



Florida Gas Transmission Company

A Southern Union/El Paso Affiliate

5444 Westheimer Road
Houston, TX 77056-5306

RECEIVED

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MAY 18 2011

BUREAU OF
AIR REGULATION

Via FedEx

May 16, 2011

Mr. Jeff Koerner, P.E.
Professional Engineer Administrator
Florida Department of Environmental Protection
Division of Air Resource Management
111 South Magnolia Drive, Suite 23
Tallahassee, Florida 32301

**Re: Florida Gas Transmission Company
Davenport Compressor Station 31 – Facility ID 0970077
Request for Air Permit Exemption – Installation of Oxidation Catalyst Controls**

Dear Mr. Koerner:

With reference to your recent conversation with Tom Davis of Environmental Consulting & Technology, Inc. (ECT), an exemption from air permitting requirements is requested for the installation of oxidation catalyst controls on an internal combustion engine located at the Florida Gas Transmission Company (FGT) Davenport Compressor Station (CS-31). CS-31 is located at 727 Old Lake Wilson Road in Kissimmee, Osceola County.

The Davenport Compressor Station was constructed in 2001 and is an area source of hazardous air pollutants (HAPs). Operation of CS-31 is presently authorized by Florida Department of Environmental Protection (FDEP) Operation Permit No. 0970077-003-AO issued on July 23, 2008 with an expiration date of August 30, 2013.

CS-31 includes a Caterpillar Model G3608 2,225 horsepower (hp) natural gas-fired spark ignition (SI) 4-stroke lean burn (4SLB) reciprocating internal combustion engine (RICE) referred to as Unit 3101. As an existing non-emergency 4SLB RICE greater than 500 hp located at an area HAP source, Unit 3101 is subject to the applicable requirements of National Emission Standard for Hazardous Air Pollutants (NESHAPS) for Stationary Reciprocating Internal Combustion Engines; i.e., 40 CFR Part 63 Subpart ZZZZ. As indicated in Table 2d of Subpart ZZZZ, this category of engine is subject to a carbon monoxide (CO) emission limit of 47 parts per million by volume dry corrected to 15 percent oxygen (ppmvd @ 15% O₂) or a reduction in CO emissions by 93 percent or more. The deadline for compliance with the NESHAPS Subpart ZZZZ requirements for existing SI RICE located at area HAP sources is October 19, 2013.

In response to the NESHAPS Subpart ZZZZ requirements, FGT plans to install an oxidation catalyst control system on CS-31 Unit 3101 that will comply with the Subpart ZZZZ requirements. FGT plans to commence installation of the oxidation catalyst controls on July 15, 2011 and complete the installation by August 1, 2011.

Please feel free to contact me at (713) 989-7111 or by email at paul.newman@sug.com if you have any questions regarding this request for an air permit exemption.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul I. Newman, III". The signature is fluid and cursive, with a large initial "P" and "N".

Paul I. Newman, III
Manager, Environmental Compliance

cc: Tom Davis, ECT