

Memorandum

**Florida Department of
Environmental Protection**

Michael Cooker

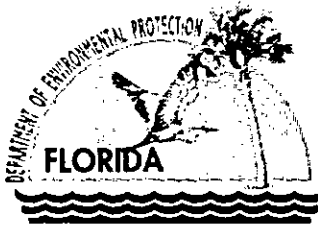
TO: ~~Joseph Kahn~~, Division of Air Resources Management
THRU: Trina Vielhauer, Bureau of Air Regulation *TV*
Al Linero, New Source Review Section *AL* 7/30
FROM: Jeff Koerner, New Source Review Section *JK*
DATE: July 30, 2003
SUBJECT: Extension of Permit Expiration Date
Air Permit No. 0571279-001-AC
Florida Gas Transmission Company
Station No. 27, Hillsborough County, Engine 2701

Attached for your approval and signature is a modification that extends the permit expiration date for the above referenced project. Florida Gas Transmission Company (FGTC) requests an extension of the air construction to provide additional time to repair and test the unit. The engine is a Rolls Royce Model No. 01-KC7-DLE gas turbine. This engine model is experiencing several mechanical and operational problems such as compressor bleed valve failures and automatic control system problems. After less than 300 hours of operation, the original Engine 2701 was replaced. After about 500 hours, the replacement Engine 2701 was found to have cracks in the combustion can liner. The manufacturer has determined that the unit can be repaired in the field. The attached extension will allow FTGC to repair and test the engine as well as submit a complete application for a Title V air operation permit. Day 74 is October 10, 2003. I recommend your approval and signature.

Attachments

Mike,
It seems Rolls Royce had a problem --
we issued a similar extension on another
facility for the same reasons.

Trina



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

August 1, 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Richard Craig, V.P. of Southeast Operations
Florida Gas Transmission Company
P.O. Box 1188
Houston, TX 77251

Re: Extension of Air Construction Permit
Hillsborough Compressor Station No. 27 – Engine 2701
Air Permit No. 0571279-001-AC, Extension

Dear Mr. Craig:

Florida Gas Transmission Company (FGTC) is in the process of constructing new compressor Station No. 27, which consists of two 7200 bhp Rolls Royce Model No. 01-KC7-DLE gas turbines. The compressor station is located approximately two miles south of U.S. Highway 301 on County Road 579 near the city of Thonotosassa in Hillsborough County, Florida. Engine 2702 is installed, tested, and in operation. Engine 2701 has experienced mechanical and operation problems. On May 1st, the expiration date of the above air construction permit was extended to November 1, 2003 to provide additional time to complete the installation and testing of Engine 2701. On June 27th, the Department received notification from FGTC that the original Engine 2701 would be permanently replaced with an identical unit due to the continuing problems. The original engine had operated less than 300 hours. On July 29th, FGTC requested a second extension of the above air construction permit to repair cracks in the combustion can liner of the replacement Engine 2701 and provide additional time to test the unit. The replacement engine has operated about 500 hours.

The Department approves the request. The permit is hereby extended from **November 1, 2003 to July 1, 2004** to repair the engine, conduct all required initial tests, and submit a complete application for a Title V air operation permit. A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permitting decision is issued pursuant to Chapter 403, Florida Statutes.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3), F.S., must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the

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proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

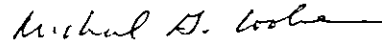
The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Department.

Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty (30) days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Michael G. Cooke, Director
Division of Air Resources Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this order was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 8/5/03 to the persons listed below.

- Mr. Richard Craig, FGTC*
- Mr. Jacob Krautsch, FGTC
- Mr. Kevin McGlynn, McGlynn Consulting Co.
- Mr. V. Duane Pierce, AQMcS
- Mr. Jerry Campbell, EPC of HC
- Mr. Gerry Kissel, SWD

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Victoria Gibson August 5, 2003
(Clerk) (Date)



Florida Gas Transmission Company

1967 Commonwealth Lane, Tallahassee, FL 32303, (850) 350-5000, Fax Downstairs (850) 350-5001

July 28, 2003

UPS Overnight - 1Z F62 059 22 1003 308 2

Mr. Jeff Koerner, P.E.
New Source Review Section
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blairstone Road MS 5500
Tallahassee, FL 32399-2400

RECEIVED

JUL 29 2003

BUREAU OF AIR REGULATION

Reference: Permit No. 0571279-001-AC
Compressor Station No. 27, Hillsborough County

Dear Mr. Koerner:

Subject: Extension of Construction Permit Expiration

New problems have been discovered with the Rolls Royce Model 501 KC-7 Engine (No. 2701) located at Florida Gas Transmission Company (FGT) Compressor Station No. 27. Cracks have been found in the combustion can liner and repairs need to be made. As a result, it will not be possible for FGT to complete the repairs, perform the required initial emissions compliance test and apply for an operating permit at least 60 days before the expiration date of the above referenced Construction Permit.

FGT requests a 90 day extension for the referenced construction permit in order to complete the repairs, perform the required Subpart GG emissions test and to submit an application for the operating permit.

If you have any questions or need additional information, please call me at (850) 350-5042 or Dr. Duane Pierce at (281) 373-5365.

Sincerely,

Jacob Krautsch
Division Environmental Specialist

CC: Air Compliance Section, Southwest District, Florida Department of Environmental Protection, 3804 Coconut Palm Drive, Tampa, Florida 33619-8218
Environmental Protection Commission of Hillsborough County, Air Management Division, 1410 21st Street, Tampa, Florida 33605
V. Duane Pierce - AQMcS, LLC
C/S 27 File



Florida Gas Transmission Company

Capital Projects Field Office, 111 Kelsey Lane, Ste. A., Tampa, FL 33619
813.655.7441 / 800.381.1477

May 29, 2003

Mr. Jeff Koerner, P.E.
New Source Review Section
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blairstone Road MS 5500
Tallahassee, FL 32399-2400

RECEIVED

JUN 27 2003

BUREAU OF AIR REGULATION

Reference: Permit No. 0571279-001-AC
Emissions Unit ID No. 001
Compressor Station No. 27, Hillsborough County

Dear Mr. Koerner:

Subject: Replacement of Turbine 2701

Florida Gas Transmission Company must replace Turbine No. 2701 (EPN 001). Turbine No. 2701 was installed at the above referenced facility under the referenced construction permit. The unit that was installed does not operate correctly and Rolls Royce has determined that the turbine must be replaced. The replacement turbine will be the same model as the original and all emissions and other engine parameters will remain the same. The replacement turbine will remain in place as the permanent installation.

The turbine that was initially installed operated for 254 hours. It is no longer being operated and will not be returned to the facility after repair.

If you have any questions or need additional information, please call me at (800) 381-1477 or Dr. Duane Pierce at (281) 373-5365.

Sincerely,

Jim Thompson
Project Manager, Environmental

CC: Air Compliance Section, Southwest District, Florida Department of Environmental Protection, 3804 Coconut Palm Drive, Tampa, Florida 33619-8218
Environmental Protection Commission of Hillsborough County, Air Management Division, 1410 21st Street, Tampa, Florida 33605
Jake Krautsch

V. Duane Pierce - AQMcs, LLC
C/S 27 File

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Richard Craig
 V.P. of Southeast Operations
 Florida Gas Transmission Company
 Post Office Box 1188
 Houston, TX 77251

2. 7001 0320 0001 3692 5436

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

T. BROOKWAY 8/11/73

C. Signature

[Signature] Agent
 Addressee

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

7001 0320 0001 3692 5436

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Sent To
Richard Craig
 Street, Apt. No.,
 or P.O. Box Box 1188
 City, State, ZIP+4
Houston, TX 77251