



Jeb Bush  
Governor

# Department of Environmental Protection

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

Colleen M. Castille  
Secretary

July 28, 2004

Mr. Robert E. Brink, V.P. Technical Services  
Gulfstream Natural Gas System, L.L.C.  
2800 Post Oak Boulevard, L-10  
Houston, Texas 77056-6100

Re: Air Construction Permit No. 0850141-001-AC  
Gulfstream Natural Gas System, L.L.C.  
Martin Natural Gas Meter Station 701  
Two Gas-Fired Natural Gas Fuel Heaters

Dear Mr. Brink:

On July 26, 2004, you submitted an application for an air permit to install two, 10 MMBtu per hour gas-fired natural gas fuel heaters at the Martin Natural Gas Meter Station 701. The equipment will be located at 21900 SW Warfield Boulevard, which is approximately 5.5 miles northwest of Indiantown in Martin County, Florida. Enclosed are the following documents: "Technical Evaluation and Preliminary Determination", "Draft Permit", "Written Notice of Intent to Issue Air Permit", and "Public Notice of Intent to Issue Air Permit".

The "Technical Evaluation and Preliminary Determination" summarizes the Permitting Authority's technical review of the application and provides the rationale for making the preliminary determination to issue a Draft Permit. The proposed "Draft Permit" includes the specific conditions that regulate the emissions units covered by the proposed project. The "Written Notice of Intent to Issue Air Permit" provides important information regarding: the Permitting Authority's intent to issue an air permit for the proposed project; the requirements for publishing a Public Notice of the Permitting Authority's intent to issue an air permit; the procedures for submitting comments on the Draft Permit; the process for filing a petition for an administrative hearing; and the availability of mediation. The "Public Notice of Intent to Issue Air Permit" is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project.

If you have any questions, please contact the Project Engineer, Jeff Koerner, at 850/921-9536.

Sincerely,

Trina Vielhauer, Chief  
Bureau of Air Regulation

Enclosures

## P.E. CERTIFICATION STATEMENT

### PERMITTEE

Gulfstream Natural Gas System, L.L.C.  
2800 Post Oak Boulevard, L-10  
Houston, Texas 77056-6100

Draft Air Permit No. 0850141-001-AC  
Martin Natural Gas Meter Station 701  
Two Gas-Fired Natural Gas Fuel Heaters  
Martin County, Florida

### PROJECT DESCRIPTION

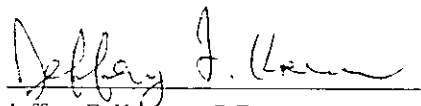
The applicant proposes to install two new indirect-fired fuel heaters manufactured by Hanover Compression, L.P. The new units will be located at the Gulfstream natural gas meter and regulator facility known as Martin Meter Station 701. The fuel heaters will heat natural gas prior to delivery to the adjacent FPL Martin Power Plant. Each fuel heater will be a have a maximum heat input rate of 10 MMBtu per hour and fire pipeline natural gas as the exclusive fuel. Annual emissions in "tons per year" (TPY) are estimated to be: 9.9 TPY of carbon monoxide; 11.8 TPY of nitrogen oxides; 0.9 TPY of particulate matter; 0.1 TPY of sulfur dioxide; and 0.7 TPY of volatile organic compounds. Emissions of hazardous air pollutants (HAP) are expected be very low – well below the threshold for a major HAP source.

Rule 62-296.406, F.A.C. regulates "fossil fuel steam generators" with less than 250 MMBtu per hour of heat input. This rule requires a determination of the Best Available Control Technology for particulate matter and sulfur dioxide emissions from the affected units. This state rule is commonly referred to as "small boiler BACT", which is currently the firing of a very low sulfur fuel such as natural gas. However, Rule 62-210.200(120), F.A.C. defines a *fossil fuel steam generator* as "... a furnace or boiler which produces steam by combustion of oil, coal, or gas of fossil origin." The fuel heaters are not considered fossil fuel steam generators because the units do not produce any steam. Therefore, the fuel heaters are not subject to Rule 62-296.406, F.A.C.

NSPS Subpart Dc regulates emissions of particulate matter and sulfur dioxide from each steam generating unit with a maximum design heat input rate of 10 MMBtu per hour or more, but less than 100 MMBtu per hour. It excludes units used for combustion research projects. Subpart Dc defines a steam generating unit as "... a device that combusts any fuel and produces steam or heats water or any other heat transfer medium." In a letter dated May 13, 2004, EPA Region 4 determined that the fuel heaters in this project are subject to Subpart Dc because natural gas is combusted to heat glycol, which is a heat transfer medium used to heat pipeline natural gas. However, Subpart Dc does not specify any emissions standards for units that combust only natural gas. Therefore, each fuel heater is subject only to the notification and record keeping requirements in Subpart Dc.

The draft permit contains conditions that authorize the installation of the two new fuel heaters, specify the rated design capacity, specify the allowable fuel, and specify the applicable NSPS Subpart Dc requirements.

*I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).*



Jeffery F. Koerner, P.E.  
Registration Number: 49441

7-27-04

(Date)

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

---

*In the Matter of an  
Application for Air Permit by:*

Mr. Robert E. Brink, V.P. Technical Services  
Gulfstream Natural Gas System, L.L.C.  
2800 Post Oak Boulevard, L-10  
Houston, Texas 77056-6100

Draft Air Permit No. 0850141-001-AC  
Martin Natural Gas Meter Station 701  
Two Gas-Fired Natural Gas Fuel Heaters  
Martin County, Florida

**Facility Location:** The applicant proposes to construct two new gas-fired fuel heaters at the Martin Natural Gas Meter Station 701, which will be located at 21900 SW Warfield Boulevard in Martin County, Florida. The site is approximately 5.5 miles northwest of Indiantown.

**Project:** The applicant proposes to install two new indirect-fired fuel heaters manufactured by Hanover Compression, L.P. The new units will be located at the Gulfstream natural gas meter and regulator facility known as Martin Natural Gas Meter Station 701. The fuel heaters will heat natural gas prior to delivery to the adjacent FPL Martin Power Plant. Each fuel heater will have a maximum heat input rate of 10 MMBtu per hour and fire pipeline natural gas as the exclusive fuel. Details of the project are provided in the in the application and the enclosed "Technical Evaluation and Preliminary Determination".

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Florida Department of Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination regarding this project. The Bureau of Air Regulation's physical address is 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301 and the mailing address is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Bureau of Air Regulation's phone number is 850/488-0114.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address and phone number listed above. A copy of the complete project file is also available at the Department's Southeast District Office at 400 North Congress Avenue, Suite 200, West Palm Beach, Florida 33401. The Southeast District's telephone number is 561/681-6774.

**Notice of Intent to Issue Permit:** The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of fourteen (14) days from the date of publication of the Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit. 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 attached Public Notice or within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

---

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 Permitting Authority'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 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 each 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 state; (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 the 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 Permitting Authority'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 Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available in this proceeding.

**Public Notice:** Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed "Public Notice of Intent to Issue Air Permit" (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at the address or phone number listed above. Pursuant to Rule 62-110.106(5), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within seven (7) days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief  
Bureau of Air Regulation

**WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT**

---

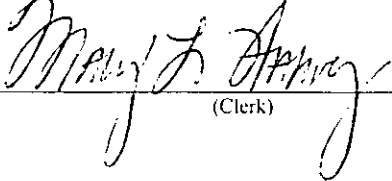
**CERTIFICATE OF SERVICE**

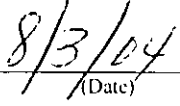
The undersigned duly designated deputy agency clerk hereby certifies that this "Written Notice of Intent to Issue Air Permit" package (including the Public Notice, the Technical Evaluation and Preliminary Determination, and the Draft Permit) was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 8/3/04 to the persons listed below.

Mr. Robert E. Brink, Gulfstream Natural Gas System, L.L.C.\*  
Mr. Michael Callegari, Williams Gas Pipeline  
Mr. Pady Bart Byrum, P.E.  
Mr. Tom Tittle, SED Office  
Mr. Buck Oven, PPS Office

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

  
\_\_\_\_\_  
(Clerk)

  
\_\_\_\_\_  
(Date)

## PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection  
Draft Air Permit No. 0850141-001-AC  
Gulfstream Natural Gas System, L.L.C.  
Martin County, Florida

**Applicant:** The applicant for this project is Gulfstream Natural Gas System, L.L.C. The applicant's mailing address is 2800 Post Oak Boulevard, L-10, Houston, Texas 77056-6100. The applicant's authorized representative is Mr. Robert E. Brink, V.P. Technical Services for Gulfstream Natural Gas System, L.L.C.

**Facility Location:** The applicant requests authorization to install two fuel heaters at the Martin Natural Gas Meter Station 701, which will be located at 21900 SW Warfield Boulevard in Indiantown, Florida 34956. The site is approximately 5.5 miles northwest of Indiantown in Martin County and adjacent to the existing FPL Martin Power Plant.

**Project:** The applicant proposes to install two new indirect-fired fuel heaters at the Gulfstream natural gas meter and regulator facility known as Martin Natural Gas Meter Station 701. The fuel heaters will heat natural gas prior to delivery to the adjacent FPL Martin Power Plant. Each fuel heater will have a maximum heat input rate of 10 MMBtu per hour and fire pipeline natural gas as the exclusive fuel. Annual emissions in "tons per year" (TPY) are estimated to be: 9.9 TPY of carbon monoxide; 11.8 TPY of nitrogen oxides; 0.9 TPY of particulate matter; 0.1 TPY of sulfur dioxide; and 0.7 TPY of volatile organic compounds. Each fuel heater is subject only to the federal notification and record keeping requirements in 40 CFR 60, Subpart Dc.

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Florida Department of Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination regarding this project. The Bureau of Air Regulation's physical address is 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301 and the mailing address is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Bureau of Air Regulation's phone number is 850/488-0114.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address and phone number listed above. A copy of the complete project file is also available at the Department's Southeast District Office at 400 North Congress Avenue, Suite 200, West Palm Beach, Florida 33401. The Southeast District's telephone number is 561/681-6774.

**Notice of Intent to Issue Air Permit:** The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of fourteen (14) days from the date of publication of this Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. 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 this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a

(Public Notice to be Published in the Newspaper)

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 Permitting Authority'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 proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of how and when the 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 state; (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 the 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 Permitting Authority'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 Permitting Authority's final action may be different from the position taken by it in this Public Notice of intent. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available for this proceeding.

## DRAFT PERMIT

### PERMITTEE:

Gulfstream Natural Gas System, L.L.C.  
2800 Post Oak Boulevard, L-10  
Houston, Texas 77056-6100

Air Permit No. 0850141-001-AC Martin Natural Gas Meter Station 701 Two Gas-Fired Natural Gas Fuel Heaters Martin County, Florida
---

### PROJECT AND LOCATION

This permit authorizes the installation of two, 10 MMBtu per hour gas-fired natural gas fuel heaters at the Martin Natural Gas Meter Station 701, which will be located at 21900 SW Warfield Boulevard in Indiantown, Florida 34956. The site is approximately 5.5 miles northwest of Indiantown in Martin County. The UTM coordinates are Zone 17, 543.83 km East, and 2993.14 km North. The Standard Industrial Classification Code is SIC No. 4911 for "gas services".

### STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.) and Title 40, Part 60 of the Code of Federal Regulations. The permittee is authorized to install the proposed equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department.

### CONTENTS

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Units Specific Conditions
- Section 4. Appendices

(DRAFT)

---

Michael G. Cooke, Director  
Division of Air Resource Management

(Date)



## SECTION 1. GENERAL INFORMATION

---

### FACILITY AND PROJECT DESCRIPTION

This permit regulates the following emissions units.

ID	Emission Unit Description
001	Gas-fired, natural gas fuel heater rated at 10 MMBtu per hour capacity
002	Gas-fired, natural gas fuel heater rated at 10 MMBtu per hour capacity

### REGULATORY CLASSIFICATION

Title III: The facility will not be a major source of hazardous air pollutants (HAP).

Title IV: The facility will have no units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility will not be a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The facility will not be a PSD-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The new units are subject to the New Source Performance Standards of 40 CFR 60, Subpart Dc.

### RELEVANT DOCUMENTS

The permit application and additional information received to make it complete are not a part of this permit; however, the information is specifically related to this permitting action and is on file with the Department.

### APPENDICES

The attached appendices are a part of this permit.

Appendix A. Citation Formats

Appendix B. General Conditions

Appendix C. Common State Regulatory Requirements

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

---

1. Permitting Authority: All documents related to applications for permits to operate an emissions unit shall be submitted to the Air Resource Section of the Department's Southeast District Office at 400 North Congress Avenue, Suite 200, West Palm Beach, Florida 33401.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resource Section of the Department's Southeast District Office at 400 North Congress Avenue, Suite 200, West Palm Beach, Florida 33401.
3. Appendices: The following Appendices are attached as part of this permit: Appendix A (Citation Formats); Appendix B (General Conditions); and Appendix C (Common State Regulatory Requirements).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403 of the Florida Statutes (F.S.); Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.); and Title 40, Part 60 of the Code of Federal Regulations (CFR), adopted by reference in Rule 62-204.800, F.A.C. The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Authorization to Construct: The authorization to construct the emissions units specified by this permit expires on August 31, 2005.
8. Air Operation Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance. An air operation permit is required for regular operation of the permitted emissions units. At least 90 days before the "authorization to construct" expires, the permittee shall submit an application for an air operation permit to the Permitting Authority. [Rules 62-4.030, 62-4.050, and 62-4.220, F.A.C.]

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### A. EU-001/002: Gas-Fired Natural Gas Fuel Heaters

This section of the permit addresses the following emissions units.

ID	Emission Unit Description
001	Gas-fired, natural gas fuel heater rated at 10 MMBtu per hour capacity
002	Gas-fired, natural gas fuel heater rated at 10 MMBtu per hour capacity

#### EQUIPMENT SPECIFICATIONS

1. **Fuel Heaters:** The permittee is authorized to install two new fuel heaters designed to preheat pipeline natural gas before delivery to the adjacent power plant. Each fuel heater shall be designed for a maximum heat input rate of 10 MMBtu per hour from the firing of natural gas. Each fuel heater shall fire natural gas as the exclusive fuel. [Applicant Request; Design; Rule 62-210.200(PTE), F.A.C.]

#### PERFORMANCE REQUIREMENTS

2. **Restricted Operation:** The hours of operation of the fuel heaters are not limited (8760 hours per year). [62-210.200(PTE), F.A.C.]

#### FEDERAL NSPS SUBPART DC STANDARDS

*{Permitting Note: Subpart Dc regulates emissions of particulate matter and sulfur dioxide from each steam generating unit with a maximum design heat input rate of 10 MMBtu per hour or more, but less than 100 MMBtu per hour. It excludes units used for combustion research projects. Subpart Dc defines a steam generating unit as, "... a device that combusts any fuel and produces steam or heats water or any other heat transfer medium." In a letter dated May 13, 2004, EPA Region 4 determined that the fuel heaters in this project are subject to Subpart Dc because natural gas is combusted to heat glycol, which is a heat transfer medium used to heat pipeline natural gas. However, Subpart Dc does not specify any emissions standards for units that combust only natural gas. Therefore, each fuel heater is subject only to the following NSPS Subpart Dc requirements for notification and record keeping.}*

3. **Reporting and Recordkeeping Requirements of 40 CFR 60.48c:** *{Original numbering is retained.}*
  - (a) The owner or operator of each affected facility shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by §60.7 of this part. This notification shall include:
    - (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
    - (3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.
    - (4) Notification if an emerging technology will be used for controlling SO<sub>2</sub> emissions. The Administrator will examine the description of the control device and will determine whether the technology qualifies as an emerging technology. In making this determination, the Administrator may require the owner or operator of the affected facility to submit additional information concerning the control device. The affected facility is subject to the provisions of §60.42c(a) or (b)(1), unless and until this determination is made by the Administrator.
  - (g) The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day.
  - (i) All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

**SECTION 4. APPENDICES**  
**CONTENTS**

---

Appendix A. Citation Formats

Appendix B. General Conditions

Appendix C. Common State Regulatory Requirements

**SECTION 4. APPENDIX A**  
**CITATION FORMATS**

---

*The following examples illustrate the format used in the permit to identify applicable permitting actions and regulations.*

**REFERENCES TO PREVIOUS PERMITTING ACTIONS**

Old Permit Numbers

*Example:* Permit No. AC50-123456 or Air Permit No. AO50-123456

*Where:* “AC” identifies the permit as an Air Construction Permit  
“AO” identifies the permit as an Air Operation Permit  
“123456” identifies the specific permit project number

New Permit Numbers

*Example:* Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

*Where:* “099” represents the specific county ID number in which the project is located  
“2222” represents the specific facility ID number  
“001” identifies the specific permit project  
“AC” identifies the permit as an air construction permit  
“AF” identifies the permit as a minor federally enforceable state operation permit  
“AO” identifies the permit as a minor source air operation permit  
“AV” identifies the permit as a Title V Major Source Air Operation Permit

PSD Permit Numbers

*Example:* Permit No. PSD-FL-317

*Where:* “PSD” means issued pursuant to the Prevention of Significant Deterioration of Air Quality  
“FL” means that the permit was issued by the State of Florida  
“317” identifies the specific permit project

**RULE CITATION FORMATS**

Florida Administrative Code (F.A.C.)

*Example:* [Rule 62-213.205, F.A.C.]

*Means:* Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

*Example:* [40 CFR 60.7]

*Means:* Title 40, Part 60, Section 7

**SECTION 4. APPENDIX B**  
**GENERAL CONDITIONS**

---

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
  - a. Have access to and copy and records that must be kept under the conditions of the permit;
  - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
  - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
  - a. A description of and cause of non-compliance; and
  - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida

**SECTION 4. APPENDIX B**  
**GENERAL CONDITIONS**

---

Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
  - a. Determination of Best Available Control Technology (BACT is not required.);
  - b. Determination of Prevention of Significant Deterioration (PSD does not apply.); and
  - c. Compliance with New Source Performance Standards (Subpart Dc does apply).
14. The permittee shall comply with the following:
  - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - c. Records of monitoring information shall include:
    - 1) The date, exact place, and time of sampling or measurements;
    - 2) The person responsible for performing the sampling or measurements;
    - 3) The dates analyses were performed;
    - 4) The person responsible for performing the analyses;
    - 5) The analytical techniques or methods used; and
    - 6) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

**SECTION 4. APPENDIX C**  
**COMMON CONDITIONS**

---

*{Permitting Note: Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.}*

**EMISSIONS AND CONTROLS**

1. **Plant Operation - Problems:** If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. **Circumvention:** The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. **Excess Emissions Allowed:** Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]
4. **Excess Emissions Prohibited:** Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. **Excess Emissions - Notification:** In case of excess emissions resulting from malfunctions, the permittee shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
6. **VOC or OS Emissions:** No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]
7. **Objectionable Odor Prohibited:** No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(203), F.A.C.]
8. **General Visible Emissions:** No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20 percent opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
9. **Unconfined Particulate Emissions:** During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]
10. **Special Compliance Tests:** When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]



**TECHNICAL EVALUATION  
&  
PRELIMINARY DETERMINATION**

**PROJECT**

Draft Air Construction Permit No. 0850141-001-AC  
Gulfstream Natural Gas System, L.L.C.  
Two Gas-Fired Natural Gas Fuel Heaters

**COUNTY**

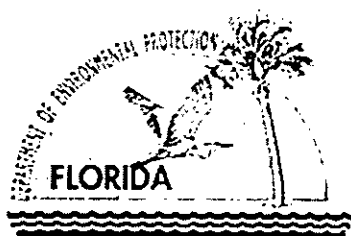
Martin County, Florida

**APPLICANT**

Gulfstream Natural Gas System, L.L.C.  
ARMS Facility ID No. 0850141

**PERMITTING  
AUTHORITY**

Florida Department of Environmental Protection  
Division of Air Resources Management  
Bureau of Air Regulation  
New Source Review Section



July 27, 2004

*{Filename: 0850141-001-AC - TEPD}*

## 1. GENERAL PROJECT INFORMATION

### Applicant Name and Address

Gulfstream Natural Gas System, L.L.C.  
2800 Post Oak Boulevard, L-10  
Houston, Texas 77056-6100

### Authorized Representative:

Mr. Robert E. Brink, V.P. Technical Services

### Processing Schedule

07/26/04 Received the application for a minor source air pollution construction permit; complete

### Facility Description and Location

The applicant requests authorization to install two 10 MMBtu per hour gas-fired natural gas fuel heaters. The new facility will be located adjacent to the FPL Martin Power Plant. The UTM coordinates are Zone 17, 543.83 km East, and 2993.14 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to a National Ambient Air Quality Standard (NAAQS). The Standard Industrial Classification Code is SIC No. 4911 for "gas services".

### Regulatory Categories

Title III: The facility will not be a major source of hazardous air pollutants (HAP).

Title IV: The facility will have no units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility will not be a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The facility will not be a PSD-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The new units will be subject to the New Source Performance Standards of 40 CFR 60, Subpart Dc.

### Project Description

The applicant proposes to install two new indirect-fired fuel heaters manufactured by Hanover Compression, L.P. The new units will be located at the Gulfstream natural gas meter and regulator facility known as Martin Meter Station 701. The fuel heaters will heat natural gas prior to delivery to the adjacent FPL Martin Power Plant. Each fuel heater will have a maximum heat input rate of 10 MMBtu per hour and fire pipeline natural gas as the exclusive fuel.

## 2. APPLICABLE REGULATIONS

### State Regulations

This project is subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The Florida Statutes authorize the Department of Environmental Protection to establish rules and regulations regarding air quality as part of the Florida Administrative Code (F.A.C.). This project is subject to the applicable rules and regulations defined in the following Chapters of the Florida Administrative Code.

<u>Chapter</u>	<u>Description</u>
62-4	Permitting Requirements
62-204	Ambient Air Quality Requirements, PSD Increments, and Federal Regulations Adopted by Reference
62-210	Permits Required, Public Notice, Reports, Stack Height Policy, Circumvention, Excess Emissions, and Forms
62-212	Preconstruction Review, PSD Review and BACT, and Non-attainment Area Review and LAER
62-296	Emission Limiting Standards
62-297	Test Methods and Procedures, Continuous Monitoring Specifications, and Alternate Sampling Procedures

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

### Federal Regulations

This project is also subject to the applicable federal provisions regarding air quality as established by the EPA in the following sections of the Code of Federal Regulations (CFR). These regulations are adopted by reference in Chapter 62-204, F.A.C.

#### Title 40, CFR    Description

Part 60            Subpart A - General Provisions for NSPS Sources  
                      NSPS Subpart Dc – Small Industrial-Commercial-Institutional Steam Generating Units  
                      Applicable Appendices

### General PSD Applicability

The Department regulates major air pollution sources in accordance with Florida's Prevention of Significant Deterioration (PSD) program, as approved by the EPA in Florida's State Implementation Plan and defined in Rule 62-212.400, F.A.C. A PSD review is required only in areas currently in attainment with the National Ambient Air Quality Standard (AAQS) or areas designated as "unclassifiable" for a given pollutant. A new facility is considered "major" with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant, or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the 28 PSD Major Facility Categories (Table 62-212.400-1, F.A.C.), or
- 5 tons per year of lead.

For PSD-major sources, each regulated pollutant is reviewed for PSD applicability based on emissions thresholds known as the Significant Emission Rates listed in Table 62-212.400-2, F.A.C. Pollutant emissions from the project exceeding these rates are considered "significant" and the applicant must employ the Best Available Control Technology (BACT) to minimize emissions of each such pollutant and evaluate the air quality impacts. Although a facility may be "major" with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants

### PSD Applicability for Project

The potential emissions from this facility are well below the thresholds for a PSD-major facility. In fact, the potential emissions from this facility are well below even the PSD significant emission rates. Therefore, the project is not subject to PSD preconstruction review.

## 3. APPLICATION REVIEW

### Emissions

The following table summarizes the emissions from this project.

Pollutant	Emission Factor		One Fuel Heater		Project Total
			Fuel	Annual Emissions	Annual Emissions
	lb/MMscf	Reference	MMscf/year	Tons/Year	Tons/Year
CO	84	AP-42, Table 1.4-1	94.2	4.95	9.89
NO <sub>x</sub>	100	AP-42, Table 1.4-1	94.2	5.89	11.77
PM <sub>10</sub>	7.6	AP-42, Table 1.4-2	94.2	0.45	0.89
SO <sub>2</sub>	0.6	AP-42, Table 1.4-2	94.2	0.04	0.07
VOC	5.5	AP-42, Table 1.4-2	94.2	0.32	0.65

\* Assumes all particulate matter is PM<sub>10</sub> in size.

The above emissions summary is based on the following: a maximum heat input rate of 10 MMBtu/hour/heater; a heating value for natural gas of 930 MMBtu/MMscf; a fuel consumption rate of 94.2 MMscf/hour/heater; 24 hours/day; and 365 days/year. However, it is more likely that these units will seldom operate due to Florida's warm climate.

#### **Rule 62-296.406, F.A.C. - Applicability**

Rule 62-296.406, F.A.C. regulates "fossil fuel steam generators" with less than 250 MMBtu per hour of heat input. This rule requires a determination of the Best Available Control Technology for particulate matter and sulfur dioxide emissions from the affected units. This state rule is commonly referred to as "small boiler BACT", which is currently the firing of a very low sulfur fuel such as natural gas. However, Rule 62-210.200(120), F.A.C. defines a *fossil fuel steam generator* as "... a furnace or boiler which produces steam by combustion of oil, coal, or gas of fossil origin." The fuel heaters not considered fossil fuel steam generators because the units do not produce any steam. Therefore, the fuel heaters are not subject to Rule 62-296.406, F.A.C.

#### **NSPS Subpart Dc - Applicability**

NSPS Subpart Dc regulates emissions of particulate matter and sulfur dioxide from each steam generating unit with a maximum design heat input rate of 10 MMBtu per hour or more, but less than 100 MMBtu per hour. It excludes units used for combustion research projects. Subpart Dc defines a steam generating unit as, "... a device that combusts any fuel and produces steam or heats water or any other heat transfer medium." In a letter dated May 13, 2004, EPA Region 4 determined that the fuel heaters in this project are subject to Subpart Dc because natural gas is combusted to heat glycol, which is a heat transfer medium used to heat pipeline natural gas. However, Subpart Dc does not specify any emissions standards for units that combust only natural gas. Therefore, each fuel heater is subject only to the notification and record keeping requirements in Subpart Dc.

#### **Other Requirements**

The units will be subject to the general visible emissions standard of 20% opacity in Rule 62-296.310, F.A.C. However, this requirement does not require the permittee to conduct initial or periodic visible emissions observations. Firing only natural gas, it is expected that these units will have no visible emissions during normal operations. Rule 62-210.370, F.A.C. requires facilities with the potential to emit more than 10 tons per year of volatile organic compounds or more than 25 tons per year of nitrogen oxides to submit an Annual Operating Report that summarizes the annual operation and emissions. No report will be required because the potential emissions of these pollutants are below these thresholds.

#### **Draft Permit Conditions**

The draft permit contains conditions that authorize the installation of the two new fuel heaters, specify the rated design capacity, specify the allowable fuel, and specify the applicable NSPS Subpart Dc requirements.

### **4. PRELIMINARY DETERMINATION**


The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Jeff Koerner is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

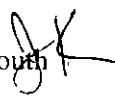
# Florida Department of Environmental Protection

## Memorandum

---

TO: Trina Vielhauer, Chief  
Bureau of Air Regulation

THROUGH: Al Linero, Program Manager   
Air Permitting South

FROM: Jeff Koerner, Air Permitting South 

DATE: July 27, 2004

SUBJECT: Draft Air Permit No. 0850141-001-AC  
Gulfstream Natural Gas System, L.L.C.  
Martin Natural Gas Meter Station 701  
Two Gas-Fired Natural Gas Fuel Heaters

Attached for your review are the following items:

- Intent to Issue Permit and Public Notice Package;
- Technical Evaluation and Preliminary Determination;
- Draft Permit; and
- PE Certification

The draft permit authorizes the construction of two new 10 MMBtu per hour gas-fired fuel heaters. The purpose of the fuel heaters is to heat pipeline natural gas before delivery to the adjacent FPL Martin Power Plant in Martin County, Florida. These units are subject only to the notification and record keeping requirements of NSPS Subpart Dc. The Technical Evaluation and Preliminary Determination provides a detailed description of the project, rule applicability, and emissions standards. The P.E. certification briefly summarizes the proposed project. Day #74 is October 7, 2004. I recommend your approval of the attached Draft Permit for this project.

Attachments

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p><i>P. Brink</i></p> <p>B. Received by (Printed Name) _____</p> <p>C. Date of Delivery <b>8-6-04</b></p>
<p>1. Article Addressed to:</p> <p>Mr. Robert E. Brink, V.P.          Technical Services          Gulfstream Natural Gas System,          L.L.C.          2800 Post Oak Boulevard, L-10          Houston, Texas 77056-6100</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes          If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number <b>7000 1670 0013 3109 9045</b>          (Transfer from service label)</p>	
<p>PS Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540</p>	

**U.S. Postal Service**  
**CERTIFIED MAIL RECEIPT**  
 (Domestic Mail Only; No Insurance Coverage Provided)

7000 1670 0013 3109 9045

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
<b>Total Postage &amp; Fees</b>	<b>\$</b>	

Send To: Mr. Robert E. Brink, V.P. Tech. Service  
 Gulfstream Natural Gas System, L.L.C.  
 2800 Post Oak Boulevard, L-10  
 Houston, Texas 77056-6100

PS Form 3800, May 2000
See Reverse for Instructions