



Florida Gas Transmission Company

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December 28, 2004
VIA UPS

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DEC 29 2004

BUREAU OF AIR REGULATION

Ms. Trina Vielhauer
Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Bldg.
2600 Blairstone
Tallahassee, FL 32399-2400

Reference: AIRS ID No. 0410004
Air Permit No. 0410004-006-AC
Emission Unit No. 003 (Engine No. 2402)
Compressor Station No. 24, Trenton, Gilchrist County

Dear Ms. Vielhauer:

Subject: Application to Modify Air Construction Permit for Increased Heat Rate

Florida Gas Transmission Company (FGT) has previously submitted an Application for an Air Construction Permit for a new Cooper-Rolls 501-KC7 compressor turbine at the above referenced facility. This was authorized by the above referenced construction permit. With this document, FGT is requesting three revisions to this construction permit.

(1) A review of data from the initial compliance test for the new engine indicates that the heat rate for the engine is higher than was predicted by the manufacturer. FGT, therefore, is requesting that the heat rate listed in the permit be changed from 63 MM Btu/hr to 68 MM Btu/hr. An application requesting these modifications is attached. The changes reflect a change in the heat rate and the resulting changes in particulate matter, hazardous air pollutants and SO₂ emissions that are based on fuel use. The 40 CFR 60 Subpart GG Nitrogen oxides standard has also been recalculated using the vendor's lower heating value. This has resulted in a slightly lower standard.

(2) On July 8, 2004, the U.S. EPA promulgated a revised 40 CFR 60 Subpart GG. Under these revisions, the fuel sulfur monitoring requirements are no longer applicable to the turbine at Compressor Station No. 24 since the gas quality characteristics are in a current, valid purchase contract, tariff sheet or transportation contract specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less (40 CFR 60.331(u)). FGT is requesting that this fuel monitoring requirement be removed from the permit.

(3) FGT is requesting that the FDEP consider inclusion of the Routine Component Replacement permit language into this construction permit for Units 2401 and 2402 (EU Nos. 001 and 003) as was done for Unit 1806 (EU No. 006) located at FGT's Orlando Compressor Station No. 18 (Facility ID No. 0950190).

The Routine Component Replacement permit language that was included in the permit for Compressor Station No. 18 was previously drafted and mutually agreed upon. The inclusion of this language in Permit No. 0410004-006-AC would allow FGT to complete routine maintenance and repair work on existing turbine gas generator/power turbine components and replace the components with "like-kind" components associated with unit 2401 and 2402 without first obtaining a construction permit.

If you have any questions or need additional information, please call me at (850) 350-5042.

Sincerely,



James Fleak, P.E.
Senior Environmental Specialist

ATTACHMENTS

CC: Rick Craig, w/o attachments
David Parham, P.E.
Duane Pierce, AQMcS, LLC
Compressor Station No. 24
Mr. Christopher Kirts, P.E., District Air Program Administrator, Northeast District,
Florida Department of Environmental Protection, 7825 Baymeadows Way, Suite
B200, Jacksonville, FL 32256-7590

Florida Gas Transmission Company

Phase VI Expansion Project

Compressor Station No. 24

**APPLICATION
For
AIR CONSTRUCTION
PERMIT MODIFICATIONS**

December 2004

Prepared by AQMcS, LLC

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1.0 INTRODUCTION

Florida Gas Transmission Company (FGT) has expanded its existing natural gas pipeline facility near Trenton in Gilchrist County, Florida (Compressor Station No. 24). This modification is part of FGT's Phase VI Expansion Project, aimed at increasing the supply capacity of FGT's network servicing domestic, commercial, and industrial customers in Florida.

Compressor Station No. 24 is located in Gilchrist County, Florida, approximately 4 miles north of Trenton on U. S. Highway 129. Figure 1-1 shows the location of the existing compressor station.

The expansion at this location consisted of the addition of one 7,200 ISO brake horsepower (bhp), natural-gas-fired, turbine compressor engine. The new compressor engine is used solely for transporting natural gas by pipeline for distribution to markets in Florida. The new engine is a Cooper-Rolls 501-KC7 DLE equipped with dry low NO_x (oxides of nitrogen) combustion. Engineering designs for the new turbine included selection of an engine incorporating dry low NO_x combustion technology. Dry low NO_x technology for control of NO_x emissions would represent Best Available Control Technology (BACT) for the new turbine engine under PSD requirements.

This application requests a revision to the heat rate for the new turbine described above. Initial emissions testing indicated that the heat rate was higher than that anticipated by the manufacturer. Therefore, FGT is proposing to increase the descriptive heat rate for this engine and to also revise the emission rates for particulate matter (PM), sulfur dioxide (SO₂) and hazardous air pollutants (HAPs) since they are dependent on fuel use.

This narrative contains the following additional sections. Descriptions of the existing operation at FGT's Compressor Station No. 24 and the new 7,200 bhp (ISO) engine addition are presented in Section 2.0. The air quality review requirements and applicability of state and federal regulations are discussed in Section 3.0 and references are included in Section 4.0

FDEP permit application forms are presented in Attachment A. Attachment B contains a plot plan of the facility. Attachment C contains vendor information and Attachment D contains emission calculations.

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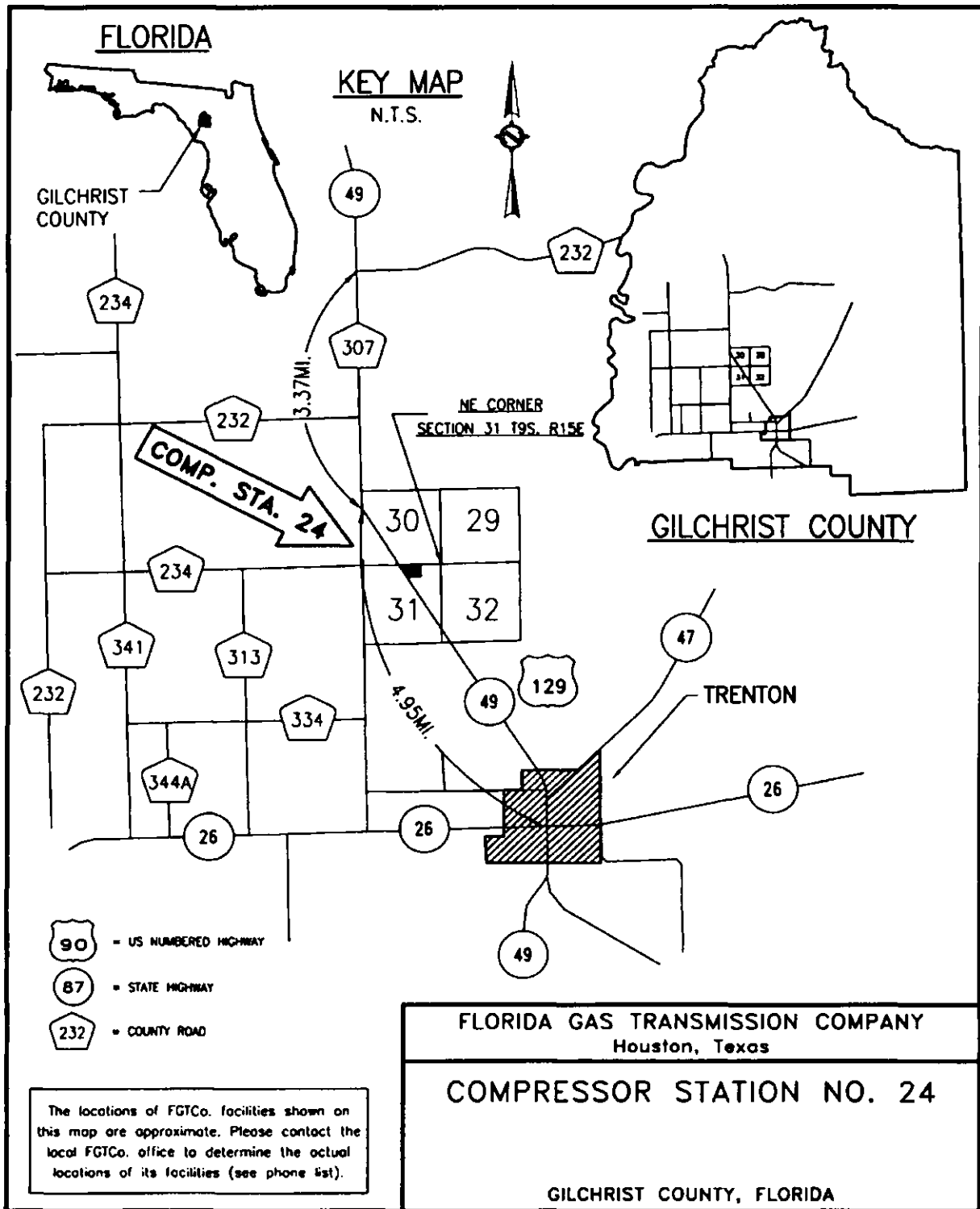


Figure 1-1

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2.0 PROJECT DESCRIPTION

A plot plan of FGT's Compressor Station No. 24, showing the location of the plant boundaries, the existing emission sources, and the location of the new engine addition is presented in Attachment B. The following sections provide a description of the existing operations at this location, as well as a description of the new project.

2.1 Existing Operations

FGT's Compressor Station No. 24 was built as a part of the Phase IV Expansion Project and was constructed in 2000-2001. Compressor Station No. 24 originally consisted of one flat rated 10,350 bhp gas-fired turbine engine (Engine 2401). Compressor Engine 2401 was up-rated in 2002 to 15,000 bhp as part of the Phase V Expansion Project. This unit was replaced with a turbine compressor unit rated at 13,000 bhp (ISO) as part of the Phase VI Expansion Project.

The existing facility also has supporting equipment including lube and used oil storage tanks, air compressors and emergency generators.

2.2 New Compressor Engine

As part of the Phase VI Expansion, Project FGT added one new gas-fired turbine (Compressor Engine 2402). The new engine is used to increase the volumetric delivery capacity by driving a gas compressor that is a part of a gas transmission line that transports natural gas from source wells in Texas and Louisiana for delivery throughout Florida.

The heat and fuel rate values provided in Table 2-1 represent revised values based on initial emission testing and observation of operating parameters since installation.

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Table 2-1 Revised Compressor Engine 2402 Specifications and Stack Parameters

Parameter	Design
Compressor Engine	2402
Type	Gas Turbine
Manufacturer	Cooper-Rolls
Model	501-KC7 DLE
Unit Size (shaft)	7,200 bhp (ISO)
Specific Heat Input ^a	9,444 Btu/hp-hr*
Heat Rate ^b	68 MM Btu/hr*
Maximum Fuel Consumption ^a	0.0654 MMscf/hr*
Speed (shaft)	13,600 rpm
Stack Parameters	
Stack Height	61.17 ft
Stack Diameter	88" x 66"
Exhaust Gas Flow	106,087 acfm*
Exhaust Temperature	958 °F
Exhaust Gas Velocity	43.84 ft/sec*
<p>NOTE:</p> <p>acfm = actual cubic feet per minute.</p> <p>bhp = brake horsepower.</p> <p>Btu/bhp-hr = British thermal units per brake horsepower per hour.</p> <p>°F = degrees Fahrenheit.</p> <p>ft = feet.</p> <p>ft/sec = feet per second.</p> <p>MMscf/hr = million standard cubic feet per hour</p> <p>rpm = revolutions per minute.</p> <p>^a Based on observed higher heat value (HHV) heat rate; lower heating value estimated at 9,579 Btu/hp-hr</p> <p>^b Fuel flow for natural gas of 1040 British thermal units per standard cubic foot (Btu/scf).</p> <p>* REVISED</p>	

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Hourly and annual emissions of regulated pollutants from the engine under normal operating conditions are presented in Table 2-2. Emissions of oxides of nitrogen (NO_x, carbon monoxide (CO) and non-methane hydrocarbons (NMHC) are based on the engine manufacturer's supplied data (See Attachment C).

Typically, turbine vendors do not provide information on particulate matter (PM), sulfur dioxide (SO₂) or hazardous air pollutant (HAP) emissions; therefore, particulate matter and HAP emissions are based upon USEPA publication AP-42 Table 3.1-2a and Table 3.1-3 respectively (USEPA, 2000) and emissions of SO₂ are based on FGT's Federal Energy Regulatory Commission (FERC) certificate limit of 10 grains sulfur per 100 cubic feet of natural gas.

Table 2-2 Emissions from FGT's New Turbine Engine No. 2402

Pollutant	Emission Factor	Reference	lb/hr	TPY
Nitrogen Oxides	5.7 lb/hr	Manufacturer Data	5.7	25.0
Carbon Monoxide	6.96 lb/hr	Manufacturer Data	6.96	30.5
Volatile Organic Compounds (non methane)	1.49 lb/hr	Manufacturer Data	1.49	6.5
Particulate Matter*	0.0066 lb/MMBtu	AP-42, Table 3.1-2a	0.45	2.0
Sulfur Dioxide*	10 grains/100 scf	FERC Limit	1.87	8.2
HAPs*	Various see Attachment D	AP-42, Table 3.1-3	0.07	0.3

* Values revised due to heat rate increase

2.2.1 Emissions Summary

The new total emissions resulting from this revision are listed on Table 2-3. The calculations used to estimate these emissions are presented in Attachment D.

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Table 2-3 Potential Annual Emissions (tpy) Summary

SOURCE ID	DESCRIPTION	NO _x	CO	VOC ^a	SO ₂	PM
EXISTING EMISSIONS						
2401	15,000 bhp Turbine Engine	49.5	60.0	1.8	14.9	3.5
GEN03	443 bhp Recip. Engine	2.2	0.6	0.01	0.2	0.2
FUGITIVE	Fugitive			0.59		
TANK 01	Oily Water Tank			<0.001		
TANK 02	Diesel Tank			<0.001		
TANK 03	Condensate Tank			<0.001		
2402	7,200 bhp (ISO) Turbine Engine – new	25.0	30.5	6.5	7.6	1.8
CURRENT TOTALS:		76.7	91.1	8.903	22.7	5.5
ADDITIONAL NEW EMISSIONS						
2402 - Added	7,200 bhp (ISO) Turbine Engine – new	0.0	0.0	0.0	0.6	0.2
PROPOSED NEW TOTALS:		76.7	91.1	8.903	23.3	5.7
(a) VOC = NM/NE HC						

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3.0 REGULATORY ANALYSIS

This section presents a review of federal and Florida State air quality regulations, which are applicable to the operations and new emission unit at Compressor Station No. 24.

3.1 Federal Regulations Review

The federal regulatory programs administered by the USEPA have been developed under the authority of the Clean Air Act. The following subsections review the essential elements of the federal regulatory program and the impact they have on the operations and new modifications at Compressor Station No. 24.

3.1.1 Applicability of New Source Performance Standards (NSPS)

The regulation of new sources through the development of standards applicable to a specific category of sources was a significant step taken by the 1970 CAA Amendments. The Administrator was directed to publish a new regulation establishing a Standard of Performance for any category of new sources that cause or contribute significantly to air pollution and which may reasonably be anticipated to endanger public health. All Standards apply to all sources within a given category, regardless of geographic location or ambient air quality at the location.

Performance standards are published in 40 CFR 60. The new turbine installed at Compressor Station No. 24 is subject to Subpart GG, Standards of Performance for Stationary Gas Turbines, because it has a maximum heat input at peak load of >10.7 gigajoules/hour (10 MMBtu/hr) based on the lower heating value of the natural gas fuel. This regulation establishes emission limits for NO_x and SO₂. The applicable emission standards are provided in Table 3-1.

The NO_x emission limit for Subpart GG is calculated as follows:

$$STD = 0.0150 (14.4/Y) + F$$

$$STD = \text{Allowable NO}_x \text{ emissions}$$

$$Y = \text{Heat rate at peak load not to exceed 14.4 KJwatt-hour}$$

$$F = \text{NO}_x \text{ emission allowance}$$

The use of the F factor in this equation is optional under the revised Subpart GG. Since the fuel bound nitrogen in natural gas is less than 0.015% by weight, the value of F as defined in 40

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CFR 60.332 would be equal to zero.

$$\begin{aligned} Y &= \text{Btu/bhp-hr} \times 1.055 \text{ Kj/Btu} \times \text{hp-hr}/745.7 \text{ watt-hour} \\ &= 8,603 \text{ Btu/bhp-hr} \times 1.055 \text{ Kj/Btu} \times \text{hp-hr}/745.7 \text{ watt-hour} \\ &= 12.2 \text{ Kj/watt-hr} \end{aligned}$$

$$\text{STD} = 0.0150 (14.4/12.2) + 0$$

$$= 0.0177 \%$$

$$= 177 \text{ ppm}_v$$

Table 3-1 summarizes the NSPS applicability for this gas turbine.

The turbine at this facility will meet the NSPS for NO_x of 177 ppmv (i.e., manufacturer's estimation of 25 ppmv), and for SO₂ of 150 ppmv (estimated for this turbine to be ~4 ppmv).

FGT was granted a custom fuel monitoring schedule for this engine; however, the daily monitoring of fuel nitrogen and sulfur is no longer required under the recent revisions effective July 8, 2004. FGT is requesting that this requirement be removed from the construction and operating permits. Specifically, FGT is requesting that Section III, Provision B.13 of the construction permit be deleted. A valid tariff sheet demonstrating the natural gas characteristics is attached as Attachment E.

3.1.2 Applicability of National Emission Standards for Hazardous Air Pollutants (NESHAPS)

Several NESHAPS are potentially applicable to this facility and these emission sources. This facility is not a major source of HAPs.

3.1.2.1 40 CFR 63 Subpart HHH

One NESHAPS potentially applicable to this compressor station is 40 CFR 63 Subpart HHH. Compressor Station No. 24 has no affected sources as defined by 40 CFR 63 Subpart HHH and is, therefore, not subject to this subpart.

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Table 3-1 Applicability of New Source Performance Standards

NSPS Subpart	NSPS Regulations	Equipment	Fuel	Pollutant	Heat Input Applicability	Equipment Design Maximum*	NSPS Emission Limits	Equipment Emissions
GG	60.332	Engine No. 2402 Gas Turbine	Gas	NO ₂	>10 MM Btu/hr	61.94MMBtu/hr	177 ppm _v	25 ppm _v
GG	60.333	Engine No. 2402 Gas Turbine	Gas	SO ₂	>10 MM Btu/hr	61.94 MMBtu/hr	150 ppm _v	~4 ppm _v

* Based on vendor design maximum of 57.3545 MM Btu/hr LHV plus 8%.

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3.1.2.2 40 CFR 63 Subpart YYYY

This facility is a not a Major Source for Hazardous Air Pollutants and this turbine is not subject to the new turbine MACT regulations (40 CFR 63 Subpart YYYY) promulgated on March 5, 2004 and stayed for two subcategories on August 18, 2004.

3.1.2.3 40 CFR 63 Subpart ZZZZ

The U.S.EPA has recently finalized 40 CFR 63 Subpart ZZZZ for reciprocating internal combustion engines; however, FGT does not have any engines subject to this regulation at this facility.

3.2 Florida State Air Quality Regulations

Compressor Station No. 24 is currently operating under Permit No. 0410004-002-AO (Modified) and is subject to the provisions of that permit. Rule 62, F.A.C., contains the air quality rules and regulations for the State of Florida. The primary federal regulations that affect Compressor Station No. 24 have been incorporated into or are referenced by these rules. The significant state regulations that are applicable to the new emission units are briefly listed below.

3.2.1 Rule 62-210.300 Permits Required

FGT is required to obtain a construction permit prior to construction of new emission units. This requirement was met by the submittal of an application for a construction permit and the subsequent issuance of Construction Permits Nos. 0410004-006-AC and 0410004-007-AC.

3.2.2 Rule 62-204.240 Ambient Air Quality Standards

FGT must not violate any of the ambient air quality standards listed under this rule.

3.2.3 Rule 62-296.320(2) Objectionable Odors

This rule prohibits the discharge of pollutants that will cause or contribute to an objectionable odor.

3.2.4 Rule 62-296.320(4)(b)1 General Particulate Emission Limiting Standards.

FGT is prohibited from allowing the new compressor engine to discharge into the atmosphere the emissions of air pollutants, the density of which is equal to or greater than that designated

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as Number 1 on the Ringelmann Chart (20 percent opacity).

3.2.5 Rule 62-210.300(3)(a) Exempt Emissions Units and/or Activities.

The emissions from the emergency generator and the fugitive leak emissions are insignificant sources and are exempt from the permitting requirements of Chapter 62-210 Stationary Sources - General Requirements, 62-213 Operation Permits For Major Sources Of Air Pollution and 62-4 Permits.

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4.0 REFERENCES

U.S. Environmental Protection Agency (USEPA). 2000. Compilation of Air Pollutant Emission Factors, Volume I: Stationary Point and Area Sources (5th Ed.) AP-42, Research Triangle Park, NC.

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Attachment A

DEP Forms

APPLICATION INFORMATION

Purpose of Application

This application for air permit is submitted to obtain: (Check one)

Air Construction Permit

Air construction permit.

Air Operation Permit

Initial Title V air operation permit.

Title V air operation permit revision.

Title V air operation permit renewal.

Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.

Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

Air construction permit and Title V permit revision, incorporating the proposed project.

Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

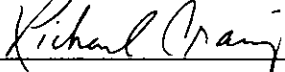
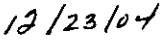
Application is for a an increase in the heat rate for a new turbine that was installed under Construction Permit 0410004-006-AC. Corresponding increases in particulate matter and sulfur dioxide emissions are also being made.

This application is for approximately 7.8% increase in the heat rate for Emission Unit No. 003 (Turbine No. 2402). Initial emissions testing indicated that the actual heat rate is higher than as described in the original permit application and the original construction permit.

APPLICATION INFORMATION

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name : Richard Craig, Vice President, Southeast Operations
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Florida Gas Transmission Company Street Address: P.O. Box 4657 City: Houston State: TX Zip Code: 77210-4657
3. Owner/Authorized Representative Telephone Numbers... Telephone: (713) 646 - 7227 ext. Fax: () -
4. Owner/Authorized Representative Email Address: rick.craig@CrossCountryEnergy.com
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other requirements identified in this application to which the facility is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility of any permitted emissions unit.</i>  Signature  Date

APPLICATION INFORMATION

Application Responsible Official Certification

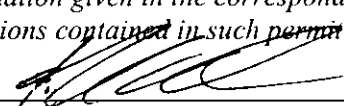
Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: NA
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
3. Owner/Authorized Representative Mailing Address... Organization/Firm: NA Street Address: City: State: Zip Code:
4. Application Responsible Official Telephone Numbers...NA Telephone: () - ext. Fax: () -
5. Application Responsible Official Email Address: NA
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i> _____ Signature _____ Date

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APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: David Holmes Parham Registration Number: 50834
2. Professional Engineer Mailing Address... Organization/Firm: Florida Gas Transmission Company Street Address: 601 S. Lake Destiny Dr. Suite 450 City: Maitland State: FL Zip Code: 32751
3. Professional Engineer Telephone Numbers... Telephone: (407) 838-7119 ext. Fax: (407) 838-7101
4. Professional Engineer Email Address: david.parham@CrossCountryEnergy.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> (1) <i>To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> (2) <i>To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> (3) <i>If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> (4) <i>If the purpose of this application is to obtain an air construction permit (check here <input checked="" type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> (5) <i>If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> _____ Signature</div> <div style="width: 45%; text-align: right;"><u>12/16/04</u> Date</div> </div> (seal)

* Attach any exception to certification statement.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates... Zone 17 East (km) 321.323 North (km) 3282.787		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) 29/39/51 Longitude (DD/MM/SS) 82/50/46	
3. Governmental Facility Code: 0	4. Facility Status Code: A	5. Facility Major Group SIC Code: 49	6. Facility SIC(s): 4922
7. Facility Comment : Compressor Station No. 24 is an existing natural gas pipeline compressor station with two existing compressor engines. It is not classified as a major source under New Source Review and Title V definitions.			

Facility Contact

1. Facility Contact Name: Abe Kattawar, Team Environmental Leader
2. Facility Contact Mailing Address... Organization/Firm: Florida Gas Transmission Company Street Address: P.O. Box 2176 City: Trenton State: FL Zip Code: 32693
3. Facility Contact Telephone Numbers: Telephone: (850) 544 - 6961 ext. Fax: (352) 463 - 0097
4. Facility Contact Email Address:

Facility Primary Responsible Official

Complete if an "application responsible official" is identified in Section I. that is not the facility "primary responsible official."

1. Facility Primary Responsible Official Name: See Section 1
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Facility Primary Responsible Official Telephone Numbers... Telephone: () - ext. Fax: () -
4. Facility Primary Responsible Official Email Address:

FACILITY INFORMATION

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a “major source” and a “synthetic minor source.”

1.	<input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2.	<input type="checkbox"/> Synthetic Non-Title V Source	
3.	<input type="checkbox"/> Title V Source	
4.	<input type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5.	<input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6.	<input type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7.	<input type="checkbox"/> Synthetic Minor Source of HAPs	
8.	<input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9.	<input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10.	<input type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11.	<input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12.	Facility Regulatory Classifications Comment: Facility is a minor source for PSD and Title V purposes. The turbines are subject to NSPS Subpart GG.	

FACILITY INFORMATION

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: <u>Attach. B</u> <input type="checkbox"/> Previously Submitted, Date: _____
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <u>08/2000</u>
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: <u>NA</u> <input type="checkbox"/> Previously Submitted, Date: _____

Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: <input checked="" type="checkbox"/> Attached, Document ID: <u>Narrative Fig. 1-1</u> <input type="checkbox"/> Not Applicable (existing permitted facility)
2. Description of Proposed Construction or Modification: <input checked="" type="checkbox"/> Attached, Document ID: <u>Narrative Section 2.0</u>
3. Rule Applicability Analysis: <input checked="" type="checkbox"/> Attached, Document ID: <u>Narrative Section 3.0</u>
4. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification (Rule 62-212.400(2), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
6. Preconstruction Air Quality Monitoring and Analysis (Rule 62-212.400(5)(f), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Ambient Impact Analysis (Rule 62-212.400(5)(d), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(5)(h)5., F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(5)(e)1. and 62-212.500(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

Section [1] of [1]

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [1] of [1]

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:

7,200 bhp ISO natural gas fired turbine compressor unit

3. Emissions Unit Identification Number: 003

4. Emissions Unit Status Code: A	5. Commence Construction Date:	6. Initial Startup Date: 09/30/03	7. Emissions Unit Major Group SIC Code: 49	8. Acid Rain Unit? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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9. Package Unit:

Manufacturer: Cooper-Rolls Royce

Model Number: 501-KC7 DLE

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment:

The new turbine engine is a Cooper-Rolls 501-KC7 DLE engine compressor unit ISO rated at 7,200 bhp (ISO). Fuel is exclusively natural gas from the FGT's gas pipeline. The new engine will incorporate dry, low NO_x combustion technology.

EMISSIONS UNIT INFORMATION

Section [1] of [1]

Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description:

The engine incorporates dry, low NOX combustion technology.

2. Control Device or Method Code(s): 99

EMISSIONS UNIT INFORMATION

Section [1] of [1]

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate:
2. Maximum Production Rate:
3. Maximum Heat Input Rate: 68 million Btu/hr
4. Maximum Incineration Rate: pounds/hr tons/day
5. Requested Maximum Operating Schedule: 24 hours/day 7 days/week 52 weeks/year 8760 hours/year
6. Operating Capacity/Schedule Comment: Heat input is 63.09 MM Btu/hr at ISO conditions based on a vendor specified 7,200 bhp (ISO) and a LHV heat rate of 7,942 Btu/bhp-hr plus 10% to adjust to HHV. This value is being increased by approximately 8% to 68 mmBtu/hr due to higher values observed during emissions testing

EMISSIONS UNIT INFORMATION

Section [1] of [1]

**C. EMISSION POINT (STACK/VENT) INFORMATION
(Optional for unregulated emissions units.)****Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram: 2402		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: NA			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: NA			
5. Discharge Type Code: V	6. Stack Height: 61.17 feet	7. Exit Diameter: 88" x 66"	
8. Exit Temperature: 958 °F	9. Actual Volumetric Flow Rate: 106,087 acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: 17 East (km): 321.323 North (km): 3282.787		14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment:			

EMISSIONS UNIT INFORMATION

Section [1] of [1]

D. SEGMENT (PROCESS/FUEL) INFORMATION**Segment Description and Rate:** Segment 1 of 1

1. Segment Description (Process/Fuel Type): Natural gas fired turbine engine driving a natural gas compressor, operating full time.		
2. Source Classification Code (SCC): 2-02-002-01		3. SCC Units: Million cubic feet burned
4. Maximum Hourly Rate: 0.0654	5. Maximum Annual Rate: 572.9	6. Estimated Annual Activity Factor: NA
7. Maximum % Sulfur: 0.03	8. Maximum % Ash: NA	9. Million Btu per SCC Unit: 1040
10. Segment Comment: Based on heat rate of 68 MMBtu/hr HHV. Percent sulfur is based on maximum Federal Energy Regulatory Commission (FERC) limit of 10 gr S/100 scf and gas density of 0.0455 lb/scf.		

Segment Description and Rate: Segment NA of _____

1. Segment Description (Process/Fuel Type): 		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment: 		

EMISSIONS UNIT INFORMATION

Section [1] of [1]

D. SEGMENT (PROCESS/FUEL) INFORMATION (CONTINUED)

Segment Description and Rate: Segment NA of _____

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

Segment Description and Rate: Segment NA of _____

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: NOX		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 5.7 lb/hour 25.0 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year NA			
6. Emission Factor: 5.7 lb/hr Reference: Vendor's data		7. Emissions Method Code: 5	
8. Calculation of Emissions: (5.70 lb/hr)(1 ton/2000 lb)(8760 hr/1 yr) = 24.97 tons/year			
9. Pollutant Potential/Estimated Fugitive Emissions Comment: Based on vendor's data. See Attachment C.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions: NA
3. Allowable Emissions and Units: 25 ppmv	4. Equivalent Allowable Emissions: 5.7 lb/hour 25 tons/year
5. Method of Compliance: Initial performance test, custom fuel monitoring	
6. Allowable Emissions Comment (Description of Operating Method): 40 CFR 60.332(a)(2) limits NOX emissions to 177 ppmv.	

Allowable Emissions Allowable Emissions NA of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions NA of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: SO2	2. Total Percent Efficiency of Control:
3. Potential Emissions: 1.82 lb/hour 8.0 tons/year	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year NA	
6. Emission Factor: 10 gr/100scf Reference: FERC limit	7. Emissions Method Code: 2
8. Calculation of Emissions: $(10 \text{ gr S}/100 \text{ scf})(65,385 \text{ scf/hr})(1 \text{ lb}/7000 \text{ gr}) = 0.93 \text{ lb S/hr}$ $(0.93 \text{ lb S/hr})(2 \text{ lb SO}_2/\text{lb S}) = 1.87 \text{ lb SO}_2/\text{hr}$ $(1.87 \text{ lb SO}_2/\text{hr})(8760 \text{ hr/yr})(1 \text{ ton}/2000 \text{ lb}) = 8.18 \text{ ton/yr}$	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: Based on vendor's heat rate value plus 10% and 1040 Btu/scf. Fuel has been increased approximately 8% based on observed values.	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions: NA
3. Allowable Emissions and Units: 10 grains/100 scf	4. Equivalent Allowable Emissions: 1.87 lb/hour 8.2 tons/year
5. Method of Compliance: Initial performance test, custom fuel monitoring	
6. Allowable Emissions Comment (Description of Operating Method): 40 CFR 60.333(a) limits SO2 emissions to 150 ppmv.	

Allowable Emissions Allowable Emissions NA of

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions NA of

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: PM	2. Total Percent Efficiency of Control:
3. Potential Emissions: 0.45 lb/hour 2.00 tons/year	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year NA	
6. Emission Factor: 0.0066 lb/MM Btu Reference: Table 3.1-2a, AP-42 4/00, Supplement E	7. Emissions Method Code: 3
8. Calculation of Emissions: (0.0066 lb/MM Btu)(68 MM Btu/hr) = 0.45 lb/hr (0.45 lb/hr)(8760 hr/yr)(1 ton/2000 lb) = 1.97 ton/yr	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: Originally based on vendor's heat rate value plus 10% and 1040 Btu/scf. Fuel has been increased approximately 8% based on observed values.	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions NA of

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions: NA
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance: Initial performance test, custom fuel monitoring	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions NA of

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions NA of

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: CO	2. Total Percent Efficiency of Control:
3. Potential Emissions: 6.96 lb/hour 30.5 tons/year	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year NA	
6. Emission Factor: 6.91 lb/hr Reference: Vendor's data	7. Emissions Method Code: 5
8. Calculation of Emissions: (6.96 lb/hr)(1 ton/2000 lb)(8760 hr/1 yr) = 30.48 tons/year	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: Based on vendor's data. See Attachment C.	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions NA of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions: NA
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance: Initial performance test, custom fuel monitoring	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions NA of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions NA of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**
 (Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: VOC		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 1.49 lb/hour 6.5 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year NA			
6. Emission Factor: 1.49 lb/hr Reference: Vendor's data		7. Emissions Method Code: 5	
8. Calculation of Emissions: (1.49 lb/hr)(1 ton/2000 lb)(8760 hr/1 yr) = 6.53 tons/year			
9. Pollutant Potential/Estimated Fugitive Emissions Comment: Based on vendor's data. See Attachment C.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions NA of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions: NA
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance: Initial performance test, custom fuel monitoring	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions NA of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions NA of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: HAPS	2. Total Percent Efficiency of Control:
3. Potential Emissions: 0.068 lb/hour 0.30 tons/year	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year NA	
6. Emission Factor: 0.001027 lb/MM Btu Reference: Table 3.1-3a, AP-42 04/00, Supplement E	7. Emissions Method Code: 3
8. Calculation of Emissions: (0.001027 lb/MM Btu)(68 MM Btu/hr) = 0.070 lb/hr (0.070/lb/hr)(8760 hr/yr)(1 ton/2000 lb) = 0.31 ton/yr	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: Detailed calculations provided in Attachment C. Included in VOC emissions.	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions NA of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions: NA
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance: Initial performance test, custom fuel monitoring	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions NA of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions NA of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

Section [1] of [1]

G. VISIBLE EMISSIONS INFORMATION

Complete if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE10	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 10 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: 40 CFR 60 Appendix A Method 9	
5. Visible Emissions Comment: Subject to 62-296-320(4)(b)1 General Visible Emissions Standards.	

Visible Emissions Limitation: Visible Emissions Limitation NA of

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

EMISSIONS UNIT INFORMATION

Section [1] of [1]

H. CONTINUOUS MONITOR INFORMATION

Complete if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor NA of

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor of

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION

Section [1] of [1]

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date <u>08/2000</u>
2. Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date <u>08/2000</u>
3. Detailed Description of Control Equipment (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: <u>NA</u> _____ <input type="checkbox"/> Previously Submitted, Date _____
4. Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: <u>NA</u> _____ <input type="checkbox"/> Previously Submitted, Date _____ <input type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records <input type="checkbox"/> Attached, Document ID: <u>Submitted separately and concurrently</u> Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input checked="" type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

Section [1] of [1]

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(6) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)) <input type="checkbox"/> Attached, Document ID: _____ NA _____ <input checked="" type="checkbox"/> Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(5)(h)6., F.A.C., and Rule 62-212.500(4)(f), F.A.C.) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Description of Stack Sampling Facilities (Required for proposed new stack sampling facilities only) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
2. Compliance Assurance Monitoring <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
4. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
5. Acid Rain Part Application <input type="checkbox"/> Certificate of Representation (EPA Form No. 7610-1) <input type="checkbox"/> Copy Attached, Document ID: _____ <input type="checkbox"/> Acid Rain Part (Form No. 62-210.900(1)(a)) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

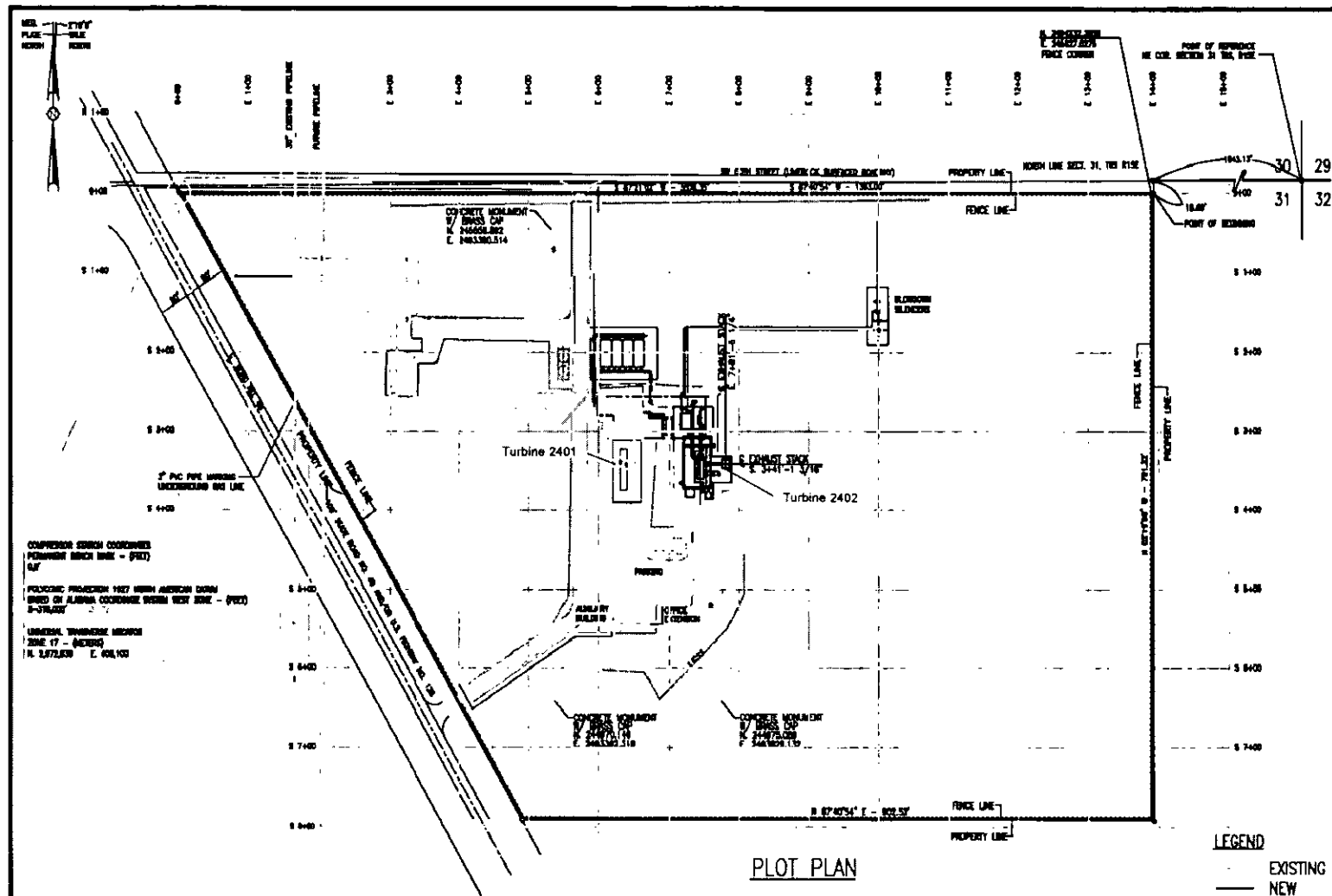
Section [1] of [1]

Additional Requirements Comment

[Empty rectangular box for Additional Requirements Comment]

Attachment B

Plot Plan



PLOT PLAN

LEGEND
 - - - EXISTING
 ——— NEW

PIPELINE, STATION, OR ACCOUNT NUMBER		SCALE N.T.S.	CONST. YR. 2003	PROJECT NO. C.012612
FILENUMBER	CADD FILENAME	DRAWN MM	DATE 10/16/02	PREVIOUS DWG. NO.
REV. NO. - DESCRIPTION	BY	DATE	APP.	SHT. OF DWG. NO. S3-1AP SHT. 1 OF 1
			Florida Gas Transmission Company An Enron/Exxon Affiliates	COMPRESSOR STATION NO. 24 FGT PHASE VI EXPANSION PLOT PLAN GILCHRIST COUNTY, FLORIDA

Attachment C

Vendor Information

Cooper-Rolls 501 KC-7 Turbine

Allison Industrial Engine Performance & Emissions Estimate (EDR 18656)

Date: June 4, 2001
Project: Florida Gas Site Analyses
Engine Configuration: 501-KC7, DLE W/Diffuser Bleed

Parameter/Data Pt. No.	C/S 15 #1
Altitude (feet)	50
Ambient Press. (psia)	14.669
Relative Humidity	60
Specific Humidity	0.006366
Inlet Loss ("H2O)	0
Exhaust Loss ("H2O)	0
Inlet Pressure (CIP, psia)	14.669
Inlet Temperature (CIT, °F)	59
Inlet Flow (lb/sec)	45.24
MGT t/c (°F)	1375
Control Temp. (°F)	1935
Fuel Flow (MMBTU/hr)	57.3545
Fuel Flow (lb/hr)	2808.74
Output Shaft Speed (rpm)	13600
Gas Generator Speed (rpm)	14677
Shaft Power (hp)	7222.1
% of Full Load	100
SFC [lb/(hp*hr)]	0.3889
HeatRate[Shaft] BTU/(shp*hr)	7942
Exhaust Flow (lb/sec)	45.708
Exhaust Temp. (f/a, °F)	958
Exhaust P-static (psia)	14.67
Fuel	Ref Gas
Fuel LHV (BTU/lb)	20420
H/C (wt ratio)	0.3261
Fuel Molecular Weight	16.6303
Fuel Specific Gravity	0.5902
Expected Emissions @ 15% O2	
NOx ppm	25
CO ppm	50
UHC ppm	20
VOC ppm	10
Expected Emissions (lb/eng-hr)	
NOx	5.7
CO	6.96
UHC	1.59
VOC	1.49
Exhaust Gas (vol %)	
CO2	2.94
H2O	6.63
O2	14.43
N2	75.1
Ar	0.9

NOTE: This data was originally prepared for Engine No. 1508 at FGT CS 15. Engine 2402 is an identical unit and the elevation is the same.

Attachment D
Emission Calculations

Engine No. 2402 EPN: 003

NOx Emissions: (Based on Vendor Data)

$$\begin{aligned} \text{lb NOx/hr} &= 5.70 \\ \text{tons NOx/yr} &= (\text{lb NOx/hr})(\text{hr/yr})(1 \text{ ton}/2000 \text{ lb}) \\ &= (5.7 \text{ lb NOx/hr})(8760 \text{ hr/yr})(1 \text{ ton}/2000 \text{ lb}) \\ &= 24.97 \end{aligned}$$

CO Emissions: (Based on Vendor Data)

$$\begin{aligned} \text{lb CO/hr} &= 6.96 \\ \text{tons CO/yr} &= (\text{lb CO/hr})(\text{hr/yr})(1 \text{ ton}/2000 \text{ lb}) \\ &= (7.0 \text{ lb CO/hr})(8760 \text{ hr/yr})(1 \text{ ton}/2000 \text{ lb}) \\ &= 30.48 \end{aligned}$$

VOC Emissions: (Based on Vendor Data)

$$\begin{aligned} \text{lb VOC/hr} &= 1.49 \\ \text{tons VOC/yr} &= (\text{lb VOC/hr})(\text{hr/yr})(1 \text{ ton}/2000 \text{ lb}) \\ &= (1.490 \text{ lb VOC/hr})(8760 \text{ hr/yr})(1 \text{ ton}/2000 \text{ lb}) \\ &= 6.53 \end{aligned}$$

SO2 Emissions: (Based on FERC Limits)

$$\begin{aligned} \text{lb S/hr} &= (\text{gr S}/100 \text{ scf})(\text{MMscf/hr})(1 \text{ lb}/7000 \text{ gr}) \\ &= (10 \text{ gr S}/100 \text{ scf})(0.0654 \text{ MMscf/hr})(1 \text{ lb}/7000 \text{ gr}) \\ &= 0.93 \end{aligned}$$

$$\begin{aligned} \text{lb SO2/hr} &= (\text{lb S/hr})(2 \text{ lb SO2}/\text{lb S}) \\ &= (0.93 \text{ lb S/hr})(2 \text{ lb SO2}/\text{lb S}) \\ &= 1.87 \end{aligned}$$

$$\begin{aligned} \text{tons SO2/yr} &= (\text{lb SO2/hr})(\text{hr/yr})(1 \text{ ton}/2000 \text{ lb}) \\ &= (1.87 \text{ lb SO2/hr})(8760 \text{ hr/yr})(1 \text{ ton}/2000 \text{ lb}) \\ &= 8.18 \end{aligned}$$

PM 10/2.5 Emissions: (Based on AP-42 Table 3.1-2a, 4/00)

$$\begin{aligned} \text{lb PM/hr} &= (\text{lb PM}/\text{MMscf})(\text{MMBtu/hr}) \\ &= (0.0066 \text{ lb}/\text{MMBtu})(68.00 \text{ MMBtu/hr}) \\ &= 0.45 \end{aligned}$$

$$\begin{aligned} \text{tons PM/yr} &= (\text{lb PM/hr})(\text{hr/yr})(1 \text{ ton}/2000 \text{ lb}) \\ &= (0.45 \text{ lb PM/hr})(8760 \text{ hr/yr})(1 \text{ ton}/2000 \text{ lb}) \\ &= 1.97 \end{aligned}$$

HAPs Emissions: (Based on AP-42 Table 3.1-3, 4/00)

$$\begin{aligned} \text{lb HAP/hr} &= (\text{lb HAP}/\text{MMBtu})(\text{MMBtu/hr}) \\ &= (0.00102733 \text{ lb}/\text{MMBtu})(68.0000 \text{ MMBtu/hr}) \\ &= 0.0699 \end{aligned}$$

$$\begin{aligned} \text{tons HAP/yr} &= (\text{lb HAP/hr})(\text{hr/yr})(1 \text{ ton}/2000 \text{ lb}) \\ &= (0.070 \text{ lb HAP/hr})(8760 \text{ hr/yr})(1 \text{ ton}/2000 \text{ lb}) \\ &= 0.31 \end{aligned}$$

Specific Engine HAP Emission Factors

HAP	Turbine	
	Factor lb/MMBtu	Ref.
1,3-Butadiene	4.30E-07	d
Acetaldehyde	4.00E-05	d
Acrolein	6.40E-06	d
Benzene	1.20E-05	d
Ethylbenzene	3.20E-05	d
Formaldehyde	7.10E-04	d
Naphthalene	1.30E-06	d
PAH	2.20E-06	d
Toluene	1.30E-04	d
Xylenes	6.40E-05	d
Total Hazardous Cmpds	1.027E-03	

Reference:

AP-42, 5th Edition, Supplement F, 04/00, Table3.1-3

Attachment E
Pages from Tariff Sheet

FLORIDA GAS TRANSMISSION COMPANY
FERC Gas Tariff
Third Revised Volume No. 1

Title Page

FERC GAS TARIFF
Third Revised Volume No. 1
(Supersedes Second Revised Volume No. 1)

of
FLORIDA GAS TRANSMISSION COMPANY

filed with

Federal Energy Regulatory Commission

Communications concerning this Tariff should be addressed to:

Robert B. Kilmer
Vice President - Rates and Certificates
Florida Gas Transmission Company
P.O. Box 1188
1400 Smith Street 77002
Houston, Texas 77251-1188

Telephone No. (713)853-6160
Facsimile No. (713)646-3201

Issued by: Robert B. Kilmer, Vice President
Issued on: April 10, 1997

Effective: May 10, 1997

GENERAL TERMS AND CONDITIONS
(continued)

- am. NAESB Definitions - shall mean any such definitions issued by NAESB which have been adopted by the FERC. Transporter incorporates NAESB Definitions (Version 1.6, July 31, 2002) including the Wholesale Gas Quadrant Recommendations R02002 and R02002-2, 1.2.8 through 1.2.19, 2.2.2, 2.2.3, 4.2.1 through 4.2.20, 5.2.2 and 5.2.3 by reference herein.
- an. "Transporter's Web site" shall mean the Uniform Resource Locator (URL) of Transporter's Electronic Communication Mechanism on the Internet at www.fgt.enron.com.
- ao. "Execution" or "executed" or any other form of the root word "execute" when used with respect to any service agreement, amendment to service agreement, or any other contract shall include electronic execution pursuant to the procedures established by Transporter.
- ap. "Written" or "in writing" or any other combination of words indicating a requirement that a document be in a physically written form shall include any service agreement, amendment to service agreement, or any other contract or document which has been electronically executed pursuant to the procedures established by Transporter.
- aq. NAESB - North American Energy Standards Board [Successor to the Gas Industry Standards Board ("GISB")], or any subsequent successor organization.

2. QUALITY

- A. Gas delivered by Shipper or for its account into Transporter's pipeline system at receipt points shall conform to the following quality standards:
 - 1. shall be free from objectionable odors, solid matter, dust, gums, and gum forming constituents, or any other substance which might interfere with the merchantability of the gas stream, or cause interference with proper operation of the lines, meters, regulators, or other appliances through which it may flow;
 - 2. shall contain not more than seven (7) pounds of water vapor per one thousand (1,000) MCF;
 - 3. shall contain not more than one quarter (1/4) grain of hydrogen sulphide per one hundred (100) cubic feet of gas;
 - 4. shall contain not more than ten (10) grains of total sulphur per one hundred (100) cubic feet of gas;
 - 5. shall contain not more than a combined total three percent (3%) by volume of carbon dioxide and/or nitrogen;
 - 6. shall contain not more than one quarter percent (1/4%) by volume of oxygen;

Issued by: Robert B. Kilmer, Vice President
Issued on: July 3, 2003
Filed to comply with order of the Federal Energy Regulatory Commission,
Docket No. RP03-361, issued June 25, 2003, 100 FERC ,

Effective: July 1, 2003

REMITTANCE STATEMENT

VENDOR NUMBER:



VOUCHER NUMBER	INVOICE DATE	INVOICE NO.	PURCHASE ORDER	AMOUNT		
				GROSS	DISCNT	NET
	12-16-04			2000.00		
SPECIAL INSTRUCTIONS:				CHECK TOTAL		2000.00

DETACH AND RETAIN THIS STUB FOR YOUR RECORDS.

CHECK # 1500000217 ATTACHED BELOW

REMOVE DOCUMENT ALONG THIS PERFORATION

THE FACE OF THIS DOCUMENT IS PRINTED BLUE - THE BACK CONTAINS A SIMULATED WATERMARK

	Florida Gas Transmission Company	DATE 12-16-04	CHECK NO. 1500000217
	P. O. Box 1188 Houston, TX 77251-1188	JPMorgan Chase Bank 6040 Tarbell Road Syracuse, NY 13206	50-937 213
PAY	Two Thousand and 00/100 Dollars		2000.00
To The Order Of	Florida Department of Environmental Protection		NOT VALID AFTER 1 YEAR 

⑈ 1500000 217 ⑈ ⑆ 0213093791601870827 ⑈

Accu-Seal Patent 4,918,128 - 4,928,875 - 5,253,798 - 5,829,670 - 5,785,242