

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Thursday, April 30, 2009 3:30 PM
To: 'dave.shellhouse@sug.com'
Cc: 'charles.wait@sug.com'; 'kevin.mcglynn@trow.com'; Kirts, Christopher; Gibson, Victoria; DeVore, Susan; Walker, Elizabeth (AIR)
Subject: FL Gas Transmission Company - TRENTON COMPRESSOR STATION 24; 0410004-016-AC
Attachments: 0410004-016-AC_Signatures.pdf

Dear Sir/ Madam:

Attached is the official **Notice of Final Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

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Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0410004.016.AC.F_pdf.zip

Owner/Company Name: FLORIDA GAS TRANSMISSION COMPANY

Facility Name: TRENTON COMPRESSOR STATION 24

Project Number: 0410004-016-AC

Permit Status: FINAL

Permit Activity: CONSTRUCTION

Facility County: GILCHRIST

Processor: Susan DeVore

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "*Air Permit Documents Search*" website at <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

Permit project documents addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)488-0114.

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us

Note: The attached document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html>.

Livingston, Sylvia

From: Shellhouse, Dave W. [Dave.Shellhouse@SUG.com]
Sent: Monday, June 01, 2009 11:56 AM
To: Livingston, Sylvia
Subject: RE: FL Gas Transmission Company - TRENTON COMPRESSOR STATION 24; 0410004-016-AC

Received. Sorry for the delay in responding.

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Thursday, April 30, 2009 3:30 PM
To: Shellhouse, Dave W.
Cc: Wait, Charles; kevin.mcglynn@trow.com; Kirts, Christopher; Gibson, Victoria; DeVore, Susan; Walker, Elizabeth (AIR)
Subject: FL Gas Transmission Company - TRENTON COMPRESSOR STATION 24; 0410004-016-AC

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Facility Name: TRENTON COMPRESSOR STATION 24
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Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)

Livingston, Sylvania

From: Wait, Charles [Charles.Wait@SUG.com]
Sent: Friday, May 01, 2009 2:54 PM
To: Livingston, Sylvania; Shellhouse, Dave W.
Cc: kevin.mcglynn@trow.com; Kirts, Christopher; Gibson, Victoria; DeVore, Susan; Walker, Elizabeth (AIR)
Subject: RE: FL Gas Transmission Company - TRENTON COMPRESSOR STATION 24; 0410004-016-AC

received

Charles Wait
Principal Engineer
Panhandle Energy
5444 Westheimer
Houston, TX 77056
Ph 713.989.7459
Cell 713.724.5901
Fax 713.989.1135

From: Livingston, Sylvania [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Thursday, April 30, 2009 2:30 PM
To: Shellhouse, Dave W.
Cc: Wait, Charles; kevin.mcglynn@trow.com; Kirts, Christopher; Gibson, Victoria; DeVore, Susan; Walker, Elizabeth (AIR)
Subject: FL Gas Transmission Company - TRENTON COMPRESSOR STATION 24; 0410004-016-AC

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DeVore, Susan

From: Wait, Charles [Charles.Wait@SUG.com]
Sent: Wednesday, February 18, 2009 4:32 PM
To: DeVore, Susan
Subject: Comments Station 24

Owner/Company Name: FLORIDA GAS TRANSMISSION COMPANY
Facility Name: COMPRESSOR STATION NO. 24
Project Number: 0410004-016-AC
Permit Status: DRAFT
Permit Activity: CONSTRUCTION
Facility County: GILCHRIST
Processor: Susan DeVore

Susan,

FGT has three comments for your consideration on the draft permit.

EU 001 is listed in the draft permit as a Mars 90-T13000. It should be designated as a Mars 100 T15000.

Condition 8 "Initial Compliance Tests" of the permit states, "The initial NO_x performance tests shall be conducted at approximately four evenly spaced points between the minimum normal operating load and 100% of peak load. Each of the three low-load NO_x performance tests shall consist of three, 20-minute test runs. The peak load NO_x performance test shall consist of three, 1-hour test runs."

This draft permit language seems to be a holdover from NSPS Subpart GG. Subpart KKKK revises the test load points for the initial compliance test of natural gas fired turbine units. Section 60.4400 (b) states that "The performance test must be done at any load condition within plus or minus 25 percent of 100 percent of peak load. You may perform testing at the highest achievable load point, if at least 75 percent of peak load cannot be achieved in practice. You must conduct three separate test runs for each performance test. The minimum time per run is 20 minutes."

FGT proposes that the peak load definition be 90-100% of rated capacity to remain consistent with current agency policy. With this in mind FGT suggests the following be substituted into the condition, "The initial NO_x performance tests shall be conducted within 90-100% of rated capacity and shall consist of three 20-minute test runs."

Condition 9 "Annual Compliance Tests" requires an annual emissions test during the federal fiscal year. FGT suggests an additional phrase be added to the condition so that this permit condition reflects the requirements of Subpart KKKK. §60.4340 states for turbines not using water injection and relying on emission testing to demonstrate compliance with the standard, "If you are not using water or steam injection to control NO_x emissions, you must perform annual performance tests in accordance with §60.4400 to demonstrate continuous compliance. If the NO_x emission result from the performance test is less than or equal to 75 percent of the NO_x emission limit for the turbine, you may reduce the frequency of subsequent performance tests to once every 2 years (no more than 26 calendar months following the previous performance test). If the results of any subsequent performance test exceed 75 percent of the NO_x emission limit for the turbine, you must resume annual performance tests." With regard to annual emissions testing, §60.4400 states "You must conduct an initial performance test, as required in §60.8. Subsequent NO_x performance tests shall be conducted on an annual basis (no more than 14 calendar months following the previous performance test)."

4/24/2009

FGT respectfully suggested that the following revision be made to the draft permit language, "During each federal fiscal year (October 1 - September 30) But not exceeding 14 months from a previous test where NOx emissions were greater than 75% of the NOx emissions standard (40CFR 60.4400 (a)), the combustion turbine shall be tested to demonstrate compliance with the emission standards for CO, NOx, and visible emissions."

Thank you for your consideration

*Charles Wait
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Cell 713.724.5901
Fax 713.989.1135*

Private and confidential as detailed [here](#). If you cannot access hyperlink, please e-mail sender.