



Florida Gas Transmission Company

P. O. Box 945100 Maitland, Florida 32794-5100 (407) 875-5800

December 4, 1997

CERTIFIED MAIL

Ms. Teresa Heron, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Bldg.
2600 Blairstone
Tallahassee FL 32399-2400

RECEIVED

DEC 09 1997

**BUREAU OF
AIR REGULATION**

Re: Air Permit 0570438-003-AO
Florida Gas Transmission Company Compressor Station No. 30

Dear Mr. Kirby:

Subject: Correction of Permit Requirement

Florida Gas Transmission Company (FGT) has discovered an error in the above referenced permit. Specific Condition No. 6 A of the permit indicates that NO_x emissions of Turbine 3003 are limited to 42 ppmv and 17.3 tons per year (tpy). The 42 ppmv is incorrect and inconsistent with the 17.3 tpy which is correct. This error appears to have been in existence since the original construction permit, Permit No. AC29-228821 was issued on September 23, 1993. The 42 ppmv appears as a footnote to the NO_x emission limitations in Specific Condition No. 1 of Permit No. AC29-228821.

It is not possible for Turbine 3003 to achieve 42 ppmv. At the time of the original construction permitting of this emission unit, four other turbines at three other compressor stations were also permitted. These other turbines were larger and equipped with state of the art low NO_x combustion technology. The NO_x emission rate for these other units were all 42 ppmv which was also considered BACT for the one unit that was subject to PSD. There was no requirement for BACT on Turbine 3003 and the low NO_x combustion technology was not available for such units.

Table 3-5 of the original construction permit application submitted in March 1993 indicated a NSPS NO_x limitation of 150 ppmv based upon 40 CFR 60 Subpart GG requirements. This table also indicated that Turbine 3003 had a NO_x emission rate of 75 ppmv.

FGT respectfully requests that this error be corrected and that the NO_x limitations for emission unit 3003 be set at 150 ppmv as required by 40 CFR 60 Subpart GG.

A request to change the current operating permit is also being sent to Hillsborough County Environmental Protection Commission in Tampa.

If additional information is needed or if you have any questions, please call Mr. Clay Roesler at (407) 875-5865. Thank you for your consideration in this matter.



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

October 15, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Clayton Roesler
Division Environmental Specialist
Florida Gas Transmission Company
P.O. Box 945100
Maitland, Florida 32794-5100

Re: Florida Gas Transmission Gas Turbines Permits
EPA Approval of Custom Fuel Monitoring Schedule
Station 30: 0570438-002-AC
Station 26: 0170035-001-AC
Station 15: 1230034-002-AC

Dear Mr. Roesler:

This letter is a reminder for you to send the Bureau of Air Regulation, the EPA Custom Fuel Monitoring Schedule approval for the above referenced gas turbines at the above mentioned FGT stations. If this request for approval has not been granted by EPA, please let us know.

As Teresa Heron has mentioned to you in previous telephone conversations, we need that information in order to update our ARMS database.

If you have any questions regarding this matter, please call Teresa Heron at (904) 488-1344.

Sincerely,

A. A. Linero, P.E.
Administrator
New Source Review Section

AAL/th/t

P 265 659 471

no-green card 7/98

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent by <i>Justin Koster</i>	
Street & Number <i>F 501</i>	
Post Office, State, & ZIP Code <i>Prattland, AL</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date <i>Oct. 30</i> <i>10-15-97</i> <i>" 26</i> <i>" 15</i>	

PS Form 3800, April 1995