## Florida Gas Transmission Company

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

August 31, 1993

### RECEIVED

SEP 2 1993

Ms. Patty Adams
Air Permitting and Standards
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Division of Air Resources Management

RE: Intent to Issue Permit

Proof of Publication - Air Permit Florida Gas Transmission Company

AC 56-189457

Station No. 20 - St. Lucie county, Ft. Pierce, Florida

AC 29-228821

Station No. 30 - Hillsborough County, Plant City, Florida

Dear Ms. Adams:

As discussed with you on the phone earlier today, please find attached copies of two affidavits as proof of public notice publication for the above referenced air permits. As you can see, the originals were sent to the district offices.

Should you have any additional questions or need additional information, please do not hesitate to call me at (713) 853-3569.

Sincerely,

V. Duane Pierce, Ph.D.

Air Quality Supervisor

Phase III Expansion Project

Florida Gas Transmission Company

V. Juma Pans

cc: Teresa Heron - FDEP

William Osborne

Allan Weatherford

Files

FILE: FDEPOILLTR G. Haupelly FIFE G. Hunnyah UPS

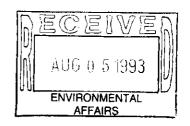


### P. O. Box 945100 Maitland, Florida 32794-5100 (407) 875-5800

Certified Mail

August 4, 1993

Mr. Tom Tittle
Florida Department of
Environmental Regulation
PO Box 15425
West Palm Beach, Florida 33406



Dear Mr. Tittle:

RE: Intent to Issue Permit

Proof of Publication - Air Permit

AC56-189457

Florida Gas Transmission Company

Station No. 20

St. Lucie County, Ft. Pierce, Florida

Attached is one (1) affidavit as proof of publication of the intent to issue notice for the above-referenced site.

Please call me at 407-875-5816 if you have any questions.

Sincerely,

Allan Weatherford, REM Compliance Environmentalist

bc aw0804tt attach

cc: Don Sterba

Allan Vollmer w/encl

Awane Pierce,



Fort Pierce, St. Lucie County, Florida 34954-0069

TE OF FLORIDA UNITY OF STILLICIE

Before the undersigned authority personally appeared avid T. Rutledge or Kathleen K. LeClair, who on oath vs that he/she is publisher, business manager of The ibune, a daily newspaper published at Fort Pierce in St. icie County, Florida; that the attached copy of the vertisement, being a NOTICE OF INTENT TO ISSUE PERMIT the matter of installing one natural gas fired ngine in St. Lucie County

as published in said newspaper in the issues of ıly 31, 1993

affiant further says that The Tribune is a newspaper published at Fort Pierce, said St. Lucie County, Florida, and that the said newspaper has heretofore m continuously published in St. Lucle County, Florida, each day and has been ared as second class mail matter at the post office in Fort Pierce, in said St. cie County, Florida, for a period of one year next preceding the first alication of the attached copy of advertisement: and affiant further says that has neither paid nor promised any person, firm or corporation any discount, ate, commission or refund for the purpose of securing this advertisement for alication in the said newspaper.

arn to and subscribed before me

2nd

Notary Public State of Florida at Large My Commission Expires

**IAL)** Notary Public Lilli-Anne Senesac AA763828

DEPARTMENT OF ENVIRONMENTAL REGULATION NOTICE OF INTENT TO ISSUE PERMIT

The Department of Environmental Protection gives notice of its intent to issue a permit to Florida Gas Transmission Company, Post Office Box 1188, Houston, Houston, Texas 77251-1188, to Install one natural fired engine. The Company's facility is located 6 miles west of the town of Ft. Pierce, in St. Lucie County, Florida. Modeling results show that approximately 9 percent of the annual NO Class II PSD Increment will be consumed. The maximum predicted NO<sup>2</sup> impact on the PSD Class I area is below the National Park Service recommended significant impact level. These emissions will not cause or contribute to a violation of any ambient air quality standard or PSD increment. A determination of Best Available Control Technology (BACT) was required. The Department is issuing this intent to issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petttion for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the inpermitting the formation set forth, below and must be filed (received) in the Office of General Coursel of the Department at 2600 Blatr Stone Road, Tallahassee, Stone Road, Tatlahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mall a copy of the petition to the applicant at the address indicated above at the time of filling. Fallure to file a petition within this time period shall constitute a water of any right such person may have to request an administrative determination hearing) under Section 120.57, Florida Stat-

The Petition shall contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Deparlment Permit File Number and the county in which the project is pro-posed; (b) A statement of how and when each petitioner received notice of the Department's action of proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action of pro-posed action; (d) A statement of the material facts disputed by Petitioner, If any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A state-ment of which rules or statutes petitioner contends require reversal or modification of the Department's acflon or proposed action; and (g) A statement of the relief sought by note



P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

Resources Management

August 11, 1993

Mr. Clair Fancy Chief, Bureau of Air Regulations Florida Department of Environmental Protection 2600 Blair Stone Road Tallahassee, Florida 32399-2400

RE: Changes to FGT Phase III Expansion Project Air Permits

Draft Air Permit AC 62-229319 / PSD-FL-202 Natural Gas Compressor Station No. 15, Taylor County

Draft Air Permit AC 05-229322 Natural Gas Compressor Station No. 19, Brevard County

Draft Air Permit AC 56-230129 / PSD-FL-203 Natural Gas Compressor Station No. 20, St. Lucie County

Draft Air Permit AC 50-229440 Natural Gas Compressor Station No. 21, Palm Beach County

Draft Air Permit AC 09-229441 Natural Gas Compressor Station No. 26, Citrus County

Draft Air Permit AC 29-228821 Natural Gas Compressor Station No. 30, Hillsborough County

Dear Mr. Fancy:

We respectfully propose the following changes to each of the above referenced draft permits.

### Item A

We propose increasing the maximum heat inputs and maximum natural gas consumption rates for each engine (Specific condition #5). We are proposing this change as a result of test results

Mr. Clair Fancy FGT Phase III Permits August 11, 1993 Page 2

on our Phase II engines which indicate higher values than those provided by the engine manufacturers and used in the permits for Phase II engines. The values proposed in our applications for our Phase III engines are also based on values provided by the manufacturers. We believe it is necessary to increase these values for our Phase III engines, in order to prevent potential future compliance problems. We propose to increase these values by 20 %. We believe the new values will be more correct. Since the SO<sub>2</sub> and PM emission rates are based on fuel consumption, we are proposing to increase these also. These changes are provided in the attached table.

### Item B

The emission limits in the permits (Specific Condition #1) represent the emission rates at 100% load conditions. We propose adding a statement or footnote to this emission limit table that indicates this.

### Item C

On the same emission limit table the Emission Factor for  $SO_2$  is given as "10 gr/100scf." This suggests that the factor is based upon 10 gr of  $SO_2$  when it is actually sulfur. We suggest the following wording be used: "100 gr S/100/scf" to avoid confusion.

### Item D

Specific Condition #12 (#11 for AC 56-230129 / PSD-FL-203 Compressor Station No. 20 and Ac 05-229322 Compressor Station No. 19) requires the source to be tested while operating "between 95% and 100% of maximum capacity." The permits for our Phase II engines require testing between 90% and 100% of maximum capacity. Due to the nature of our operations, it is sometimes difficult to reach even the 90% load on our engines when a test is scheduled. Raising this minimum level to 95% will make this a greater problem. We therefore request that this condition be changed to require testing "between 90% and 100% of maximum capacity" as required by our other permits.

Mr. Clair Fancy FGT Phase III Permits August 11, 1993 Page 3

Again FGT appreciates this opportunity to comment on these permit conditions and your consideration of our proposed changes. If you have any questions or need additional information, please do not hesitate to call me at (713) 853-3569.

Sincerely,

V. Duane Pierce, Ph.D.

Air Quality Supervisor

Phase III Expansion Project

Florida Gas Transmission Company

W. Hum land

cc: Carlon Nelson

William Osborne

Allan Weatherford

Barry Andrews - ENSR

Files

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# ORIGINALLY PROPOSED VALUES

	MAXIMUM HEAT INPUT	MAXIMUM GAS	SO <sub>2</sub> EM	ISSIONS 🎘	PM/PM <sub>10</sub> EN	MISSIONS =
STATION	(MMBtu/hr)	CONSUMPTION (MMscf/hr)	②lb/hr湊	T/yr	₩ lb/hr	本 T/yr 特
1	109.66		3.01	<sup>23</sup> 13.19 <sup>28</sup>	<sup>ुद्ध</sup> े 0.53 <sup>ङ्</sup>	·* 2.31 <sup>55</sup>
19	38.3	70.0368	0.94	** 4.12	0.17	0.74
Ž0 📆	27.8	<b>经现代 0.0267</b> 多分数	<sup>7</sup> 0.70 🌁	3.33	0.13	<sup>3</sup> 0.57 <sup>3</sup> €
21	59.60	<b>基金等 0.057 图 10</b>	1.64	<b>***7.18 ***</b> **	0.29	**· 1.26 😘
26	59.60	0.057	1.64	一.27.18 灣	0.29	1.26
30	13.13	一种 0.013	0.37	1.62	0.064	0.28

### **NEW VALUES**

	MAXIMUM HEAT	MAXIMUM GAS	SO <sub>2</sub> EMISSIONS		PM/PM <sub>10</sub> EMISSIONS	
STATION	INPUT (MMBtu/hr)	CONSUMPTION (MMscf/hr)	🔅 lb/hr 🎉	孫 T/yr 變	lb/hr 👯	₹ T/yr
15	131.59	0.1265	3.61	<sup>13</sup> 15.83 <sup>33</sup>	0.64	· 2.77
19	45.96	0.0442	二 1.13 零	4.94	≈ 0.20 <sup>1/4</sup>	0.89
20	33.36	0.0320	0.84	4.00	章 0.16	<sup>∰</sup> 0.68 <sup>%</sup>
21	71.52	0.0684	1.97	8.62	<b>第一0.35</b>	1.51
26	71.52	0.0684	学 1.97 🗃	8.62	0.35	1.51
30		0.0156	0.44	1.94	達 0.077 🚟	0.34



#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

#### REGION IV

345 COURTLAND STREET, N.E. ATLANTA, GEORGIA 30365

4APT-AEB

JUL 26 1993

RECEIVED

AUG 0 3 1993

Mr. Clair H. Fancy, P.E., Chief Bureau of Air Regulation Florida Department of Environmental Protection Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Division of Air Resources Management

RE: Florida Gas Transmission Company, Compressor Station Number 20, St. Lucie County, FL (PSD-FL-203)

Dear Mr. Fancy:

This is to acknowledge receipt of the Prevention of Significant Deterioration (PSD) permit application package for the above referenced facility, by your letter dated April 28, 1993. The proposed expansion to the existing facility will be the addition of one Cooper-Bessemer 10V-275C natural gas fired, reciprocating, internal combustion engine, equipped with lean-burn technology. The proposed engine is rated at 4,000 brake horsepower and will be used to drive gas compressors for transporting natural gas by pipeline for distribution to markets in the Gulf Coast region. The proposed modification is subject to PSD review on the basis of significant NO, emissions.

The applicant proposes to limit  $NO_{\rm x}$  emissions from the combustion engine through lean-burn technology.

We have reviewed the package as submitted and have no adverse comments. Thank you for the opportunity to review and comment on the package. If you have any questions or comments, please contact Mr. Scott Davis of my staff at (404) 347-5014.

Sincerely yours,

Brian L. Beals, Chief Source Evaluation Unit Air Enforcement Branch

Air, Pesticides, and Toxics

Management Division

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## Florida Gas Transmission Company

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

July 30, 1993

RECEIVED

AUG 2 1993

Division of Air
Mr. Clair Fancy, P.Besources Management
Chief, Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Fancy:

Upon reviewing the Technical Evaluations and Preliminary Determinations for the proposed natural gas compressor engines located in Palm Beach County (Station No. 21) and Citrus County (Station No. 26), it was discovered that our draft permits contained the nominal lb/hr emission rates rather than the maximum emission rates which were presented in the Applications to Operate/Construct Air Pollution Sources. Further review indicates that this error also holds true for draft permits which have been received for proposed natural gas compressor engines located in Taylor County (Station No. 20).

Florida Gas Transmission Company (FGTC) requests that the permits be amended to include the maximum lb/hr emission levels for the natural gas compressor engines addressed above as follows:

Pollutant (lh/hr)

		J	onutant (	10/111)		
Station	$No_x$	СО	VOC	TSP	PM <sub>10</sub>	$SO_2$
No. 15 - Taylor County (AC 62-229319)	18.66	13.49	0.76	0.53	0.53	3.01
No. 19 - Brevard County (AC 05-229322)	79.38	45.20	16.57	0.19	0.19	1.05
No. 20 - St. Lucie County (AC 56-230129)	52.92	26.46	12.35	0.15	0.15	0.84
No. 21 - Palm Beach County (AC 50-229440)	9.15	6.64	0.38	0.29	0.29	1.64
No. 26 -Citrus County (AC 09-229441)	9.15	6.64	0.38	0.29	0.29	1.64

Mr. Clair Fancy, P.E. July 30, 1993 Page 2.

These changes do not affect the TPY limits which are based on the nominal lb/hr emission rates. FGTC also discovered that for Station 21, the nominal lb/hr emission rates presented in Table 2-2 of our application were inadvertently transferred to the maximum lb/hr column on page 4A of the Application to Operate/Construct Air Pollution Sources. To resolve this error, FGTC has included a corrected page 4A and has had this transmittal letter signed and sealed by Barry Andrews (ENSR Consulting and Engineering) who is representing FGTC as the professional engineer of record. This procedure is consistent with instructions given by Mr. Preston Lewis of your bureau.

Please note that this letter is not intended to address all of FGTC's comments for Stations 20, 21 and 26. FGTC is presently reviewing the Technical Evaluations and Preliminary Determinations for each of these Stations and will be providing additional comments in the near future.

FGTC appreciates the opportunity to provide the Bureau of Air Regulation with these comments. Should you have any questions, please contact Duane Pierce at (713) 853-3569.

Barry D. Anders

ENSR Consulting and Engineering

Barry Andrews, P.E.

Sincerely,

V. Duane Pierce, Ph.D.

Air Quality Supervisor

Phase III Expansion Project

Florida Gas Transmission Company

W. Dusmi Present

Enclosures

cc: Carlon Nelson

EB0463

William R. Osborne

EB0365

Files

VDP:meb

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### SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

	Contem	Inente	Utilization			
Description	Туре	# Wt	Rate - 1bs/hr	Relate to Flow Diagram		
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				·		

R.	Process	Rate.	i f	applicable:	(See	Section V	. Item 1)
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- 1. Total Process Input Rate (lba/hr):\_\_\_\_\_
- Product Weight (lbs/hr):
- C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Emission Point 2101

Name of Contaminant	Emission <sup>2</sup>		Allowed <sup>2</sup> Emission Rate per	Allowable <sup>3</sup> Emission	Potential <sup>4</sup> Emission		Relate to Flow
	Maximum lbs/hr	Actual T/vr	Rule 17-2	lbe/hr	lbs/yr	T/yr	Diagram
NOx	9.15	39.05			9.15	39.05	
<b>α</b>	6,64	28,29			6.64	28.29	
NMHC	.38	1.62			.38	1,62	
SO <sub>2</sub>	1.64	7.18			1.64	7.18	
PM	.29	1.26	,		.29	1.26	

<sup>&</sup>lt;sup>1</sup>See Section V, Item 2.

DER Form 17-1.202(1) Effective November 30, 1982

<sup>&</sup>lt;sup>2</sup>Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

<sup>3</sup>Calculated from operating rate and applicable standard.

<sup>&</sup>lt;sup>4</sup>Emission, if source operated without control (See Section V, Item 3).