STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:

Florida Gas Transmission Company
P.O. Box 1188
Houston, TX 77251

Authorized Representative:
Mr. Rick Craig, V.P. Southeastern Operations

Santa Rosa Compressor Station No. 12
Air Permit No. 1130037-008-AC
Air Permit Modification

Enclosed is Final Air Permit No. 1130037-008-AC, to change the CO emission rates and to remove certain load restrictions related to turbine No. 1208 (EU 010). The equipment is installed at Compressor Station No. 12, which is located north of Munson on Highway 191 approximately 5 miles north of Highway 4 in Santa Rosa County, Florida. As noted in the Intent to Issue, the permit changes will result in no CO emissions changes, and only slight VOC annual emission increases. This permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes, by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty (30) days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

Trina Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 3/12/04 to the person(s) listed:

Mr. Rick Craig, FGT*
Mr. Jacob Krautsch, FGT
Mr. David Holmes Parham, P.E.
Mr. Duane Pierce, AQMcs, LLC
Ms. Sandra Veazey, NWD
Mr. Greg Worley, EPA Region 4.

Clerk Stamp

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

(Clerk) 3/12/04 (Date)

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

PERMITTEE:

Florida Gas Transmission Company
1400 Smith Street
Houston, TX 77002

Authorized Representative:
Mr. Rick Craig, V.P. Southeastern Operations

Santa Rosa Compressor Station No. 12
Air Permit No. 1130037-008-AC
Facility ID No. 1130037
SIC No. 4922
Permit Expires: December 31, 2004

PROJECT AND LOCATION

This permit authorizes the construction of a new 15,700 bhp gas turbine compressor engine (No. 1208), the up-rating of an existing gas turbine compressor engine (No. 1207) to 13,000 bhp, and modification of two existing reciprocating internal combustion compressor engines (Nos. 1204 and 1205). The new equipment will be installed at Compressor Station No. 12, which is located north of Munson on Highway 191, approximately 5 miles north of Highway 4 in Santa Rosa County, Florida. The UTM coordinates are Zone 16, 510.8 km East, and 3419.0 km North.

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. This permit is a modification of Permit No. 1130037-003-AC to revise the CO emission standard and specific load restrictions. It does not authorize new construction and the expiration date is extended simply to allow ample time for inclusion of the subject revisions into the Title V permit.

CONTENTS

Michael G. Cooke, Director
Division of Air Resources Management

3/11/04
(Date)

FACILITY AND PROJECT DESCRIPTION

The existing facility operates as a compressor station in Santa Rosa County for the Florida Gas Transmission Company's natural gas pipeline. The project will add a new 15,700 bhp gas turbine compressor engine (No. 1208), up-rate existing gas turbine compressor engine (No. 1207) to 13,000 bhp, and modify two existing reciprocating internal combustion compressor engines (Nos. 1204 and 1205). After the project is complete, the facility will consist of the following emissions units.

ID	Emission Unit Description
004	**FGT No. 1204**: One modified 2000 bhp natural gas-fired reciprocating internal combustion engine (Cooper-Bessemer Model No. LS-8-SG) was installed as a compressor engine in 1966.
005	**FGT No. 1205**: One modified 2000 bhp natural gas-fired reciprocating internal combustion engine (Cooper-Bessemer Model No. LS-8-SG) was installed as a compressor engine 1968.
006	**FGT No. 1206**: One 4100 bhp natural gas-fired reciprocating internal combustion engine (Dresser-Rand Model No. TVC-10) was installed as a compressor engine in 1991.
007	**FGT Nos. 1201 to 1203**: Three 2000 bhp natural gas-fired reciprocating internal combustion engines (Cooper-Bessemer Model No. LS-8-SG) were installed as compressor engines in 1958.
008	**FGT No. 1207**: One 13,000 bhp gas turbine (Solar Model No. Mars 90-T-13000S) was originally installed as a compressor engine in January 2001 and up-rated later in 2001.
009	**Miscellaneous Unregulated Emissions Units**
010	**FGT No. 1208**: A new 15,700 bhp gas turbine (Nuovo Pignone Model No. PGT-10B) to be installed as a compressor engine in 2001.

{Note: Emissions units 001, 002, and 003 are "inactive".}

REGULATORY CLASSIFICATION

Title III: The existing facility is identified as a potential major source of hazardous air pollutants (HAP).

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

Title V: Because potential emissions of at least one regulated pollutant exceed 100 tons per year, the facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C. Regulated pollutants include pollutants such as carbon monoxide (CO), nitrogen oxides (NOx), particulate matter (PM/PM_{10}), sulfur dioxide (SO_2), and volatile organic compounds (VOC).

PSD: The project is located in an area designated as "attainment" or "unclassifiable" for each pollutant subject to a National Ambient Air Quality Standard. Potential emissions of at least one regulated pollutant exceed 250 tons per year. Therefore, the facility is classified as a major source of air pollution with respect to Rule 62-212.400, F.A.C. the Prevention of Significant Deterioration (PSD) of Air Quality. Because potential emissions from this project do not exceed the PSD Significant Emissions Rates (Table 62-212.400-2), the project is not subject to the PSD preconstruction review requirements.

NSPS: The new gas turbine and the existing gas turbine are subject to the New Source Performance Standards of 40 CFR 60, Subpart GG.

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.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: All documents related to applications for permits to construct or modify emissions units regulated by this permit shall be submitted to the Bureau of Air Regulation of the Florida Department of Environmental Protection (DEP) at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. All documents related to applications for permits to operate an emissions unit shall be submitted to the Department's Northwest District Office at 160 Governmental Center, Pensacola, Florida 32501-5794 and phone number 850/595-8364.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Department's Northwest District Office at 160 Governmental Center, Pensacola, Florida 32501-5794 and phone number 850/595-8364.

3. Appendices: The following Appendices are attached as part of this permit.

   - Appendix CF: Citation Format
   - Appendix FM: Custom Fuel Monitoring Plan for Gas Turbines Subject to NSPS Subpart GG
   - Appendix GC: General Conditions [Rule 62-4.160, F.A.C.]
   - Appendix GG: NSPS Subpart GG Requirements for Gas Turbines
   - Appendix SC: Standard Conditions [applicable requirements from Chapters 62-4, 62-210, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.).]

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, 62-213, 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. Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the Department's Bureau of Air Regulation, and copies to each Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

A. EU-004 and 005: FGT Nos. 1204 and 1205, Modified Reciprocating Compressor Engines

This section of the permit addresses the following modified emissions units.

Emissions Unit No. 004 and 005 (FGT Nos. 1204 and 1205)
Modified Reciprocating Compressor Engines

Description: Each modified reciprocating internal combustion engine is a Cooper-Bessemer Model No. LS-8-SG that is used as a compressor engine for the natural gas pipeline. Engine No. 1204 was installed in 1966 and Engine No. 1205 was installed in 1968.

Fuel: Each engine fires pipeline-quality natural gas (SCC No 2-02-002-54). The maximum natural gas firing rate is approximately 15,900 cubic feet per hour based on a heat content of 1040 BTU per SCF of gas.

Capacity: At 16.5 mmBTU per hour of heat input, each engine produces approximately 2000 bhp. After initial startup, the engines are intended to operate at or near capacity.

Controls: The efficient combustion of pipeline-quality natural gas at high temperatures minimizes emissions of PM/PM_{10}, SO_2, and VOC. A catalytic converter reduces emissions of CO and VOC. Modifications to the engine turbocharger increase the air manifold pressure and airflow to each cylinder, which reduces NOx emissions.

Stack Parameters: When operating at capacity, exhaust gases exit a 28 feet tall stack that is 1.44 feet in diameter with a flow rate of approximately 11,600 acfm at 700° F.

{Permitting Note: The existing natural gas compressor station is a major source with respect to the PSD preconstruction review program. The compressor engines were installed prior to implementation of the PSD program. However, specific modifications are being made in this project to obtain actual emissions decreases for use in a netting analysis that shows the project to be minor with respect PSD. Therefore, the control systems, fuel specifications, operational restrictions, emissions standards, monitoring provisions, and reporting requirements of this section are established in accordance with Rule 62-212.400, F.A.C.}

EQUIPMENT

1. Engine Turbocharger Modifications: The permittee is authorized to physically modify the turbocharger for each reciprocating compressor engine in order to increase the air manifold pressure and airflow to each cylinder. The purpose of this modification is to increase the air-to-fuel mixture and decrease the cylinder temperatures, which will result in lower NOx emissions. Each control system shall be readjusted to include the new engine performance parameters and operating set points. The permittee shall tune, maintain, and operate the modified engine and control system to preserve the reduced NOx emissions. [Applicant Request]

PERFORMANCE RESTRICTIONS

2. Permitted Capacity: The maximum heat input rate to each modified reciprocating compressor engine shall not exceed 16.5 mmBTU per hour while producing approximately 2000 bhp based on a higher heating value (HHV) of 1040 BTU per SCF for natural gas. [Rule 62-210.200(PTE), F.A.C.]

3. Authorized Fuel: The modified reciprocating compressor engines shall fire only pipeline-quality natural gas with a maximum of 10 grains of sulfur per 100 standard cubic feet of natural gas. The custom fuel monitoring plan for the gas turbine (FGT Unit No. 1208) shall serve as the compliance demonstration for the fuel sulfur limit. [Applicant Request; Rule 62-210.200(PTE), F.A.C.]

4. Restricted Operation: The hours of operation of each modified reciprocating compressor engine are not limited (8760 hours per year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

A. EU-004 and 005: FGT Nos. 1204 and 1205, Modified Reciprocating Compressor Engines

EMISSIONS STANDARDS

5. Emissions Standards: Emissions from each modified reciprocating compressor engine shall not exceed the following limits for carbon monoxide (CO), nitrogen oxides (NOx), opacity, particulate matter (PM), sulfur dioxide (SO_2), and volatile organic compounds (VOC).

Pollutant	Standards	Equivalent Maximum Emissions [f]		Rule Basis [g]
		lb/hour	TPY	
CO [a]	0.8 gram/bhp-hour	3.5	15.5	Avoid Rule 62-212.400, F.A.C.
NOx [b]	5.4 gram/bhp-hour	23.8	104.3	Avoid Rule 62-212.400, F.A.C.
SO_2 [c]	10 grains of sulfur per 100 SCF of gas	0.5	2.0	Avoid Rule 62-212.400, F.A.C.
Opacity [d]	10% opacity, 6-minute average	Not Applicable		Avoid Rule 62-212.400, F.A.C.
PM [e]	Good combustion practices (Factor: 0.00999 lb/mmBTU)	0.2	0.7	Avoid Rule 62-212.400, F.A.C.
VOC [e]	Good combustion practices (Factor: 0.1 gram/bhp-hour)	0.4	1.9	Avoid Rule 62-212.400, F.A.C.

a. The CO standard is based on a 3-hour test average as determined by EPA Method 10.

b. The NOx standard is based on a 3-hour test average as determined EPA Method 7E.

c. The fuel sulfur specification is based on the maximum limit specified by Federal Energy Regulatory Commission (FERC) and effectively limits the potential SO_2 emissions. Expected fuel sulfur levels are less than 1 grain per 100 SCF of natural gas from the pipeline. Compliance by record keeping.

d. The opacity standard is based on a 6-minute average, as determined by EPA Method 9.

e. For both PM and VOC, the efficient combustion of clean fuels is indicated by compliance with opacity and CO standards. Equivalent maximum PM emissions are based on data in Table 3.2-2 of AP-42. Equivalent maximum VOC emissions are based on test data. No testing required.

f. Equivalent maximum emissions are based on the maximum expected emissions (or the emissions standard) at permitted capacity and 8760 hours of operation per year.

g. The emissions standards of this permit ensure that the project does not trigger the PSD preconstruction review requirements of Rule 62-212.400, F.A.C.

EMISSIONS PERFORMANCE TESTING

6. Initial Compliance Tests: Each modified reciprocating compressor engine shall be tested to demonstrate initial compliance with the emissions standards for CO, NOx, and visible emissions. The initial tests shall be conducted within 60 days after achieving at least 90% of the maximum permitted capacity, but not later than 180 days after initial operation of the modified engine. CO and NOx performance tests shall be conducted concurrently at permitted capacity. SO_2 emissions shall be calculated based on fuel flow and vendor analysis of fuel sulfur content. [Rule 62-297.310(7)(a)1, F.A.C.]

7. Annual Compliance Tests: During each federal fiscal year (October 1st to September 30th), each modified reciprocating compressor engine shall be tested to demonstrate compliance with the emissions standards for NOx and visible emissions. SO_2 emissions shall be calculated based on fuel flow and vendor analysis of fuel sulfur content. [Rule and 62-297.310(7)(a)4, F.A.C. and to avoid Rule 62-212.400, F.A.C.]

8. Tests Prior to Renewal: Within the 12-month period prior to expiration of the operation permit, each modified reciprocating compressor engine shall be tested to demonstrate compliance with the emission standards for CO, NOx, and visible emissions. CO and NOx performance tests shall be conducted concurrently at permitted capacity. SO_2 emissions shall be calculated based on fuel flow and vendor analysis of fuel sulfur content. [Rule 62-297.310(7)(a)3, F.A.C.]

9. Test Notification: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. [Rule 62-297.310(7)(a)9, F.A.C.]

10. Test Methods: Required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
7E	Determination of Nitrogen Oxide Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources
10	Determination of Carbon Monoxide Emissions from Stationary Sources {Note: The method shall be based on a continuous sampling train.}
19	Determination of Sulfur Dioxide Removal Efficiency and Particulate Matter, Sulfur Dioxide, and Nitrogen Oxides Emission Rates (Optional F-factor method may be used to determine flow rate and gas analysis to calculate mass emissions in lieu of Methods 1-4.)

Tests shall also be conducted in accordance with the requirements specified in Section 4, Appendix SC of this permit. The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used for compliance testing unless prior written approval is received from the administrator of the Department's Emissions Monitoring Section in accordance with an alternate sampling procedure pursuant to 62-297.620, F.A.C. [Rules 62-204.800 and 62-297.100, F.A.C.; 40 CFR 60, Appendix A]

RECORDS AND REPORTS

11. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Section 4, Appendix SC of this permit. For each test run, the report shall also indicate the natural gas firing rate (cubic feet per hour), heat input rate (mmBTU per hour), and the power output (bhp). [Rule 62-297.310(8), F.A.C.]

12. Operational Data: The permittee shall adequately monitor the fuel consumption rate and hours of operation for use in submittal of the required Annual Operating Report. At least once per calendar quarter, a trained engine analyst shall inspect each modified engine, estimate the exhaust NOx concentration with a portable analyzer, and adjust engine performance as necessary. These inspections shall be recorded in a permanent log and made available for inspection upon request of the Department. [Rule 62-4.070(3), F.A.C.]

B. EU-008: FGT No. 1207, Up-Rated Gas Turbine Compressor Engine

This section of the permit addresses the following modified emissions unit.

Emissions Unit No. 008 (FGT No. 1207): Up-Rated Gas Turbine Compressor Engine
Description: The up-rated 13,000 bhp gas turbine is a Solar Model No. Mars 90-T-13000S that is used as a compressor engine for the natural gas pipeline. Engine No. 1207 was originally installed in January of 2001.
Fuel: The gas turbine fires pipeline-quality natural gas (SCC No 2-02-002-01). The maximum natural gas firing rate is approximately 108,470 cubic feet per hour based on a heat content of 1040 BTU per SCF of gas.
Capacity: At 112.8 mmBTU per hour of heat input, the gas turbine produces approximately 13,000 bhp. After initial startup, the gas turbine is intended to operate at or near capacity.
Controls: The efficient combustion of pipeline-quality natural gas at high temperatures minimizes emissions of CO, PM/PM_{10}, SO_2, and VOC. NOx emissions are reduced with dry low-NOx combustion technology.
Stack Parameters: When operating at capacity, exhaust gases exit a rectangular stack (7.5 feet by 8 feet) that is 58 feet tall with a flow rate of approximately 179,500 acfm at 870° F.

{Permitting Note: The existing natural gas compressor station is a major source with respect to the PSD preconstruction review program. The project includes up-rating the existing gas turbine (FGT No. 1207) installed in January of 2001. As such, it is part of the netting analysis that shows the project to be minor with respect to PSD. Therefore, the control systems, fuel specifications, operational restrictions, emissions standards, monitoring provisions, and reporting requirements of this section are established in accordance with Rule 62-212.400, F.A.C.}

APPLICABLE STANDARDS AND REGULATIONS

1. NSPS Requirements: The gas turbine shall comply with the New Source Performance Standards (NSPS) of Subpart GG in 40 CFR 60. The applicable NSPS requirements are provided in Appendix GG of this permit. The Department determines that the conditions in this section are at least as stringent, or more stringent than, the NSPS requirements of Subpart GG. [Rule 62-4.070(3), F.A.C.; 40 CFR 60, Subpart GG]

EQUIPMENT

2. Up-Rated Gas Turbine (FGT No. 1207): The permittee is authorized to up-rate the recently installed Solar Model No. Mars 90-T-13000S gas turbine from 10,350 bhp to 13,000 bhp. The permittee shall tune, operate and maintain the gas turbine's dry low-NOx combustion system to reduce emissions of nitrogen oxides below the permitted limits. Ancillary equipment includes the automated Solar Turbotronic gas turbine control system, an inlet air filtration system, and a rectangular stack (7.5 feet by 8.0 feet) that is 58 feet tall. [Applicant Request]

PERFORMANCE RESTRICTIONS

3. Permitted Capacities: The maximum heat input rate to the gas turbine shall not exceed 112.8 mmBTU per hour while producing approximately 13,078 bhp based on a compressor inlet air temperature of 59° F, 100% load, and a higher heating value (HHV) of 1040 BTU per SCF for natural gas. Heat input rates will vary depending upon gas turbine characteristics, load, and ambient conditions. For the gas turbine, the permittee shall provide manufacturer's performance curves (or equations) that correct for site conditions to the Permitting and Compliance Authorities within 45 days of completing the initial testing. Performance data shall be adjusted for the appropriate site conditions in accordance with the performance curves and/or equations on file with the Department. [Rule 62-210.200(PTE), F.A.C.] *{Permitting Note: The maximum heat input rates are based on the manufacturer's equipment specifications for each gas turbine. They are*

included to identify the capacity of each emissions unit for purposes of confirming that tests are conducted within 90% to 100% of the emission unit's rated capacity (or to limit future operation to 105% of the test load, if applicable), to establish appropriate emissions limits, and to aid in determining future rule applicability.}

4. Authorized Fuel: The gas turbine shall fire only pipeline-quality natural gas with a maximum of 10 grains of sulfur per 100 standard cubic feet of natural gas. [Applicant Request; Rule 62-210.200(PTE), F.A.C.]

5. Restricted Operation: The hours of operation for the gas turbine are not limited (8760 hours per year). Except for startup and shutdown, operation below 50% base load is prohibited. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

6. Emissions Standards: Emissions from the gas turbine shall not exceed the following limits for carbon monoxide (CO), nitrogen oxides (NOx), opacity, particulate matter (PM), sulfur dioxide (SO_2), and volatile organic compounds (VOC).

Pollutant	Standards	Equivalent Maximum Emissions [f]		Rule Basis [g]
		lb/hour	TPY	
CO [a]	50.0 ppmvd @ 15% O_2	12.4	54.5	Avoid Rule 62-212.400, F.A.C.
NOx [b]	25.0 ppmvd @ 15% O_2	10.2	44.7	Avoid Rule 62-212.400, F.A.C. 40 CFR 60.332
SO_2 [c]	10.0 grains of sulfur per 100 SCF of gas	3.1	13.6	Avoid Rule 62-212.400, F.A.C. 40 CFR 60.332
Opacity [d]	10% opacity, 6-minute average	Not Applicable		Avoid Rule 62-212.400, F.A.C.
PM [e]	Good combustion practices (Factor: 0.00999 lb/mmBTU)	0.7	3.3	Avoid Rule 62-212.400, F.A.C.
VOC [e]	Good combustion practices (Factor: 2.5 ppmvd @ 15% O_2)	0.4	1.6	Avoid Rule 62-212.400, F.A.C.

a. The CO standard is based on a 3-hour test average as determined by EPA Method 10.

b. The NOx standards is based a 3-hour test average as determined EPA Method 20.

c. The fuel sulfur specification is based on the maximum limit specified by Federal Energy Regulatory Commission (FERC) and effectively limits the potential SO_2 emissions. Expected fuel sulfur levels are less than 1 grain per 100 SCF of natural gas from the pipeline.

d. The opacity standard is based on a 6-minute average, as determined by EPA Method 9.

e. For both PM and VOC, the efficient combustion of clean fuels is indicated by compliance with opacity and CO standards. Equivalent maximum PM emissions are based on vendor data. Equivalent maximum VOC emissions were conservatively assumed to be 10% of the vendor's data for total unburned hydrocarbon. No testing required.

f. Equivalent maximum emissions are based on the maximum expected emissions, permitted capacity, a compressor inlet air temperature of 59° F, and 8760 hours of operation per year. For comparison purposes, the permittee shall provide a reference table with the initial compliance test report of mass

emission rates versus the compressor inlet temperatures. Each test report shall include measured mass emission rates for CO, NOx and SO_2. Mass emission rates for SO_2 shall be calculated based on actual fuel sulfur content and fuel flow rate. For tests conducted at 59° F or greater, measured mass emission rates shall be compared to the equivalent maximum emissions above. For tests conducted below 59° F, measured mass emission rates shall be compared to the tabled mass emission rates provided by the manufacturer based on compressor inlet temperatures.

g. The emissions standards of this permit ensure that the project does not trigger the PSD preconstruction review requirements of Rule 62-212.400, F.A.C.

EMISSIONS PERFORMANCE TESTING

7. Initial Compliance Tests: The gas turbine shall be tested to demonstrate initial compliance with the emission standards for CO, NOx, and visible emissions. The initial tests shall be conducted within 60 days after achieving at least 90% of the maximum permitted capacity, but not later than 180 days after initial operation of the gas turbine. The initial NOx performance tests shall be conducted at approximately four evenly spaced points between the minimum normal operating load and 100% of peak load. Each of the three low-load NOx performance tests shall consist of three, 20-minute test runs. The peak load NOx performance test shall consist of three, 1-hour test runs. The CO performance tests shall be conducted concurrently with the NOx performance tests at peak load. SO_2 emissions shall be calculated based on fuel flow and vendor analysis of fuel sulfur content. [Rule 62-297.310(7)(a)1, F.A.C.; 40 CFR 60.8 and 60.335]

8. Annual Compliance Tests: During each federal fiscal year (October 1st to September 30th), the gas turbine shall be tested to demonstrate compliance with the emission standards for CO, NOx, and visible emissions. CO and NOx emissions shall be tested concurrently at permitted capacity. SO_2 emissions shall be calculated based on fuel flow and vendor analysis of fuel sulfur content. [Rule and 62-297.310(7)(a)4, F.A.C. and to avoid Rule 62-212.400, F.A.C.]

9. Test Notification: The permittee shall notify the Compliance Authority in writing at least 30 days prior to any initial NSPS performance tests and at least 15 days prior to any other required tests. [Rule 62-297.310(7)(a)9, F.A.C.; 40 CFR 60.7 and, 60.8]

10. Test Methods: Required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
9	Visual Determination of the Opacity of Emissions from Stationary Sources
10	Determination of Carbon Monoxide Emissions from Stationary Sources {Note: The method shall be based on a continuous sampling train.}
19	Determination of Sulfur Dioxide Removal Efficiency and Particulate Matter, Sulfur Dioxide, and Nitrogen Oxides Emission Rates (Optional F-factor method may be used to determine flow rate and gas analysis to calculate mass emissions in lieu of Methods 1-4.)
20	Determination of Nitrogen Oxides, Sulfur Dioxide and Diluent Emissions from Gas Turbines

Tests shall also be conducted in accordance with the requirements specified in Section 4, Appendix SC of this permit. The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used for compliance testing unless prior written approval is received from the administrator of the Department's Emissions Monitoring Section in accordance with an alternate sampling procedure pursuant to 62-297.620, F.A.C. [Rules 62-204.800 and 62-297.100, F.A.C.; 40 CFR 60, Appendix A]

RECORDS AND REPORTS

11. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Section 4, Appendix SC of this permit. In addition, NOx emissions shall be corrected to ISO ambient atmospheric conditions and compared to the NSPS Subpart GG standard identified in Appendix GG of this permit for each required test. For each run, the test report shall also indicate the natural gas firing rate (cubic feet per hour), heat input rate (mmBTU per hour), the power output (bhp), percent base load, and the inlet compressor temperature. [Rule 62-297.310(8), F.A.C.; 40 CFR 60.332]

12. Custom Fuel Monitoring Schedule: In lieu of the NSPS fuel monitoring requirements of 40 CFR 60.334 of Subpart GG, the Department approves the custom fuel-monitoring schedule specified in Appendix FM of this permit. [Rule 62-4.070(3); 40 CFR 60.334]

13. Operational Data: Using the automated gas turbine control system, the permittee shall monitor and record heat input (mmBTU), power output (bhp), and hours of operation for the gas turbine. Within the first 10 days of each month, the permittee shall summarize the following information: average heat input (mmBTU per hour); average power output (bhp); and total hours of gas turbine operation. The average heat input for the month shall be based on the contracted heat content (mmBTU per SCF) of the natural gas for the given month. This information shall also be used for submittal of the required Annual Operating Report. [Rule 62-4.070(3), F.A.C.]

C. EU-010: FGT No. 1208, New Gas Turbine Compressor Engine

This section of the permit addresses the following new emissions unit.

Emissions Unit No. 010 (FGT No. 1208): New Gas Turbine Compressor Engine
Description: The new 15,700 bhp gas turbine is a Pignone Model No. PGT-10B to be used as a compressor engine for the natural gas pipeline.
Fuel: The gas turbine fires pipeline-quality natural gas (SCC No 2-02-002-01). The maximum natural gas firing rate is approximately 129,600 cubic feet per hour based on a heat content of 1040 BTU per SCF of gas.
Capacity: At 134.8 mmBTU per hour of heat input, the gas turbine produces approximately 15,700 bhp. After initial startup, the gas turbine is intended to operate between 50% and 100% of base load.
Controls: The efficient combustion of pipeline-quality natural gas at high temperatures minimizes emissions of carbon monoxide (CO), particulate matter (PM/PM_{10}), sulfur dioxide (SO_2), and volatile organic compounds (VOC). NOx emissions are reduced with dry low-NOx combustion technology.
Stack Parameters: When operating at capacity, exhaust gases exit a 7.6 feet diameter stack that is 61.5 feet tall with a flow rate of approximately 215,200 acfm at 910° F.

APPLICABLE STANDARDS AND REGULATIONS

{Permitting Note: The existing natural gas compressor station is a major source with respect to the PSD preconstruction review program. The project includes adding a new gas turbine (FGT No. 1208) to increase the compressor station capacity. As such, it is part of the netting analysis that shows the project to be minor with respect to PSD. Therefore, the control systems, fuel specifications, operational restrictions, emissions standards, monitoring provisions, and reporting requirements of this section are established in accordance with Rule 62-212.400, F.A.C.}

1. NSPS Requirements: The new gas turbine shall comply with the New Source Performance Standards (NSPS) of Subpart GG in 40 CFR 60. The applicable NSPS requirements are provided in Appendix GG of this permit. The Department determines that the conditions in this section are at least as stringent, or more stringent than, the NSPS requirements of Subpart GG. [Rule 62-4.070(3), F.A.C.; 40 CFR 60, Subpart GG]

EQUIPMENT

2. New Gas Turbine (FGT No. 1208): The permittee is authorized to install, tune, operate, and maintain a new Pignone Model No. PGT-10B gas turbine to be used as a compressor engine for the natural gas pipeline. The gas turbine design shall incorporate dry low-NOx combustion technology to reduce emissions of nitrogen oxides below the permitted limits. Ancillary equipment includes an automated gas turbine control system, an inlet air filtration system, and a 7.6 feet diameter stack that is 61.5 feet tall. The permittee identifies the new gas turbine compressor engine as FGT No. 1208. [Applicant Request; Design]

PERFORMANCE RESTRICTIONS

3. Permitted Capacity: The maximum heat input rate to the gas turbine shall not exceed 134.8 mmBTU per hour while producing approximately 15,700 bhp based on a compressor inlet air temperature of 59° F, 100% load, and a higher heating value (HHV) of 1040 BTU per SCF for natural gas. Heat input rates will vary depending upon gas turbine characteristics, load, and ambient conditions. The permittee shall provide manufacturer's performance curves (or equations) that correct for site conditions to the Permitting and Compliance Authorities within 45 days of completing the initial compliance testing. Performance data shall be adjusted for the appropriate site conditions in accordance with the performance curves and/or equations on file with the Department. [Rule 62-210.200(PTE), F.A.C.] *{Permitting Note: The maximum heat input rates are based on the manufacturer's equipment specifications for each gas turbine. They are included to*

identify the capacity of each emissions unit for purposes of confirming that tests are conducted within 90% to 100% of the emission unit's rated capacity (or to limit future operation to 105% of the test load, if applicable), to establish appropriate emissions limits, and to aid in determining future rule applicability.]

4. Authorized Fuel: The gas turbine shall fire only pipeline-quality natural gas with a maximum of 10 grains of sulfur per 100 standard cubic feet of natural gas. [Applicant Request; Rule 62-210.200(PTE), F.A.C.]

5. Restricted Operation: The ~~total~~ hours of operation for the gas turbine are not limited (8760 hours per year). Except for startup and shutdown, operation below 50% base load is prohibited. ~~Operation between 50% and 90% of base load shall not exceed 2190 hours during any consecutive 12 months. Of this authorized low-load operation, operation between 50% and 70% of base load shall not exceed 438 hours during any consecutive 12 months.~~ [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

6. Emissions Standards: Emissions from the gas turbine shall not exceed the following limits for carbon monoxide (CO), nitrogen oxides (NOx), opacity, particulate matter (PM), sulfur dioxide (SO_2), and volatile organic compounds (VOC).

Pollutant	Standards		Equivalent Maximum Emissions [f]		Rule Basis [g]
	Load	Standard	lb/hour	TPY	
CO [a]	~~90-100%~~	~~15.0 ppmvd @ 15% O2~~	~~5.1~~	30.8	Avoid Rule 62-212.400, F.A.C.
	~~70-90%~~	~~30.0 ppmvd @ 15% O2~~	~~10.2~~		
	50-~~70~~100%	~~75.0~~ 21.0 ppmvd @ 15% O2	~~22.5~~ 7.03		
NOx [b]	50-100%	25.0 ppmvd @ 15% O2	14.1	61.8	Avoid Rule 62-212.400, F.A.C. 40 CFR 60.332
SO_2 [c]	50-100%	10.0 grains of sulfur per 100 SCF of natural gas	3.7	16.2	Avoid Rule 62-212.400, F.A.C. 40 CFR 60.332
Opacity [d]	50-100%	10% opacity, 6-minute average	Not Applicable		Avoid Rule 62-212.400, F.A.C.
PM [e]	50-100%	Good combustion practices	0.9	3.9	Avoid Rule 62-212.400, F.A.C.
VOC [e]	~~90-100%~~	~~Good combustion practices~~	~~0.3~~	~~2.0~~	Avoid Rule 62-212.400, F.A.C.
	~~70-90%~~	~~Good combustion practices~~	~~0.8~~	6.6	
	50-~~70~~100%	Good combustion practices	1.5		

a. The CO standards are based on 3-hour test average as determined by EPA Method 10. Annual CO emissions were based on emissions standards and restricted hours of operation.

b. The NOx standards are based on a 3-hour test average as determined EPA Method 20.

c. The fuel sulfur specification is based on the maximum limit specified by Federal Energy Regulatory Commission (FERC) and effectively limits the potential SO_2 emissions. Expected fuel sulfur levels are less than 1 grain per 100 SCF of natural gas from the pipeline.

d. The opacity standard is based on a 6-minute average, as determined by EPA Method 9.

e. For both PM and VOC, the efficient combustion of clean fuels is indicated by compliance with opacity and CO standards. Equivalent maximum PM emissions are based on data in Table 3.1-2a in AP-42. Equivalent maximum VOC emissions are based on vendor data. Annual VOC emissions were based on the vendor data and restricted hours of operation. No testing required.

f. Equivalent maximum hourly emissions are the maximum expected emissions based on permitted capacity and a compressor inlet air temperature of 59° F. For comparison purposes, the permittee shall provide a reference table with the initial compliance test report of mass emission rates versus the compressor inlet temperatures. Each test report shall include measured mass emission rates for CO, NOx and SO_2. Mass emission rates for SO_2 shall be calculated based on actual fuel sulfur content and fuel flow rate. For tests conducted at 59° F or greater, measured mass emission rates shall be compared to the equivalent maximum emissions above. For tests conducted below 59° F, measured mass emission rates shall be compared to the tabled mass emission rates provided by the manufacturer based on compressor inlet temperatures.

g. Equivalent maximum annual emissions are based on 8760 hours of operation per year.

h. The emissions standards of this permit ensure that the project does not trigger the PSD preconstruction review requirements of Rule 62-212.400, F.A.C.

EMISSIONS PERFORMANCE TESTING

7. Initial Compliance Tests: The gas turbine shall be tested to demonstrate initial compliance with the emission standards for CO, NOx, and visible emissions. The initial tests shall be conducted within 60 days after achieving at least 90% of the maximum permitted capacity, but not later than 180 days after initial operation of the gas turbine. The initial CO and NOx performance tests shall be conducted at approximately four evenly spaced points between the minimum normal operating load and 100% of peak load. Each of the three low-load CO and NOx performance tests shall consist of three, 20-minute test runs. The peak load CO and NOx performance test shall consist of three, 1-hour test runs. The CO performance tests shall be conducted concurrently with the NOx performance tests. SO_2 emissions shall be calculated based on fuel flow and vendor analysis of fuel sulfur content. [Rule 62-297.310(7)(a)1, F.A.C.; 40 CFR 60.8 and 60.335] {Permitting Note: This permit modification does not impose any new, additional testing.}

8. Annual Compliance Tests: During each federal fiscal year (October 1st to September 30th), the gas turbine shall be tested to demonstrate compliance with the emission standards for CO, NOx, and visible emissions. CO and NOx emissions shall be tested concurrently at permitted capacity. SO_2 emissions shall be calculated based on fuel flow and vendor analysis of fuel sulfur content. [Rule and 62-297.310(7)(a)4, F.A.C. and to avoid Rule 62-212.400, F.A.C.]

9. Test Methods: Required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
9	Visual Determination of the Opacity of Emissions from Stationary Sources
10	Determination of Carbon Monoxide Emissions from Stationary Sources {Note: The method shall be based on a continuous sampling train.}
19	Determination of Sulfur Dioxide Removal Efficiency and Particulate Matter, Sulfur Dioxide, and Nitrogen Oxides Emission Rates (Optional F-factor method may be used to determine flow rate and gas analysis to calculate mass emissions in lieu of Methods 1-4.)
20	Determination of Nitrogen Oxides, Sulfur Dioxide and Diluent Emissions from Gas Turbines

Tests shall also be conducted in accordance with the requirements specified in Section 4, Appendix SC of this permit. The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used for compliance testing unless prior written approval is received from the administrator of the Department's Emissions Monitoring Section in accordance with an alternate sampling procedure pursuant to 62-297.620, F.A.C. [Rules 62-204.800 and 62-297.100, F.A.C.; 40 CFR 60, Appendix A]

10. Test Notification: The permittee shall notify the Compliance Authority in writing at least 30 days prior to any initial NSPS performance tests and at least 15 days prior to any other required tests. [Rule 62-297.310(7)(a)9, F.A.C.; 40 CFR 60.7 and, 60.8]

RECORDS AND REPORTS

11. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Section 4, Appendix SC of this permit. In addition, NOx emissions shall be corrected to ISO ambient atmospheric conditions and compared to the NSPS Subpart GG standard identified in Appendix GG of this permit for each required test. For each run, the test report shall also indicate the natural gas firing rate (cubic feet per hour), heat input rate (mmBTU per hour), the power output (bhp), percent base load, and the inlet compressor temperature. [Rule 62-297.310(8), F.A.C.; 40 CFR 60.332]

12. Custom Fuel Monitoring Schedule: In lieu of the NSPS fuel monitoring requirements of 40 CFR 60.334 of Subpart GG, the Department approves the custom fuel-monitoring schedule specified in Appendix FM of this permit. [Rule 62-4.070(3); 40 CFR 60.334]

13. Operational Data: Using the automated gas turbine control system, the permittee shall monitor and record heat input (mmBTU), power output (bhp), and hours of gas turbine operation ~~within each of the following load ranges: 50% to 70% load; 70% to 90% load; and 90% to 100% load~~. Within the first 10 days of each month, the permittee shall summarize the following information: average heat input (mmBTU per hour); average power output (bhp); total hours of gas turbine operation; and hours of gas turbine operation ~~between 50% to 70% load; hours of gas turbine operation between 70% to 90% load; and hours of gas turbine operation between and 90% to 100% load~~. The average heat input for the month shall be based on the contracted heat content (mmBTU per SCF) of the natural gas for the given month. This information shall also be used for submittal of the required Annual Operating Report. [Rule 62-4.070(3), F.A.C.]

D. EU-009: Miscellaneous Unregulated Emissions Units

This permit recognizes the following unregulated emissions units.

Emissions Unit No. 009: Miscellaneous Unregulated Emissions Units	
004	Support equipment includes: • One Caterpillar Model 3412 emergency generator (637 bhp) fired exclusively with natural gas and identified by the permittee as "GEN03"; • One 1 mmBTU/hour air compressor engine fired exclusively with natural gas and identified by permittee as "Air Compressor No. 1"; • Lube oil storage tanks; • Used oil storage tanks; • Blowdown stacks; and • Miscellaneous fugitive emission leaks from valves, flanges, etc.

The emergency generator and air compressor engine are exempt from air pollution construction permitting requirements in accordance with the following rule.

Rule 62-210.300, F.A.C. Permits Required.

(3) Exemptions.

(c) Categorical Exemptions

20. One or more emergency generators located within a single facility provided:

    a. None of the emergency generators is subject to the Federal Acid Rain Program; and

    b. Total fuel consumption by all such emergency generators within the facility is limited to 32,000 gallons per year of diesel fuel, 4,000 gallons per year of gasoline, 4.4 million standard cubic feet per year of natural gas or propane, or an equivalent prorated amount if multiple fuels are used.

21. One or more heating units, general purpose internal combustion engines, or other combustion devices, all of which are located within a single facility, are not listed elsewhere in Rule 62-210.300(3)(a), F.A.C., and are not pollution control devices, provided:

    a. None of the heating units, general purpose internal combustion engines, or other combustion devices that would be exempted is subject to the Federal Acid Rain Program;

    b. Total fuel consumption by all such heating units, general purpose internal combustion engines, and other combustion devices that would be exempted is limited to 32,000 gallons per year of diesel fuel, 4,000 gallons per year of gasoline, 4.4 million standard cubic feet per year of natural gas or propane, or an equivalent prorated amount if multiple fuels are used; and

    c. Fuel for the heating units, general purpose internal combustion engines, and other combustion devices that would be exempted is limited to natural gas, diesel fuel, gasoline and propane.

Memorandum

Florida Department of
Environmental Protection

TO: Mike Cooke

THRU: Trina Vielhauer
Jim Pennington

FROM: Mike Halpin

DATE: March 10, 2004

SUBJECT: Final Air Construction Permit No. 1130037-008-AC
Florida Gas Transmission Company
Santa Rosa Compressor Station No. 12
Permit Modifications

Attached for approval and signature is a construction permit modification for FGT's Compressor Station No. 12 located in Santa Rosa County. The permit modification is to revise the CO emission rates and remove certain operating restrictions in the low and middle load ranges. The changes will not cause any increases in CO, although an incidental increase in VOC emissions may occur (< 5TPY) as a result (only) of the load limitation removal. The permit is issued without a BACT Review since the permit revision does not cross any PSD pollutant thresholds.

The applicant published the "Public Notice of Intent to Issue" in Pensacola News Journal on February 19, 2004. No comments were received beyond a single request from FGT. FGT had asked that a fairly standard permitting note be included within Specific Condition No. 3 of EU-008 and EU-010. The requested permitting note (concerning the Department's basis for including heat input values within permits) was included as requested.

I recommend your approval of the attached Final Permit for this project.

Attachments

mph

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Rick Craig
Florida Gas Transmission Company
Post Office Box 1188
Houston, TX 77251

COMPLETE THIS SECTION ON DELIVERY

A. Signature: x E.O. Price — ☑ Agent ☐ Addressee

B. Received by (Printed Name): E.O. Price — C. Date of Delivery: 03/15/04

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label): 7000 2870 0000 7028 3703

PS Form 3811, August 2001 — Domestic Return Receipt — 102595-02-M-1540

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

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Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

Sent To: Florida Gas Transmission Co.
Street, Apt. No., or PO Box No.: P O Box 1188
City, State, ZIP+4: Houston TX - 77251

PS Form 3800, May 2000 — See Reverse for Instructions

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

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Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

Sent To: MR. Rick Craig, TGT
Street, Apt. No., or PO Box No.: P. O. Box 1188
City, State, ZIP+4: Houston TX - 77251

PS Form 3800, May 2000 — See Reverse for Instructions

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- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Florida Gas Transmission Company
Post Office Box 1188
Houston, TX 77251

COMPLETE THIS SECTION ON DELIVERY

A. Signature: x E.O. Price — ☑ Agent ☐ Addressee

B. Received by (Printed Name): E.O. Price — C. Date of Delivery: 03/15/04

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label): 7000 2870 0000 7028 3901

PS Form 3811, August 2001 — Domestic Return Receipt — 102595-02-M-1540