



May 2, 1997

A. A. Linero, PE Administrator
New Source Review Section
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED
MAY 08 1997
BUREAU OF
AIR REGULATION

**Re: Florida Gas Transmission Permit Modification
Station No. 21, Palm Beach County**

Dear Mr. Linero:

I welcome the opportunity to process the permit modification for the project located in Palm Beach County. Just for my own future information, I have a few general questions on the permitting process:

- (1) Your memorandum indicates that these modifications will be performed as construction permit modifications. Should any consideration be given to a FESOP for this permitting action? After all, no "modification" by definition is being performed, but rather a "like kind" replacement.
- (2) Assuming construction permits are issued, when should the operation permits be revised to include these changes? Should we wait until after the initial replacements?
- (3) Does a letter requesting a permit amendment constitute an "application" and require a processing "time clock"? Was a processing fee and application received?

In addition to the items listed in your draft Request for Additional Information, I also request the following information:

- (1) A table identifying for both the existing unit and the replacement unit: the manufacturer, model number, serial number, capacity (bhp), and the emission levels of CO, NO_x, PM, SO₂, and VOC for each.
- (2) Certification by a Professional Engineer, registered in Florida, that the replacement units are rated at the same capacity (brake horsepower) *or less* than the existing units AND that the emission levels of CO, NO_x, PM, SO₂, and VOC are equal to *or less* than the existing units. I would avoid using "identical" to describe the replacement units. For example, it would be reasonable to allow the installation of a smaller unit with emission levels equal to or less than the existing units.

I recommend the following changes/additions to the proposed "draft modification":

No comments on conditions 1., 2., 3., 4., 5., 6., and 7.

8. I don't believe we have a "Completion of Construction" form anymore; it's the Short Form Application, Form No. 62-210.900(2). I recommend the following condition:

"Emission Compliance Stack Test Reports: A report indicating the results of the initial emissions compliance tests shall be filed with the Health Department as soon as practical, but no later than 45 days after the last sampling run is completed. The report shall provide sufficient detail on the tested emissions unit and the procedures used to allow the Health Department to determine if the test was properly conducted and if the test results were properly computed. At a minimum, the test report shall provide the applicable information listed in F.A.C. 62-297.310(8)(c). The report shall also include a certification by a licensed Professional Engineer, registered in Florida, that the turbines were installed in accordance with the manufacturer's recommendations and that the test results demonstrate compliance with the existing permit conditions and 40 CFR 60, Subpart GG. [Rules 62-297.310(8) and 62-4.050(3), F.A.C.]"

9. *Add this requirement:* "FGT shall provide written notice of a proposed replacement at least seven days prior to replacing a turbine. The notification shall be certified by a professional engineer and include the manufacturer, model number, serial number, operating capacity (bhp), and emission levels for both the existing unit and the replacement unit."

Final question: Why are the pre-NSPS units subject to preconstruction review? Do you believe they will then be subject to NSPS Subpart GG? The following is the NSPS definition of "modification":

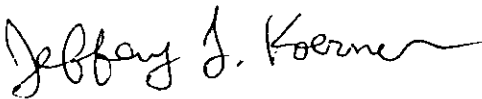
40 CFR 60.2 DEFINITIONS.

"Modification means any physical change in, or change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted into the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) into the atmosphere not previously emitted. [Revised at 59 FR 12427, March 16, 1994]"

This situation doesn't apply to the units in Palm Beach County, I'm just curious as to the interpretation. If you have any questions, please call me at the numbers below. Thank you for the opportunity to comment on this project.

Sincerely,

For the Division Director
Environmental Health and Engineering



Jeffery F. Koerner, PE
Air Pollution Control Section

Phone: (407) 355-4549 SunCom: 273-4549

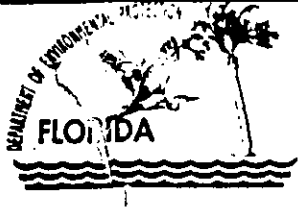
FAX: (407) 355-2442

This letter was also faxed on May 2, 1997 to Mr. Linero and to the following individuals at (904) 922-6979:

cc: Kim Tober, DEP - Bureau of Air Regulation
Theresa Heron, DEP - Bureau of Air Regulation

Filename: FGT_REP.DOC

cc: T. Nelson
a. Linero



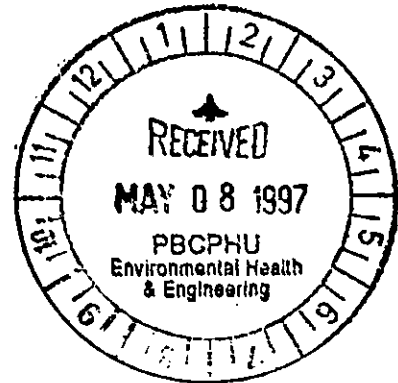
Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

May 5, 1997



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: Florida Gas Transmission Permit Modifications
1230034-004-AC, (PSD-FL-202), Station 15, Taylor County
0990333-003-AC, Station 21, Palm Beach County
0170035-003-AC, Station 26, Citrus County
0570438-004-AC, Station 30, Hillsborough County

Dear Mr. Roesler:

This letter is to confirm your April 9, 1997 telephone conversation with Ms. Teresa Heron, concerning your letter dated April 2, 1997. Your letter essentially requested treatment of turbine replacements as routine replacements not requiring construction permits or modifications. Based on your observations, the turbines have been lasting only approximately 5000 hours or so making their replacement routine rather than life extension projects or modifications subject to construction permitting.

It was our understanding that only the new (Phase III) turbines were unreliable to the extent that routine (possibly annual) replacement is foreseen. However it is not clear that the replacement is just for the gas turbines permitted during Phase III that are defective. Your request implies all existing gas turbines in the Florida Gas Transmission system. Be advised that a replacement of an old unit (pre- NSPS) for a new unit will have to be accomplished by the permitting process. New units will be subject to 40 CFR 60, Subpart GG.

Based on our review of your request the following information is needed:

Provide reasonable assurance (e.g. a letter from the manufacturer of the turbine) that will indicate the limited life of the turbines and the need of routine repair, maintenance, or replacement for the affected turbines. Identify those FGT units that would be affected.

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Submit a table identifying for both the existing and the replacement unit: the manufacturer, model number, serial number, capacity (bhp) and the allowable emissions levels.

Pursuant to Rule 62-4.050 F.A.C., please submit the above requested information under a professional engineer seal. This is required to provide reasonable assurance that the units to be replaced are rated at the same capacity (brake horsepower) or less than the existing units and that the emissions levels will not exceed those of the already permitted turbine for that site or otherwise contravene a Department rule or permit condition.

Please direct a copy of your response to each of the individuals listed below. If you have any questions regarding this matter, please call Teresa Heron at (904) 488-1344.

Sincerely,



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

AAL/th/t

cc: Jerry Campbell, EPCHC
Jerry Kissel, SWD
Jeff Koerner, PBCPHU ✓
Bob Leetch, NED