



Florida Gas Transmission Company

1967 Commonwealth Lane, Tallahassee, FL 32303, (850) 350-5000, Fax Downstairs (850) 350-5001

February 26, 2004

UPS Overnight – 1Z F62 059 22 1004 396 4

Mike Halpin
Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Bldg.
2600 Blairstone
Tallahassee, FL 32399-2400

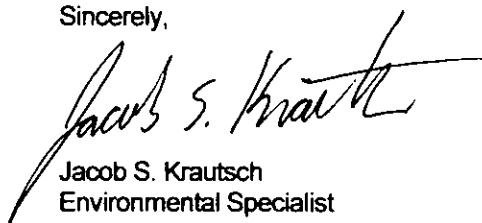
Re: Florida Gas Transmission Company, Draft Air Permit No. 1130037-008-AC
Compressor Station No. 12 Munson

Dear Mr. Mike Halpin

Florida Gas Transmission (FGT) requests that the following permitting note be included with Emission Units No. 008 and 010's Specific Condition (3) Permitted Capacities: 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 the tests are conducted within 90% to 100% of the emission unit's rated capacity (or to limit future operation to 110% of the test load, if applicable), to establish appropriate emissions limits, and to aid in determining future rule applicability.

Included with this letter is another Florida Gas Transmission permit that includes this permitting note. If you have any questions, please call me at (850) 350-5042.

Sincerely,



Jacob S. Krautsch
Environmental Specialist

Attachment

Cc: C/S 12
Duane Pierce
Tallahassee File
Envision Env. 3.1.20

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FEB 27 2004

BUREAU OF AIR REGULATION

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Compressor Station 24

PERFORMANCE RESTRICTIONS

5. Permitted Capacities

- a. *Engine 2401*: The maximum heat input rate to the gas turbine is 113 MMBtu per hour while producing approximately 13,000 bhp (ISO) based on a turbine inlet air temperature of 59° F, 100% load, and a heating value (HHV) of 1040 Btu/scf of natural gas.
- b. *Engine 2402*: The maximum heat input rate to the gas turbine is 63 MMBtu per hour while producing approximately 7222 bhp (ISO) based on a turbine inlet air temperature of 59° F, 100% load, and a heating value (HHV) of 1040 Btu per scf of 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 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.}*

- 6. **Authorized Fuel**: Each gas turbine shall fire only 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.]
- 7. **Restricted Operation**: The hours of operation for each gas turbine are not restricted (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

- 8. **Emissions Standards**: Each gas turbine shall not exceed the following standards for carbon monoxide (CO), nitrogen oxides (NOx), opacity, particulate matter (PM), sulfur dioxide (SO₂), and volatile organic compounds (VOC).

Pollutant	Standards Engines 2401 and 2402	Equivalent Maximum Emissions ^f				Rule Basis ^g
		Engine 2401		Engine 2402		
		lb/hour	TPY	lb/hour	TPY	
CO ^a	50.0 ppmvd @ 15% O ₂	12.3	54	7.0	31	Rule 62-4.070(3), F.A.C.
NOx ^b	25.0 ppmvd @ 15% O ₂	10.1	44	5.7	25	Rule 62-4.070(3), F.A.C. 40 CFR 60.332
SO ₂ ^c	10 grains of sulfur/100 scf	3.1	14	1.7	8	Rule 62-4.070(3), F.A.C. 40 CFR 60.333
Opacity ^d	10% opacity, 6-minute average	Not Applicable				Rule 62-4.070(3), F.A.C.
PM ^e	Lean premix combustion design	0.7	3	0.4	2	Rule 62-4.070(3), F.A.C.
VOC ^e	Lean premix combustion design	0.4	2	1.5	7	Rule 62-4.070(3), F.A.C.

- a. The CO standards are based on the average of three test runs as determined by EPA Method 10.
- b. The NOx standards are based on the average of three test runs 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 SO₂ 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.



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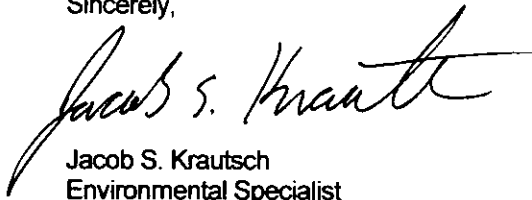
Re: Proof of publication – Intent to Issue Construction Permit
Florida Gas Transmission Company, Draft Air Permit No. 1130037-008-AC
Compressor Station No. 12 Munson

Dear Mr. Mike Halpin

Please find enclosed the proof of publication for the above referenced facility. The public notice ran on February 19, 2004 in the Pensacola News Journal.

If you have any questions, please call me at (850) 350-5042.

Sincerely,



Jacob S. Krautsch
Environmental Specialist

Cc: C/S 12
Duane Pierce
Tallahassee File
Envision Env. 3.1.20

Published Daily-Pensacola, Escambia County, FL.

STATE OF FLORIDA
County of Escambia

Before the undersigned authority, personally appeared NIKKI WINDHAM who is personally known to me and who on oath says that he/she is a representative of The Pensacola News Journal, a daily newspaper published in Pensacola in Escambia County, Florida; that the attached copy of advertisement, being a legal in the matter of **PUBLIC NOTICE OF INTENT** said newspaper in the issues **FEBRUARY 19, 2004**. Affidavit further says that the said Pensacola News Journal is a newspaper published in Pensacola, in said Escambia County, Florida, and that the said newspaper has heretofore been continuously published in said Escambia County, Florida each day and has been entered as second class mail matter at the post office in Pensacola, in said Escambia County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and Affidavit further says that he/she has neither paid nor promised any person, firm, or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me this **19TH DAY OF FEBRUARY**
A.D., 2004.

Berith Ferguson
Notary Public

RECEIVED

FEB 27 2004

BUREAU OF AIR REGULATION
BERITH FERGUSON
Notary Public, State of FL.
My Comm. Expires OCT. 10, 2005
Comm. No. DD048052

**PUBLIC NOTICE OF INTENT TO ISSUE AIR
CONSTRUCTION PERMIT MODIFICATION STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Draft Air Permit No. 1130037-008-AC
Florida Gas Transmission Company
Santa Rosa Compressor Station No. 12**

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification to the Florida Gas Transmission Company Department to modify the permit to change the Carbon Monoxide (CO) and Volatile Organic Compounds (VOC) emission rates and to remove certain load restrictions related to turbine no. 1208 (EU 010). The equipment is installed at existing 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 applicant's authorized representative is Mr. Rick Craig, Vice President Southeastern Operations. The applicant's mailing address is Florida Gas Transmission Company, P. O. Box 1188, Houston, TX 77251.

The originally permitted limits for turbine no. 1208 and the related restrictions were set based upon information provided by the turbine manufacturer. During years 2002 and 2003, FGT conducted testing which showed the emission rates of CO to be much lower than originally permitted. Based upon this test data, FGT seeks to decrease such emission rates and related load restrictions. As a result of this request, there will be no increase in the annual emissions of CO, nor any other permitted air pollutant except for VOC's. An incidental increase in VOC emissions (4.6 TPy) will occur as an effect of the removal of the load restrictions.

Because potential emissions of at least one regulated pollutant exceed 250 tons per year, the existing 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. The existing station is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to a National Ambient Air Quality Standard (NAAQS). This project is not subject to PSD preconstruction review because the net emissions increases are less than each of the corresponding PSD significant emissions rates.

The Department will issue the Final Permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions. The Department will accept written comments concerning the proposed permit issuance action for a period of fourteen (14) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C. A petition that disputes the material facts upon which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C. Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection
Bureau of Air Regulation
(111 S. Magnolia Drive, Suite 4)
2600 Blair Stone Road, MS #5505
Tallahassee, Florida, 32399-2400
Telephone: 850/488-0114
Fax: 850/922-6979

Department of Environmental Protection
Northwest District Office
Air Resources Section
160 Governmental Center
Pensacola, FL 32501-5794
Telephone: 850/595-8300
Fax: 850/595-4417

The complete project file includes the application, Technical Evaluation and Preliminary Determination, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Department's reviewing engineer for this project for additional information at the address and phone numbers listed above.

Legal No. 66158 1T February 19, 2004