



Vandolah Power Company, LLC

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May 5, 2005

Ms. Trina Vielhauer, Bureau Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road MS 5500
Tallahassee, FL 32399-2400
Phone: 850-488-0114

RECEIVED

MAY 10 2005

BUREAU OF AIR REGULATION

Re: Request for a Custom Natural Gas Fuel Monitoring Schedule
Vandolah Power Company, Wauchula, FL.
Title V Permit No. 0490043-003AV
ORIS Code- 55415

0490043-004-AV

Dear Ms. Vielhauer:

Vandolah Power Company is requesting a custom schedule for the natural gas monitoring requirement. The primary fuel burned at the Vandolah Plant is pipeline natural gas, as defined in 40 CFR 72.2 and documented according to 40 CFR 75.2.3.1.4(a)(1). Thus, Vandolah requests approval of the following schedule for natural gas monitoring.

- Monitoring of fuel nitrogen will not be performed or required while natural gas is fired in the combustion turbines.
- Monitoring of fuel sulfur will not be performed or required while natural gas is being fired in the combustion turbines.

This request is in accordance with Section A.45 of the facility's Title V Permit (0690043-003AV). For your convenience, this section of the Title V permit is copied below in bold type.

A.45. Natural Gas Monitoring Schedule: A custom fuel monitoring schedule pursuant to 40 CFR 75 Appendix D for natural gas may be used in lieu of the daily sampling requirements of 40 CFR 60.334 (b)(2) provided the following requirements are met:

- **The permittee shall apply for an Acid Rain permit within the deadlines specified in 40 CFR 72.30.**

The Vandolah Plant has applied for and received an Acid Rain Permit and is following all permit conditions.

- **The permittee shall submit a monitoring plan, certified by signature of the Designated Representative, that commits to using a primary fuel of pipeline supplied natural gas (sulfur content less than 20 gr/100 scf pursuant to 40 CFR 75.11(d)(2)).**

The Vandolah Plant has submitted a monitoring plan, certified by Douglas A. Jensen, Plant Manager and Designated Representative, that commits to using a primary fuel of pipeline supplied natural gas with a sulfur content of less than ten (10) grains of total sulfur per one hundred (100) cubic feet of gas, and a hydrogen sulfide content of less than one quarter (1/4 or .25) grain per one hundred (100) cubic feet of gas. The reported sulfur and hydrogen sulfide rates are listed in the Florida Gas Transmission Company and Gulfstream Natural Gas System FERC Gas Tariffs General Terms and Conditions Section. A copy of the relevant sections of the tariffs has been included as Attachment 1 and 2 respectively. The natural gas quality listed in the tariffs exceeds the requirement for pipeline natural gas listed in the Vandolah Title V Permit.

- **Each unit shall be monitored for SO₂ emissions using methods consistent with the requirements of 40 CFR 75 and certified by the USEPA.**

The sulfur dioxide (SO₂) emissions from each of four (4) combustion turbines are monitored via the use of a continuous emissions monitoring system (CEMS) that was set up to continuously monitor nitrogen oxide (Nox) emissions from the combustion turbines. The CEMS has been certified by the EPA according to 40 CFR 75. Both Nox emissions and SO₂ emissions are reported to the EPA on a quarterly basis.

This custom fuel monitoring schedule will only be valid when pipeline natural gas is used as a primary fuel. If the primary fuel for these units is changed to a higher sulfur fuel, SO₂ emissions must be accounted for as required pursuant to 40 CFR 75.11(d).

- The Vandolah Plant will continue to monitor fuel nitrogen and fuel sulfur in its backup fuel of No. 2 fuel oil or superior grade of distillate fuel oil according to the requirements listed in the Title V Permit. In addition, should the sulfur content in the natural gas fired at the facility increase above twenty (20) grains per one hundred (100) cubic feet of gas, the Vandolah Plant will notify the Florida Department of Environmental Protection and the EPA. The Plant will then monitor sulfur content in the natural gas as required pursuant to 40 CFR 75.11(d) until a new custom fuel monitoring schedule is obtained.

Vandolah Power Company appreciates the opportunity to submit this formal request for a custom natural gas fuel monitoring schedule in lieu of daily sampling and looks forward to your response.

If you have any questions or need more information, please contact me at (863) 773-2277 x2222 or Chris Coombs at x2228.

Sincerely,

A handwritten signature in black ink, appearing to read 'Douglas A. Jensen', with a long horizontal flourish extending to the right.

Douglas A. Jensen

Vandolah Plant Manager

cc: Chris Coombs, Environmental Leader, Vandolah Plant

J. Heron

D. Waters, SWP

ATTACHMENT 1

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FLORIDA GAS TRANSMISSION COMPANY
Substitute Eighth Revised Sheet No. 102C
FERC Gas Tariff
Superseding
Third Revised Volume No. 1
Seventh Revised Sheet No. 102C

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

Effective: July 1, 2003

Filed to comply with order of the Federal Energy Regulatory Commission,

Docket No. RP03-361, issued June 25, 2003, 100 FERC ,

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ATTACHMENT 2

GENERAL TERMS AND CONDITIONS
(CONTINUED)

3. QUALITY

- 3.1 Heat Content. Heat content shall mean the gross heating value per cubic foot of Gas delivered at each Receipt Point and Delivery Point. The Gas at each Receipt Point shall have a heat content not greater than 1075 BTUs per cubic foot or less than 1000 BTUs per cubic foot when determined on a dry basis. The Gas received and delivered shall have a hydrocarbon dew point less than 25 Degrees Fahrenheit at 800 psig. Transporter shall have the right to waive such BTU content limit if Transporter is able to accept such Gas without affecting Transporter's operations. The total heating value per cubic foot of Gas shall be determined at each Receipt Point and at strategic location(s) determined by Transporter to be represented for each Delivery Point by standard methods accepted in the industry for this purpose.

The unit of quantity for the purpose of determining total heating value shall be one (1) cubic foot of anhydrous Gas at a temperature of sixty (60) degrees Fahrenheit and an absolute pressure of 14.73 psia.

- 3.2 Freedom from Objectionable Matter. The Gas received and delivered hereunder:
- (a) shall be commercially free from dust or other solid or liquid matter which might interfere with its merchantability or cause injury to or interference with proper operation of the lines, regulators, meters and other equipment of Transporter;

Issued by: P. Martin Teague, Assistant General Counsel
Issued on: March 27, 2002

Effective on: May 28, 2002

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Gulfstream Natural Gas System, L.L.C.
FERC Gas Tariff
Original Volume No. 1

First Revised Sheet No. 119
Superseding
Original Sheet No. 119

GENERAL TERMS AND CONDITIONS
(CONTINUED)

(b) shall not contain more than four (4) parts per million (one quarter grain per one hundred (100) cubic feet of Gas) of hydrogen sulfide, as determined by the method prescribed in the Gas Processors Association Standard 2377, entitled "Test for Hydrogen Sulfide and Carbon Dioxide in Natural Gas Using Length of Stain Tubes";

(c) shall not contain more than ten (10) grains of total sulfur (including the sulfur in any hydrogen sulfide and mercaptans) per one hundred (100) cubic feet of Gas;

(d) shall not at any time have an oxygen content in excess of 0.25% by volume and the parties hereto shall make every reasonable effort to keep the Gas free of oxygen;

(e) shall not contain as nearly as practicable any free water nor contain more than seven (7) pounds of water vapor per million cubic feet of Gas;

(f) shall not contain more than three percent (3%) by volume of nitrogen and carbon dioxide combined;

(g) shall be delivered at a temperature not in excess of one hundred twenty (120) degrees Fahrenheit or less than forty (40) degrees Fahrenheit; and

(h) shall not contain any toxic, hazardous materials or substances, or any deleterious material potentially harmful to persons or to the environment, including but not limited to, polychlorinated biphenyls and substances requiring investigation, remediation or removal under any law, regulation, rule or order in effect from time to time.

(i) shall not contain more than eighteen one-hundredths (0.18) parts per million by volume (two one-hundredths (0.02) grains per one hundred (100) cubic feet of Gas (by weight) of carbonyl sulfide, as determined by the method prescribed in the American Society for Testing & Materials Standard D-5623, entitled "Standard Test Method for Sulfur Compounds in Light Petroleum Liquids by Gas Chromatography and Sulfur Selective Detection.

Issued by: P. Martin Teague, Assistant General Counsel
Issued on: August 1, 2002 Effective on: May 1, 2003
Filed to comply with order of the Federal Energy Regulatory Commission, Docket No. CP00-6-004, et al., issued July 2, 2002, 00 FERC ¶ 61,018

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