures, etc.). These operating data will be included in the report to document the test conditions.

**Access:** A safe means of access to the sampling ports is to be provided for test personnel and equipment (platform, ladders, scaffolding, etc.). Scaffold must meet OSHA guidelines. Cubix retains the right to inspect scaffold, ladders and platform.

**Sample Ports:** There are two basic methods that allow measurement of stack flow rates from combustion processes. The port location requirements for the two methods are slightly different. Selection of the flow measurement technique depends on the stack's physical constraints and may be subject to regulatory agency approval.

### *Port Location for Pitot Tube Flow Measurements*

Flue gas volumetric flow may be measured using a pitot tube per EPA Methods 1 & 2. The regulatory agencies are more familiar with this method. However, pitot tubes are not accurate if the flow rate is less than 600 ft/min., or if the flow is turbulent. If this method is used, the sample ports must be located a minimum of 2 diameters downstream and 0.5 diameters upstream of the nearest flow disturbance. Two ports should be installed at 90° angles to each other and horizontal to the ground. This type of port installation must be used if particulate testing is required. On some sources (e.g. engines) this is not possible because the stack itself is horizontal. For horizontal stacks, install one port vertically, on top of the stack, and install the second port horizontally, on the side of the stack.

### *Port Location for Stoichiometric Flow Measurements*

This method determines pollutant mass emission rates based on a fuel composition, the fuel flow, and a carbon balance or oxygen balance of the source. If this method is used, the location and size of a single port in the stack is not critical, if the sample is well-mixed and the location is out of the combustion zone. Accurate fuel flow and composition data must be available to use this method.

### *Port Construction*

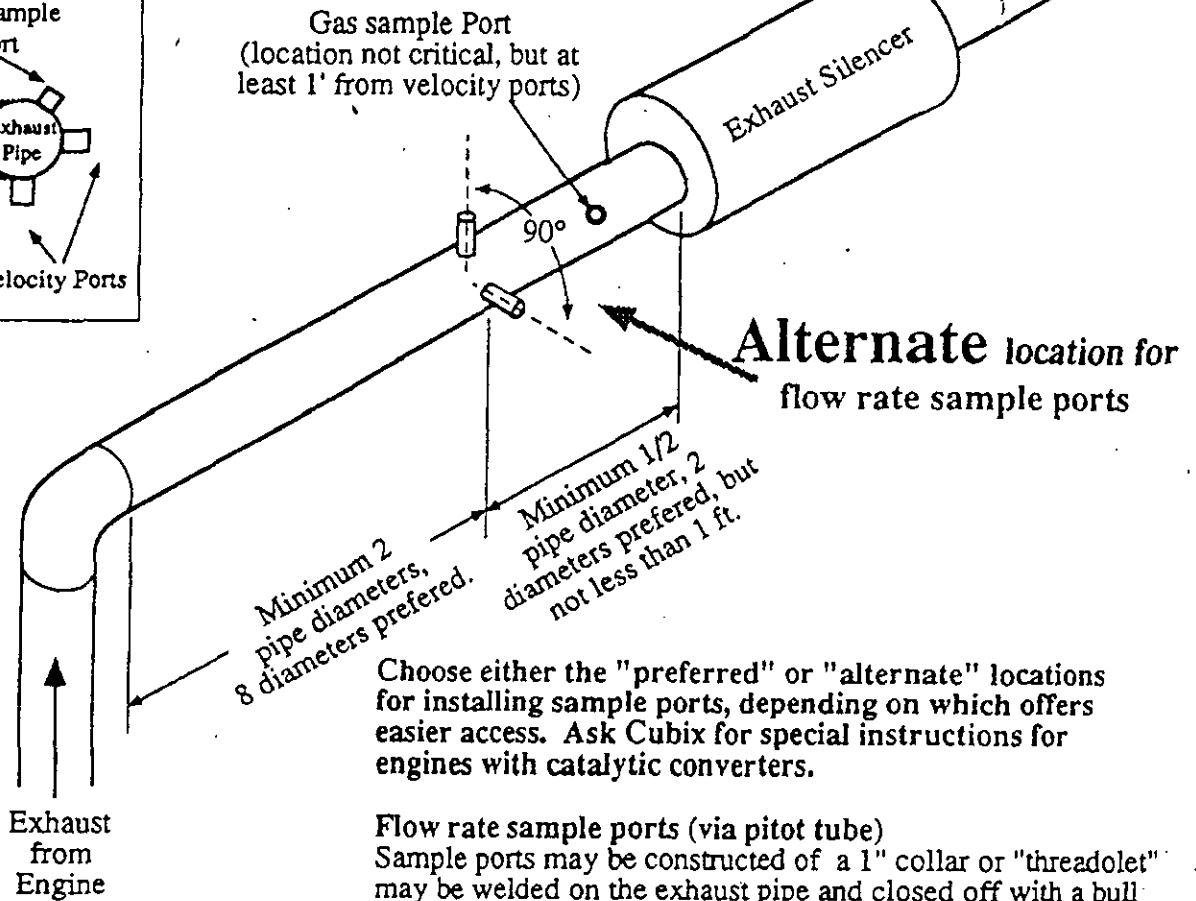
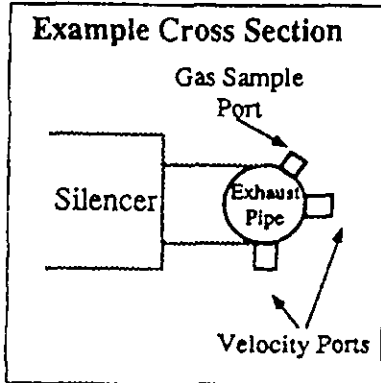
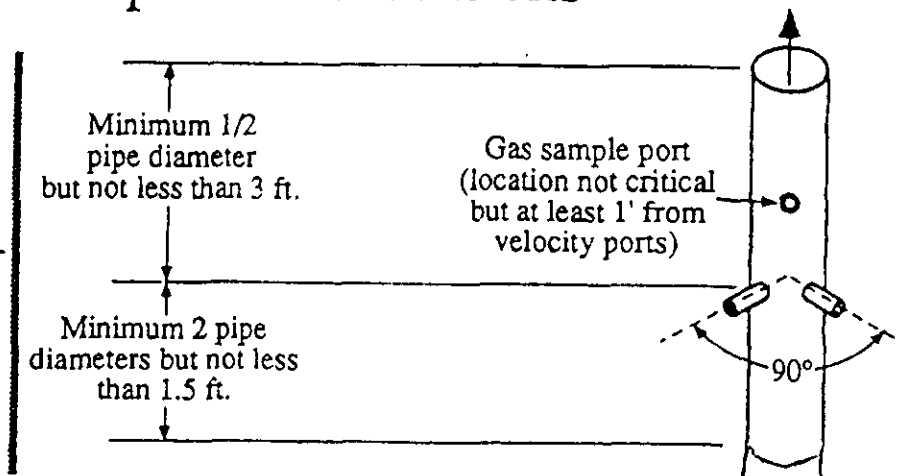
For larger stacks (i.e. 36" diameter and larger) and when manual sampling equipment is to be used (e.g. for particulate matter tests) ports should be constructed of 3" or 4" diameter pipe. The ports should be approximately 6 inches long and mounted flush with the inside wall. The pipe can be threaded with male NPT and closed with a pipe cap. The threads should be coated with high temperature anti-seize compound and the cap should be hand-tightened only. Alternately, a blind flange fitting may be used instead threaded pipe. If manual sampling equipment is to be used (i.e. for particulate matter tests), then hard monorail attach points must be provided 32" to 48" above each sample port. Four sample ports may be required if the stack diameter is greater than 8 ft..

For smaller stacks and vents (<36" diameter) that do not require the use of manual sampling equipment (i.e. particulate matter tests, etc.), the sample ports must be at least 1" diameter to allow insertion of pitot tube, sample probe, etc. These smaller ports may be constructed from a surface weld fitting and closed with a bull plug.

**Cubix  
Corporation**

# Engine Sample Port Locations

**Preferred** location for flow rate sample ports



**Alternate** location for flow rate sample ports

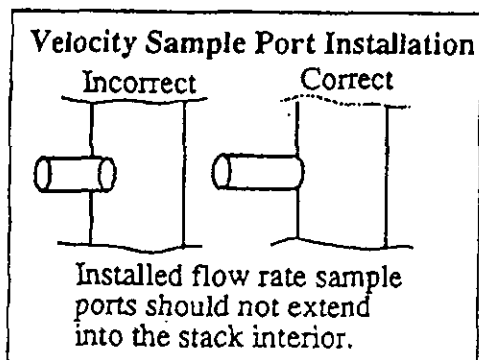
Choose either the "preferred" or "alternate" locations for installing sample ports, depending on which offers easier access. Ask Cubix for special instructions for engines with catalytic converters.

## Flow rate sample ports (via pitot tube)

Sample ports may be constructed of a 1" collar or "threadolet" may be welded on the exhaust pipe and closed off with a bull plug. Alternately, use a 1" x 6" pipe nipple, closed with a pipe cap. Threaded connections should be made hand tight only and threads should be coated with a high temperature anti-seize compound. There should be no obstructions within 2 pipe diameters of the direction pointed by the port.

## Gas sample ports (concentration measurements)

Gas sample ports may be constructed by welding a 1/2" to 1" collar or threadolet on the exhaust pipe and closing it off with a bull plug. The location of these ports is not critical provided a representative sample can be obtained. Flow rate sample ports may be used to collect gas samples but this will slow the testing process by interrupting the concentration measurements.



Post-It™ brand fax transmittal memo 7671 # of pages >	
To <b>BILL LOEFFLER</b>	From <b>ROB KREZKE</b>
Co. <b>DARM</b>	Co. <b>NW OST</b>
Dept.	Phone # <b>436-8364</b>
Fax # <b>7-292-6979</b>	Fax #

9225 Lockhart Hwy., Austin, Texas 78747  
 (512) 243-0202 FAX (512) 243-0222

## EMISSION TEST PLAN

### Quincy Compressor Station Florida Gas Transmission Company

**Sources:** One Natural Gas Fired Compressor Engine, 2400 Hp, Cooper Bessemer, Model GMVR-12C2, Unit #6.

**Location:** 8 miles southwest of Quincy, Gadsden County, Florida

**Applicable Permits and Regulations:** Florida Department of Environmental Protection Permit No. AC 20-189438

**Owner/Operator:** Florida Gas Transmission Company  
 601 South Lake Destiny Drive  
 Maitland, Florida 32751  
 Attn: Allan Weatherford  
 (407) 875-5816 TEL  
 (407) 875-5896 FAX

**Test Contractor:** Cubix Corporation  
 9225 Lockhart Highway  
 Austin, Texas 78747  
 Attn: Rick J. Krenzke  
 (512) 243-0202 TEL  
 (512) 243-0222 FAX

**Proposed Test Dates:** July 28, 1993  
 This is the 3rd of 9 compressor stations tested along the pipeline during this project, so delays at prior test sites could affect the proposed test date.

**Test Protocol**

I) Test Matrix

**RECEIVED**  
**JUL 20 1993**  
 Northwest Florida  
 DEP.

- A) Three test runs of 60-minutes each shall be conducted on one unit (#6) during which NO<sub>x</sub>, CO, and O<sub>2</sub> shall be continuously monitored.
- B) One pitot tube traverse shall be conducted before each test run.
- C) Moisture determinations as required for stack gas flow rate calculations shall be determined stoichiometrically based on the fuel's combustion moisture content, excess air dilution factor, and combustion air humidity due to ambient conditions. One moisture train shall be run throughout the three test runs to verify the validity of the stoichiometric calculations.
- D) Three 6-minute opacity observations shall be conducted on the engine.

II) Test Measurements by Cubix

- A) EPA Method 1 for traverse point layout
- B) EPA Method 2 for stack gas velocity and volumetric flow rate
- C) EPA Method 3a for O<sub>2</sub> and CO<sub>2</sub> concentrations
- D) Stoichiometric calculation of moisture content
- E) EPA Method 4 for moisture content
- F) EPA Method 7e for NO<sub>x</sub> concentrations.
- G) EPA Method 9 for opacity observations
- H) EPA Method 10 for CO concentrations
- I) Ambient conditions
  - 1) temperature
  - 2) barometric pressure
  - 3) humidity

III) Operational Data to be provided by Florida Gas

- A) Fuel flow (if available)
- B) Recent fuel composition analysis
- C) Suction and discharge pressures
- D) Gas flow
- E) Engine speed
- F) Ignition timing
- G) Fuel and air manifold temperatures and pressures
- H) Engine load
- I) Any other data available to document each test run

IV) Quality Assurance/ Quality Control

(as appropriate for the test methods listed above).

- A) Sample system leak check.
- B) Calibration of O<sub>2</sub>, CO and CO<sub>2</sub> analyzers with vendor certified calibration gases.



- C) Calibration of NOx analyzer with gases traceable via EPA protocol #1.
- D) Analyze audit samples provided by regulatory agency (if available).
- E) NOx converter efficiency test.
- F) Pitot tube meeting EPA criteria and wind tunnel tested.
- G) Zero and span analyzer calibration drift tests between each test run.
- H) Multipoint calibration to demonstrate instrument linearity.
- I) Sampling system bias check (using NOx).
- J) Interference response documentation.
- K) Sample system response time data.

### **Test Report**

- A) Summary of Results
  - 1) Tabular summary of each test run showing NOx emissions in ppmv, lbs/hr, tons/year, and g/hp-hr for comparison with permit limits.
  - 2) Operating conditions reported in tabular summary.
- B) Process Description
- C) Description of Analytical Techniques
- D) Quality Assurance Activities
- E) Appendices:
  - Documentation including field data forms, strip charts, calibration gas certifications, equipment calibrations, example calculations, audit sample results, etc...

### **Miscellaneous**

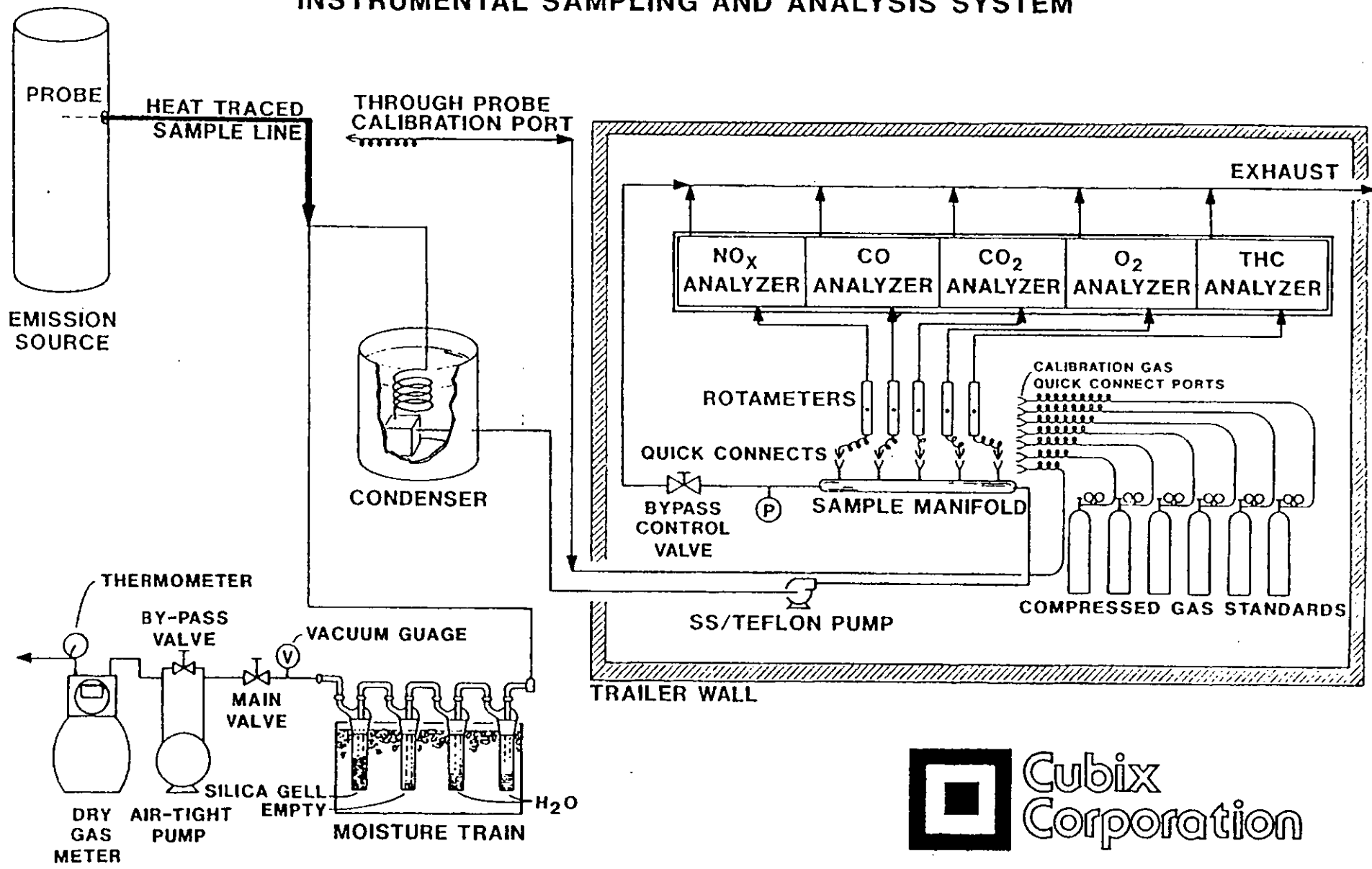
- 1) It is assumed that Florida Gas will provide adequate sampling facilities and safe access to same. (see enclosed information regarding requirements for stack testing)

### **Attachments:**

Sampling System Diagram  
 Analytical Instrumentation  
 Requirements for Emission Testing  
 Engine Sample Port Requirements Diagram

This test plan is the property of Cubix Corporation and is intended solely for the use of Florida Gas

# INSTRUMENTAL SAMPLING AND ANALYSIS SYSTEM



## Analytical Instrumentation

<u>Parameter</u>	<u>Model and Manufacturer</u>	<u>Common Use Ranges</u>	<u>Sensitivity</u>	<u>Response Time (sec.)</u>	<u>Detection Principle</u>
NO <sub>x</sub>	TECO 10AR	0-10 ppm 0-100 ppm 0-200 ppm 0-500 ppm 0-1,000 ppm 0-5,000 ppm	0.1ppm	1.7	Thermal reduction of NO <sub>2</sub> to NO. Chemiluminescence of reaction of NO with O <sub>3</sub> . Detection by PMT. Inherently linear for listed ranges.
CO	TECO 48	0-10 ppm 0-20 ppm 0-50 ppm 0-100 ppm 0-200 ppm 0-500 ppm 0-1000 ppm	0.1ppm	10	Infrared absorption, gas filter correlation detector, micro-processor based linearization
CO <sub>2</sub>	Servomex 1410 B	0-4% 0-20%	0.02%	30	Infrared absorption, analog linearization.
O <sub>2</sub>	Servomex 1420 B	0-10% 0-25 %	0.1%	15	Paramagnetic cell, inherently linear.

**NOTE:** Higher ranges available by sample dilution.  
Other ranges available via signal attenuation.

The following should be provided by the client. If any of these specifications cannot be met, please advise Cubix as soon as possible so other arrangements can be made and the field work is not delayed.

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**Electrical:** Electrical power for the mobile lab is to be provided within 100 feet of the parking site. Three 20-amp, 120 volt, 60 Hz, single-phase circuits are needed. NEMA 5-20R or NEMA 5-15R outlets should be provided to accept the standard household three-prong plugs on Cubix's extension cords. Pigtail adapter plugs should be provided to adapt to explosion-proof receptacles. To avoid delays, please check that the electrical power is in place and operational before the test team arrives.

**Unit Operation:** Operation of the source at the load conditions required for testing (e.g., maximum normal load), and instrumentation for collection of operating data (e.g., fuel consumption, load, pressures, etc.). These operating data will be included in the report to document the test conditions.

**Access:** A safe means of access to the sampling ports is to be provided for test personnel and equipment (platform, ladders, scaffolding, etc.). Scaffold must meet OSHA guidelines. Cubix retains the right to inspect scaffold, ladders and platform.

**Sample Ports:** There are two basic methods that allow measurement of stack flow rates from combustion processes. The port location requirements for the two methods are slightly different. Selection of the flow measurement technique depends on the stack's physical constraints and may be subject to regulatory agency approval.

#### *Port Location for Pitot Tube Flow Measurements*

Flue gas volumetric flow may be measured using a pitot tube per EPA Methods 1 & 2. The regulatory agencies are more familiar with this method. However, pitot tubes are not accurate if the flow rate is less than 600 ft/min., or if the flow is turbulent. If this method is used, the sample ports must be located a minimum of 2 diameters downstream and 0.5 diameters upstream of the nearest flow disturbance. Two ports should be installed at 90° angles to each other and horizontal to the ground. This type of port installation must be used if particulate testing is required. On some sources (e.g. engines) this is not possible because the stack itself is horizontal. For horizontal stacks, install one port vertically, on top of the stack, and install the second port horizontally, on the side of the stack.

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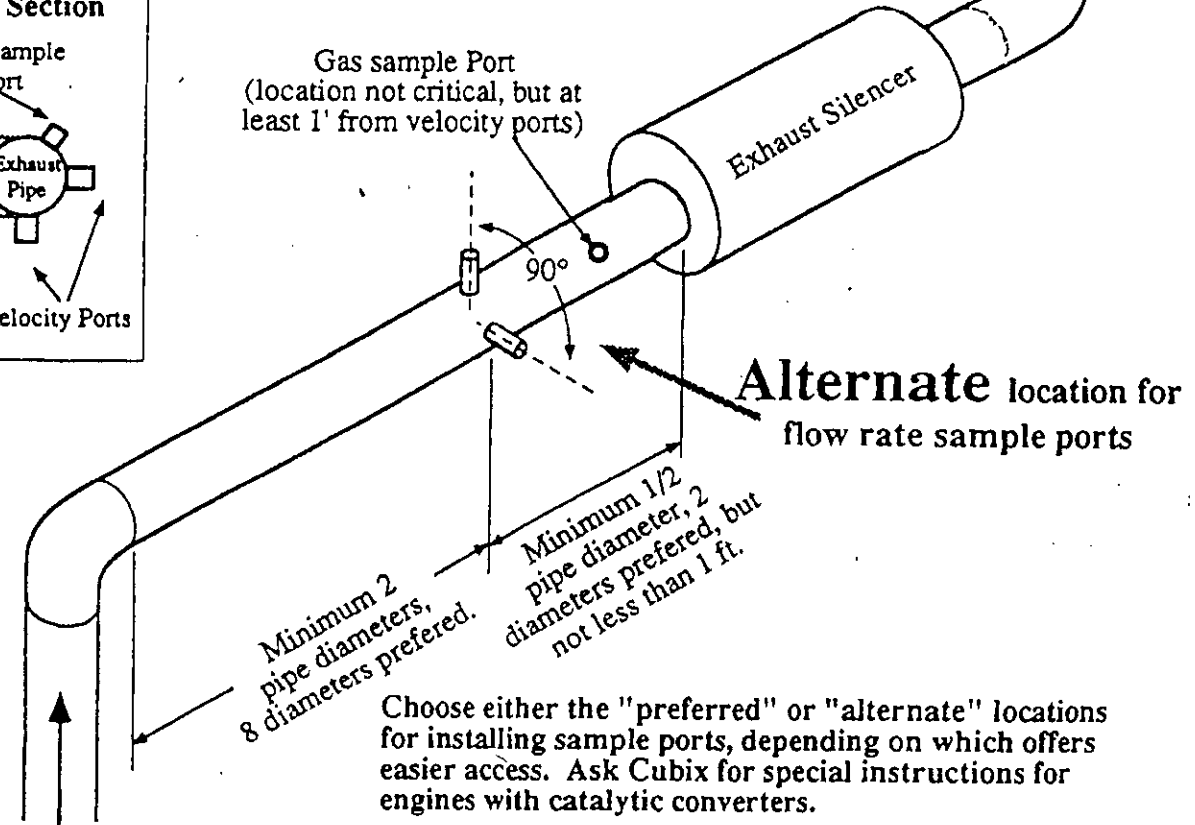
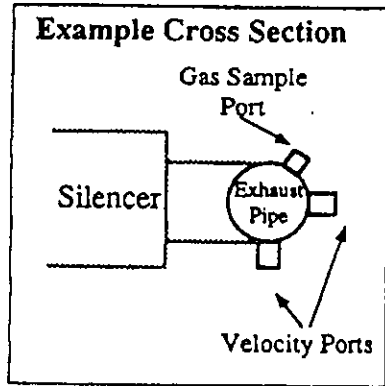
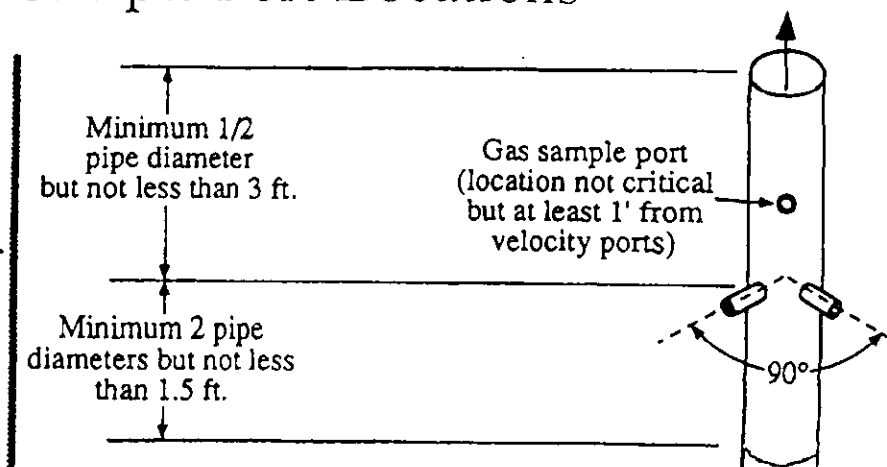
#### *Port Construction*

For larger stacks (i.e. 36" diameter and larger) and when manual sampling equipment is to be used (e.g. for particulate matter tests) ports should be constructed of 3" or 4" diameter pipe. The ports should be approximately 6 inches long and mounted flush with the inside wall. The pipe can be threaded with male NPT and closed with a pipe cap. The threads should be coated with high temperature anti-seize compound and the cap should be hand-tightened only. Alternately, a blind flange fitting may be used instead threaded pipe. If manual sampling equipment is to be used (i.e. for particulate matter tests), then hard monorail attach points must be provided 32" to 48" above each sample port. Four sample ports may be required if the stack diameter is greater than 8 ft..

For smaller stacks and vents (<36" diameter) that do not require the use of manual sampling equipment (i.e. particulate matter tests, etc.), the sample ports must be at least 1" diameter to allow insertion of pitot tube, sample probe, etc. These smaller ports may be constructed from a surface weld fitting and closed with a bull plug.

**Cubix  
Corporation**

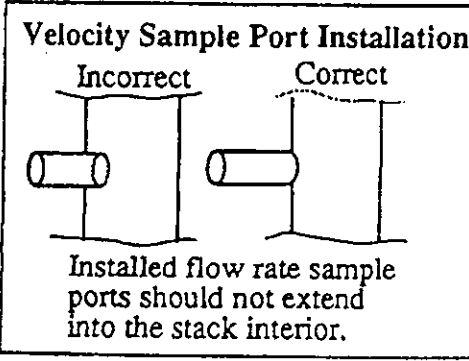
**Preferred location for flow rate sample ports**



Choose either the "preferred" or "alternate" locations for installing sample ports, depending on which offers easier access. Ask Cubix for special instructions for engines with catalytic converters.

**Flow rate sample ports (via pitot tube)**  
 Sample ports may be constructed of a 1" collar or "threadolet" may be welded on the exhaust pipe and closed off with a bull plug. Alternately, use a 1" x 6" pipe nipple, closed with a pipe cap. Threaded connections should be made hand tight only and threads should be coated with a high temperature anti-seize compound. There should be no obstructions within 2 pipe diameters of the direction pointed by the port.

**Gas sample ports (concentration measurements)**  
 Gas sample ports may be constructed by welding a 1/2" to 1" collar or threadolet on the exhaust pipe and closing it off with a bull plug. The location of these ports is not critical provided a representative sample can be obtained. Flow rate sample ports may be used to collect gas samples but this will slow the testing process by interrupting the concentration measurements.



**Cubix Corporation**

Construction Points to Add Compressors

Built Oversize Compressors

No Tests = No OP Applications -

Applied for repair parts

Never Annulled AC - Loan At Utility Applications for  
Annulled AC - Filed Late

Only CP Req test for No. 4 Co - Not Passed

Chalrs to test Method - ASP Granted

---

Caroline Robinson 40d 5d7 290f

Auto Pickers

TO: Mike Hewett TAL  
TO: Mike Harley TAL  
TO: John Brown TAL  
TO: Jim Pennington TAL

( HEWETT\_M )  
( HARLEY\_M )  
( BROWN\_J )  
( PENNINGTON\_J )



# 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 ←  
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

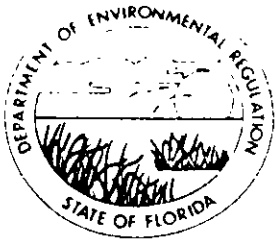
Permit No. AC56-189457  
Florida Gas Transmission Company, Station 20  
Ft. Pierce, St. Lucie County, Florida

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

1993 JUN 30 11:10:19  
RECEIVED  
MAIL ROOM

← This file contains  
all the attachments  
related to this  
correspondence.





# 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  
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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:


- (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;
- (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
- (g) A statement of the relief sought by petitioner, stating 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. The 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.

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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

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DEC 17 1992

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Division of Air  
Resources Management

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

bc  
aw1207cf

cc: Chuck Truby  
Raymond Young  
Fred Griffin  
Barry Andrews, ENSR

*J. Wilson*  
*C. Mitchell*