

P 872 562 513



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PS Form 3800, JUNE 1991

Sent to <b>Mr. Allan Weatherford</b>	
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TOTAL Postage & Fees	\$
Postmark or Date <b>Mailed: 12/21/93</b> <b>Request for Amendments to Construction Permits</b>	

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#### SENDER:

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- Addressee's Address
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3. Article Addressed to:  
**Mr. Allan Weatherford**  
**Compliance Environmentalist**  
**Florida Gas Transmission Company**  
**P.O. Box 94500**  
**Maitland, Florida 32794-5100**

4a. Article Number  
**P 872 562 513**

4b. Service Type  
 Registered  Insured  
 Certified  COD  
 Express Mail  Return Receipt for Merchandise

5. Signature (Addressee)  
*Jeax Clark*



7. Date of Delivery

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.



# Florida Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

December 9, 1993

Mr. Allan Weatherford  
Compliance Environmentalist  
Florida Gas Transmission Company  
P.O. Box 94500  
Maitland, Florida 32794-5100

Dear Mr. Weatherford:

RE: Request for Amendments and Extensions to Air Construction  
Permits AC 57-188869, AC 67-189220, AC 20-189438,  
AC 62-189439, AC 04-189454, AC 42-189455, AC 48-189456,  
AC 05-189655, and AC 56-189457  
Phase II - Florida Gas Transmission Company

The Department is in receipt of Mr. Barry Andrew's letter dated December 3, 1993, on behalf of your company, requesting to amend the above permits to use EPA Method 3A instead of EPA Method 3 for Gas Analysis. The Department has reviewed this request and has determined to amend the above mentioned permits as requested.

Specific Condition No. 8 of the above mentioned permits will be amended as follows:

**SPECIFIC CONDITION NO. 8**

**FROM:**

8. Compliance with the NO<sub>x</sub>, SO<sub>2</sub>, CO, VE, and VOC standards shall be determined by the following reference methods as described in 40 CFR 60, Appendix A (July 1, 1988) and adopted by reference in F.A.C. Rule 17-2.700.

- Method 1. Sample and Velocity Traverses
- Method 2. Volumetric Flow Rate
- Method 3. Gas Analysis
- Method 7E. Determination of Nitrogen Oxides Emissions from Stationary Sources
- Method 9. Determination of the Opacity of the Emissions from Stationary Sources
- Method 10. Determination of the Carbon Monoxide Emission from Stationary Sources
- Method 25. Determination of Total Gaseous Nonmethane Organic Emissions as Carbon

Mr. Allan Weatherford  
December 9, 1993  
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TO:

8. Compliance with the NO<sub>x</sub>, SO<sub>2</sub>, CO, VE, and VOC standards shall be determined by the following reference methods as described in 40 CFR 60, Appendix A (July 1, 1992) and adopted by reference in F.A.C. Rule 17-2.700.

- Method 1. Sample and Velocity Traverses
- Method 2. Volumetric Flow Rate
- **Method 3A. Gas Analysis**
- Method 7E. Determination of Nitrogen Oxides Emissions from Stationary Sources
- Method 9. Determination of the Opacity of the Emissions from Stationary Sources
- Method 10. Determination of the Carbon Monoxide Emission from Stationary Sources
- **Method 25A. Determination of Total Gaseous Organic Concentrations Using a Flame Ionization Analyses**

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;

Mr. Allan Weatherford  
December 9, 1993  
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(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action;

(g) A statement of the relief sought by petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this amendment in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

This letter must be attached to the above mentioned permits and shall become a part of each permit.

Sincerely,



Howard Rhodes  
Director  
Division of Air Resources  
Management

Attachment to be Incorporated

Mr. Barry Andrew's letter of December 3, 1993.

cc: E. Middleswart, NWD  
Robert Leetch, NED  
Charles Collins, CD  
Isidore Goldman, SED  
Duane Pierce, FGTC  
Barry Andrews, ENSR

Mr. Allan Weatherford  
December 9, 1993  
Page Four

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this AMENDMENT and all copies were mailed by certified mail before the close of business on 12/21/93 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,  
on this date, pursuant to  
§120.52(11), Florida Statutes,  
with the designated Department  
Clerk, receipt of which is hereby  
acknowledged.

Barbara J. Boutwell  
Clerk

12/21/93  
Date



ENSR Consulting  
and Engineering  
2809 West Mall Drive  
Florence, AL 35630  
(205) 767-1210  
FAX (205) 767-1211

December 3, 1993

Mr. Clair Fancy, P.E.  
Chief, Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blairstone Road  
Tallahassee, FL 32399-2400

RECEIVED

DEC - 6 1993

Division of Air  
Resources Management

Dear Clair:

**RE: Request for Amendments to Permits  
Florida Gas Transmission Company**

**Station 12 - Permit No. AC57-188869**  
Munson, Santa Rosa County, Florida

**Station 13 - Permit No. AC67-189220**  
Caryville, Washington county, Florida

**Station 14 - Permit No. AC20-189438**  
Quincy, Gadsden County, Florida

**Station 15 - Permit No. AC62-189439**  
Perry, Taylor County, Florida

**Station 16 - Permit No. AC04-189454**  
Brooker, Bradford County, Florida

**Station 17 - Permit No. AC42-189455**  
Salt Springs, Marion County, Florida

**Station 18 - Permit No. AC48-189456**  
Orlando, Orange County, Florida

**Station 19 - Permit No. AC05-189665**  
Melbourne, Brevard County, Florida

**Station 20 - Permit No. AC56-189457**  
Ft. Pierce, St. Lucie County, Florida



December 3, 1993  
Mr. Clair Fancy  
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This letter is in response to our recent conversation regarding a previous request by Florida Gas Transmission Company (FGTC) to amend the above permits to include Method 3A instead of Method 3.

On June 29, 1993, FGTC requested that the permits for the compressor engines referenced in this letter be amended to adjust the horsepower ratings and heat input rates. On September 9, 1993 (letter attached), FGTC further requested that specific condition 8 in each of the permits be amended to replace Method 3 with 3A, and that the SO<sub>2</sub> emission limits be clarified to base SO<sub>2</sub> emissions on the fuels sulfur content.

On September 17, 1993 the Division of Air Resources Management (DARM) responded to FGTC's request with a letter amending the permits. Included were the amendments for horsepower ratings, heat input, restrictions, and clarification of sulfur as the basis for SO<sub>2</sub> emissions.

It has recently come to FGTC's attention through the process of obtaining operating permits from the district offices that the request to replace Method 3 with Method 3A was not included in DARM's response. Until now it was assumed that the request had been included in the September 17, 1993 letter of amendment.

Accordingly, FGTC requests that DARM evaluate the request for the amendment to the testing method. This should not require an alternate sampling procedure since there is no regulatory requirement for determining the oxygen and carbon dioxide concentrations from compressor station engines.

Your expedited response to this request is appreciated since it relates to the issuance of our operating permits. Should you need additional information or have any questions please contact Mr. Alan Weatherford with FGTC at (407) 875-5816.

Sincerely,

A handwritten signature in cursive script that reads "Barry Andrews".


Barry D. Andrews, P.E.  
Manager, Air Quality Services

cc : Alan Weatherford

Enclosure

Memorandum

Florida Department of  
Environmental Protection

TO: Howard L. Rhodes  
FROM: Clair Fancy   
DATE: December 9, 1993  
SUBJ: Request for Amendments and Extensions to Air  
Construction Permits AC 57-188869, AC 67-189220,  
AC 20-189438, AC 62-189439, AC 04-189454, AC 42-189455,  
AC 48-189456, AC 05-189655, and AC 56-189457  
Phase II - Florida Gas Transmission Company

Attached for your approval and signature is an amendment to the above construction permits prepared by the Bureau of Air Regulation for the above referenced company. The purpose of the amendment is to use EPA Method 3A instead of EPA Method 3 for Gas Analyses.

I recommend your approval and signature.

CF/TH/bjb

Attachment

OK  
GPL  
CLARK 12/13