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1. Article Addressed to:

Mr. Danny Pribble
 Vice President of Operations
 Florida Gas Transmission Company
 P.O. Box 1188
 Houston, TX 77251

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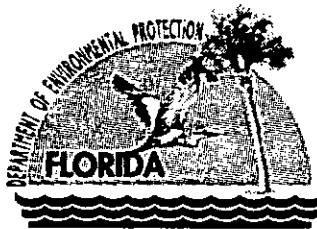
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Mr. Danny Pribble
 Vice President of Operations
 Florida Gas Transmission Company
 P.O. Box 1188
 Houston, TX 77251

See back for Instructions



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

May 30, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Danny Pribble, Vice President of Operations
Florida Gas Transmission Company (FGTC)
P.O. Box 1188
Houston, TX 77251

Re: Request for Additional Information
Project No. 0830070-003-AC
FGTC Compressor Station No. 17 - Marion County, Florida
Phase V Modification

Dear Mr. Pribble:

On May 2, 2001, the Department received your application for an air construction permit to increase the capacity of Compressor Station No. 17 located in Marion County. The project is part of the overall Phase V Expansion Project aimed at boosting the capacity of FGTC's natural gas pipeline for Florida customers. The application is incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. The netting analysis presented assumes that operation of existing Units 1701, 1702, 1703, and 1705 will not increase as a result of this project. Please discuss the typical operation of these units as related to demands from the natural gas pipeline placed on Compressor Station No. 17. Does FGTC predict that these units will increase operation as a result of this project? How does FGTC determine which units are dispatched first or most frequently? Does FGTC tend to run each engine approximately the same amount of hours for purposes of scheduled maintenance? Does FGTC expect dispatching to change as a result of this project? As supporting information, please provide the individual engine operating hours from 1996 through 2000 for Units 1701, 1702, 1703, 1704 and 1705.
2. Did FGTC obtain any air construction permits during the contemporaneous period (September 1, 1996 through December 1, 2001)? If so, identify the projects and the associated emissions. Please describe any other emissions increases or decreases that occurred during this period. Please describe the function of the 585 bhp Waukesha Model H24GL emergency generator identified as "GEN 03". Why is it necessary to replace the two existing emergency generators?
3. Page D-3 states that the maximum hours of operation for new Unit 1706 represent 40% operation (3504 hour/year) at full load and 60% operation (5256 hour/year) at 50% load. Note "b" on Page 7 of the application indicates this same schedule, but the text below states that annual CO and VOC emissions were based on 20% operation at 100% load and 80% operation at 50% load. Please explain. Does FGT intend to vary the load conditions on this unit based on system demands? Are compressor station engines generally operated in this manner? Does varying the load result in increased maintenance?
4. Summarizing, the proposed modifications to Unit 1704 includes:
 - The engine turbocharger will be physically modified to increase the air manifold pressure and airflow to each cylinder. This will increase in the air-to-fuel mixture with a corresponding decrease in the cylinder temperatures. The decreased temperatures result in lower NOx emissions.
 - The control system will be readjusted to include the new engine performance parameters and operating set points.

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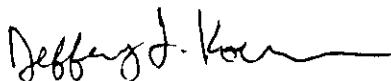
Is this an accurate general description of the proposed modifications? What will be the new "target" air manifold pressure (psig) and cylinder temperature (° F)? Will the ignition timing change from the current 27° to 30° BTDC? How does FGTC propose to monitor the NOx emission performance improvements? How frequently does FGTC currently perform thorough maintenance inspections for this engine? Will the frequency of inspections change as a result of these modifications? What types and frequencies of inspections does FGTC propose to ensure that the engine remains "in tune" for the improved emission performance levels? Unlike the Phase V modifications being made at other compressor stations, it does not appear that a new silencer/oxidation catalyst will be installed on existing Unit 1704 to reduce CO emissions. Is this a smaller unit or does it simply have lower CO emissions?

5. How does FGTC currently monitor the engine operating hours? How does FGTC propose to conservatively monitor the engine operating hours at the proposed load conditions (50% and 100%) to ensure that operation and emissions do not exceed these levels?

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official. You are reminded that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days or provide a written request for an additional period of time to submit the information.

If you have any questions regarding this matter, please call me at 850/921-9536.

Sincerely,



Jeff Koerner, P.E.
New Source Review Section

AAL/jfk

cc: Mr. Jim Thompson, FGTC
Mr. Kevin McGlynn, McGlynn Consulting Co.
Mr. Duane Pierce, AQMCs
Mr. Len Kozlov, CD Office

Mr. Dick Fancher, NWD Office
Mr. Gregg Worley, EPA Region 4 Office
Mr. John Bunyak, NPS



Florida Gas Transmission Company

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

July 11, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Jeff Koerner, P.E.
New Source Review Section
Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Bldg.
2600 Blairstone
Tallahassee, FL 32399-2400

RECEIVED

JUL 13 2001

BUREAU OF AIR REGULATION

Re: **Request for Additional Information**
Project No. 0830070-003-AC
FGTC Compressor Station No. 17 - Marion County, Florida
Phase V Modification

Dear Mr. Koerner:

The following is being sent in response to the above referenced Request for Additional Information.

- The netting analysis presented assumes that operation of existing Units 1701, 1702, 1703 and 1705 will not increase as a result of this project. Please discuss the typical operation of these units as related to demands from the natural gas pipeline placed on Compressor Station No. 17. Does FGTC predict that these units will increase operation as a result of this project? How does FGTC determine which units are dispatched first or most frequently? Does FGTC tend to run each engine approximately the same amount of hours for purposes of scheduled maintenance? Does FGTC expect dispatching to change as a result of this project? As supporting information, please provide the individual engine operating hours from 1996 through 2000 for Units 1701, 1702, 1703, 1704 and 1705.*

Response:

FGT does not expect the use of units 1701, 1702 and 1703 or 1705 to increase as a result of this project. There is no known reason for FGT to change dispatching order as a result of the project

There are two major factors evaluated in choosing which compressors will be dispatched first. These are, the unit's capacity to move gas and the required maintenance of the units.

Generally when a station comes on line gas control requests the unit that moves the most gas on first. This is 1705. Then, other units are chosen at the station level and the selection is usually based on maintenance requirements.

It should be noted that the operating hours of the whole station and the reciprocating units as a whole are primarily a function of pipeline demand. The demands of the pipeline as a whole can increase resulting in increased usage of all the station compressors.

There is no known reason for FGT to change dispatching order as a result of the project

Annual operating hours for the years 1996 through 2000 for Units 1701, 1701, 1703, 1704 and 1705 are listed below.

FGT Compressor Station No. 17					
Unit	Hours of Operation				
	1996	1997	1998	1999	2000
1701	4576	5969	6028.50	6004.73	6504.20
1702	4920	5406	6457.25	6853.45	6428.14
1703	4258	6419	6313.00	6943.75	7114.80
1704	4388	5371	5469.75	7015.00	7107.15
1705	5471	6371	5932.50	6868.50	7077.88

2. Did FGT obtain any air construction permits during the contemporaneous period (September 1, 1996 through December 1, 2001). If so, identify the projects and the associated emissions. Please describe any other emissions increases or decreases that occurred during this period. Please describe the function of the Waukesha Model H24GL emergency generator identified as "GEN03". Why is it necessary to replace the two existing emergency generators?

Response: There is one contemporaneous change that has occurred and has not been listed in Table 3-4, page 23 of the application narrative. This involved the conversion of the two generators (E.U. ID Nos. 006 and 007, Engine Nos. 1706 and 1707) to emergency generator status. Prior to February 13, 1998, these two generators served as the power source for the compressor station. In February 1998 power lines were routed to the station and the generators were no longer needed as a continuous source of power. In January 2000 FGT requested that the FDEP change these generators to emergency generator status in the Title V Permit. This involved changing the combined operating hours for the two generators from 8760 hours/year as a fulltime power source to 1000 hours/year (500 hrs each) as emergency generators. This resulted in a reduction in emissions from these emission units. FGT has chosen not to take credit for these reductions since emissions rates for the units have not been clearly established.

There are no other emission increases or decreases that have occurred during the contemporaneous period defined as July 14, 1996 through October 14, 2001. Additionally, FGTC has not obtained any other air construction permits during this period other than for the changes listed in Table 3-4.

The Waukesha Model H24GL engine identified as "GEN03" is a new emergency generator that will be limited to 500 hours of operation per year and will replace the two existing emergency generators. These engines are being replaced due to their age and capacity limitations.

3. Page D-3 states that the maximum hours of operation for Unit 1706 represent 40% operation (3504 hour/year) at full load and 60% operation (5256 hour/year) at 50% load. Note "b" on Page 7 of the application indicates this same schedule, but the text below states that annual CO and VOC emissions were based on 20% operation at 100% load and 80% operation at 50% load. Please explain. Does FGT intend to vary the load conditions on this unit based on system demands? Are compressor station engines generally operated in this manner? Does varying the load result in increased maintenance?

Response:

The text below Table 2-3 on Page 7 of the Application Narrative is incorrect. The sentence should have read as follows. "CO and VOC emission rates are based on operation at 100% load for 40% of the time (3504 hr/yr) and 50% load for 60% of the time (5256 hr/yr)."

The unit control panel will be tracking the hours accumulated in each category. The station control panel will not allow the unit to exceed the budgeted hours at low loads.

FGT does intend to vary the load on this unit as the system demands as with any compressor station. However this unit will be allowed to vary the loads as long as it does not cause an exceedance of budgeted operating hours at low loads. If the budgeted hours are consumed at low loads then the unit will not be allowed to run at the low loads. At this point a decision will be made as to what is the best option for moving gas.

Depending on the pipeline conditions the unit may be shut off, another unit might be shut off (which would increase the load on the unit), and gas might be re-routed or re-circulated.

Varying the load on this unit will not result in increased maintenance.

4. *Summarizing, the proposed modifications to Unit 1704 includes:*

- *The engine turbocharger will be physically modified to increase the air manifold pressure and airflow to each cylinder. This will increase in the air-to-fuel mixture with a corresponding decrease in the cylinder temperatures. The decreased temperatures result in lower NO_x emissions.*
- *The control system will be readjusted to include the new engine performance parameters and operating set points.*
- *A new silencer/oxidation catalyst will be installed to reduce CO and VOC emissions.*

Is this an accurate general description of the proposed modifications? What will be the new "target" air manifold pressure (psig) and cylinder temperature (° F)? Will the ignition timing change from the current 27° to 30° BTDC? How does FGTC propose to monitor NO_x emission performance improvements? How frequently does FGTC currently perform thorough maintenance inspections for this engine? Will the frequency of inspections change as a result of these modifications? What types and frequencies of inspections does FGTC propose to ensure that the engine remains "in tune" for the improved emission performance levels? Unlike the Phase V modifications being made at other compressor stations, it does not appear that a new silencer/oxidation catalyst will be installed on existing unit 1704 to reduce emissions. Is this a smaller unit or does it simply have lower CO emissions?

Response:

AMP and timing parameters have not yet been finalized. Final AMP is expected to increase to a value between 8-10" Hg. Final timing is expected to be from 24-28° BTDC. These parameters will be fine tuned to meet or be less than emission permit levels with a secondary consideration to fuel consumption.

FGT expects that because of known engine responses from adjustments that the unit will produce NO_x at levels less than the new permit levels.

CO and VOC are not to be removed from the exhaust with a catalyst because CO PSD trigger limits are not approached with this project. Furthermore, CO is not expected to increase significantly with this modification.

FGT monitors the engine for maintenance needs as the automation indicates a change in performance. When the need arises, an engine analyzer analysis is performed. FGTC proposes to monitor CO and NO_x emission performance semi-annually with a portable analyzer. This frequency of inspections is not expected to change with the modification.

5. *How does FGTC currently monitor the engine operating hours? How does FGTC propose to conservatively monitor the engine operating hours at each given load condition (50% and 100%) to ensure that operations and emissions do not exceed these levels?*

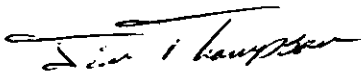
Response: For existing engines, FGTC only maintains monthly hours of operation. For the proposed new Unit 1906, the control system will maintain records of hours of operation and loads at which the turbine operated. The following is a description of what the control program will do on the new turbine.

The unit automation will calculate the thermal load based on actual conditions. This will be done in small intervals (30 seconds or a minute). It will then log the time operated in a load category (e.g. 50-60% load, 70-80%load). It will do this continuously while summing up hours that are operated in each category. A report, and feed information will be made sent to the station control panel that shows the year to date operating hours for each category. The station control panel will control the percent load budget based on the operating hours spent in order to prevent any operation that would exceed the permitted hours for lower loads. For example, it will increase the load on the PGT10B if it has already spent the allocated operating hours for 50-70% load. A report will be printed annually that will summarize the operating hours used for each load category.

FGTC believes that the above responses do not constitute material changes to the application; therefore, a new certification statement by the authorized responsible official has not been included.

If you have any questions or need additional information, please call me at (800) 381-1477.

Sincerely,



Jim Thompson
Project Manager, Environmental

CC: Dan Pribble
Jake Krautsch
Frank Diemont
Marcello Minotti
Kevin McGlynn
Duane Pierce